

Roger H. Hoole (5089)
HOOLE & KING, L.C.
4276 S. Highland Drive
Salt Lake City, UT 84124
Telephone: (801) 272-7556
Facsimile: (801) 272-7557
rogerh@hooleking.com
Attorneys for Plaintiffs

Jaclyn J. Robertson (11951)
JR LAW GROUP, PLLC
244 West 4860 South
Salt Lake City, UT 84107
Telephone: (801) 297-8545
jrobertson@jrlawgroup.com

**IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH**

Amanda Rae Grant; Jenny Kingston; Ladonna Ruth Lancaster, individually and as mother and natural guardian of JJ, a minor; Jana Nicole Johnson; Julie Ruth Nichols; Melissa Ruth Hansen; Michelle Michaels; Allison Eames, and Jeremy Roberts,

Plaintiffs,

vs.

Paul Elden Kingston, John Daniel Kingston, Sr., Hyrum Dalton Kingston, David Ortell Kingston, Jesse Orvil Kingston, Jason Ortell Kingston, Rachel Orlean Kingston Young, John Paul Johnson, Jacob Daniel Kingston, Jr., Jacob Ortell Kingston, Sr., Sally Kingston, John Daniel Kingston, Jr., Travis Ortell Kingston, Jr., Daniel Ortell Kingston, Patricia Kingston, Elden Paul Kingston, Michele Afton Michaels, Debra Williams, Jolene Andrews, Joshua Paul Kingston, April McKay, Valarie Martin, Lynn Roberts, and Individual Does 1 through 20, and Davis County Cooperative Society, Inc., dba, Redwood Grocery & Health Foods and John's Market Place, and Kingston Corporation of the Church of Jesus Christ of Latter, Latter Day Church of Christ, dba, ZMPC and LDCC, and Corporate Does 21 through 200,

Defendants.

**COMPLAINT AND JURY DEMAND
(TIER 3)**

Case No.

Judge

Plaintiffs, Amanda Rae Grant; Jenny Kingston; Ladonna Ruth Lancaster, individually and as mother and natural guardian of JJ, a minor; Jana Nicole Johnson; Julie Ruth Nichols; Melissa Ruth Hansen; Michelle Michaels; Allison Eames, and Jeremy Roberts (collectively “Plaintiffs”), by and through their undersigned counsel of record, complain against Individual Defendants, Paul Elden Kingston, John Daniel Kingston, Sr., Hyrum Dalton Kingston, David Ortell Kingston, Jesse Orvil Kingston, Jason Ortell Kingston, Rachel Orlean Kingston Young, John Paul Johnson, Jacob Daniel Kingston, Jr., Jacob Ortell Kingston, Sr., Sally Kingston, John Daniel Kingston, Jr., Travis Ortell Kingston, Jr., Daniel Ortell Kingston, Patricia Kingston, Elden Paul Kingston, Michele Afton Michaels, Debra Williams, Jolene Andrews, Joshua Paul Kingston, April McKay, Valarie Martin, Lynn Roberts, and Individual Does 1 through 20, and Davis County Cooperative Society, Inc., dba, Redwood Grocery & Health Foods and John’s Market Place, and Kingston Corporation of the Church of Jesus Christ of Latter, Latter Day Church of Christ, dba, ZMPC and LDCC, and Corporate Does 21 through 200 and allege as follows:

INTRODUCTION

1. The Defendants are members of an enterprise that they call “the Order” and that outsiders typically refer to as “the Kingstons.” Plaintiffs are former members of that enterprise, which for purposes of this Complaint will be referred to as the Order. Plaintiffs recognize that the Order has both religious and business functions. In filing this Complaint, Plaintiffs do not seek or intend to disparage the lawful religious aspects or beliefs of the Order. Rather, Plaintiffs’ allegations are directed to the unlawful religious and business aspects of the Order. To the extent Plaintiffs reference religious practices in this Complaint, they do so only when those practices are illegal or as needed for context as shown by their allegations.

2. For example, Plaintiffs allege that Defendants and the Order engaged in unlawful patterns and practices that harmed Plaintiffs, including, without limitation, the following:

- a. It is a common and intentional practice in the Order for girls to be taught and learn that bearing children with her husband is required and, thus, their responsibility because having children is necessary to increase the Order.
- b. It is a common and intentional practice in the Order for marriages to be directed and arranged by Order members, subject to approval by the leader of the Order.
- c. It is a common and intentional practice in the Order to require girls and women to submit sexually against their will to their husbands to produce children.
- d. It is a common and intentional practice in the Order for girls to be impregnated when they are young so they cannot leave; this is especially true for girls that may resist Order rules or may not show sufficient obedience.
- e. It is a common and intentional practice in the Order for women to have as many children as possible to prevent them from leaving the Order.
- f. It is a common and intentional practice in the Order for girls and women to have as many children as possible to supply the Order with unlawful child labor.
- g. It is a common and intentional practice in the Order to abuse children physically and sexually or to conceal and fail to report the physical and sexual abuse of children.
- h. It is a common and intentional practice in the Order to defraud children and members of their wages.
- i. It is a common and intentional practice in the Order to operate fraudulently, falsify records, and lie to outsiders.

- j. It is a common and intentional practice in the Order to defraud state and federal governments by “Bleeding the Beast” as illustrated in the operation of its daycare centers, schools, including the Vanguard Academy, and businesses such as Washaki Renewable Energy.
- k. It is a common and intentional practice in the Order to Bleed the Beast by systematically preparing and filing false tax returns.
- l. It is a common and intentional practice in the Order for fathers not to be listed on their children’s birth certificates to create confusion, avoid criminal prosecution for fathering children in underage, plural and incestuous marriages, and/or for illicit labor and tax reasons.
- m. It is a common and intentional practice in the Order for members to be taught and learn that the laws of God, not society, govern them, thus creating the seeds of anarchy and contempt for the rule of law which blossom to justify any action deemed necessary to advance the needs of the Order regardless of legality.

3. Some of the Order’s practices are lawful and constitutionally protected, some are unlawful and have no constitutional protection, particularly when they involve children.

4. Children in the Order are involved in these practices and typically do not recognize that they are part of and furthering the unlawful aspects of the Order’s enterprise, but when they are disobedient, fail to comply, or challenge these practices, they are punished.

5. It is believed in the Order that Paul Elden Kingston holds the keys necessary to perform spiritual marriages, and regardless of whether that is true, he personally performs or delegates to certain Numbered Men the performance of all marriages in the Order, including those that are kept secret because they involve incest, bigamy and/or underage girls.

6. It is largely through the Order's illegal marriage practices that the Order is able to unlawfully make girls and their children religious martyrs and traffic them for sexual and labor purposes.

JURISDICTION, VENUE AND DISCOVERY TIER

7. This court has jurisdiction pursuant to Utah Code section 78A-5-102.
8. Venue is proper in this court because Utah Code section 78B-3-307.
9. This is a Tier 3 action pursuant to Utah Rule of Civil Procedure 25(a)(c)(5).

PLAINTIFFS

10. Plaintiff Amanda Rae Grant is a young woman and former member of the Order.
11. Plaintiff Jenny Kingston is a young woman and former member of the Order.
12. Plaintiff LaDonna Ruth Lancaster is a young woman and former member of the Order.
13. Plaintiff JJ is Ladonna Ruth Lancaster's infant and former member of the Order.
14. Plaintiff Jana Nicole Johnson is a young woman and former member of the Order.
15. Plaintiff Julie Ruth Nichols is a young woman and former member of the Order.
16. Plaintiff Melissa Ruth Hansen is a young woman and former member of the Order.
17. Plaintiff Michelle Michaels is a young woman and former member of the Order.
18. Plaintiff Allison Eames is a young woman and former member of the Order.

INDIVIDUAL DEFENDANTS

19. Defendant Paul Elden Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.
20. Defendant John Daniel Kingston Sr. is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

21. Defendant Hyrum Dalton Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

22. Defendant, David Ortell Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

23. Defendant Jesse Orvil Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

24. Defendant Jason Ortell Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

25. Defendant Rachael Orlean Kingston Young is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.,

26. Defendant John Paul Johnson is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

27. Defendant John Paul Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

28. Defendant Jacob Daniel Kingston, Jr. is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

29. Defendant Jacob Ortell Kingston, Sr. is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

30. Defendant Sally Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

31. Defendant John Daniel Kingston, Jr. is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

32. Defendant Travis Ortell Kingston is an individual believed to be residing in Salt

Lake County, State of Utah, and a member of the Order.

33. Defendant Daniel Ortell Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

34. Defendant Patricia Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

35. Defendant Elden Paul Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

36. Defendant Michele Afton Michaels is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

37. Defendant Debra Williams is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

38. Defendant Jolene Andrews is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

39. Defendant Joshua Paul Kingston is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

40. Defendant April Mckay is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

41. Defendant Valarie Martin is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

42. Defendant Lynn Roberts is an individual believed to be residing in Salt Lake County, State of Utah, and a member of the Order.

43. Individual Defendant Does 1 through 20 are members and agents of the Order, not yet identified, who hold property and conduct business for the benefit of the Order.

CORPORATE DEFENDANTS

44. Defendant Davis County Cooperative Society, Inc. is a corporation registered as a nonprofit entity with the state of Utah and has been since September 19, 1941.

45. Defendant Davis County Cooperative Society has also registered two additional names under which it conducts business: Redwood Grocery & Health Foods and John's Market Place.

46. Defendant Redwood Grocery & Health Foods is a for profit grocery store located at 4141 South Redwood Road, Salt Lake City, Utah.

47. Defendant John's Market Place is a for profit grocery store located at 4141 South Redwood Road, Salt Lake City, Utah.

