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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

17 Gigi Gaston,  
18 Plaintiff,  
19 v.  
20 DOE 1, DOE 2, DOES 3–50,  
21 Defendants.

Case No.  
**COMPLAINT FOR DAMAGES;  
DEMAND FOR JURY TRIAL**

- 1) Premises Liability
- 2) Negligence
- 3) Negligent Supervision
- 4) Negligent Retention
- 5) Negligent Failure to Train, Warn or Educate
- 6) Sexual Battery
- 7) Sexual Harassment
- 8) Gender Violence

**Filed Pursuant to Code of Civil Section  
340.1, as Amended by Assembly Bill 218**

1 Plaintiff Gigi Gaston brings this action against Defendants DOE 1, DOE 2, and DOEs 3  
2 through 50 (together, “Defendants”), and alleges as follows:

3 **NATURE OF THE ACTION**

4 1. This case is about the sexual assault of a minor, female equestrian athlete by a  
5 world-renowned trainer known by many in the equestrian sport, including Defendants, to abuse  
6 and assault young female riders.

7 2. Plaintiff Gigi Gaston (“Ms. Gaston”) began riding horses at the age of three years  
8 old. As Ms. Gaston’s talent began to flourish, her family invested in Ms. Gaston’s elite training to  
9 provide her the best opportunity to make the United States Equestrian Team (the “National  
10 Team”).

11 3. At just 12 years old, Ms. Gaston began training at DOE 1 in Southern California.  
12 Ms. Gaston entered DOE 1 excited and eager to train like an Olympian at what was widely  
13 considered to be the finest equestrian training facility on the West Coast.

14 4. The chief differentiator between DOE 1 and its competitors, and the reason that so  
15 many young riders were drawn to DOE 1, was its star trainer—Jimmy Williams (“Williams”).  
16 Williams was one of the most high-profile individuals in the equestrian sport, and considered the  
17 greatest coach of young equestrians on the West Coast. Williams successfully created champion  
18 equestrian athletes at both the national and international level. In the equestrian sport, it was  
19 considered an extraordinary privilege to be able to train with Williams.

20 5. In order to be selected for Williams’s elite coaching, however, young female  
21 athletes were required to comply with Williams’s every order and endure his repeated sexual  
22 assaults. If a minor athlete fought back against Williams’s sexual advances, Williams had the  
23 power to withhold the best horses and best training from that young athlete, derailing their entire  
24 equestrian career.

25 6. For decades, Williams sat in a position of power in the equestrian world, and was  
26 protected and empowered by DOE 1, the American Horse Shows Association (AHSA), and later  
27 its successor-in-interest DOE 2, and the individuals and organizations at the highest levels of the  
28 equestrian sport. Williams was granted unbridled access to the grounds of DOE 1; in or around

1 1988, DOE 2 honored Williams by naming an award after him; and the equestrian world ignored  
2 and justified his known patterns of sexual assault as merely a mischaracterization of Williams’s  
3 charming and charismatic personality.

4 7. Williams, a DOE 2 member and resident of DOE 1, perpetually assaulted young  
5 female athletes, including Ms. Gaston, on DOE 1’s grounds during DOE 2 sanctioned events.

6 8. Williams’s assault of amateur athletes, including Ms. Gaston, has been highly  
7 publicized in The New York Times and the prominent weekly equestrian magazine, the Chronicle  
8 of the Horse. At least 38 athletes, trainers, groomers, and equestrian officials have now come  
9 forward to describe and report Williams’s sexual assaults at DOE 1 and DOE 2 sanctioned events.  
10 In 2016, DOE 2 removed Williams’s name from one of the most prestigious awards in the sport  
11 due to the credibility of the female athletes who came forward—a gesture that came far too late  
12 from the very body that should have protected its young members.

13 9. Ms. Gaston brings this action both to bring to light the systematic failures facing  
14 underage equestrian athletes aspiring to compete at the Olympics, and to seek redress for the years  
15 of physical and emotional harm she suffered at the hands of Defendants.

16 **PARTIES**

17 10. Plaintiff Ms. Gaston is an adult female born in 1958 and was a minor throughout  
18 the period of child sexual assault alleged herein. At all times, Plaintiff resided in Los Angeles  
19 County, within the State of California. Plaintiff brings this Complaint pursuant to Code of Civil  
20 Procedure Section 340.1, as amended by Assembly Bill 218, for the child assault she suffered at  
21 the hands of Defendants. Thus, Plaintiff’s claims for damages suffered as a result of childhood  
22 sexual assault is timely filed as it is filed within three years of January 1, 2020.

23 11. Defendant DOE 1 is an organization incorporated in California with its principal  
24 place of business in La Cañada Flintridge, Los Angeles County, within the State of California.  
25 DOE 1 is an elite equestrian riding club in Southern California, and serves as a training facility for  
26 amateur equestrian athletes, many of whom are seeking to qualify for the National Team. At all  
27 times relevant hereto, Williams resided on DOE 1 property and was an adult coach, trainer,  
28 employee, servant, and/or agent of DOE 1, and was under DOE 1’s control and supervision.

