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JUAN CARLOS GUZMAN
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1 **Thea Gilbert**, Attorney at Law
2 State Bar No. 018367
3 **GILBERT LAW FIRM, PC**
4 1661 N. SWAN RD., STE. 258
5 Tucson, AZ 85712
6 Telephone: (520) 903-0295
7 Email: GILBERTLAW5000@GMAIL.COM
8 **Attorney for Plaintiff**

9 **Karen Barth Menzies** (pro hac vice application to be filed)
10 California State Bar No. 180234
11 Email: karen@justicelc.com

12 **Kelly Guagenty** (pro hac vice application to be filed)
13 Massachusetts State Bar No. 658872
14 Email: kelly@justicelc.com

15 **Keith Smith** (pro hac vice application to be filed)
16 Texas State Bar No. 24118540
17 keith@justicelc.com

18 **JUSTICE LAW COLLABORATIVE LLC**
19 210 WASHINGTON STREET
20 NORTH EASTON, MA 02356
21 Telephone: (508) 230-2700
22 **Attorneys for Plaintiff**

23 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
24 **IN AND FOR THE COUNTY OF SANTA CRUZ**

25 In the matter of:

26 **JANE M. DOE,**
Plaintiff,

vs.

ESTATE OF VAN OF URANTIA aka
GABRIEL OF URANTIA aka **GABRIEL**
OF SEDONA aka **PRINCE MELFAX** aka
TALIASVAN aka **VAN OF URANTIA**
aka **ANTHONY JOSEPH DELEVIN;**
NANCY "NIANN" EMERSON CHASE;

Case No.: CV-25-384

SECOND AMENDED COMPLAINT

Tier 3

1 **TIYIENDEA DELLERBA aka STACY**
2 **LEE MYSZKA; CENTRIA LILLY aka**
3 **CATHERINE J. LILLY; MARAYEH**
4 **CUNNINGHAM aka LINDA**
5 **CUNNINGHAM; GLOBAL**
6 **COMMUNITY COMMUNICATIONS**
7 **ALLIANCE, an Arizona domestic**
8 **nonprofit corporation; JOHN DOES I-X;**
9 **JANE DOES I-X; and ABC**
10 **PARTNERSHIPS I-X AND XYZ**
11 **CORPORATIONS I-X,**

12 Defendants.

(Honorable Thomas Fink)

13 COMES NOW Plaintiff, by and through Counsel, and complains against
14 Defendants by alleging as follows:

15 **I. INTRODUCTION**

16 1. This case arises from two decades of unchecked power, institutional betrayal, and
17 systemic abuse inflicted upon a child who had no ability—nor permission—to protect
18 herself. Plaintiff was an infant when she was brought into the closed world of Defendant
19 Global Community Communications Alliance (GCCA), a secretive, insular compound in
20 Santa Cruz County controlled by a self-proclaimed prophet, his wives, and a circle of
21 hand-selected elders. From infancy until her escape as a teenager, Plaintiff lived under the
22 total control of Defendants, who dictated every aspect of her life: where she slept, whom
23 she saw, what she was allowed to say, and even whether she could be near her own parents.
24 Defendants engineered a system designed to break children and adults down, isolate them,
25 and make them dependent on the very people harming them. In this system, punishments
26 were harsh, surveillance was constant, and obedience to GCCA leadership was mandatory.
Children were separated from their parents, deprived of education, forced into hard labor,
subjected to sexualized discipline, and denied basic medical care. Plaintiff was one of those
children—and she suffered devastating physical, sexual, emotional, and psychological
harm as a result.

1 2. Defendants conspired to operate and continue to operate GCCA as a criminal
2 enterprise for the common purpose of exploitation, trafficking, forced labor and sexual
3 abuse.

4 3. For years, Defendants concealed and ignored repeated warnings, disclosures, and
5 signs of abuse. They protected known predators, silenced victims, staged sham inspections,
6 and lied to government officials. When Plaintiff's abuser eventually admitted his guilt,
7 Defendants still refused to act. Instead, they blamed Plaintiff for the abuse she suffered and
8 demanded that she "let go" of what had been done to her.

9 **II. JURISDICTION AND VENUE**

10 4. This Court has jurisdiction over this case pursuant to A.R.S. § 12-123 and related
11 provisions, and, with regard to the Estate of Van of Urantia, pursuant to A.R.S. § 14-3803.

12 5. Venue is appropriate in Santa Cruz County because all Defendants reside and/or are
13 situated there and the facts alleged in this cause occurred in that county.

14 **III. IDENTITY OF THE PARTIES**

15 6. JANE M. DOE ("Plaintiff") is an adult individual residing in Maricopa County,
16 Arizona. She lived on the GCCA compound from infancy until her escape in June 2015
17 and brings this action for the extensive abuse she suffered there. As a direct and proximate
18 result of Defendants' wrongful conduct, Plaintiff has suffered, and will continue to suffer,
19 physical, and/or mental injury, pain, suffering, and other actual and consequential injury,
20 harm, and economic damages.

21 7. GLOBAL COMMUNITY COMMUNICATIONS ALLIANCE ("GCCA") is an
22 Arizona non-profit corporation operating a closed, communal campus in Santa Cruz
23 County. GCCA may be served through its statutory agent.

24 8. THE ESTATE OF ANTHONY JOSEPH DELEVIN (also known as "Gabriel,"
25 "Van of Urantia," and other aliases) is named pursuant to A.R.S. § 14-3803. Delevin was
26 the founder, spiritual leader, and controlling authority of GCCA until his death in August

1 2025.

2 9. NANCY EMERSON CHASE is an adult resident of Santa Cruz County and was
3 the co-founder, senior leader, and spouse of Delevin. She served as secretary, treasurer,
4 and elder of GCCA.

5 10. STACY MYSZKA, also known within GCCA as TiyiEndea DellErba, (“Myszka”)
6 is an adult resident of Santa Cruz County and was Delevin’s second wife and a senior
7 GCCA elder with supervisory authority over members, including children.

8 11. CATHERINE J. “CENTRIA” LILLY is an adult resident of Santa Cruz County.
9 She is a GCCA Director and elder who exercised authority over childcare, discipline, labor
10 assignments, and internal investigations.

11 12. MARAYEH “LINDA” CUNNINGHAM is an adult resident of Santa Cruz County
12 and an intermittently licensed psychologist. She served as GCCA’s counselor, directed
13 unlicensed counseling practices, extracted confidential information from members, and
14 participated in concealing child abuse.

15 13. GCCA ELDERS I–X are individuals whose identities are presently unknown, but
16 who participated in the abuse, neglect, concealment, supervision, and control of Plaintiff
17 during her childhood.

18 14. DOES 1–50 are persons and entities whose identities are presently unknown, but
19 who participated in, facilitated, or failed to prevent the abuse described herein.

20 **IV. PRELIMINARY STATEMENT OF THE CASE**

21 15. This lawsuit exposes the depth and scale of the harm Plaintiff endured while trapped
22 inside GCCA’s closed compound. What happened to her was not an accident, not an
23 oversight, and not the result of isolated misconduct. It was the predictable outcome of a
24 hierarchical system and enterprise built on coercion, secrecy, and absolute control.