48. Defendant Kingston Corporation of the Church of Jesus Christ of Latter is registered in the State of Utah as a Corporation Sole and has been since August 7, 1902, with its meeting house at 1880 West Parkway Boulevard, West Jordan, Utah, which building is sometimes referred to by Order members as "Damon Palmer."

49. Defendant Latter Day Church of Christ is a corporation registered as a nonprofit entity with the State of Utah and has been since December 27, 1977, however, it has only been active since December 28, 2001.

50. Defendant Latter Day Church of Christ has registered two names under which it conducts business: ZMPC9 and LDCC.

51. The Order owns and manages numerous other entities and businesses throughout the State of Utah as well as other states, including but not limited to, the entities and businesses listed in Exhibit A hereto.

52. These Corporate Defendants are referred to hereinafter as "Order Businesses."

53. Corporate Defendants Does 21 through 200 are Order Businesses, not yet identified, which are controlled by the Order and part of its enterprise and which conduct business and hold property for the benefit of the Order.

54. The Individual Defendants and the Order Businesses are sometimes collectively referred to herein as the “Order.”

GENERAL ALLEGATIONS

55. To become a member of the Order, you have to be born into it or on rare occasion can be admitted by unanimous vote of all members during a New Year’s Church Meeting.

56. The Order is structured in a patriarchal and numerical manner with Paul Elden Kingston, who has the lowest assigned number, the leader of the enterprise.

57. Paul Elden Kingston is one of the seven sons of John Ortell Kingston, who died after assigning number nine to Paul Elden Kingston and appointing him to lead the Order. As a leader in the Order, Paul Elden Kingston is known as a “Numbered Man.”

58. All the Numbered Men in the Order with a number lower than Paul Elden Kingston have died.

59. As the leader of the Order, Paul Elden Kingston is sometimes known as “The Man in the Watch Tower.”

60. John Ortell Kingston’s seven sons are all Numbered Men in the Order, and listed in age order are: Joseph Ortell Kingston (deceased), assigned number 14; John Daniel Kingston, Sr., assigned 15; Hyrum Dalton Kingston, assigned number 25; Paul Elden Kingston, assigned number 9; David Ortell Kingston, assigned number 33; Jesse Orvil Kingston, assigned number 48; and Jason Ortell Kingston, assigned number 49 (collectively herein, the “Seven Kingston Brothers”).

61. The Seven Kingston Brothers are considered royal in the Order and have authority

over members of the Order and the Kingston Church. Within the Seven Kingston Brothers there is a hierarchy in which all of the living brothers report to The Man in the Watch Tower, Paul Elden Kingston.

62. Paul Elden Kingston and his brothers draw on their combined power and authority over the Order to govern members and administer Order business and affairs.

63. There is also an entity sometimes called the “Governing Board” or “Order Board, consisting of the Seven Kingston Brothers and other powerful Numbered Men in the Order all of whom report to Paul Elden Kingston.

64. Upon information and belief, the following individuals serve on the Order Board: James Charles Young, assigned number 107; John Alden Gustafson, assigned number 27; John Daniel Kingston Sr., assigned number 15; Hyrum Dalton Kingston, assigned number 25; David Ortell Kingston, assigned number 33; Jesse Orvil Kingston, assigned number 48; Jason Ortell Kingston, assigned number 49; Robert John Kingston, assigned number 59; Joshua Paul Kingston, assigned number 56; Matthew Ortell Kingston, assigned number 60; John Daniel Kingston Jr., assigned number 69; Kent William Johnson Sr., assigned number 26; Verl James Johnson, assigned number 36; Steven Elden Miller, assigned number 89; Ellery Merlin Kingston, assigned number 32; and Paul Elden Kingston, assigned number 9.

65. All Order members are required to submit to Paul Elden Kingston’s authority and direction.

66. To facilitate Paul Elden Kingston’s control, Order members are expected to follow “The Law of One Above Another.”

67. This requires Order members to obey any instructions given to them by the male individual that is “above them,” even if they are instructed to do something immoral, wrong, or

illegal. The belief is that by obeying and following The Law of One Above Another you are being obedient to God and will not be punished for any actions you have been instructed to take, instead, the individual ordering the action will be punished, if necessary, in the eyes of God.

68. A husband is the “One Above” all his wives and all their unwed children.

69. When a girl or woman is married, her “One Above” changes from her father to her husband.

70. Any married but unnumbered man reports to his assigned “One Above,” a Numbered Man who is either his father or a Numbered Man that is closely related.

71. Numbered Men in the Order report to the One Above who is typically Paul Elden Kingston, one of the Seven Kingston Brothers, or to a man on the Order Board.

72. The Seven Kingston Brothers and the men on the Order Board report to their “One Above,” who is Paul Elden Kingston.

73. As set forth below, The Law of One Above Another was used in this fashion to make Plaintiffs and other children born into the Order provide labor as religious martyrs for their parents, and, thus, the Order and its leaders.

74. Young girls in the order are specifically taught to ensure they are “. . . fitting in with the ones over [them] and pleasing [the One Above] in every way [they] know how...”

75. Order members as a whole are taught to “. . . [abide] by the order standards...[and] make sure the ones around you are doing the same” by following the Law of One Above.

76. In order to have children for labor, The Law of One Above Another is essential for coercing arranged Order marriages and the production of as many children as possible.

77. A general diagram of the Law of One Above Another structure is attached as Exhibit B.

78. Failure to abide by the Law One Above Another is considered to be a sin in the Order, punishable not only by God, but by members of the Order.

79. Punishments include a rigorous repentance process that varies in extremes from members being physically restrained or held against their will, to being denied basic human necessities under the guise of a 42 day fast, to physical beatings, among other things.

80. The repentance process often includes packets of paperwork to be completed by the member deemed as needing to repent. This paperwork is evaluated by numbered men in the Order as well as Paul Elden Kingston to determine if the member has “repented of their sins.”

81. In addition to a patriarchal and numerical hierarchy, the Seven Kingston Brothers govern the Order with a belief in the “Pure Kingston Blood,” which causes them to arrange marriages for Kingstons within the Kingston blood line to maintain Pure Kingston Blood.

82. The greater the quantity of “Kingston Blood” in your line, the more worthy you are as an individual, thus the more “freedom” you have.

83. Members of the Order who have Kingston blood are favored over those from families whose blood is impure. The Order deems a person’s blood impure if they have any blood in their line stemming from a minority race¹, if they enter into an inter-racial relationship, or if they exhibit LGBTQ+ “tendencies.”

84. Women in the Order are favored to the extent they are obedient, pure of blood, married to a Numbered Man, a first wife, and the mother of numerous children.

85. Men in the Order are favored and given authority and power to the extent they are obedient, pure of blood, have large families, and can produce a lot of money and workers for the

¹ The Order teaches members that only those with pure Kingston blood will survive the apocalypse.

Order.

86. Favored men in the Order are often “gifted” additional wives to exemplify the status of their favor and worthiness.

87. In the Order, Numbered Men following The Law of One Above Another have arranged and/or directed marriages but each Order marriage must ultimately be approved by the leader of the Order. This is typically done in an engagement meeting with Paul Elden Kingston at which the arranged couple are present with their parents.

88. To satisfy its self-imposed objectives and needs, marriage practices in the Order commonly and intentionally involve underage girls, polygamy and/or incest.

89. The Order attempts unsuccessfully to mitigate these illegalities and biological realities in various ways. For example, by having first wives become “Happily Divorced” so that a subsequent wife can “legally” marry, by taking blood samples from girls to check genetic compatibility and to maintain Pure Kingston Blood, but mostly by locking girls into the Order through marriages, pregnancies and children so they cannot leave and can be controlled to keep the Order’s secrets.

90. Order girls are taught from birth that their primary purposes in life are to be obedient, a submissive wife, and to bear as many children as possible.

91. Order girls learn these teachings at home, at their Order jobs, at Order functions, in Order schools, the Kingston Church, and from Order instructional courses where a “Preparation for Marriage Class” curriculum is taught.

92. This curriculum includes lessons on being an obedient wife, utilizing your fertility period, how to keep your husband happy, budgeting for a large family, as well as memory gems.

93. Most young girls in the Order are required to complete a child-bearing worksheet

in which they calculate how many children they can have in their lifetime from the age of 16 to age 40 and are often told to assume they are only pregnant for nine months.

94. This indoctrination makes it normal to hear elementary aged schoolgirls discuss their dreams of becoming a first wife, theorizing who they will marry, and how many children they will have.

95. All of this is designed to make preparing for marriage a girl's top priority, which is lawful until put into practice in the context of minors and the Order's patterns and practices of illicit and illegal conduct, including trafficking.

96. When they are married, men are also directed to engage in sexual intercourse with their wives to multiply and increase the Order and to accomplish its objectives of producing workers for Order Businesses.

97. One of the ways the Order grooms girls to marry young and/or into plural and incestuous relationships with these men is by having them attend and participate in "Order Dances"---a permitted form of courting in the Order---where girls are given Dance Cards with the names of the men they may dance with that evening.

98. Order Dances occur almost weekly.

99. If a man is not on a girl's Dance Card but asks her to dance, she is required to dance with that man as a precursor to not denying sexual intercourse after marriage. Rejecting a man at an Order Dance is rude but withholding consent to a husband's sexual advances is sinful.

100. Once married, wives who fail to give birth frequently are often shunned, considered unworthy, or ostracized. Even worse, are women who experience miscarriages. In the Order, a woman who has a miscarriage may be labeled a sinner and murderer and often left without support or medical care during an incredible difficult time in their life.