1           12.     At all times relevant hereto, Defendant DOE 2, a New York corporation, or its  
2 predecessors-in-interest, served, and DOE 2 continues to serve, as the National Governing Body  
3 (“NGB”) for the equestrian sport, and trains, selects, and helps fund the National Team. Since  
4 2003, DOE 2 operates as the successor-in-interest to USA Equestrian, Inc., a New York  
5 corporation. USA Equestrian, Inc. governed the equestrian sport with the National Team from  
6 2001–2003 as successor-in-interest to the American Horse Shows Association, Inc. (“AHSA”), a  
7 New York corporation.

8           13.     At all times relevant hereto, DOE 2 and its predecessors-in-interest repeatedly  
9 conducted equestrian competitions throughout the United States, including, but not limited to,  
10 California. As described herein, Ms. Gaston suffered sexual assault at the hands of Williams at  
11 one or more competitions and other events of AHSA that were conducted in California. At each  
12 of these competitions, DOE 2, as successor to AHSA, was responsible for the operations and  
13 programming of the events, as well as for overseeing the activities carried out at those events.  
14 DOE 2 continues to serve as a resource center for members, clubs, fans, and equestrians  
15 throughout the United States. On information and belief, at all times relevant hereto, Williams  
16 was a member of DOE 2 and Ms. Gaston was a minor amateur athlete participating in events  
17 sanctioned by DOE 2.

18           14.     Ms. Gaston is informed and believes and thereon alleges that the true names and  
19 capacities, whether individual, corporate, associate, or otherwise of Defendants named herein as  
20 Defendant DOES 3 through 50, inclusive, are unknown to Ms. Gaston, who therefore sues  
21 Defendants DOES 3 through 50 by such fictitious names, and who will amend the Complaint to  
22 show their true names and capacities when such names have been ascertained. Ms. Gaston is  
23 informed and believes and thereon alleges that DOES 3 through 50 are legally responsible in some  
24 manner for the events, happenings, and/or tortious and unlawful conduct that caused the injuries  
25 and damages alleged in this Complaint.

26           15.     Each of the Defendants aided and abetted each other Defendant and Williams.  
27 Each Defendant knowingly gave substantial assistance to each other Defendant, and Williams,  
28 who performed the wrongful conduct alleged herein. Accordingly, each Defendant is jointly and

1 severally liable for the damages proximately caused by Williams's and each other Defendant's  
2 wrongful conduct.

3       16. Each of the Defendants is, and at all relevant times herein mentioned was, the co-  
4 conspirator of each other Defendant and Williams, and, therefore, each Defendant is jointly and  
5 severally liable to Ms. Gaston for the damages sustained as a proximate result of each other  
6 Defendant and Williams. Each Defendant entered into an express or implied agreement with each  
7 of the other Defendants and Williams to commit the wrongs herein alleged. This includes, but is  
8 not limited to, the conspiracy to perpetrate sexual assault against Ms. Gaston and other young  
9 female equestrian athletes.

10       **THE HISTORY OF DUTIES OF DOE 2 IN TRAINING MINOR ATHLETES**

11                                   *A History of Equestrian Competition*

12       17. The United States Olympic Committee ("USOC"), an organization created to  
13 govern amateur athletes, recognizes and oversees approximately 45 NGBs. NGBs are organized  
14 at an individual sport level, including the equestrian sport.

15       18. DOE 2 serves as the NGB for the equestrian sport and trains, selects, and helps  
16 fund the National Team. The National Team competes at competitions throughout the world,  
17 including the Olympic Games.

18       19. DOE 2 presents themselves as an organization established in 1917 "dedicated to  
19 pursuing excellence and promoting growth, all while providing and maintaining a safe and level  
20 playing field for both its equine and human athletes."

21       20. DOE 2 operates as the modern successor of AHSA. As the NGB of the equestrian  
22 sport, DOE 2 continues the duties of AHSA and its successors, including overseeing equestrian  
23 competitions and affiliate organizations, and regulating membership.

24       21. On information and belief, DOE 2, and previously its predecessors-in-interest, must  
25 grant a license for any horse show in the United States if that horse show will serve as a qualifying  
26 event for more prestigious national competitions and Olympic qualifying events. DOE 2  
27 sanctioned events are the sole events at which a successful competitor can qualify for prominent  
28 national and international equestrian competitions and Olympic qualifying events.

1 *The Long Ride to Accountability*

2 22. In 1978, by virtue of the Amateur Sports Act, the so-called “Ted Stevens Act,”  
3 Congress codified and refined explicit duties of USOC and NGBs relating to athlete’s safety while  
4 participating in amateur sports. The Ted Stevens Act now controls the USOC and the NGBs that  
5 operate as extensions or agents of the USOC.