25 16. Defendants created and enforced an environment where vulnerable children could
26 be—and were—regularly abused. GCCA leaders stripped parents of authority, placed

1 children with rotating caretakers, ignored medical needs, and demanded exhaustive labor
2 from children barely old enough to read.

3 17. In this controlled environment, known predators were given unrestricted access to
4 children, including Plaintiff. Despite knowledge of prior misconduct, Defendants allowed
5 a teenage male with a history of sexual violence to live among young children and enter
6 their private spaces. The result was years of repeated sexual assaults, violence, and trauma
7 inflicted upon Plaintiff.

8 18. Defendants not only failed to intervene—they actively concealed the abuse. When
9 state investigators approached, Defendants staged false living environments, manipulated
10 appearances, and coerced caretakers into hiding Plaintiff's condition. When Plaintiff's
11 abuser admitted his acts years later, Defendants again chose to protect their institution
12 rather than the child they had harmed.

13 19. Plaintiff brings this action because every safeguard that should have protected her
14 failed. Institutions meant to guide, nurture, and support instead manipulated, exploited, and
15 destroyed. Her claims are rooted in the trauma Defendants inflicted and the decades-long
16 pattern of control that shaped her childhood.

17 **V. ALLEGATIONS**

18 **A. GCCA's Background**

19 20. GCCA is a self-described multifaceted global change nonprofit originally based in
20 Sedona, Arizona and, since 2009, headquartered on a 165- to 200-acre closed campus in
21 Tumacácori, Arizona. The organization presents itself as a prototype of "spiritualized
22 culture" and a divine administrative model for higher civilization. However, former
23 members and investigative journalists, including a Dateline NBC episode that aired in
24 1998, have consistently described GCCA as a coercive, cult-like community.

25 21. GCCA was founded and led for decades by Anthony Joseph Delevin, known within
26 the organization as Gabriel or Van, and Prince Malifax, who portrayed himself as a prophet,

1 reincarnated historical figure, and extraterrestrial being with divine authority. Prior to his
2 death in August 2025, Delevin exerted complete control over the daily lives, finances,
3 relationships, and family structures of GCCA members. Members had to bow as if to
4 royalty when he entered a room, or if they saw him.

5 22. Delevin led GCCA with his wife and co-founder Nancy “Niánn” Emerson Chase
6 and his additional “wife” Stacy Myszka as his seconds-in-command. A hand-selected
7 group of about ten “elders” were third in the hierarchy. Members of this authority group
8 held ultimate supervisory authority over all members, including decision-making regarding
9 labor assignments, childcare, discipline, financial management, and medical access. They
10 determined child discipline, romantic partner choices, and what foods to eat. Defendant
11 Catherine J. “Centria” Lilly was among these elders and served as both a Director and
12 public representative of GCCA. Marayah “Linda” Cunningham was also among those in a
13 position of power. On information and belief, the control structure and leadership at GCCA
14 have remained the same since Defendant Delevin’s death.

15 23. GCCA functioned not merely as a religious community but as a coordinated
16 enterprise under the direction of a fixed leadership group consisting of Delevin, Chase,
17 Myszka, Lilly, Cunningham, (the GCCA Leadership) and a circle of elders. The GCCA
18 Leadership controlled all aspects of GCCA operations, including finances, where both
19 adults and children lived, medical decisions, school and counseling programs, labor
20 assignments, and discipline. The enterprise also encompassed a constellation of affiliated
21 businesses—all led, managed, or staffed by GCCA members—which generated revenue
22 through the use of unpaid or coerced labor. These entities operated with a unified purpose:
23 to maintain absolute control over members and derive financial benefit through the
24 exploitation of children and adults living on the compound.

25 24. GCCA operated through rigid control, enforced isolation, and deprivation. Members
26 were required to surrender all money and possessions upon joining. Movement on and off

1 the property was tightly restricted; even requests for medical or dental appointments
2 required elder approval and could take months. Medication was confiscated and controlled
3 by GCCA Leadership, and members who relied on medical care were shamed as spiritually
4 weak.

5 25. Counseling was mandatory and used as a tool of discipline, not care.
6 Defendant Cunningham, intermittently licensed and a former member of the Synanon cult,
7 served as GCCA's primary counselor. She and the unlicensed "counselors" she trained
8 extracted confidential information from members, enforced compliance with GCCA
9 Leadership's directives, and reported children's and adults' disclosures to Delevin. Child
10 victims of sexual abuse were told their assaults were punishments for being "harlots,"
11 "rebellious," or sinful in past lives.

12 26. These practices created an environment in which children were uniquely vulnerable
13 to exploitation, including forced labor, harsh and sexualized punishments, and sexual
14 abuse.

15 **B. Plaintiff's Parents Placed Her Under GCCA's Total Control**

16 27. Plaintiff was born in Hilo, Hawaii in 1995. Her family was introduced to GCCA
17 through her maternal grandfather, a longtime follower. In 1996, when Plaintiff was ten
18 months old, her parents brought her to live at GCCA's Sedona campus.

19 28. When Plaintiff turned four, GCCA separated her from her parents under its policy
20 of placing young minor children in "assigned homes" with adults chosen by the elders.
21 GCCA members were forced to live in communal houses with many unrelated individuals.
22 The purpose was to prevent "misplaced compassion," a parent-child disconnection
23 philosophy developed by Marayeh Cunningham prior to coming to live at GCCA; she
24 developed this tool, and others she brought, while still living in and providing advice and
25 assistance to the cult, Synanon, in California. The effect of this parent-child separation was
26 to sever parental protection and place children into environments where no safety or

1 security existed, as the goal was to sever all bonds between persons that might interfere
2 with Delevin and GCCA's total control of individuals. Parents who tried to protect their
3 children were punished for their efforts. In these new homes, exploitation and abuse were
4 common, which Delevin and the GCCA Leadership group knew about, benefited from, and
5 never took steps to correct.

6 29. Between 2000 and 2015, Plaintiff lived in at least seven different GCCA homes
7 under the control of rotating adult caretakers. These adults subjected her to verbal
8 degradation, isolation, sleep deprivation, loss of food and clothing, and corporal and sexual
9 punishments. She was denied bonding with her parents and not permitted to call her father
10 "papa" or "dad."

11 **C. Plaintiff Was Forced Into Child Labor and Subjected to Sexualized**
12 **Punishments**

13 30. Children's primary role at GCCA was forced labor. Children at GCCA served the
14 labor needs of the community and their business ventures. GCCA claimed to provide
15 schooling, but in reality, schooling was minimal and sporadic, and when it did occur, it
16 consisted primarily of indoctrination into GCCA doctrine. Children spent the majority of
17 their time performing cleaning, cooking, gardening, childcare, animal care, and other
18 forced labor.