101. For their part, Order children learn, through personal experience and observation, that if they question the Order's absolute power, control, and authority, they suffer. A young child who makes noise during a prayer, for example, is at risk of being beaten and/or physically restrained.

102. The Order consists of religious and secular entities and as an enterprise operates through numerous Order Businesses held for the benefit of the Order often through its members.

103. Central to the Order's enterprise is the "Order Bank," which is not a real bank.

104. Member's do not receive wages for working at Order Businesses, rather their wages² are paid by Order Businesses to the Order Bank. Members, particularly children, do not have any choice in this matter.

105. The Order Bank receives the wages of Order members, reserves small amounts for use by Order members and filters the rest of the funds through back accounts at the Order Bank to pay member expenses---typically owed to itself or Order Businesses, and for other Order purposes, while funneling the balance of the member earnings into bank accounts at real banks controlled by the Order.

106. The Order represents its member's earnings are tracked with "statements," and that any wages earned are accounted for in each member's statement. Member statements, however, are systematically manipulated as their earnings are processed at the Order Bank away from the members.

107. The Order Businesses do not function separately but are integrated in the Order economy as a single enterprise or common concern and operate to achieve common purposes,

² It should be noted that Order Members, particularly children, are often paid less than minimum wage.

including the patterns and practices identified in the Introduction to this Complaint and as otherwise set forth herein.

108. As to the Order Businesses, members are taught: “If we don’t have it, you don’t need it.”

109. Members become dependent on the Order in various ways, including, for example, through:

- a. Requiring members to live in a closed, insular society;
- b. Teaching children to fear, distrust, and not associate with outsiders;
- c. Controlling the education and indoctrination of children;
- d. Teaching children to disobey the laws of society;
- e. Operating an array of Order Businesses;
- f. Requiring most members to work Order Jobs;
- g. Operating the Order Bank to restrict or prevent access to earnings;
- h. Using the Order Bank to misappropriate member earnings;
- i. Stressing the need to function within the Order’s economy;
- j. Arranging and directing all Order marriages;
- k. Insisting that girls and women give birth to large numbers of Children;
- l. Threatening girls and women with the loss of their children if they leave;
- m. Threatening the loss of family and friends for leaving; and
- n. Cutting those who do leave off from their families and friends.

110. Once dependent on the Order, members are often compelled to submit to and perpetuate these practices on others against their will.

111. Withholding paychecks and controlling member wages enables the Order to, *inter*

alia, manipulate members' income, tax returns, have their medical bills paid by Medicaid, and otherwise Bleed the Beast.

112. In the Order, "betrothed" refers to the process of becoming engaged to be married and all engagements and marriages in the Order must be approved by Paul Elden Kingston.

113. The Order begins teaching young girls how to receive direction for the purpose of marriage when they are in elementary school. The concepts are reiterated throughout the girl's childhood.

114. Girls may experience infatuation which, according to the Order, is a trick from Satan disguised as direction.

115. To ensure that direction is received from God and not Satan, all Direction must be approved by the One Above.

116. The One Above help girls find their direction, particularly in regard to their "Number One Choice" by "removing things in [their] life that do not contribute to success" and that parents cannot "stand by and do nothing while [their] child considers marrying someone that is less."

117. Girls are taught that they may have to "fulfill the law of sacrifice in order to get [themselves] in the condition [that will enable them] to receive the Lord's direction" and by receiving direction to pursue marriage they are "promising to give [themselves] to the man such that he can guide [them] to [their] salvation."

118. The concept of direction is a ploy used to manipulate children into arranged and illegal marriages.

119. Once there is what may be considered direction, men will "Come Forward" on the girls by informing their One Above and the One Above the girl that they wish to be considered for

marriage.

120. At this point, there is what sometimes is call a “betrothal,” that is the process of becoming engaged to be married, and because all engagements and marriages in the Order must be approved by Paul Elden Kingston, betrothals are as well.

121. The One Above both the girl and the man will discuss with the Man in the Watch Tower to determine if a match has potentially been made.

122. Next, the One Above the girl will often present a list of the approved men that have Come Forward for marriage. The One Above will guide the girl into which man she is to marry.

123. Then, the families of the girl and the man will meet with the Man in the Watch Tower who will ultimately decide if a match is to be made.

124. During this meeting, the Man in the Watch Tower typically announces his approval by declaring the girl and the man engaged and instructing them to hold hands in order to solidify the engagement. Once engaged, the girl and the man are expected to marry quickly.

125. At times, the Order has members forge and fabricate documents, often against their will, to further the self-interests. This facilitates Bleeding the Beast.

126. To “Bleed the Beast” refers to the concept of exploiting and defrauding governments and taxpayers for the benefit of the Order. The Washaki Renewable Energy fraud is an example of the Bleeding the Beast.

127. The Order is a group of families centered around the Kingston clan that owns Order Businesses and engages in illegal conduct under the guise of a religion and which uses religion as a protection against prosecution.

128. Paul Elden Kingston, by virtue of his authority and power, exercised supreme and inseparable authority over Plaintiffs to keep them within a closed community, made them

dependent on the Order for their needs, support and shelter and otherwise made it nearly impossible for them to leave and live beyond his authority.

129. The Order constitutes a single enterprise or common concern and its wrongful conduct as alleged herein is imputed to the Seven Kingston Brothers and members of the Order Board for which each are liable to Plaintiffs as alleged below.

130. At all times material hereto, the individual Defendants did not function separately, but rather, integrated their resources and efforts into the single enterprise or common concern known as the Order to achieve a common purpose.

131. The Defendants conspired together as part of the Order to commit the wrongful conduct alleged herein and are jointly and severally liable for their conduct.

**FIRST CAUSE OF ACTION BY AMANDA RAE GRANT FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

132. Plaintiff, Amanda Rae Grant (“Amanda”), incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant John Paul Johnson.

133. Amanda was born in an Order apartment in the Salt Lake City area on August 31, 1995, and on information and belief, was delivered by Paul Elden Kingston. When Amanda was born, she began her life as a member of the Order.

134. Amanda’s father is Verl Johnson, and her mother is Lorie Peterson.

135. Lorie Peterson and Verl Johnson entered into an unlawful polygamous marriage when Lorie Peterson was 17 years old.

136. Lorie Peterson was the second wife of the three wives of Verl Johnson.

137. Lorie Peterson gave birth to 10 children, all of whom were, on information and

belief, fathered by Verl Johnson.

138. Upon information and belief, Verl Johnson has fathered at least 33 children with these wives.

139. Verl Johnson is a numbered man in the Order and has been assigned number 36, but he is not listed on Amanda's birth certificate. A fictitious father, named "Kyle Grant," is listed instead. "Kyle Grant" is also listed as the fictitious father on Lorie Peterson's other children with Verl Johnson.

140. It is a common and intentional practice in the Order not to list fathers on their children's birth certificates to cause confusion, avoid criminal prosecution for fathering children in underage, plural or incestuous marriages, and/or for illicit tax and child labor reasons.

141. Upon information and belief, years after Amanda's birth, the State of Utah located a "Kyle Grant" for purposes of recovering state child support payments only to conclude that he was not the father. This was told as a funny story in Amanda's family.

142. Amanda's father, Verl Johnson, came to her home about twice a week, but she did not learn that he was her father until he baptized her when she was eight years old.

143. Growing up, Amanda saw Verl Johnson as an acquaintance even though she was disciplined by him with bare bottom spankings, which practice occurred with some of her siblings into their teens. Other than with respect to discipline and marriage, Amanda and her father seldom conversed.

144. Amanda considered herself lucky because the physical abuse in her home seemed to be much less than in other Order homes.

145. Amanda's first memory as a child was at age five. The memory is of being sexually abused by John Paul Johnson, a son of one of her father's plural wives, and some eight years older.

Despite telling her parents, Amanda was not protected by those in the Order who knew of it, and the abuse continued until she was 15. Amanda eventually told two outsiders.

146. The Division of Child and Family Services (“DCFS”) came to the Ensign Learning Academy where Amanda was working. When they arrived, Hyrum Kingston, the Principal of the Order’s school rushed to tell Amanda that legally she could have a witness in the room, to make sure she honored her father and her mother, and to make sure to protect her family.

147. Amanda did not know that DCFS had arrived and was confused and frightened by how Hyrum Kingston was acting and by what he was telling her to do. She did not know how to respond to his questions about who she wanted in the room with her as a witness.

148. Once Amanda learned that DCFS was there to interview her, she did not want a witness from the Order in the room. A witness would prevent her from saying what had been happening to her.

149. Out of the limited options Amanda had, the only person from the Order there that she thought she could trust was Mary Sommers. Mary Sommers came into the room but was asked to leave by the DCFS workers. When she walked out, she made it obvious that she was leaving a tape recorder in the room.

150. If it was Mary Sommer’s intent to make sure Amanda was not going to say anything, it worked because she became very hesitant to talk about the abuse. Under the pressure she was feeling from the Order, Amanda protected her abuser.

151. When asked by DCFS whether she was being sexually abused by her “brother,” Amanda was able to answer “no,” because her abuser was her “half-brother.” When further pressed, she said he was a “cousin” to protect her father’s polygamous family. After the interview, DCFS made Mary Sommers erase her recording.

152. At a follow up interview with DCFS, Amanda continued to protect her abuser because she knew that if he went to jail, she would ultimately pay the consequence. Fortunately, however, after DCFS got involved, the abuse stopped. Amanda does not think it would have stopped if DCFS had not learned of the abuse and intervened.