6 23. Despite a congressionally recognized duty and the utmost importance of  
7 protecting child athletes, the USOC and affiliated NGBs had to be forced into a world of  
8 accountability for the rampant problems with child sexual assault in their constituent sports. On  
9 information and belief, since 1982 alone, over 290 coaches and officials associated with the USOC  
10 or with USOC organizations have been publicly accused of sexual misconduct.

11 24. Nevertheless, the USOC did not approve a plan to create an independent entity to  
12 address sexual assault throughout amateur sports until 2014. In or around 2017, the U.S. Center  
13 for SafeSport (“SafeSport”) opened as an independent 501c(3) non-profit organization with the  
14 stated intention of preventing the sexual assault of amateur athletes.

15 25. On or about March 28, 2017, prior to Congress federally authorizing SafeSport, the  
16 Committee on the Judiciary in the United States Senate held a hearing on Protecting Young  
17 Athletes from Sexual Abuse. During this hearing, star Olympic athletes testified before Congress  
18 relating to USOC’s failure, and the failure of their NGBs, to protect amateur athletes from sexual  
19 assault. Rick Adams, USOC Executive in charge of USOC’s oversight and management of  
20 SafeSport, acknowledged “[t]he Olympic community failed the people it was supposed to  
21 protect.”

22 26. DOE 2 has created its own rules and regulations requiring aspiring Olympians to  
23 become members of its organization, to train with individuals who are members of the  
24 organization, and to compete at events sanctioned by the organization. Yet, DOE 2 has failed to  
25 create any meaningful rules or regulations to protect its athletes from sexual abuse and  
26 misconduct.

27 27. On information and belief, in or around 2018, DOE 2 considered a rule change  
28 proposal that would have required professionals and anyone who signs as a coach at a competition

1 to undergo SafeSport training and a background check, among other things. The proposal was  
2 rejected. On information and belief, DOE 2 currently only requires certain DOE 2 Designees to  
3 undergo background checks.

4 28. On information and belief, DOE 2 has sole control over the access to and oversight  
5 of its own events. DOE 2's General Counsel has commented that DOE 2 "can control who has  
6 access to the showgrounds and who doesn't," speaking to the ability of DOE 2 to take legal action  
7 against non-members at its events in the past. DOE 2's purview over the behavior of member  
8 trainers, coaches, and amateur athletes is even greater than that towards non-members.

9 **WILLIAMS WAS A RENOWNED COACH AT DOE 1**

10 29. DOE 1 is the oldest riding club on the West Coast and has built and advertised  
11 itself as a world-class training facility. Since 1922, DOE 1 has been home to numerous Olympic  
12 athletes and almost exclusively trains equestrians with Olympic aspirations. DOE 1 attracts riders  
13 with approximately 40 acres, three jumping arenas, two dressage rings, a cross-country course,  
14 and elite training and instruction.

15 30. On information and belief, in or around 1957, Williams began training and  
16 coaching at DOE 1. Throughout his career, Williams coached at least 37 professional riders who  
17 went on to become Olympians, DOE 2 Chefs d'equipes, and National Team medalists, including  
18 Ms. Gaston. In or around 1976, under the training of Williams, Ms. Gaston became the youngest  
19 rider at the time to win at the Washington International Horse Show, a competition with special  
20 designation of DOE 2 as a Heritage Competition. Before Williams began coaching and training  
21 equestrian athletes, he was a champion rider of horses in every discipline in the equestrian sport.

22 31. Williams received numerous accolades and awards. He was also inducted into both  
23 the Show Jumping Hall of Fame and National Reined Cow Horse Association Hall of Fame. On  
24 information and belief, Williams was selected as Chefs d'equipe, a prestigious managerial role, of  
25 the United States Show Jumping Team for international competition. In 1989, DOE 2 named one  
26 of the most prestigious and meaningful awards in the sport after Williams. DOE 2 continued to  
27 bestow an award bearing Williams's name until 2016—long after allegations of his sexual  
28 misconduct became well-known throughout the industry

1                                    **WILLIAMS’S REPEATED SEXUAL ASSAULT OF MS. GASTON**

2            32.     Ms. Gaston trained at DOE 1 from the ages of 12 to 18 years old with ambitions of  
3 becoming an Olympic rider.

4            33.     During her time at DOE 1, Ms. Gaston trained exclusively with Williams and his  
5 staff because he was known as a the greatest equestrian trainer in the country. As a young girl,  
6 Ms. Gaston happily began training at DOE 1, but soon learned that if she did not succumb to  
7 Williams’s inappropriate sexual acts, he could and would punish her by withholding from her the  
8 top horses and deliberately fail to train Ms. Gaston to the level of the other young women who  
9 complied with Williams. For example, he would take no interest in Ms. Gaston and pawn her off  
10 on lesser trainers, such as Kathy Moore, and often put Ms. Gaston on horses that she feared. All  
11 of Williams’s efforts were to humiliate, shame, and mind control Ms. Gaston and other minor  
12 equestrian athletes.