19 31. From age eleven onward, Plaintiff's workdays routinely lasted from 6:00 a.m. to
20 9:30 p.m. with only brief breaks. She received no days off except, at times, a few hours on
21 Sunday, and no compensation. Illness or injury did not excuse her labor unless she was
22 severely ill.

23 32. In fact, Defendants extracted labor without compensation from all its members,
24 adults and children alike, all of whom lived within the GCCA compound.

25 33. GCCA also used the threat of permanent family separation to coerce labor and
26 obedience. Some parents were required to sign documents acknowledging that if they

1 attempted to leave GCCA, they would be forced to leave their children behind. GCCA
2 Leadership enforced this policy in practice: GCCA financed and supported custody battles
3 to ensure that the child remained on the compound under GCCA's control. These tactics
4 reinforced the GCCA Leadership's power and made it impossible for parents or children
5 to leave, resist labor requirements or report abuse without risking total familial separation.

6 34. Children who failed to comply or who struggled physically were punished, often in
7 sexualized ways. Plaintiff and other children were forced to expose their buttocks and
8 genitals for spankings administered by adult men under the guise of "cleansing." These
9 punishments frequently caused bruising and welts. The GCCA Leadership and GCCA
10 Elders, including without limitation Delevin and Chase, knew of this practice and
11 encouraged it.

12 35. Plaintiff became severely malnourished and underweight due to neglect and harsh
13 conditions. At age four, she weighed only twenty-five pounds, a clinically malnourished
14 state documented in a medical report following an attempted rescue by her grandparents.

15 36. Defendants concealed her physical condition from her parents, restricted contact,
16 and staged fraudulent home environments when state investigators became involved.
17 Caretakers were instructed to force-feed Plaintiff in the days before official visits to
18 disguise her malnourishment.

19 **D. Plaintiff Was Repeatedly Sexually Abused by a Known Predator**

20 37. Although GCCA publicly professed abstinence, Delevin taught that men's sperm
21 had spiritual healing properties—particularly his own—and used this doctrine to justify
22 sexual relationships with adult female members. The unspoken culture of the community
23 was that men were more divine; males of all ages were permitted much greater authority
24 and freedom than females, which provided the perfect opportunities for males to abuse
25 others. When they did, victims who spoke out were castigated and punished, not the males.

26 38. Defendants ignored, minimized, or concealed sexual abuse disclosures. Victims

1 reporting sexual assaults, including children, were directed to Cunningham or her trainees,
2 who blamed victims and told them their assaults were karmic consequences for their past
3 misbehavior, such as being rebellious” or a “harlot” in a past life.

4 39. The sole known instance in which GCCA reported abuse to law enforcement
5 involved a child whose abuser was in a custody dispute with an elder’s adult daughter,
6 illustrating selective reporting when it served Defendants’ interests.

7 40. Between ages four and seven, Plaintiff was repeatedly sexually abused by Brendan
8 Fitzpatrick, a teenager twelve years older. Fitzpatrick attended GCCA’s “school,” lived on
9 the same compound, and had unrestricted access to Plaintiff.

10 41. Fitzpatrick routinely isolated Plaintiff in the communal home’s shared bathroom
11 and sexually assaulted her, including digital penetration, attempted penile penetration, oral
12 rape, and pervasive molestation over and under her clothing.

13 42. Despite these assaults occurring in a small home occupied by multiple adults and
14 children, no GCCA adults, or GCCA Leadership, intervened or questioned why a teenage
15 boy repeatedly took a young girl into a closed bathroom for extended periods.

16 43. Over three years, Fitzpatrick assaulted Plaintiff twenty to thirty times. He threatened
17 her to ensure silence. Plaintiff’s distress was visible, but again no adults or GCCA
18 Leadership asked questions or offered help.

19 44. On information and belief, Defendants, including without limitation GCCA
20 Leadership, knew Fitzpatrick had a history of sexual misconduct before he joined GCCA—
21 including that he had been expelled from school for sexual abuse. On information and
22 belief his family paid Defendants to accept him, and he was known for exposing himself to
23 children and engaging in bestiality. Defendants nonetheless allowed him unrestricted
24 access to children.

25 45. When Fitzpatrick later admitted publicly to abusing Plaintiff and other children,
26 GCCA elders summoned Plaintiff, not to protect her, but to extract details while excluding

1 her parents through intentional misinformation about the meeting time.

2 46. GCCA elders told Plaintiff to “let go of the past,” provided no counseling or support,
3 and despite Fitzpatrick’s own admission of guilt, they failed to report the abuse to law
4 enforcement as legally required under A.R.S. § 13-3620(A). Fitzpatrick was neither
5 disciplined nor removed from access to children.

6 47. When Plaintiff requested that Defendants not allow Fitzpatrick near her in group
7 settings, Defendants refused to comply with her request, leaving her in a continued state of
8 vulnerability.

9 48. On information and belief, Defendants, including without limitation GCCA
10 Leadership, deliberately chose not to protect Plaintiff and, instead, protected Fitzpatrick
11 because his parents made significant financial contributions to GCCA and because
12 Fitzpatrick performed media and technical work vital to GCCA operations.

13 **E. Fitzpatrick Attempted to Assault Plaintiff Again**

14 49. At age fourteen, Plaintiff reported that Fitzpatrick accosted her outside her
15 communal home, harassed her with sexual comments, attempted to grab and fondle her,
16 and attempted to assault her again before she escaped.

17 50. Plaintiff immediately reported the incident to Defendants. Rather than protect her,
18 GCCA elders blamed her, telling her she was being “punished” for past-life wrongdoing
19 and accusing her, a child, of seducing an adult twice her age. They again failed to report
20 the incident, despite legal obligations to do so.

21 **F. Plaintiff Escaped the GCCA Compound**

22 51. After years of abuse, coercion, forced labor and indoctrination, Plaintiff’s doubts
23 about GCCA intensified. A friend confided that he believed that Delevin was a fraud and
24 that he planned to leave the community. Plaintiff began to recognize hypocrisy in GCCA
25 Leadership and deceit in their claims of spiritual authority.

26 52. GCCA elders monitored Plaintiff’s communications and reprimanded her for

1 speaking with her departing friend, further heightening her fear and mistrust.

2 53. In June 2015, Plaintiff reached a breaking point. With severely limited access to the
3 outside world, she secretly borrowed a phone and contacted her friend, pleading for help.

4 54. That night, Plaintiff climbed over the wrought-iron fence enclosing the GCCA
5 compound and fled into the Arizona desert. Her friend waited nearby and drove her to
6 safety, ending twenty years of coercive control, forced labor, and repeated abuse.

7 55. Plaintiff was physically able to escape the GCCA compound, but Defendants'
8 collective, intentional psychological torture and abuse have and continue to profoundly
9 interfere with her ability to recover from the harm she endured.