153. As the second oldest child, Amanda was given a lot of responsibility over her younger siblings and, in some ways, was treated as an adult and required to do unlawful things. For example, at age 15, she was required to drive her younger siblings to and from their Order school without a driver license.

154. Amanda drove her parents' four-door car sometimes with as many as five children on board. When pulled over by the police, her parents got the ticket for allowing her to drive, but her parents persisted in having her drive children and told her to lie to the police whenever pulled over by telling them her parents did not know she was driving.

155. Amanda was expected to follow The Law of One Above Another, which meant she was not allowed to question what she was told because doing so would be questioning God which was essentially an unforgivable sin.

156. Her role in life as a girl was to not question and to follow the One Above, especially in terms of getting married at a young age and having children. For Amanda this meant following her parents, who followed Paul Elden Kingston, who followed God. In other words, it meant not questioning any of them.

157. The Law of One Above Another was used in this fashion to make Amanda and other children born into the Order religious martyrs for her parents, and, thus, the Order and its leaders.

158. While in elementary school, Amanda received her first work assignment in the Order. Her first Job was at Fidelity or the Order Bank where she worked in the back with other

children often under the supervision of Derek Kingston, the man she was later told to marry.

159. At age 13 or 14, Amanda was reassigned to work at Advance Copy, where Order wedding announcements and invitations were printed because wedding pictures of little girls marrying men in incestuous or plural marriages could not be printed at Walmart.

160. Then at 15, she went to work at another Order Business, John's Market Place, where she was a cashier, before being reassigned to work as a teacher's assistant at Ensign Learning Academy.

161. Finally at 17, she was sent back to the Order Bank this time to work at the front counter responding to Order members who wanted to withdraw funds from their statements and to answer phone calls. Each day, she was given an envelope containing \$500 which was the total amount that she was allowed to give that day to members who came to the Order Bank and then only to those members who had approval to receive money.

162. Amanda was given no choice about working for Order Businesses. She had been coerced throughout childhood to provide labor as instructed by her One Above. If, like any act of disobedience, she had refused to work, she would have been physically punished into submission.

163. Amanda was trafficked into working for these Order Businesses which were all run by Paul Elden Kingston, his six brothers, and their sister, Rachel Kingston Young.

164. By the time Amanda was 15 and 16, her friends who were also 15 or 16 were already in arranged Order marriages. Any girls who were not married young were seen as not holy or righteous enough and looked down on in the Order.

165. Amanda felt intense pressure to marry in the Order and have children at a young age because she had been groomed for that singular purpose throughout her life.

166. Amanda told her father the names of two members of the Order she would consider

marrying. At age 15, one was a Jeremy, but her father told her that Jeremy was not her “Number One Choice.” At age 17, the other was an Eric, but her father said he smoked weed so she should not want to marry him.

167. Otherwise, Amanda fought marriage because she knew girls that were betrothed, spiritually married, and got pregnant at 15, some of whom were legally married to their husbands when they got older, but then regretted all that had happened to them.

168. When Amanda was 16, or maybe as old as 17, her father, Verl Johnson, met with her about the choice for marriage that he wanted her to have, which was her first cousin, Derek Kingston. He informed her that Derek Kingston was on his way to their home to “come forward on her.”

169. Amanda resisted her One Above by telling her father that she did not want to marry her first cousin. Verl Johnson dismissed his daughter’s resistance by saying: “Well, he is on his way. He is coming over.” Amanda had no choice.

170. Derek Kingston arrived at Amanda’s home and came forward on her by telling her about his direction from God and that he was supposed to marry her. Amanda responded that she did not believe in polygamy and that he was her first cousin. He laughed at her resistance to the inevitable.

171. At an Order Dance, the day before she was engaged to marry, Amanda’s father gave Derek Kingston permission to dance with her twice.

172. Amanda had attended numerous secret Order weddings, including those of many of her friends, and knew that no engagement or marriage in the Order could occur without the direction and approval of Paul Elden Kingston.

173. Consistent with the requirement of Paul Elden Kingston’s approval of all Order

marriages, Amanda was tricked by her parent to go to the Order Bank where Paul Elden Kingston had an office. When Paul Elden Kingston appeared, Amanda was frightened because she knew that some of her friends had resisted and even been feisty about having to marry but had gone to meetings with Paul Elden Kingston and come out engaged.

174. At one point during the meeting, Paul Elden Kingston excused Amanda so that he could speak privately with her parents. When that happened, Amanda seized the chance to flee and walked all the way to Sugarhouse, only stopping when it got dark. That meeting, which occurred shortly before she left the Order, was her last with Paul Elden Kingston.

175. It is believed in the Order that Paul Elden Kingston holds the keys necessary to perform spiritual marriages, and regardless of whether that is true, he personally performs or delegates to certain Numbered Men the performance of all marriages in the Order, including those that are kept secret because they involve incest, bigamy and/or underage girls like Amanda.

176. It is through the Order's illegal marriage practices that the Order is able to unlawfully make young girls and then their children religious martyrs and traffic them for sexual and labor purposes.

177. Amanda had continued to fight against an Order marriage and attempted to run away from the Order several times. Before she succeeded in leaving and while she worked at the Order Bank, she was systematically able to withdraw some \$2,000 from her account so that she would have some money when she left.

178. The rest of the money Amanda had earned since starting to work in elementary school had been siphoned out of her account by the Order without her consent and put into another account hidden deeper in the Order Bank, identified as "Back Account CO36."

179. Finally, when Amanda was 17, one of her friends, who had left the Order and

needed to survive on the outside, wanted to get the \$40,000 that he had earned working for Order Jobs out of the Order Bank. Her friend, Bill Hughes, was being denied his money, so he approached Amanda with a plan.

180. Bill Hughes's plan was to have Amanda, who had worked at the Order Bank, go into the Order Bank and take pictures of the children working in the back of the building so that he could use the pictures as leverage to get his money.

181. When Amanda started to photograph the children laboring unlawfully in the back, she was quickly found out and attacked by Jason Ortell Kingston who got the phone she was using to take pictures and physically forced her out of the building, causing her to bleed from the neck.

182. Amanda and Bill Hughes were able to quickly flag down a police officer who had previously investigated the suspicious death of an Order baby, and who immediately said he believed Amanda when she told him about being attacked by Jason Ortell Kingston.

183. Later, however, another officer arrived and had Amanda get into his patrol car. This officer clearly supported the Kingstons and after 30 minutes had talked her out of pressing charges.

184. Amanda's attempts to leave the Order were unsuccessful until July 25, 2013, when the incident at the Order Bank occurred. A few weeks later, when she turned 18, she was told by her mother that she was "cut off" and her relationship with those members of her family still in the Order ended.

185. Amanda was told that she could see her brothers and sisters again only when she came back to the Order.

186. John Paul Johnson, acting negligently, caused sexual contact with Amanda that was harmful and offensive, and caused her to suffer injuries.

WHEREFORE, Plaintiff, Amanda Rae Grant, prays for relief as set forth below.

**SECOND CAUSE OF ACTION BY AMANDA RAE GRANT FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

187. Plaintiff, Amanda Rae Grant (“Amanda”), incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants John Daniel Kingston, Sr., Hyrum Dalton Kingston, Paul Elden Kingston, David Ortell Kingston, Jesse Orvil Kingston, and Jason Ortell Kingston, Rachael Kingston, and the Order.

188. Amanda was made to work for Order Businesses through force, fraud, or coercion, as alleged herein. She was raised for that purpose, would be punished for refusing to work, and was falsely told that she would be able to receive her earnings.

189. The Defendants named in this cause of action directly benefited from trafficking Amanda for sexual and labor purposes.

190. Amanda was a trafficking victim of these Defendants because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

191. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff, Amanda Rae Grant, prays for relief as set forth below.

**THIRD CAUSE OF ACTION BY JENNY KINGSTON FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

192. Plaintiff Jenny Kingston (“Jenny”) incorporates herein the allegations contained in

the other paragraphs of this Complaint and alleges as follows against Defendant Jacob Kingston, Jr.

193. Jenny became part of the Order when her mother secretly gave birth to her on May 10, 1997, in a home in the Salt Lake area.

194. Jenny's mother, Benny Kingston, was born on or about April 12, 1973.

195. Jenny's father, Jeremy Kingston, Sr. was born on or about June 15, 1971.

196. Benny Kingston and Jeremy Kingston, Sr. ("Jenny's parents") are members of the Order.

197. Jeremy Kingston, Sr. is a Numbered Man in the Order and assigned number 68.

198. Benny Kingston is the first wife of Jeremy Kingston, Sr.'s four plural wives.

199. Jeremy Kingston, Sr. is currently unlawfully married to three of these women. His fourth wife, who was married to him underage, plurally, and incestuously---resulting in him being sent to prison in approximately 2003---left him.

200. Upon information and belief, Benny Kingston was 14 years old when she was married and has given birth to 14 children, all of whom were fathered by Jeremy Kingston, Sr.

201. Upon information and belief, Jeremy Kingston, Sr., has fathered at least 40 children with his plural wives.

202. As a young child, Jenny was taught to live the standards of the Order, which included being obedient, receiving direction in marriage, marrying young, and bearing children, but she struggled with belief, was seen as a problem, and was often punished and ostracized to force her submission to the Order.

203. As a child, Jenny experienced sexual abuse and a denial of the help and assistance she needed to cope with the abuse, so she resisted some of the Order's rules and was considered

sinful and referred to as a “whore.”

204. In the Order, it is known that young girls, and especially young girls, like Jenny, that may resist rules or may not fully believe, need to be married young and impregnated before they can become more independent and leave.