13           34.     Between 1971 and 1977, when Ms. Gaston was approximately 12 to 18 years old,  
14 Williams sexually assaulted her on over 100 separate occasions. Most of these sexual assaults  
15 occurred at DOE 1, including during many events licensed and sponsored by DOE 2. Williams  
16 always threatened Ms. Gaston to not tell anyone about the sexual assault.

17           35.     On many such occasions, Williams, who sometimes appeared intoxicated, would  
18 take advantage of the isolated design of DOE 1’s premises to assault Ms. Gaston. Williams would  
19 lead Ms. Gaston to a secluded horse stall or barn aisle for training on how to handle horses, but  
20 instead would sexually assault her by forcing her against the wall and massaging, manipulating,  
21 fondling, and digitally penetrating her genitals, and forcibly kissing her. Williams would also  
22 abuse Ms. Gaston in his golf cart or by the horse chute on DOE 1 property.

23           36.     Williams routinely used the guise of a “kissing lesson” to force Ms. Gaston, then an  
24 adolescent, into horse stalls where he could force his tongue down her throat. Ms. Gaston recalls  
25 to this day the slime on his tongue and, sometimes, the taste of beer on Williams’s mouth during  
26 these encounters. On multiple occasions, Williams sexually assaulted Ms. Gaston and other minor  
27 athletes in front of DOE 1 employees and DOE 2 members and officials.

28

1           37.     On one occasion, in or around 1976, Williams specifically invited Ms. Gaston to  
2 visit his secluded residence, which was located on DOE 1’s property. Williams used DOE 1’s  
3 loudspeaker system to ensure Ms. Gaston was aware of her requested presence.

4           38.     At Williams’s residence, he sexually assaulted her through forced oral copulation.  
5 In fact, Williams used so much force in pushing Ms. Gaston’s head to his genitals that she cut into  
6 his genitals with her mouth. Ms. Gaston then ran out of Williams’s residence in tears and told  
7 several adults about Williams’s sexual misconduct.

8           39.     Ms. Gaston did not, and was unable to, give free or voluntary consent to the sexual  
9 acts perpetrated against her by Williams, as she was a minor child at the time of the assaults  
10 alleged herein.

11          40.     The conduct described herein constitutes child sexual assault as defined by  
12 California Code of Civil Procedure Section 340.1, as modified by Assembly Bill 218, and was a  
13 violation of the California Penal Code, including but not limited to Penal Code Sections 287, 288,  
14 289, and 647.6.

15          41.     Former DOE 1 President from 1977–1979, Priscilla McClure, has publicly  
16 admitted that she was aware at the time that Williams frequently kissed everyone. McClure claims  
17 not to recall receiving any formal complaints regarding Williams’s conduct, but McClure also  
18 recognized that she “would have been the last person anyone would have come to about that.”

19          42.     While Williams’s reputation for being a “ladies man” was well-known and  
20 accounts of his sexual misconduct spread throughout the equestrian community, Defendants DOE  
21 2 and DOE 1 continued to allow Williams unfettered access to minor amateur athletes.

22          43.     DOE 2 and DOE 1 failed to maintain any form of security at competitions or the  
23 training facility to prevent improper contact between coaches and young athletes.

24          44.     DOE 2 and DOE 1 fostered a hostile, competitive training environment that  
25 deliberately placed monetary interests over the safety of its young athletes.

26          45.     On information and belief, at least one report of sexual assault against Williams  
27 was submitted by the mother of a minor athlete at DOE 1. According to public reporting of  
28

1 Williams's assaults at DOE 1, a DOE 1 board member recalled seeing such a report in DOE 1's  
2 files.

3 46. At least 38 athletes, trainers, groomers, and equestrian officials have now come  
4 forward to describe and report Williams's sexual assaults at DOE 1 and DOE 2 sanctioned events.

5 47. In 2016, DOE 2 quietly removed Williams's name from one of the most prestigious  
6 awards in the sport—an award DOE 2 named after Williams in or around 1988 despite DOE 2's  
7 knowledge of Williams's sexual misconduct.

8 48. In or around March 2017, DOE 2, facing public pressure, reported that its board  
9 voted unanimously to retire the trophy due to the credibility of the female athletes who came  
10 forward.

11 49. On information and belief, in or around May 2018, DOE 2 banned Williams from  
12 DOE 2 for his sexual misconduct and removed his name from all DOE 2 awards and honors.

13 50. On information and belief, on April 18, 2019, current DOE 1 members were  
14 notified by the club that DOE 1 would be removing any public affiliation with Williams.

15 51. Williams's sexual assault of Plaintiff is the result of Defendants' cover up, as  
16 statutorily defined by Code of Civil Procedure section 340.1(b).

17 **FIRST CAUSE OF ACTION**

18 **PREMISES LIABILITY**

19 **(Against Defendants DOE 1 and DOES 3–50)**

20 52. Ms. Gaston repeats, re-alleges, and incorporates herein by reference all consistent  
21 paragraphs of this Complaint as if fully set forth herein.

22 53. At all times material hereto, DOE 1 and DOES 3–50, owned, occupied, and  
23 controlled the property at DOE 1, where Williams was allowed to train minor amateur athletes and  
24 reside.

25 54. Ms. Gaston was an a minor equestrian athlete who lawfully trained at DOE 1.  
26 When Ms. Gaston was between the ages of approximately 12 and 18 years old, she was repeatedly  
27 molested, harassed, and sexually assaulted by Williams on the grounds of DOE 1.

28

1           55.     At all times material hereto, Defendants DOE 1 and DOES 3–50 had a duty to  
2 exercise reasonable care to protect Ms. Gaston, and similarly situated amateur athletes, from  
3 Williams’s dangerous sexual propensities.

4           56.     Defendants DOE 1 and DOES 3–50 knew or should have known, or were  
5 otherwise on notice, that Williams had engaged in unlawful sexual-related conduct with minors in  
6 the past, and/or was continuing to engage in such conduct with Ms. Gaston, and failed to take  
7 reasonable steps, and to implement reasonable safeguards, to avoid acts of unlawful sexual  
8 conduct in the future by Williams.

9           57.     At the time Williams performed the acts alleged herein, it was or should have been  
10 reasonably foreseeable to and/or anticipated by DOE 1 and DOES 3–50 that by continuously  
11 exposing and making Ms. Gaston available to Williams on the DOE 1 premises, Defendants DOE  
12 1 and DOES 3–50 were placing Ms. Gaston at grave risk of being sexually assaulted by Williams  
13 on a premises over which they had control.

14           58.     At all times alleged herein, Defendants DOE 1 and DOES 3–50 possessed a  
15 sufficient degree of control over Williams’s personal and business affairs so as to keep Williams  
16 away from Ms. Gaston and other minor children, and prevent any sexual molestation or assault  
17 against them. Further, at all times alleged herein, Defendants DOE 1 and DOES 3–50 possessed a  
18 sufficient degree of control over the DOE 1 premises so as to take reasonable care to protect Ms.  
19 Gaston, keep Williams away from her and other minor children, and prevent any sexual  
20 molestation or assault against them. Defendants DOE 1 and DOES 3–50, however, were negligent  
21 in the use and maintenance of the property and failed to take reasonable steps or implement  
22 reasonable safeguards for Ms. Gaston’s protection.

23           59.     Despite Defendants DOE 1 and DOES 3–50’s opportunities to take action or  
24 otherwise investigate Williams and to warn amateur athletes, including Ms. Gaston, of Williams’s  
25 sexual propensities, Defendants failed to do so. Defendants’ failure to do so resulted in an  
26 unreasonable risk to the safety of Ms. Gaston and athletes who trained on DOE 1 property.

27  
28



1 which he could perform sexual assault; to manipulate his authority to procure compliance with his  
2 sexual demands from his victims; to induce the victims to continue to allow the assault; and to  
3 coerce them not to report it to any other persons or authorities. As an elite trainer, Williams had  
4 unique access to, and was in a position of authority among, minor amateur athletes who were  
5 actively involved in training at DOE 1 and competing at events sponsored by DOE 2.

6 67. Defendants breached their duties by failing to protect Ms. Gaston from harm and  
7 failing to enact any policies or procedures to address sexual assault by trainers and other persons  
8 in authority, including Williams.

9 68. As a proximate result of Defendants' multiple and continuous breaches, Ms. Gaston  
10 has suffered economic injury, all to Ms. Gaston's general, special, and consequential damage in an  
11 amount to be proven at trial, but in no event less than the minimum jurisdictional amount of this  
12 Court.

13 69. As a result of the above-described conduct, Ms. Gaston was subject to repeated  
14 sexual assault and molestation by Williams, and has suffered mentally and emotionally as a child  
15 and will continue to suffer severe emotional distress including, but not limited to severe anxiety,  
16 feelings of self-blame, feelings of estrangement from friends and/or family, hypervigilance, a lost  
17 sense of worth, a sense of being tainted and/or shamed, lack of trust, intimacy and relationship  
18 issues, and other economic damages according to proof at the time of trial.

19 **THIRD CAUSE OF ACTION**

20 **NEGLIGENT SUPERVISION**

21 **(Against All Defendants)**

22 70. Ms. Gaston repeats, re-alleges, and incorporates herein by reference all consistent  
23 paragraphs of this Complaint as if fully set forth herein.

24 71. At all times relevant hereto, Williams resided on DOE 1 property and was an adult  
25 coach, trainer, employee, servant, and/or agent of Defendants, and was under Defendants' control  
26 and supervision.

27 72. As an elite riding club entrusted with the care of minors, where all minor amateur  
28 athletes are entrusted to trainers and coaches, DOE 1 expressly and implicitly represented that

1 these individuals, including Williams, were not a sexual threat to children and others who would  
2 fall under Defendants' influence, control, direction, and guidance.

3 73. As an organization designed to govern its members and protect amateur athletes,  
4 where all minor amateur athletes are entrusted to trainers and coaches at events, DOE 2 expressly  
5 and implicitly represented that these individuals, including Williams, were not a sexual threat to  
6 children and others who would fall under Defendants' influence, control, direction, and guidance.

7 74. By virtue of Ms. Gaston's special relationship with Defendants and Defendants'  
8 special relationship with Williams, Defendants owed Ms. Gaston a duty to provide reasonable  
9 supervision of Williams, to use reasonable care in investigating Williams's background and  
10 complaints arising during Williams's employment and/or agency, and to provide adequate  
11 warning to Ms. Gaston, Ms. Gaston's family, and other minor amateur athletes of Williams's  
12 dangerous propensities and unfitness.

13 75. Defendants had a duty to protect, supervise, and monitor Ms. Gaston's safety from  
14 sexual predators, and a duty to supervise and monitor Williams such that he would not be placed  
15 in seclusion with minor children, including Ms. Gaston.

16 76. At no time did Defendants have a reasonable system or procedure in place to  
17 investigate, supervise, or monitor their staff and/or agents, including Williams, to prevent pre-  
18 sexual grooming and sexual harassment, molestation, and assault of children.

19 77. Defendants, by and through their agents, servants, and employees, knew or should  
20 have known of Williams's sexually abusive and exploitative propensities and/or that Williams was  
21 an unfit agent. Despite such knowledge, Defendants negligently failed to supervise Williams in  
22 his position of trust and authority as an elite trainer, in which position he was able to commit the  
23 wrongful acts against Ms. Gaston alleged herein. Defendants failed to provide reasonable  
24 supervision of Williams, failed to use reasonable care in investigating Williams, and failed to  
25 provide adequate warning to Ms. Gaston and her family regarding Williams's sexually abusive  
26 and exploitative propensities and unfitness. Defendants further failed to take reasonable measures  
27 to prevent future sexual assault against minors.

28



1 an opportunity to learn of Williams’s sexual misconduct, Defendants DOE 1 and DOES 3–50  
2 negligently hired, retained, and/or engaged in the services of Williams in his position of trust and  
3 authority as an elite trainer, where he was able to commit the wrongful acts against Ms. Gaston  
4 alleged herein. Defendants DOE 1 and DOES 3–50 failed to properly evaluate Williams in  
5 advance by failing to conduct necessary screening, failed to properly evaluate Williams’s conduct  
6 and performance as an employee of, or provider of services to Defendants; and failed to exercise  
7 the due diligence incumbent upon employers to investigate employee misconduct, or to take  
8 appropriate disciplinary action, including immediate termination and report and referral of  
9 Williams’s sexual assault to appropriate authorities. Defendants DOE 1 and DOES 3–50  
10 negligently continued to retain Williams in service as an elite trainer, working or providing  
11 services for Defendants, which enabled him to continue engaging in the sexually abusive and  
12 predatory behavior described herein.

13 85. On information and belief, at no time during the periods of time alleged did  
14 Defendants DOE 1 and DOES 3–50 have in place any system or procedure to investigate,  
15 supervise, and monitor staff, trainers, horse groomsmen, and other employees and/or agents,  
16 including Williams, to prevent pre-sexual grooming or sexual harassment, molestation and assault  
17 of children. Nor did they implement a system or procedure to oversee or monitor conduct toward  
18 minors, participants, and members.

19 86. On information and belief, Defendants DOE 1 and DOES 3–50 were put on notice  
20 that Williams engaged in unlawful sexual conduct with minors, and it was reasonably foreseeable  
21 that Williams was engaging, or would engage in illicit sexual activities with Plaintiff, and others,  
22 under the cloak of his authority, confidence, and trust, bestowed upon him through Defendants.

23 87. Defendants DOE 1 and DOES 3–50 were placed on actual or constructive notice  
24 that Williams had sexually assaulted or was assaulting minor athletes and members during his  
25 employment and/or agency with Defendants, yet Defendants chose to allow him to remain  
26 unsupervised where he could continue to sexually abuse Ms. Gaston.

27 88. Defendants DOE 1 and DOES 3–50 conduct was a breach of their duties to Ms.  
28 Gaston.





1           100. Because of Williams’s position of authority over Ms. Gaston, her mental and  
2 emotional state, and her young age, Ms. Gaston was unable to and did not give consent to such  
3 acts.

4           101. Defendants ratified and authorized Williams’s sexual assault of Ms. Gaston by (1)  
5 failing to discharge, dismiss, discipline, suspend and/or supervise Williams after being on notice  
6 of Williams sexually assaulting children, (2) actively shielding Williams from responsibility for  
7 his sexual assault of Ms. Gaston and other minors, (3) failing to acknowledge the existence of  
8 complaints against Williams of sexual assault on Ms. Gaston and other minors, (4) failing to report  
9 such complaints to civil or criminal authorities, and (5) failing to take steps to timely remove  
10 Williams from DOE 1’s employ and revoke his DOE 2 membership so as to prevent him from  
11 using his authority bestowed upon him by Defendants to gain access to minors and sexually  
12 assault them.

13           102. As a result of the above-described conduct, Ms. Gaston has suffered economic  
14 injury, all to her general, special, and consequential damage in an amount to be proven at trial, but  
15 in no event less than the minimum jurisdictional amount of this Court.

16           103. As a result of the above-described conduct, Ms. Gaston has suffered mentally and  
17 emotionally as a child and will continue to suffer severe emotional distress including, but not  
18 limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or  
19 family, hypervigilance, a lost sense of worth, a sense of being tainted and/or shamed, lack of trust,  
20 intimacy and relationship issues, and other economic damages according to proof at the time of  
21 trial.

22           104. In subjecting Ms. Gaston to the wrongful treatment alleged herein, Defendants  
23 acted willfully and maliciously with the intent to harm Ms. Gaston and in conscious disregard for  
24 her rights so as to constitute malice and oppression under Civil Code section 3294. Ms. Gaston is  
25 therefore entitled to the recovery of punitive damages in a sum to be shown according to proof at  
26 trial.

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1 **SEVENTH CAUSE OF ACTION**

2 **SEXUAL HARASSMENT**

3 **(Against All Defendants)**

4 105. Ms. Gaston repeats, re-alleges, and incorporates herein by reference all consistent  
5 paragraphs of this Complaint as if fully set forth herein.

6 106. At all times relevant hereto, Williams resided on DOE 1 property and was an adult  
7 coach, trainer, employee, servant, and/or agent of Defendants, and was under Defendants' control  
8 and supervision.

9 107. During Ms. Gaston's time as a minor equestrian athlete at DOE 1 and member of  
10 DOE 2, Williams intentionally, recklessly, and wantonly made sexual advances, solicitations,  
11 requests, and demands for sexual compliance of a hostile nature based on Ms. Gaston's gender  
12 that were unwelcome, pervasive, and severe. The sexual harassment and assault included, but was  
13 not limited to, Williams massaging, manipulating, fondling, and penetrating Ms. Gaston's body,  
14 including her genitals. These incidents of sexual assault occurred on the grounds of DOE 1 and at  
15 events sponsored by DOE 2 and DOES 3-50, all while Williams was acting in the course and  
16 scope of his agency and/or employment with Defendants.

17 108. Given the nature of equestrian sport, Ms. Gaston's young age, and Ms. Gaston's  
18 relationship with Defendants, Ms. Gaston was unable to terminate the relationship she had with  
19 Defendants.

20 109. Submission to Williams's conduct was explicitly or implicitly made a condition of  
21 an Ms. Gaston's training and progress as an equestrian athlete.

22 110. Because of Williams's age and position of authority, physical seclusion of  
23 Ms. Gaston, Ms. Gaston's mental and emotional state, and her age of minority, Ms. Gaston was  
24 unable to and did not give meaningful consent to Defendants' acts.

25 111. Even though Defendants knew or should have known of these activities by  
26 Williams, Defendants did nothing to investigate, supervise or monitor Williams to ensure the  
27 safety of minor children, including Ms. Gaston.

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1           112. Defendants ratified and authorized Williams’s sexual assault of Ms. Gaston by (1)  
2 failing to discharge, dismiss, discipline, suspend and/or supervise Williams after being on notice  
3 of Williams sexually assaulting children, (2) actively shielding Williams from responsibility for  
4 his sexual assault of Ms. Gaston and other minors, (3) failing to acknowledge the existence of  
5 complaints against Williams of sexual assault on Ms. Gaston and other minors, (4) failing to report  
6 such complaints to civil or criminal authorities, and (5) failing to take steps to timely remove  
7 Williams from DOE 1’s employ and revoke his DOE 2 membership so as to prevent him from  
8 using his authority bestowed upon him by Defendants to gain access to minors and sexually  
9 assault them.

10           113. As a result of the above-described conduct, Ms. Gaston was subjected to repeated  
11 sexual assault and molestation by Williams.

12           114. As a result of Williams’s sexual harassment, Ms. Gaston has suffered economic  
13 injury, all to her general, special, and consequential damage in an amount to be proven at trial, but  
14 in no event less than the minimum jurisdictional amount of this Court.

15           115. As a result of the above-described conduct, Ms. Gaston has suffered mentally and  
16 emotionally as a child and will continue to suffer severe emotional distress including, but not  
17 limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or  
18 family, hypervigilance, a lost sense of worth, a sense of being tainted and/or shamed, lack of trust,  
19 intimacy and relationship issues, and other economic damages according to proof at the time of  
20 trial.