10 **G. GCCA Enterprise Structure, Financial Operations, and Racketeering**
11 **Conduct**

12 56. Defendants' acts constitute a long-term, continuous pattern of racketeering,
13 including:

- 14 a. child sex trafficking;
- 15 b. forced labor;
- 16 c. labor trafficking;
- 17 d. sexual exploitation of a minor;
- 18 e. unlawful imprisonment;
- 19 f. kidnapping;
- 20 g. fraud, wire fraud, and mail fraud;
- 21 h. money laundering;
- 22 i. obstruction of criminal investigations.

23 These acts were coordinated and executed through GCCA's hierarchical structure.

24 57. GCCA is an association-in-fact enterprise with 1) a common purpose of controlling
25 and exploiting minors and adults; 2) relationships between GCCA Leadership, elders,
26 handlers, and enforcers; and 3) continuity over many years. Defendants conducted and

1 participated in this enterprise by directing, managing, or contributing to its operations.

2 58. For decades, GCCA controlled every element of a system that produced obedience,
3 coerced unpaid labor, and the money from that labor. The GCCA enterprise included
4 GCCA leadership, adult guardians, transport coordinators, disciplinary enforcers, and other
5 associated individuals and entities, some of whom are not named as defendants in this
6 action. Defendants and their enterprise accomplished their common purpose by combining
7 a closed highly controlled compound, a coercive leadership hierarchy, and a coordinated
8 group of affiliated commercial businesses that funneled profits back to Defendants. These
9 businesses included Soulistic Medical Institute, Global Alliance Properties, Avalon
10 Universal Enterprises, Camp Avalon, Sea of Glass Center for the Arts, Global Change
11 Media, Magic Land Realty, Food for Ascension and multiple agricultural and hemp
12 operations.¹

13 59. Defendants, including without limitation GCCA leadership, assigned labor centrally
14 and required members—including minors—to staff GCCA's for-profit and nonprofit
15 businesses without wages, benefits, or lawful employment protections. Children's labor
16 included cooking, cleaning, gardening, childcare, food service, animal care, maintenance
17 of facilities, construction and support for various commercial enterprises.

18 60. GCCA-affiliated businesses shared management, ownership, or financial control
19 with GCCA Leadership. These businesses funneled revenue back to GCCA.

20 61. Defendants used the internet, websites, email communications, online fundraising
21 mechanisms, and digital promotional materials to market its enterprises, solicit donations,
22 sell event tickets, and represent to outsiders that its operations were lawful. These

23
24 ¹ Plaintiff reserves the right to amend this complaint and add additional defendants,
25 including those individuals or entities that are involved in or benefitting from the enterprise
26 described here as investigation and discovery proceed.

1 representations were of a long-running scheme to obtain money through unpaid, coerced
2 labor.

3 62. Defendants also used coercive custody practices to maintain control over families
4 and ensure a stable labor force. Parents were required to sign documents stating that if they
5 left GCCA, they would be forced to leave their children behind. Defendants reinforced this
6 threat by financing custody litigation for favored members to ensure that children remained
7 on GCCA grounds. This created a continuous threat of family separation that prevented
8 parents and children from leaving, reporting abuse, or refusing labor assignments.

9 63. Defendants, including without limitation GCCA leadership, coordinated the
10 concealment of sexual abuse, physical abuse, child malnourishment, and forced labor by
11 staging false living environments before state inspections, instructing caretakers and
12 children to hide injuries, engaging in force-feeding to conceal signs of starvation, and
13 directing adults to lie to investigators. GCCA's leadership also knowingly failed to report
14 abuse despite mandatory reporter obligations, thereby obstructing criminal investigations.

15 64. These practices were not isolated but formed part of GCCA's regular method of
16 operation. The enterprise operated with continuity of leadership for more than twenty
17 years, using the same leadership, the same coercive mechanisms, the same labor systems,
18 and the same unified business network with the come purpose to finance the GCCA.

19 65. Through these acts, the GCCA enterprise engaged in a pattern of racketeering
20 activity, including forced labor, child abuse, custodial interference, extortion, fraudulent
21 schemes and artifices, obstruction of justice, and unlawful control of an enterprise, as
22 defined under both federal and Arizona law.

23 **VI. PLAINTIFFS' DAMAGES**

24 66. As a direct result of Defendants' conduct, including Plaintiff's ordeal of child
25 physical, mental, emotional, and sexual abuse; neglect; forced child labor; forced
26 separation from her parents; and harsh treatment at GCCA, Plaintiff suffered severe and

1 lasting physical, mental, emotional, and psychological trauma, non-transient physical
2 illnesses and psychological disturbances, medical expenses, and financial scars. Plaintiff
3 suffers from severe anxiety, depression, post-traumatic stress disorder, unexplained
4 exhaustion, and insomnia as well as recurring night terrors and a morbid, uncontrollable
5 fear of men. Plaintiff also suffered from occasional suicidal thoughts. Plaintiff's
6 psychological conditions cause her to be unable to attend college or any large gathering of
7 people for any length of time, which limits her ability to earn an education or a material
8 income.

9 67. Plaintiff is an intelligent woman who, due to Defendants' actions, is rendered unable
10 to obtain an adequate education or employment that would permit her to support herself
11 for the duration of her life. She was, is, and likely will be plagued by lifelong physical and
12 mental health problems. Plaintiff's actual damages exceed 7.5 million dollars.

13 68. Defendants' conduct was malicious, oppressive, and in reckless disregard of
14 Plaintiff's rights, justifying an award of punitive damages in an amount to be determined.

15 **COUNT I: NEGLIGENCE**
16 **(Against All Defendants)**
17 ***A.R.S. §§ 12-542, 12-551***

18 69. Plaintiff realleges all prior paragraphs.

19 70. Defendants owed Plaintiff a duty to provide reasonable care, protection,
20 supervision, and safety while she lived on GCCA grounds. That duty arose from
21 Defendant's assumption of control over all aspects of Plaintiff's life and from Arizona laws
22 designed to protect children, including A.R.S. § 8-802.

23 71. Defendants breached these duties by creating, permitting, and concealing an
24 environment of abuse, neglect, forced labor, sexual exploitation, and psychological
25 coercion.

26 72. As a direct and proximate result, Plaintiff suffered severe physical, emotional,
psychological, and financial harm.

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COUNT II: GROSS NEGLIGENCE
(Against All Defendants)
A.R.S. §§ 12-542, 12-551

73. Plaintiff realleges all prior paragraphs.

74. Defendants' conduct—including knowingly placing Plaintiff in danger, ignoring reports of abuse, and enabling sexual predators—constitutes gross negligence and reckless indifference.

75. Plaintiff suffered extensive damages as a direct and proximate result.

COUNT III: NEGLIGENT HIRING, RETENTION, AND SUPERVISION
(Against GCCA, Estate of Delevin, Chase, Myszka, Lilly, Cunningham)

76. Plaintiff realleges all prior paragraphs.

77. Defendants hired, retained, and placed individuals in positions of authority whom they knew or should have known were unlicensed, unqualified, abusive, or dangerous.