205. Jacob Daniel Kingston Jr. “came forward on Jenny,” but she was 17 and did not want to marry him--even if that was God’s will, as she was being told by the Ones Above.

206. Before Jenny was aware that Jacob Daniel Kingston, Jr. would be coming forward on her, Jenny was required to work directly next to him at the Washakie Renewable Energy as part of the grooming for her marriage.

207. Washakie Renewable Energy was an Order Business run by Jacob Daniel Kingston Jr.’s father, Jacob Ortell Kingston, Sr.

208. It is common for young girls in the Order to be assigned to work before their engagement for Order Businesses run by the families they will be married into.

209. Jacob Ortell Kingston, Sr. also flew his son and Jenny in a private plane to Las Vegas as part of their arranged Order “courtship.”

210. Later, Jacob Ortell Kingston, Sr. went to prison for helping Washakie Renewable Energy “Bleed the Beast” by defrauding the United States government of over \$500,000,000.

211. Jenny resisted when Jacob Daniel Kingston, Jr. came forward on her for many reasons, including the fact that she was interested in someone else.

212. As a result, her parents conspired with Order members to institutionalize her until they could gain control over her.

213. Jenny was sent, against her will, to Lifeline for Youth (“Lifeline”), a rehabilitation center for troubled teens.

214. Jenny was told that she was placed in Lifeline because of alcohol abuse, sex addiction, and self-harm; however, she never used drugs or drank alcohol as a minor and had been sexually active with only one person.

215. Although she had engaged in self-harm because of the sexual molestation she suffered as a child, she did not need to be institutionalized.

216. The real reason that Jenny was put in Lifeline and not allowed to leave that facility was because she was not obedient to the Order and needed a “better spirit,” meaning she needed to receive the “right direction” to be married.

217. After some six months at Lifeline, Jenny agreed to be submissive to the Order and was finally allowed to return home.

218. Thereafter, she attended an engagement meeting with Paul Elden Kingston, her parents, Jacob Daniel Kingston, Jr. and his parents, Sally Kingston and Jacob Ortell Kingston, Sr., as well as the couples’ living grandparents, at which Paul Elden Kingston, as the leader of the Order, approved Jenny’s marriage.

219. Jenny’s parents, along with Jacob Daniel Kingston, Jr., who was an adult, and his parents, Sally Kingston and Jacob Ortell Kingston, Sr., and the grandparents who were present all agreed to the marriage.

220. Accordingly, about a month later, on April 24, 2015, while Jenny was 17 years old, she was trafficked into an unlawful marriage to Jacob Daniel Kingston, Jr.

221. Jacob Daniel Kingston, Jr.’s grandfather, John Daniel Kingston Sr. directed the wedding in the absence of Paul Elden Kingston, and instructed Jenny’s father to officiate by reading the Order’s wedding ceremony from an old piece of paper.

222. In the Order, no one is allowed to officiate at a wedding, possess that old piece of

paper, or read the Order’s wedding ceremony without the permission of Paul Elden Kingston.

223. Jenny recalls John Daniel Kingston Sr. standing nearby her father as he held the old piece of paper and officiated at the couples’ marriage by reading the Order’s wedding ceremony to the couple.

224. John Daniel Kingston, Sr. would not have acted as a witness and Jeremy Ortell Kingston, Sr. would not have officiated at the wedding, without the approval of Paul Elden Kingston who approves and directs all marriages in the Order.

225. Bill Stoddard, a Numbered Man in the Order, now deceased, signed the Utah Marriage License, claiming falsely to have been the “Officiant.” The Marriage License states:

I hereby certify that on the 24th day of April in the year of two thousand 15 in the city of Sandy in said county of Salt Lake, I, the undersigned, a Elder did join in matrimony according to law M[s]. Jenny LaDonna Kingston and M[r]. Jacob Daniel Kingston, The nature of the ceremony was according to Utah Law and was a present mutual agreement of marriage between the parties.

/s/ Jacob Kingston
Signature of Spouse 1

/s/ Bill Stoddard
Signature of Officiant

/s/ Jenny Kingston
Signature of Spouse 2

/s/ B.W. Stoddard
Printed Name of Officiant

/s/ John Daniel Kingston
Signature of First Witness

Elder
Title

/s/ Joseph Ortell Kingston
Signature of Second Witness

(Emphasis added.)

226. The Marriage License issued by the State of Utah was completed by Bill Stoddard to fraudulently conceal the fact that there was no lawful marriage; rather, there was only an Order marriage ceremony performed by Jenny’s father, which was the product of trafficking.

227. As a minor, Jenny could not be made a religious martyr or consent to either

marriage or sexual relations with Jacob Daniel Kingston, Jr.

228. After the wedding, Jacob Daniel Kingston, Jr. immediately began to initiate sexual relations with Jenny.

229. Although Jenny continuously told Jacob Daniel Kingston, Jr. that she did not want to have sex with him nor engage in any other sexual conduct, he insisted that it was unacceptable for her to deny him.

230. Jacob Daniel Kingston, Jr. became verbally abusive and regularly referred to Jenny as “trash,” often using the term, and variations of it, both descriptively and as a nickname.

231. Jacob Daniel Kingston, Jr. told Jenny that she had to have sex with him because he “saved [her] from the dumps” or because she owed him since he had saved her eternal salvation.

232. Throughout their “marriage,” Jacob Daniel Kingston, Jr. was also physically abusive to Jenny even when not forcing her to have sex with him. Later, he was also physically abusive of their children.

233. Through this kind of abuse and torment, Jacob Daniel Kingston, Jr. sometimes got Jenny to submit to his unwanted and unwelcome sexual desires and advances.

234. When Jacob Daniel Kingston, Jr. was unable to coerce Jenny into engaging in unwanted sex, he would forcibly rape her.

235. These rapes were often violent and accomplished through physical force.

236. Jenny was repeatedly told that forced sexual intercourse and other unwanted sexual intimacies were nonexistent in marriage. The common phrase used was: “It isn’t rape if you are married.”

237. Jenny knew that having sex with her husband was the most important responsibility of a wife in the Order because having children was commanded and necessary to increase the

Order, yet she also knew that having children could finally lock her into the Order forever.

238. As she struggled to avoid sexual relations, Jacob Daniel Kingston, Jr. Jacob Ortell Kingston, Sr., and other members of the Order were increasingly unhappy that she had not become pregnant.

239. Members in the Order, including Jacob Ortell Kingston, Sr. John Daniel Kingston, Sr., and Sally Kingston were aware that Jacob Daniel Kingston, Jr. frequently abused Jenny to try to get her pregnant.

240. Paul Elden Kingston and John Daniel Kingston, Jr. also became aware of this, but failed to stop or report the abuse to law enforcement.

241. Jacob Ortell Kingston, Sr. was allowed by the Order to use money to send Jenny to a fertility doctor.

242. The fertility doctor determined that Jenny was fertile and capable of bearing children, but, upon information and belief, also determined that Jacob Daniel Kingston, Jr. would need surgery to father children.

243. Jacob Ortell Kingston, Sr., however, informed Jacob Daniel Kingston, Jr. and Jenny that time was of the essence, surgery would take too long, and that they need to just “get her pregnant.”

244. Jacob Ortell Kingston, Sr. then compelled Jenny to undergo in vitro fertilization (“IVF”), and, upon information and belief, was again allowed by the Order to use funds to pay for the IVF.

245. Jenny underwent the IVF process, as instructed, which entailed surgical procedures, medications, and the removal of eggs from her body for fertilization.

246. Upon information and belief, the sperm used to fertilize Jenny’s eggs belonged to

Jacob Daniel Kingston, Jr., and once fertilized, Jenny's eggs were returned to her uterus.

247. The IVF treatment resulted in the birth of twins in October of 2017.

248. In or about August 2018, Jacob Ortell Kingston, Sr., who was the One Above Jenny and Jacob Daniel Kingston, Jr., was arrested, convicted, and sent to jail for Bleeding the Beast for the benefit of the Order through Washakie Renewable Energy. He is yet to be sentenced.

249. In his absence, John Daniel Kingston, Jr. was assigned to be the One Above and the man with direct authority over Jenny, Jacob Daniel Kingston, Jr., and their children, and, thus, the man to whom she was required to go on important matters, including those related to her "marriage."

250. John Daniel Kingston, Jr. is a numbered man in the Order, assigned number 69. The One Above him is his father, John Daniel Kingston, Sr., who reports directly to the One Above him--Paul Elden Kingston.

251. Jenny was required to attend counseling sessions with John Daniel Kingston, Jr. as the One Above her. The intent of these counseling sessions was to help her correct her faults within her unlawful marriage.

252. Because the Order controls all Order marriages, in or before December 2020, Jenny asked John Daniel Kingston, Jr. whether she could divorce Jacob Daniel Kingston, Jr.

253. When Jenny asked John Daniel Kingston, Jr. about a divorce, she was informed that the Order does not grant Order divorces, and her request for permission to leave Jacob Daniel Kingston Jr. was denied.

254. Jenny then scheduled a meeting with Paul Elden Kingston, John Daniel Kingston, Jr., and Jacob Daniel Kingston, Jr. to ask Paul Elden Kingston for a divorce, but Paul Elden Kingston also refused to allow Jenny to end her "marriage" to Jacob Daniel Kingston, Jr. Jenny

recorded the meeting.

255. Jenny would not have been married without Paul Elden Kingston's approval, nor could she get out of the marriage without his approval.

256. To leave the "marriage," Jenny fled the Order with her two minor children.

257. Jacob Daniel Kingston, Jr. has told Jenny that he will give her full custody of their children if she has ongoing sex with him. Jenny refused and recorded those conversations.

258. Jacob Daniel Kingston, Jr., acting with intent, caused sexual contact with Jenny that was harmful and offensive, and caused Jenny to suffer injuries.

WHEREFORE, Plaintiff Jenny Kingston prays for relief as set forth below.

**FOURTH CAUSE OF ACTION BY JENNY KINGSTON FOR
CONSPIRACY TO COMMIT BATTERY AND SEXUAL ABUSE OF A CHILD**

259. Plaintiff Jenny Kingston ("Jenny") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Jacob Daniel Kingston, Jr., Jacob Ortell Kingston, Sr., John Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order.

260. The Defendants named in this cause of action as part of the Order intentionally, knowingly, or recklessly, solicited, instructed, commanded, encouraged and/or intentionally aided Jacob Kingston, Jr. to commit the sexual battery, abuse, and rape of Jenny.

261. These Defendants as part of the Order conspired and combined together for the purpose of causing Jacob Kingston, Jr. to commit the sexual battery, abuse, and rape of Jenny.

262. The object of the conspiracy was illegal and carried out as the result of a calculated plan between these Defendants as part of the Order.

263. These Defendants as part of the Order commanded and acted in concert with Jacob

Kingston, Jr. in committing the sexual battery, abuse, and rape of Jenny.

264. There was a meeting of the minds among these Defendants as part of the Order regarding this object or course of action.

265. These Defendants as part of the Order committed one or more unlawful and overt acts in furtherance of their conspiracy.

266. Unlawful and overt acts were committed in Utah by these Defendants in furtherance of the Order.

267. The conduct of these Defendants constituted an unlawful conspiracy.

WHEREFORE, Plaintiff Jenny Kingston prays for relief as set forth below.

**FIFTH CAUSE OF ACTION BY JENNY KINGSTON FOR
NEGLIGENT SEXUAL BATTERY AND ABUSE OF A CHILD**

268. Plaintiff Jenny Kingston (“Jenny”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order.

269. The Defendants named in this cause of action negligently interjected themselves in and furthered Jenny’s unlawful marriage, Jacob Daniel Kingston, Jr.’s efforts to impregnate Jenny, the continuation of the unlawful marriage, and the repeated rapes of Jenny.

270. These Defendants knew or should have known that their acts and omissions furthered Jenny’s unlawful marriage, Jacob Daniel Kingston, Jr.’s efforts to impregnate Jenny, the continuation of the unlawful marriage, and the repeated rapes of Jenny.

271. Through their conduct, these Defendants had and assumed duties not to negligently cause or further Jenny’s sexual abuse and rapes.

272. These Defendants breached their duties to Jenny.

273. The negligent conduct of these Defendants caused sexual abuse and rapes that were harmful and offensive to Jenny and caused her to suffer injuries.

WHEREFORE, Plaintiff, Jenny Kingston prays for relief as set forth below.

**SIXTH CAUSE OF ACTION BY JENNY KINGSTON FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

274. Plaintiff Jenny Kingston (“Jenny”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John, Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order.

275. In addition to being trafficked into an unlawful marriage, Jenny was required to begin working for the Order part time as a young child when she was approximately six or seven years old.

276. Just like being coerced and forced into an unlawful marriage, Jenny was coerced and forced to work for Order Businesses. At 14, after she graduated from Pen Foster, an online school used by the Order to speed girls through high school, she was forced and coerced through The Law of One Above the Other to work for the Order fulltime. If she had refused, she knew she would be punished into submission.

277. One of Jenny’s first jobs was at Advanced Vending, an Order Business, where she was supervised by her father, Jeremy Kingston. At times, Jenny would go straight to work from school and spend the night there.

278. Jenny was responsible for counting money and sorting items such as chips, candy, soda, etc., for the vending machines. She also cleaned the office, worked in the warehouse, and

assisted with paperwork.

279. Jenny worked at Advanced Vending until she was reassigned at about 14 to work fulltime at Washakie Renewable Energy, commonly referred to in the Order as WRE.

280. Washakie Renewable Energy, now defunct, was an Order Business primarily managed by her future father-in-law, Jacob Ortell Kingston, Sr.

281. Even though she was a minor, Jenny began working at Washakie Renewable Energy in the accounting department, assisted with tax filings for the business, and ultimately reported to Jacob Ortell Kingston, Sr.

282. Sometime after being assigned to work at Washakie Renewable Energy, Jenny was additionally assigned to work for one of two franchised A&W restaurants, which were also Order Businesses, where she helped manage the day-to-day operations of one restaurant and initially reported to Jacob Ortell Kingston, Sr.

283. In 2017, the FBI executed a search warrant on some of the Order Businesses as well as Jacob Ortell Kingston, Sr.'s home.

284. Jenny, Jacob Daniel Kingston, Jr., Sally Kingston and other members of the Order were present at the home during the search.

285. The Order had been tipped off and knew that the FBI planned on executing search warrants. With this knowledge, the Order specifically instructed members to assist in destroying evidence, hiding evidence, and lying to the government.

286. Jenny witnessed numerous Order members destroy, remove, and hide as much evidence as possible before the FBI arrived.

287. Upon information and belief, the remaining evidence that was seized pursuant to the search warrants resulted in the criminal convictions and imprisonment of Order Members,

including Jacob Ortell Kingston, Sr., and a judgment in favor of the United States in excess of \$500,000,000 for fraud related to Washakie Renewable Energy's illegal activities on behalf of the Order.

288. After Jacob Ortell Kingston, Sr. was arrested in August 2018, John Daniel Kingston, Sr. took over the A&W restaurant where Jenny was assigned to work and she began reporting to him.

289. Later, Jenny was reassigned to work at A-1 Disposal where she reported to John Daniel Kingston, Jr., but at the same time was also required to work for Laura Fuller, one of the Order lawyers, in a secret room set up in the A-1 Disposal office building.

290. Jenny's work for Laura Fuller involved retrieving evidence hidden to avoid seizure by the FBI which she cleaned, filed, and organized. Jenny reported directly to Laura Fuller and Sally Kingston.

291. Prior to leaving the Order, Jenny was also required to work at other Order Businesses, including Family Stores True Value, Standard Restaurant Supply, Ensign Learning Center, the Food Group, United Fuel Supply, the Washakie farm, and the Order's main office.

292. Despite being forced and coerced to work for various Order Businesses during her childhood and early adult life, Jenny never received a paycheck.

293. The Order Bank captures all member's wages directly from Order Businesses and claims that member's earnings are tracked and accounted for with "statements" periodically given to Order members.

294. Jenny did not regularly spend her earnings, but was occasionally able to use some of her funds to purchase goods at Order Businesses, however, she was denied unlimited and unrestricted access to her funds and had to withdraw cash when she needed to surreptitiously buy

things at non-Order Businesses.

295. Despite being forced to work for the Order for nearly two decades and leaving much of her money in her Order account, upon leaving the Order, Jenny was informed that her statement had a negative balance.

296. The Order refused to specify what caused the deficit and refused to provide Jenny with any additional information or records.

297. To date, Jenny has not been fairly compensated for her forced labor at any of the Order Businesses where she was trafficked to work.

298. The Defendants named in this cause of action benefited from trafficking Jenny for sexual and labor purposes.

299. Jenny was a trafficking victim of these Defendants because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

300. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Jenny Kingston prays for relief as set forth below.

**SEVENTH CAUSE OF ACTION BY JENNY KINGSTON FOR
INFLECTION OF EMOTIONAL DISTRESS**

301. Plaintiff Jenny Kingston (“Jenny”) incorporates herein the allegations contained in

the other paragraphs of this Complaint and alleges as follows against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John, Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order.

302. The conduct of the Defendants named in this cause of action was outrageous and intolerable in that it offended society's generally accepted standards of decency and morality.

303. These Defendants intentionally and negligently caused or acted in reckless disregard of the likelihood of causing Jenny severe emotional distress.

304. As a proximate result of the conduct of these Defendants Jenny suffered severe emotional distress.

WHEREFORE, Plaintiff Jenny Kingston prays for relief as set forth below.

**EIGHTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

305. Plaintiff LaDonna Ruth Lancaster ("Blaklyn") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Travis Ortell Kingston.

306. Blaklyn became part of the Order when her mother secretly gave birth to her on June 8, 2004 in a home located in Sandy, Utah.

307. Blaklyn's mother was Jeanne Lancaster, aka, Samantha Jeanne Johnson Lancaster, who was born on or about April 16, 1974, and died on or about October 31, 2009, when Blaklyn was five-years old.

308. Jesse Orvil Kingston, born on or about July 17, 1967, is Blaklyn's biological father, but is not listed on Blaklyn's birth certificate.

309. Jesse Orvil Kingston is a Numbered Man in the Order and assigned number 48.

310. Blaklyn's parents, Jeanne Lancaster and Jesse Orvil Kingston, are the children of John Ortell Kingston, the eighth Numbered Man, now deceased, and are each other's brother and sister.

311. When Jeanne Lancaster and Jesse Orvil Kingston married illegally, she became his 5th of the 14 wives who have not left him.

312. Jeanne Lancaster became pregnant with her first child, a girl, at age 15, and before Jeanne Lancaster's death, gave birth to approximately 9 children, all of whom were fathered by Jesse Orvil Kingston.

313. Upon the death of her biological mother, Blaklyn was moved by her father, Jesse Orvil Kingston, to live with his first wife, Janice Vesta Kingston.

314. Janice Vesta Kingston gave birth to approximately 16 children, all of whom were fathered by Jesse Orvil Kingston.

315. Janice Vesta Kingston died on or about April 9, 2020.

316. Jesse Orvil Kingston has fathered over 300 children with his multiple wives.

317. As a child, Blaklyn and her siblings were often punished, restrained, and physically abused by their father and his first wife for perceived disobedience and for not working for Order Business as required of Order children.

318. As a child, Blaklyn suffered punishment in the form of physical battery and abuse at the hands of her father Jesse Orvil Kingston and his first wife Janice Vesta Kingston.

319. Before her death, Janice Vesta Kingston, was particularly brutal. She would instruct Blaklyn to remove her shoes and socks and then stomp on Blaklyn's bare feet while wearing boots with plastic spikes or cleats lining the bottom of the boots.

320. On many other occasions, Janice Vesta Kingston also hit Blaklyn with her hands

and locked her in a room. At one point, Blaklyn was restrained in a basement room.

321. And from a young age, Blaklyn was forced and coerced to work for the Order at risk of physical punishment.

322. To obtain the submission of children, physical abuse and forced restraint are common and intentional practices in the Order. These abuses are generally concealed and seldom reported.

323. Blaklyn witnessed other children being physically restrained and physically abused, including a teenage girl, who was forced to wear a clear plastic bag, sometimes as a diaper, at home, school, and church.

324. Blaklyn was allowed limited schooling in the Order but in middle school she was required to drop out and forced or coerced to go to work for the Order fulltime. Before dropping out and going to work fulltime, Blaklyn was required to work for the Order part time during school years and fulltime in the summers as far back as she can remember.

325. Blaklyn's first full time Order job was at the Century Office where the Order Bank is located. She was trained by Susanne Kelly to receive checks turned in by Order members from their side jobs, sign the names of Order members on checks using signature stamps, and processed the checks to real banks. She was not told and did not understand why she did these functions.

326. Her next Order jobs were at Premier Catering & Food Services, LLC, where she made food for Order school students and teachers, as well as workers at other Order Businesses; at John's Market Place where she helped in the bakery and deli; and at First Family Medicine, where she did filing and performed similar tasks.

327. Blaklyn never received a single paycheck for any of her work for Order Businesses. Her wages were purportedly sent directly to her account at the Order Bank. When she left the

Order at age 17, she did not attempt to retrieve her earnings from the Order Bank but may in the future.

328. Growing up, Blaklyn was taught and learned that getting married early and having children early and often with her assigned husband was not only expected, but it was also required.

329. When Blaklyn turned 15, that requirement became a reality as she was directed and trafficked into an Order marriage with Travis Ortell Kingston.

330. Blaklyn's father, Jesse Orvil Kingston, and Travis Ortell Kingston's father, David Ortell Kingston, are full brothers and two of the Seven Kingston Brothers, making Blaklyn and Travis Ortell Kingston first cousins.

331. To preserve the Pure Kingston Blood, Jesse Orvil Kingston and David Ortell Kingston wanted Blaklyn to marry her cousin, Travis Ortell Kingston.

332. Although Blaklyn did not want to marry her cousin, Janice Vesta Kingston suggested that Blaklyn marry Travis Ortell Kingston, and Blaklyn was also soon required to work under and with him at the Century Office.

333. Under the pressure steadily built up over a lifetime, Blaklyn, at 15, was manipulated and coerced into considering this to be "direction" to marry Travis Ortell Kingston.

334. Jesse Orvil Kingston, David Ortell Kingston, and Travis Ortell Kingston, who is some 11 or 12 years older than Blaklyn, then asked Paul Elden Kingston to allow the marriage.

335. Paul Elden Kingston officially granted their request and declared Blaklyn and Travis Ortell Kingston engaged at an engagement meeting which Travis Ortell Kingston and his parents, as well as Blaklyn, her father, and Janice Vesta Kingston in attendance.

336. Without the direction of Janice Vesta Kingston and the approval of Paul Elden Kingston, marrying Travis Ortell Kingston would never have crossed Blaklyn's mind.

337. A few months later, Blaklyn at age 16, was made a religious martyr and trafficked into a secret incestuous and underage Order marriage with Travis Ortell Kingston, who was born on August 30, 1993.

338. The Order wedding took place at 1880 West Parkway Boulevard, West Valley, Utah. Paul Elden Kingston allowed Jesse Orvil Kingston to read the words of the ceremony from an old piece of paper while he, Paul Elden Kingston, David Ortell Kingston, and others witnessed the secret ceremony.

339. At the time, Blaklyn did not realize that the actual purpose of her illicit marriage was to get her pregnant at 16 and make it extremely difficult for her to leave.

340. After the wedding, Travis Ortell Kingston initiated sexual relations with Blaklyn, which she did not want and could not consent to as a minor. Soon she was pregnant.

341. On May 19, 2021, at the age of 16, Blaklyn secretly gave birth to JJ in a home at 3280 West 3890 South, West Valley City, Utah.

342. Throughout Blaklyn's life, Paul Elden Kingston and other Order members had taught Blaklyn to have as many children as possible to build the Order.

343. In the weeks following JJ's birth, Order members, including Jesse Orvil Kingston, David Ortell Kingston, Sharlee Kingston, and Paul Elden Kingston, increasingly pressured Blaklyn to get pregnant again.

344. Pressure from Travis Ortell Kingston and the Order turned to harassment when Blaklyn had not become pregnant again soon after giving birth to JJ, so occasionally she allowed sexual relations under that pressure.

345. Usually, throughout the illegal marriage, however, Blaklyn refused and fought the sexual advances of Travis Ortell Kingston as he physically assaulted her and continued to force

himself on her.

346. Travis Ortell Kingston would not allow Blaklyn to sleep wearing her clothes and on numerous occasions she awoke in the night choking on Travis Ortell Kingston's penis, which he would force into her mouth to wake and rape her.

347. After the birth of JJ, Travis Ortell Kingston had become even more violent and continued to frequently rape Blaklyn, often threatening to harm JJ to force Blaklyn to comply with his sexual desires.

348. At this point, Blaklyn and some of her siblings started noticing bruising on JJ and hearing Travis Ortell Kingston call JJ by sexually inappropriate names.

349. After Blaklyn saw Travis Ortell Kingston use JJ as a sex toy, Blaklyn began looking for a way to flee the Order and in about February 2022, one of her brothers helped her and JJ get away for their protection.

350. Travis Ortell Kingston admitted on a recorded telephone call with Blaklyn's sister-in-law, Angela Lancaster, that he had used JJ for sexual purposes. Angela Lancaster has that recording.

351. Travis Ortell Kingston acting with intent, caused sexual contact with Blaklyn that was harmful and offensive, and caused Blaklyn to suffer injuries.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**NINETH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
CONSPIRACY TO COMMIT SEXUAL BATTERY AND ABUSE OF A CHILD**

352. Plaintiff LaDonna Ruth Lancaster ("Blaklyn"), incorporates herein the allegation contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, David Ortell Kingston, Jesse Orvil Kingston, Travis Ortell Kingston, and the

Order.

353. The Defendants named in this cause of action as part of the Order intentionally, knowingly or recklessly, solicited, instructed, commanded, encouraged and/or intentionally aided Travis Ortell Kingston to commit the sexual battery, abuse, and rape of Blaklyn.

354. These Defendants as part of the Order conspired and combined together for the purpose of causing Travis Ortell Kingston to commit the sexual battery, abuse, and rape of Blaklyn.

355. The object of the conspiracy was illegal and carried out as the result of a calculated plan between these Defendants as part of the Order.

356. These Defendants as part of the Order commanded and acted in concert with Travis Ortell Kingston in committing the sexual battery, abuse, and rape of Blaklyn.

357. There was a meeting of the minds among these Defendants as part of the Order regarding this object or course of action.

358. These Defendants as part of the Order committed one or more unlawful and overt acts in furtherance of their conspiracy.

359. Unlawful and overt acts were committed in Utah by these Defendants in furtherance of the Order.

360. The conduct of these Defendants constituted an unlawful conspiracy.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**TENTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
PHYSICAL BATTERY AND ABUSE OF A CHILD**

361. Plaintiff LaDonna Ruth Lancaster (“Blaklyn”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant

Travis Ortell Kingston.

362. On numerous occasions after Blaklyn's unlawful marriage, Travis Ortell Kingston physically assaulted her to force and complete unwanted sexual contact with her.

363. Travis Ortell Kingston, acting with intent, caused physical contact with Blaklyn that was harmful and offensive, and caused Blaklyn to suffer injuries.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**ELEVENTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

364. Plaintiff LaDonna Ruth Lancaster ("Blaklyn") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order.

365. In addition to being forced and coerced into an illegal marriage, Blaklyn was similarly forced and coerced to work for the Order as a young child and by the time she was middle school age was required to work fulltime at the Century Office for the Order Bank reporting to Susanne Kelly the manager of the Century Office. There, she worked with and under Travis Ortell Kingston.

366. Blaklyn primarily worked as a kind of teller receiving money from Order members, signing and processing checks, working on member statements, and performing other tasks.

367. While compelled to work at the Century Office, Blaklyn was trained to sign the signatures of Order members that were not physically present using signature stamps, and, under the direction of her supervisors, used a spread sheet which contained usernames, passwords, and answers to security questions to access legitimate bank accounts.

368. Blaklyn was next required to prepare food and meals at Premier Catering & Food Services, LLC where she reported to Jen Hardy.

369. At approximately 16, Blaklyn was required to work at John's Market Place, an Order owned and operated grocery store functioning as a DBA of the Davis County Cooperative Society, Inc.

370. Later that same year, when Blaklyn was a minor child and obviously pregnant, she was required to work at another Order Business Health First Family Medicine and Pediatrics, where she reported to Dr. Darren Jenkins.

371. On information and belief, neither of the Order doctors, Darren Jenkins and Joseph Kingston, nor any of their staff, reported the sexual abuse of Blaklyn as required by Utah Code section 62A-4a-402, which abuse was obvious from her pregnancy.

372. The Order members working at Health First Family Medicine and Pediatrics benefitted the Order by their failure to report the sexual abuse because Blaklyn's earnings went directly to the Order Bank.

373. Despite being forced and coerced into working for various Order Businesses during her childhood, Blaklyn never received a paycheck. She was repeatedly informed and assured that her earnings would go to the Order Bank and be available to her at the Order Bank, but those representations were largely false.

374. The Order claims that member earnings are tracked with their individual statements, and that their earnings are accounted for in these statements.

375. Earnings, however, are taken out of the statements of minors without lawful consent and those withdrawals are not accounted for on their statements.

376. In this manner, the Order and the parents of children make martyrs of the children

and unlawfully reap the benefit of the children's largely uncompensated labor.

377. To date, Blaklyn has not been fairly compensated for her labor at the Order Store House, Premier Catering & Food Services, LLC, the Order Bank, John's Market Place, nor Health First Family Medicine and Pediatrics.

378. The Defendants named in this cause of action directly benefited from trafficking Blaklyn for sexual and labor purposes.

379. Blaklyn was a trafficking victim of these Defendants because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

380. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**TWELFTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
NEGLIGENT SEXUAL BATTERY AND ABUSE OF A CHILD**

381. Plaintiff LaDonna Ruth Lancaster ("Blaklyn") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order.

382. The Defendants named in this cause of action negligently interjected themselves in

and furthered Blaklyn's unlawful marriage, Travis Ortell Kingston's efforts to impregnate Blaklyn, the continuation of the unlawful marriage, and the repeated rapes of Blaklyn.

383. These Defendants knew or should have known that their acts and omissions furthered Blaklyn's unlawful marriage, Travis Ortell Kingston's efforts to impregnate Blaklyn, the continuation of the unlawful marriage, and the repeated rapes of Blaklyn.

384. Through their conduct, these Defendants had and assumed duties not to negligently cause or further Blaklyn's sexual abuse and rapes.

385. These Defendants breached their duties to Blaklyn.

386. The negligent conduct of these Defendants caused sexual abuse and rapes that was harmful and offensive to Blaklyn and caused her to suffer injuries.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**THIRTEENTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER FOR
INFLECTION OF EMOTIONAL DISTRESS**

387. Plaintiff LaDonna Ruth Lancaster ("Blaklyn") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order.

388. The conduct of the Defendants named in this cause of action was outrageous and intolerable in that it offended society's generally accepted standards of decency and morality.

389. These Defendants intentionally and negligently caused or acted in reckless disregard of the likelihood of causing Blaklyn severe emotional distress.

390. As a proximate result of the conduct of these Defendants, Blaklyn suffered severe emotional distress.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster prays for relief as set forth below.

**FOURTEENTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER
AS MOTHER AND NATURAL GUARDIAN OF JJ, A MINOR, FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

391. Plaintiff LaDonna Ruth Lancaster (“Blaklyn”) as mother and natural guardian of JJ, a minor, incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Travis Ortell Kingston.

392. JJ became part of the Order when her 16-year-old mother, Blaklyn, secretly gave birth to her on May 19, 2021, in a home located at 3280 West 3890 South., West Valley City, Utah.

393. In or about the fall of 2021, Travis Ortell Kingston began sexually assaulting JJ.

394. During this time, Blaklyn walked into a room and witnessed Travis Ortell Kingston sexually abusing and attempting to rape JJ.

395. Travis Ortell Kingston was naked from the waist down and was “humping” JJ when Blaklyn entered the room.

396. Travis Ortell Kingston’s penis was fully erect, and his semen was visible on JJ.

397. This was the first time Blaklyn knew that Travis Ortell Kingston was sexually abusing JJ, but in retrospect and on information and believe, it had probably happened before.

398. The bruising found on JJ following this incident was consistent with the bruising on JJ that Blaklyn had seen in the recent past and Travis Ortell Kingston had been calling JJ by sexually inappropriate names.

399. JJ’s father, Travis Ortell Kingston, was born on or about August 30, 1993, but is not listed on JJ’s birth certificate.

400. Although it is a common and intentional practice in the Order for fathers not to be listed on their children’s birth certificates to create confusion, avoid criminal prosecution for

fathering children in underage, plural or incestuous marriages, in this instance JJ's father, Travis Ortell Kingston, has fallen on his own sword.

401. Despite the illegality of Blaklyn's Order marriage and the illegal sexual conduct that produced JJ, Travis Ortell Kingston initiated a paternity action to establish his paternity of JJ in the Fourth Judicial District Court, Utah County, State of Utah, Case Number 224400994.

402. He did so in a conscious effort to protect the Numbered Men—Jesse Orvil Kingston, David Ortell Kingston, and Paul Elden Kingston—who had directed and conspired with him to illegally marry and impregnate his 16-year-old first cousin.

403. Travis Ortell Kingston has also admitted to Blaklyn and close family members that he sexually abused JJ. One such family member is Angela Lancaster, an aunt of JJ, whose Order job is running an in-home day care for minor children, license number 47674.

404. Angela Lancaster has acknowledged making a recording of Travis Ortell Kingston talking about sexually abusing JJ.

405. Travis Ortell Kingston, acting with intent, caused sexual contact with JJ that was harmful and offensive, and caused JJ to suffer injuries.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster ("Blaklyn") as mother and natural guardian of JJ, a minor, prays for relief as set forth below.

**FIFTHTEENTH CAUSE OF ACTION BY LADONNA RUTH LANCASTER
AS MOTHER AND NATURAL GUARDIAN OF JJ, A MINOR, FOR
NEGLIGENT SEXUAL BATTERY AND ABUSE OF A CHILD**

406. Plaintiff LaDonna Ruth Lancaster ("Blaklyn") as mother and natural guardian of JJ, a minor, incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Travis Ortell Kingston.

407. Travis Ortell Kingston negligently sexually abused JJ.

408. Travis Ortell Kingston knew or should have known that his acts and omissions furthered JJ's sexual abuse.

409. Through his conduct, Travis Ortell Kingston had and assumed duties not to negligently cause JJ's sexual abuse.

410. Travis Ortell Kingston breached his duties to JJ.

411. The negligent conduct of Travis Ortell Kingston caused sexual abuse that was harmful and offensive to JJ and caused her to suffer injuries.

WHEREFORE, Plaintiff LaDonna Ruth Lancaster ("Blaklyn") as mother and natural guardian of JJ, a minor, prays for relief as set forth below.

**SIXTEENTH CAUSE OF ACTION BY JANA NICOLE JOHNSON FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

412. Plaintiff Jana Nicole Johnson ("Jana") incorporates herein the allegation contained in the other paragraphs of this Complaint and alleges as follows against Defendant Daniel Ortell Kingston.

413. Jana became part of the Order when her mother secretly gave birth to her on January 9, 2003 in a home located at 1415 West Parliament Avenue, West Valley City, Utah.

414. Jana's father, Kent William Johnson, born on August 18, 1962, is one of the sons of John Ortell Kingston, a half-brother of the Seven Kingston Brothers, and a Numbered Man, assigned number 26.

415. Jana's mother is Nataleen Johnson, born on October 14, 1962, becoming the first wife of Kent William Johnson's 5 polygamous wives.

416. Nataleen Johnson gave birth to 13 children, all of whom were fathered by Kent William Johnson.

417. Kent William Johnson has fathered at least 52 children with his wives.
418. Jana was subjected to the Order's common and intentional practice of teaching girls that marrying and bearing children with their husband is required and their responsibility.
419. Like virtually all Order children of her age, Jana attended Order owned and operated schools--Ensign Learning Center and Vanguard Academy.
420. Jana's uncle, Paul Elden Kingston, and his first wife, Patricia Kingston, are the parents of Daniel Ortell Kingston, who was born on or about October 25, 2001.
421. Jana and Daniel Ortell Kingston are related, including as first cousins by blood.
422. Kent William Johnson and his half-brother, Paul Elden Kingston, intended and arranged for Jana to eventually marry her cousin Daniel Ortell Kingston.
423. This grooming began when Jana and Daniel Ortell Kingston were in elementary school at Ensign Learning Center.
424. As Jana grew up, she was required to spend time and play with Daniel Ortell Kingston and was repeatedly told that Daniel Ortell Kingston would be a good husband.
425. All of Jana's older sisters had married Daniel Ortell Kingston's older brothers to preserve the Pure Kingston Blood. Two of Jana's sisters are currently married to the same man.
426. Jana was also pressured to meet the expectations of a girl of royal blood and maintain her family's worthy status in the Order by marrying a Kingston.
427. Jana was instructed that she needed to be married by the age of 16 if she wanted the honor and privilege of holding the title of "first wife."
428. While the pressure to be married by the Order was mounting, Jana was also required to go to work for the Order. Jana knew that refusing to work for the Order, like refusing to submit to an arranged Order marriage would result in sever punishment.

429. One of Jana's first Order jobs was at the Order Office which is also sometimes known interchangeably as or referred to in conjunction with the Order Bank, and the Century Office.

430. At the Order Office, Jana was required to work part time and was responsible for totaling checks and reporting to Deborah Williams.

431. A few months later, Jana was required to work at an Order Business called "Fidelity Lending," where her responsibilities included monitoring outstanding loans and collecting loan payments under the direct supervision of Cehryl Miller.

432. