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13 *Attorneys for Plaintiff Gigi Gaston*

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

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WILLIAMS’S REPEATED SEXUAL ASSAULT OF MS. GASTON

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

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

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

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

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

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
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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.
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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.

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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.

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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.

28

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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1 126. Pursuant to section 52.4 of the California Civil Code, Plaintiff seeks actual
2 damages, compensatory damages, punitive damages, attorneys' fees and costs, and all other
3 appropriate relief.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff Ms. Gaston prays for the following relief against Defendants:

- 6 1. For past, present, and future general damages in an amount to be determined at
7 trial;
- 8 2. For past, present, and future special damages, including but not limited to past,
9 present and future lost earnings, economic damages, and others in an amount to be determined at
10 trial;
- 11 3. For treble damages as a result of DOE 1 and DOE 2's cover up, as authorized by
12 Code of Civil Procedure 340.1(b)(1);
- 13 4. Any appropriate statutory damages;
- 14 5. For cost of suit;
- 15 6. For interest as allowed by law;
- 16 7. For attorney's fees pursuant to Code of Civil Procedure sections 1021, *et seq.*, 51,
17 *et seq.*, 52 *et seq.*, and 52.4, or otherwise as allowable by law; and
- 18 8. For such other and further relief as the Court may deem proper.

19
20 DATED: August 4, 2020

GREENBERG GROSS LLP

21
22 By: 

23 Matthew S. Ingles
24 Deborah S. Mallgrave
Desiree N. Murray

25 JEFF ANDERSON & ASSOCIATES
26 Michael Reck
27 Michael G. Finnegan
Jennifer E. Stein

28 *Attorneys for Plaintiff Gigi Gaston*

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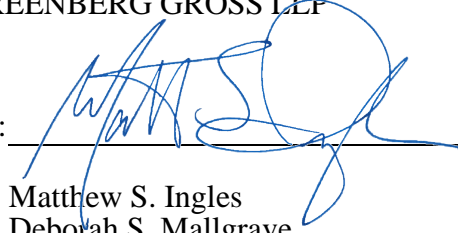
DEMAND FOR JURY TRIAL

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

DATED: August 4, 2020

GREENBERG GROSS LLP

By: _____



Matthew S. Ingles
Deborah S. Mallgrave
Desiree N. Murray

JEFF ANDERSON & ASSOCIATES

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