21           116. In subjecting Plaintiff to the wrongful treatment alleged herein, Defendants acted  
22 willfully and maliciously with the intent to harm Plaintiff and in conscious disregard for Plaintiff’s  
23 rights so as to constitute malice and oppression under Civil Code section 3294. Plaintiff is  
24 therefore entitled to the recovery of punitive damages in a sum to be shown according to proof at  
25 trial.

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1 **EIGHTH CAUSE OF ACTION**

2 **GENDER VIOLENCE**

3 ***(Cal. Civ. Code, § 52.4)***

4 **(Against All Defendants)**

5 117. Ms. Gaston repeats, re-alleges, and incorporates herein by reference all consistent  
6 paragraphs of this Complaint as if fully set forth herein.

7 118. California Civil Code section 52.4 provides a plaintiff with a private cause of  
8 action for damages against any person who subjects another to “Gender Violence.” Gender  
9 Violence constitutes gender discrimination through either: (1) at least one act: (a) that would  
10 constitute a criminal offense under state law that has as an element the use, attempted use, or  
11 threatened use of physical force against the person or property of another, and (b) that was  
12 committed at least in part based on the gender of the victim; or (2) a physical intrusion or physical  
13 invasion of a sexual nature under coercive conditions.

14 119. At all times relevant hereto, Williams resided on DOE 1 property and was an adult  
15 coach, trainer, employee, servant, and/or agent of Defendants, and was under Defendants’ control  
16 and supervision.

17 120. Williams’s acts committed against Ms. Gaston, including the sexual harassment,  
18 molestation and assault of a minor, constitute gender violence and sex discrimination in that one  
19 or more of Williams’s acts would constitute a criminal offense under state law that has as an  
20 element the use, attempted use, or threatened use of physical force against the person of another,  
21 committed at least in part based on the gender of the victim, whether or not those acts have  
22 resulted in criminal complaints, charges, prosecution, or conviction.

23 121. Williams’s acts committed against Ms. Gaston, including the sexual harassment,  
24 molestation and assault of the minor Ms. Gaston also constitute gender violence and a form of sex  
25 discrimination in that Williams’s conduct cause a physical intrusion or physical invasion of a  
26 sexual nature upon Ms. Gaston under coercive conditions, whether or not those acts have resulted  
27 in criminal complaints, charges, prosecution, or conviction.

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1           122. Defendants aided and abetted the Williams's crimes and sexual assault of Ms.  
2 Gaston. They hired and retained Williams as an elite coach. They knowingly, intentionally,  
3 deliberately, willfully, and/or recklessly disregarded complaints regarding Williams's sexual  
4 violence against young female athletes. In so doing, they fostered and facilitated the environment  
5 and impunity Williams needed to sexually violate Ms. Gaston. Defendants conspired to sexually  
6 violate young female athletes, including Ms. Gaston. They explicitly and/or implicitly agreed to  
7 perpetrate harmful and offensive contact between Williams and Ms. Gaston and otherwise create  
8 the hostile environment necessary for Williams to sexually violate young female athletes.

9           123. As a result of the above-described conduct, Ms. Gaston has suffered economic  
10 injury, all to her general, special, and consequential damage in an amount to be proven at trial, but  
11 in no event less than the minimum jurisdictional amount of this Court.

12           124. As a result of the above-described conduct, Ms. Gaston was subject to repeated  
13 sexual assault and molestation by Williams, and Ms. Gaston has suffered mentally and  
14 emotionally as a child and will continue to suffer severe emotional distress including, but not  
15 limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or  
16 family, hypervigilance, a lost sense of worth, a sense of being tainted and/or shamed, lack of trust,  
17 intimacy and relationship issues, and other economic damages according to proof at the time of  
18 trial.

19           125. Defendants engaged in the conduct described herein with malice, oppression, and  
20 fraud. Defendants intended to cause injury to Ms. Gaston or otherwise engaged in the described  
21 despicable conduct with a willful and conscious disregard for the rights or safety of countless  
22 vulnerable young women. Defendants engaged in despicable conduct that subjected these young  
23 women to cruel and unjust hardship in disregard of their rights. Defendants intentionally  
24 misrepresented, deceived, and/or concealed the true nature of Williams's sexual violence with the  
25 intention of depriving these young women of their property and/or their legal right to be free from  
26 violence, and/or otherwise causing them injury.

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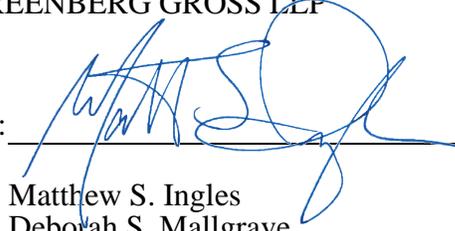
**DEMAND FOR JURY TRIAL**

Plaintiff Gigi Gaston hereby demands a trial by jury in this matter.

DATED: August 4, 2020

GREENBERG GROSS LLP

By: \_\_\_\_\_



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