78. Defendants GCCA Elders and Delevin failed to supervise members who posed a foreseeable risk of harm, including, but not limited to, failing to restrict Fitzpatrick's access to children, including Plaintiff, despite actual or imputed knowledge of Fitzpatrick's prior and ongoing misconduct, and by failing to meet even a minimally adequate level of supervision over the minor and her safety. See *Kuehn v. Stanley*, 208 Ariz. 124 (App. 2004).

79. Defendants failed to supervise these individuals, allowing Plaintiff to be repeatedly abused.

80. By engaging in the conduct described in this Complaint, the Defendants breached their duty to Plaintiff and proximately caused injury.

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1 Glendale, 150 Ariz. 218 (App. 1986). A.R.S. § 13-3623 imposes a duty on all caretakers
2 to protect children from abuse or neglect. Defendants' intentional, reckless, and negligent
3 conduct repeatedly violated this statutory duty.

4 90. By engaging in the conduct described in this Complaint, the defendants breached
5 their duty to Plaintiff and proximately caused injury.

6 **COUNT VI: NEGLIGENT INFLICTION**
7 **OF EMOTIONAL DISTRESS**
8 **(Against All Defendants)**

9 91. Plaintiff realleges all prior paragraphs.

10 92. Defendant's negligent, reckless, and intentional conduct, as explained herein,
11 caused Plaintiff severe emotional distress that manifested in physical symptoms, physical
12 illness, malnutrition, and trauma, as well as her ongoing, non-transitory physical ailments
13 and mental disturbances.

14 93. Plaintiff endured severe emotional trauma as a direct result of Defendants' negligent
15 acts.

16 94. By engaging in the conduct described in this Complaint, the Defendants breached
17 their duty to Plaintiff and proximately caused injury.

18 **COUNT VII: INTENTIONAL INFLICTION**
19 **OF EMOTIONAL DISTRESS**
20 **(Against All Defendants)**

21 95. Plaintiff realleges all prior paragraphs.

22 96. Defendants' conduct—removing Plaintiff from her parents, ignoring and concealing
23 abuse, and forcing her to live in abusive conditions—was extreme and outrageous,
24 warranting liability.

25 97. Defendants' conduct was extreme and outrageous, including coercing children,
26 punishing them sexually, and ignoring sexual assault.

98. Defendants intended to cause emotional distress or acted with reckless disregard.

1 99. Defendants intentionally, and/or with a reckless disregard, engaged extreme and
2 outrageous conduct as described herein which caused Plaintiff extreme emotional distress.

3 **COUNT VIII – CIVIL CONSPIRACY**
4 **(Against All Defendants)**

5 100. Plaintiff realleges all prior paragraphs.

6 101. Defendants conspired to conceal abuse, suppress reports, punish victims,
7 enforce silence, and maintain a system that allowed harm.

8 102. A civil conspiracy exists when two or more persons agree to accomplish an
9 unlawful purpose or a lawful purpose by unlawful means. See Dawson v. Withycombe,
10 216 Ariz. 84 (App. 2007).

11 103. During the period Plaintiff lived within the closed, communal campus of
12 GCCA, Defendants conspired to conceal Plaintiff's abuse and neglect and at least once
13 conspired to obstruct an investigation into Plaintiff's abuse and neglect.

14 104. To date, all Defendants continue to agree to conceal Plaintiff's abuse and
15 neglect and have continued to conspire to, and to actually conceal, the abuse and neglect
16 of Plaintiff and other children/former children including as recently as 2025.

17 105. By engaging in the conduct described in this Complaint, the defendants
18 breached their duty to Plaintiff and proximately caused injury.

19 **COUNT IX: AIDING AND ABETTING**
20 **(Against All Defendants)**

21 106. Plaintiff realleges all prior paragraphs.

22 107. Defendants knowingly aided, supported, concealed, or enabled the abusive
23 acts committed against Plaintiff.

24 **COUNT X: TRAFFICKING VICTIMS PROTECTION**
25 **REAUTHORIZATION ACT (TVPRA)**

26 **(Against All Defendants)**

18 U.S.C. §§ 1589, 1590, 1595

108. Plaintiff realleges all prior paragraphs as though fully set forth herein.

1 109. Defendants knowingly obtained Plaintiff's labor and services through means
2 prohibited by 18 U.S.C. § 1589(a).

3 110. Defendants also obtained Plaintiff's labor by making, and threatening to
4 make, her suffer "serious harm" within the meaning of 18 U.S.C. § 1589(a)(2). "Serious
5 harm" includes physical, psychological, financial, and reputational harm, and encompasses
6 threats of family separation, spiritual consequences, and community shunning.

7 111. Defendants further obtained Plaintiff's labor through the "abuse or
8 threatened abuse of law or legal process," in violation of 18 U.S.C. § 1589(a)(3). This
9 included requiring some parents to sign documents acknowledging that if they left GCCA,
10 they would be forced to leave their children behind.

11 112. Defendants engaged in a "scheme, plan, or pattern intended to cause the
12 person to believe that, if the person did not perform such labor, the person or another person
13 would suffer serious harm," in violation of 18 U.S.C. § 1589(a)(4). The threats and coercive
14 tactics alleged herein constitute 'serious harm' within the meaning of 18 U.S.C. §
15 1589(c)(2), including physical, psychological, financial, and reputational harm, as well as
16 threats of family separation and spiritual consequences used to compel Plaintiff's labor.
17 Defendants' threats to remove Plaintiff from her parents and to permanently separate
18 families constituted abuse of the legal process under 18 U.S.C. § 1589(a)(3) and also a
19 scheme intended to make Plaintiff believe she had no safe alternative but to perform forced
20 labor, in violation of 18 U.S.C. § 1589(a)(4).

21 113. Defendants knowingly benefited, financially and otherwise, from
22 participation in a venture that they knew or should have known engaged in forced labor, in
23 violation of 18 U.S.C. § 1589(b). GCCA and its leadership constituted a 'venture' within
24 the meaning of 18 U.S.C. § 1589(b), and Defendants knowingly benefited, financially and
25 otherwise, from participation in that venture while knowing or in reckless disregard of the
26 fact that it engaged in forced labor.

1 114. Defendants also violated 18 U.S.C. § 1590 by recruiting, harboring,
2 transporting, providing, and obtaining Plaintiff for labor and services through coercion,
3 threats, psychological manipulation, and isolation, even when interstate movement was not
4 involved.”

5 115. Defendants knowingly obstructed, attempted to obstruct, and conspired to
6 obstruct enforcement of federal trafficking laws, in violation of 18 U.S.C. § 1595(d).
7 Defendants obstructed and attempted to obstruct enforcement of the trafficking laws
8 through acts including staging false living environments, force-feeding Plaintiff before
9 inspections, instructing members to lie to investigators, suppressing disclosures of sexual
10 abuse, and failing to make mandatory reports to law enforcement.

11 116. As a direct and proximate result of Defendants’ violations of 18 U.S.C. §§
12 1589 and 1590, Plaintiff suffered physical, emotional, psychological, educational,
13 developmental and economic harms, including trauma, malnutrition, physical injury, loss
14 of childhood, loss of earning capacity, loss of the value of her earnings, ongoing PTSD and
15 anxiety, and costs of future treatment.”

16 117. Plaintiff is entitled to civil remedies under 18 U.S.C. § 1595, including
17 compensatory damages, punitive damages, attorneys’ fees, statutory damages and all other
18 relief this Court deems just and proper.

19 **COUNT XI: ARIZONA STATE-LAW TRAFFICKING**

20 **(Against All Defendants)**

21 ***A.R.S. §§ 13-1307, et. seq.***

22 118. Plaintiff realleges all prior paragraphs.

23 119. Defendants forced Plaintiff, including while she was a minor, to work long
24 hours, controlled her movement, denied education, and manipulated her psychologically.

25 120. Defendants recruited, maintained, and exploited Plaintiff for labor, control,
26 and sexual access by others. Defendants trafficked Plaintiff by recruiting, enticing,
harboring, transporting, and maintaining her for forced labor, sexual exploitation, and

1 involuntary servitude. Plaintiff seeks all civil remedies allowed by Arizona law.

2 **COUNT XII: PREMISES LIABILITY**
3 **(Against All Defendants)**

4 121. Plaintiff realleges all prior paragraphs.

5 122. At all relevant times, GCCA controlled and maintained dangerous and unsafe
6 conditions, including closed and remote compound where physical isolation, restricted
7 access and perimeter fencing restricted ingress and egress and access to outside assistance,
8 foreseeably preventing Plaintiff was leaving, obtaining help or protecting herself from
9 harm. .

10 **COUNT XIII: VICARIOUS LIABILITY / RESPONDEAT SUPERIOR**
11 **(Against Defendant GCCA)**

12 123. Plaintiff realleges all prior paragraphs.

13 124. At all relevant times, Defendant GCCA is liable for the acts and omissions
14 of its leaders, employees, counselors, and agents all of which occurred in the course and
15 scope of their assigned duties and in furtherance of GCCA's operations

16 **COUNT XIV: ARIZONA CIVIL RACKETEERING (AZRICO)**
17 **(Against All Defendants)**

Racketeering under A.R.S. § 13-2301(D)(4); A.R.S. § 13-2314.04

18 125. Plaintiff realleges all prior paragraphs.

19 126. Defendants conducted and participated in an enterprise engaged in
20 racketeering under A.R.S. § 13-2301, including child sex trafficking, forced labor,
21 unlawful imprisonment, sexual exploitation, fraud, and obstruction. The GCCA enterprise
22 is distinct from the individual Defendants and consists of an association-in-fact through
23 which the racketeering activity was carried out. Under A.R.S. § 13-2314.04, Plaintiff seeks
24 treble damages, attorneys' fees, and costs for injuries as a result of Defendant's
25 racketeering conduct.

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COUNT XV: FRAUDULENT CONCEALMENT
(Against All Defendants)

127. Plaintiff realleges all prior paragraphs.

128. Defendants concealed known abuse, manipulated records, staged sham inspections, and withheld information.

129. Defendant Delevin, the GCCA Leadership and Defendant Elders knowingly and intentionally made material, false representations to the Arizona Department of Child Safety (“DCS”) in response to DCS’ investigation of a DCS hotline report made in approximately 2001 that alleged Plaintiff was being neglected and abused. Specifically, after being contacted by DCS during its investigation of the hotline report, Defendant Delevin and Defendant Elders constructed a fake scenario inside one of the houses located on the closed GCCA campus for the sole purpose of causing DCS to falsely believe that no abuse or neglect of Plaintiff was occurring.

130. Specifically: Defendants caused a house within the closed, communal campus of GCCA to appear as if Plaintiff resided there with her parents, when in fact her parents resided in a different house; that Plaintiff’s parents were the only adults caring for Plaintiff and/or held responsibility for and contributed to Plaintiff’s care, which was not true; that Plaintiff was not being underfed and malnourished, which was untrue, and which misrepresentation was accomplished by GCCA Elders themselves or other GCCA members upon instruction of GCCA Elders repeatedly force-feeding Plaintiff; and that Plaintiff was not being abused or neglected, which she was, including being sexually abused.

131. GCCA’s leadership’s fabrications satisfy each element of fraudulent misrepresentation, and as a result of Defendants’ material, fraudulent misrepresentations, at the conclusion of DCS’ investigation, DCS did not find that Plaintiff was being abused, which in turn caused Plaintiff’s abuse and neglect to continue unabated. See Nielson v.

1 Flashberg, 101 Ariz. 335 (1966).

2 132. By engaging in the conduct described in this Complaint, the defendants
3 breached their duty to Plaintiff and proximately caused injury.

4 **COUNT XVI: BREACH OF FIDUCIARY DUTY**
5 **(Against All Defendants)**

6 133. Plaintiff realleges all prior paragraphs.

7 134. By controlling Plaintiff's upbringing, caretakers, housing, and daily
8 existence, Defendants undertook fiduciary duties and breached them.

9 **COUNT XVII: RECKLESS ENDANGERMENT**
10 **(Against All Defendants)**
11 *A.R.S. § 13-1201*

12 135. Plaintiff realleges all prior paragraphs.

13 136. Defendants knowingly exposed Plaintiff to danger by allowing predators
14 near her and punishing her for reporting.

15 **COUNT XVIII: FAILURE TO REPORT AND COVER-UP OF CRIMINAL ACTS**
16 **(Against Leadership Defendants)**
17 *A.R.S. § 13-3620 mandatory reporting; A.R.S. § 13-2409 obstruction*

18 137. Plaintiff realleges all prior paragraphs.

19 138. Defendants repeatedly failed to report sexual abuse, physical abuse, and
20 neglect as required by Arizona law.

21 **COUNT XIX: PUNITIVE DAMAGES**
22 **(Against All Defendants)**
23 *A.R.S. § 12-653.02*

24 139. Plaintiff realleges all prior paragraphs.

25 140. Defendants acted with conscious disregard, evil mind, and deliberate
26 indifference warranting punitive damages.

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1 **COUNT XX: VIOLATIONS OF THE RACKETEER INFLUENCED AND**
2 **CORRUPT ORGANIZATIONS ACT (RICO)**

3 **(Against All Defendants)**

4 ***18 U.S.C. §§ 1962(c) and 1962(d)***

5 141. Plaintiff realleges all prior paragraphs.

6 142. Defendants, each being a "person" within the meaning of 18 U.S.C. §
7 1961(3), conducted or participated in the conduct of an enterprise through a pattern of
8 racketeering activity in violation of 18 U.S.C. § 1962(c).

9 **A. The Enterprise**

10 143. The Global Community Communications Alliance ("GCCA"), its
11 leadership, and its affiliated business entities together constituted an association-in-fact
12 enterprise within the meaning of 18 U.S.C. § 1961(4). This enterprise (the "GCCA
13 Enterprise") was a continuing unit composed of GCCA's hierarchical leadership structure,
14 including Delevin, Chase, Myszka, Lilly, Cunningham, and the Doe Elder Defendants,
15 together with affiliated commercial entities such as Soulistic Medical Institute, Global
16 Alliance Properties, Avalon Universal Enterprises, Camp Avalon, Sea of Glass Center for
17 the Arts, Global Change Media, Magic Land Realty, Food for Ascension, and other
18 agricultural and hemp operations.

19 144. The purpose of the GCCA Enterprise was to maintain a closed, coercive
20 community in which children and adults could be controlled, isolated, and exploited for
21 labor; to extract uncompensated and forced labor from members; and to generate financial,
22 operational, and organizational benefits for GCCA and its leadership through a network of
23 businesses dependent on that coerced labor. The enterprise's methods included rigid
24 hierarchical control; family separation; indoctrination; deprivation of education and
25 outside contact; threats of physical, psychological, and spiritual harm; and the coordinated
26 concealment of abuse and labor violations.

 145. The GCCA Enterprise had a structure sufficient to satisfy 18 U.S.C. §

1 1961(4). GCCA Leadership exercised centralized decision-making authority; mid-level
2 enforcers implemented directives regarding discipline, labor, housing, schooling, and
3 medical access; and GCCA-affiliated businesses relied on this coerced labor pool to
4 maintain operations.

5 146. The members of the enterprise were connected through their roles,
6 relationships, and shared objectives, and the enterprise existed continuously for more than
7 two decades.

8 147. Each of the RICO Defendants—GCCA, the Estate of Delevin, Chase,
9 Myszka, Lilly, Cunningham, and the Doe Elder Defendants—is a “person” within the
10 meaning of 18 U.S.C. § 1961(3). Each Defendant is distinct from the enterprise itself and
11 knowingly conducted or participated, directly or indirectly, in the conduct of the
12 enterprise’s affairs through a pattern of racketeering activity, in violation of 18 U.S.C. §
13 1962(c).

14 148. The GCCA Enterprise operated a centralized and pooled labor system in
15 which uncompensated labor extracted from children and adults was allocated across
16 GCCA-controlled operations as leadership directed. Plaintiff personally performed forced
17 labor for Food for Ascension and agricultural entities controlled by GCCA leadership.

18 149. The value of that labor was not confined to those entities alone but flowed
19 through GCCA to support the enterprise as a whole, including other affiliated businesses
20 and operations by reducing labor costs, increasing available resources, sustaining
21 enterprise infrastructure, and enabling the continued operation and expansion of GCCA-
22 controlled entities. In this manner, all enterprise members benefitted, directly or indirectly,
23 from the forced-labor scheme, even where Plaintiff’s labor was performed for particular
24 enterprise components.

25 150. The enterprise engaged in and affected interstate commerce through its
26 websites; online promotion of events; solicitation of donations; interstate communications;

1 transmission of digital media; Medicare-funded hospice operations through Soulistic
2 Medical Institute; and interstate financial transactions.

3 **B. Predicate Acts**

4 151. Defendants engaged in multiple acts constituting "racketeering activity"
5 under 18 U.S.C. § 1961(1), including but not limited to

- 6 a. Forced Labor – 18 U.S.C. § 1589(a)(1)
- 7 b. Threats of Serious Harm – 18 U.S.C. § 1589(a)(2)
- 8 c. Abuse or Threatened Abuse of Law or Legal Process – 18 U.S.C. §
9 1589(a)(3)
- 10 d. Scheme, Plan, or Pattern Intended to Cause Belief in Harm – 18 U.S.C. §
11 1589(a)(4)
- 12 e. Financial Benefit from Forced Labor – 18 U.S.C. § 1589(b)
- 13 f. Obstruction of justice (18 U.S.C. § 1512);

14 **C. Pattern of Racketeering Activity**

15 152. The acts were related, continuous, and part of the enterprise's regular way of
16 operating. Defendants committed these acts repeatedly from Plaintiff's early childhood
17 until her escape in 2015.

18 Common facts include:

- 19 a. At ten months old, Plaintiff was brought to the organization that later became
20 the GCCA, a secretive and coercive religious compound located in rural
21 Arizona. From early childhood until her escape at age nineteen, Plaintiff
22 lived under the complete control of GCCA leadership and its network of
23 affiliated entities and enforcers.
- 24 b. Her daily life, movements, education, and labor were dictated by a hierarchy
25 led by Gabriel of Urantia (also known as Delevin), and implemented by
26 senior elders including Chase, Myszka, Lilly, Cunningham, and others.

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Together, these individuals and entities operated as an association-in-fact enterprise for purposes of 18 U.S.C. § 1961(4).

- c. GCCA operated as an insular and authoritarian community that isolated children from the outside world, separated them from their parents, and subjected them to extensive indoctrination. From approximately age four until she escaped at age nineteen, Plaintiff was placed into group housing, cycled through unrelated adult caretakers, and denied consistent access to her own parents, who still remain members of the group.
- d. In order to maintain this insular world, GCCA members, including Plaintiff were discouraged from seeking outside medical care, legal advice, or public education, further isolating Plaintiff from any external protection or intervention. This ensured that members were only focused on work that financially benefitted the organization.
- e. Plaintiff was required to perform daily labor from early childhood through adolescence. Her assignments included agricultural work, cleaning, cooking, child care, fundraising, mostly in GCCA-controlled enterprises, such as Food for Ascension and other GCCA business entities. Labor was not compensated, and refusal to work was punished through food deprivation, loss of privileges, public shaming, and increased labor demands.
- f. Plaintiff was denied access to formal education beyond a basic internal program controlled by GCCA. She received no high school diploma and was not allowed to pursue further education or independent learning. All educational content was filtered through the spiritual doctrine of the group and used to reinforce compliance.
- g. Leadership enforced obedience through spiritual and psychological threats, including condemnation, eternal punishment, and loss of one's family.

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Plaintiff understood that disobedience or questioning leadership would result in humiliation, isolation, increased labor, or expulsion from the group with no resources.

- h. While Delevin was the unquestioned leader, he carried out his coercive control through a hierarchy of enforcers. Chase and Myszka were both his “wives.” Chase was considered Delevin’s “highest spiritual complement” and she was responsible for the educational curriculum as well as the indoctrination of the community. Along with Myszka, Chase oversaw all the housing arrangements, as people in the community were constantly being moved into different houses in the compound. This was intentional and had the effect of preventing emotional attachments, family bonds and the opportunity for resistance. Chase’s title was Secretary and she was also on the Board of Directors.
- i. As one of Delevin’s wives, Myszka held incredible power and influence alongside Delevin. Since approximately 2010, Myszka has been in charge of most departments within GCCA, and she is also on the Board of Directors.
- j. Cunningham came to GCCA from Synanon in 1992 and quickly became an elder with daily interactions with Delevin related to the management of the community. She was instrumental in setting up the structure and programs of GCCA, including the forced separation of children from their parents. She, along with Lilly acted as liaison between Delevin and members, overseeing compliance, discipline, “counseling” and labor scheduling.
- k. Lilly came to the GCCA in approximately 1994. She was responsible for all interactions with the county, for all business relations and accounting. She has had the title of CFO and is also on the Board of Directors.
- l. Chase, Myszka, Cummingham and Lilly operated under Delevin’s directives

1 and helped ensure that the coercive practices were uniformly implemented
2 across housing, education, and work settings. For example, every house with
3 children had a designated "caregiver" who ensured that children were
4 properly indoctrinated. There were also "soul watchers" who were
5 responsible for reporting and disciplining any spiritual infractions.

6 m. The GCCA also had an auxiliary Board of Directors, which consists in part
7 of the Defendants, as well as Delevin and Chase's son, Delevin and Myszka's
8 daughter, Daniel Steinhardt and three or four other higher level community
9 members.

10 n. The effectiveness of the GCCA enterprise depended on its rigid internal
11 hierarchy, through which orders flowed from Delevin down to Chase,
12 Myszka, Cunningham and Lilly then to mid-level staff who enforced
13 control through daily supervision, labor assignments, punishment protocols,
14 and spiritual indoctrination. This control structure ensured that forced labor
15 could be extracted efficiently and continuously, while also concealing abuses
16 from outside scrutiny.

17 o. For example, Plaintiff was regularly summoned to group disciplinary
18 meetings led by Delevin and Cunningham. These meetings reinforced group
19 conformity and served as a mechanism through which leadership delegated
20 control and implemented collective punishment strategies. Plaintiff and
21 others were frequently threatened with spiritual punishment by Delevin and
22 the other Defendants.

23 p. Children within GCCA were rotated among various labor assignments and
24 residences, a program instituted by Cunningham. Plaintiff recalls being
25 moved between homes and assigned to different "mothers" or "caregivers."
26 These movements were used to control behavior and isolate children from

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family bonds.

- q. Plaintiff was physically prevented from leaving the compound. GCCA properties were located in remote, rural areas without public transportation, and she had no personal means of transportation, money, or legal identification. Her communications were monitored, and outside contact was restricted.
- r. From age five forward, Plaintiff worked under the direction of named Defendants, including Defendant Lilly (who assigned and supervised agricultural labor), Defendant Chase (who administered educational and religious indoctrination), and Defendant Cunningham (who oversaw housing and discipline for young members). The many businesses of the GCCA, including the Food for Ascension where Plaintiff was employed as a child without pay, were directed by Develin and Myszka.
- s. Other former GCCA members have provided corroborating accounts of similar experiences, including forced labor, spiritual coercion, isolation from parents, deprivation of education, denial of medical care, and retaliation against those who tried to leave or speak out, including both lying to legal authorities and lying under oath. A report from a psychiatric expert done when the Plaintiff was 4 years old supports not only the deprivation that Plaintiff experienced, but the lengths to which the GCCA went to cover up their scheme and obstruct justice.
- t. The Plaintiff will produce witnesses who will testify that the Defendants orchestrated numerous cover-ups during the custody litigation commenced by her grandparents, including staging false living conditions for authorities and instructing members to lie under oath custody proceedings initiated by Plaintiff's grandparents. Witnesses will also testify that similar cover-ups

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have continued to the present day.

- u. Most of Plaintiff's work in agriculture and food preparation, supported revenue-generating businesses, where her unpaid labor directly supported increased revenue for GCCA.
- v. Plaintiff has suffered significant economic loss including loss of the value of her labor, lost wages and earning capacity and increased expenses for medical and psychological treatment.
- w. The acts described above were part of a coordinated pattern of conduct directed by GCCA Leadership and used to benefit a network of entities including Soulistic Medical Institute, Camp Avalon, Global Change Media, Food for Ascension and others. These entities willfully and with actual knowledge orchestrated Plaintiff's years of unpaid labor and received considerable financial and operational benefit in return. This pattern continued for more than a decade and was part of a consistent, ongoing organizational practice of labor exploitation and concealment.
- x. The pattern of conduct Plaintiff endured is consistent with federal definitions of forced labor and trafficking and forms the factual basis for the RICO claims asserted herein. These facts demonstrate a coordinated, prolonged, and intentional scheme to extract forced labor and suppress its discovery, supporting the elements of the RICO claims set forth below.

D. Causation and Injury

153. As a direct and proximate result of Defendants' violations of 18 U.S.C. § 1962(c), Plaintiff suffered injury to her business and property, including loss of the value of her labor, lost wages and earning capacity, educational opportunities, relocation expenses, economic value of years of uncompensated labor, and increased expenses for medical and psychological treatment reasonably necessary to address the harm caused by

1 Defendants treatment. Plaintiff seeks treble damages and attorneys' fees under 18 U.S.C.
2 § 1964(c).

3 **COUNT XXI: FEDERAL RICO CONSPIRACY**
4 **(Against All Defendants)**
5 ***18 .S.C. § 1962(d)***

6 154. Plaintiff realleges all prior paragraphs.

7 155. Each Defendant knowingly agreed to facilitate, participate in, and further the
8 conduct of the GCCA Enterprise through a pattern of racketeering activity, in violation of
9 18 U.S.C. § 1962(d).

10 156. Each Defendant knowingly agreed to facilitate the enterprise's unlawful
11 objectives, including trafficking, forced labor, sexual exploitation, concealment,
12 punishment, and coercive control of minors.

13 157. Each Defendant was aware of the nature and scope of the enterprise and the
14 racketeering acts, and at least one conspirator committed overt acts in furtherance of the
15 conspiracy.

16 158. Plaintiff was injured by overt acts committed in furtherance of the
17 conspiracy, including years of forced labor, deprivation of education and liberty, sexual
18 abuse, physical punishment, psychological domination, concealment, and retaliation.
19 Plaintiff seeks all remedies permitted under 18 U.S.C. § 1964, including treble damages
20 and attorneys' fees.

21 **VII. DEMAND FOR JURY TRIAL**

22 159. Plaintiff hereby demands a trial by jury as to all matters.

23 **VIII. REQUEST FOR RELIEF**

24 160. Based upon the allegations and requests contained herein, immediate action
25 is required. Plaintiff therefore requests that this Court FIND and/or ORDER that:

- 26
- a. This Court has jurisdiction over the persons and subject matter of this case;
 - b. Venue is proper in Santa Cruz County;

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- c. An award of damages in amounts to be established at trial are appropriate, including, without limitation, damages for past, present, and future emotional pain and suffering; ongoing and severe mental anguish and physical injuries; compensation for harm to reputation; loss of past, present, and future enjoyment of life; past and future lost earnings and earning capacity; out-of-pocket expenses; attorneys' fees; costs of suit; punitive damages; pre- and post-judgment interest; and liquidated damages; and
- d. Any other judgment and orders for justified relief that the evidence shows is warranted and this Court deems appropriate.

RESPECTFULLY SUBMITTED this 12th day of December 2025.

GILBERT LAW FIRM, PC

Thea M Gilbert
by Thea Gilbert, Esq.

Type text here

E-filed this 12 day of December 2025
with copies to all defendants the
same day by USPS Mail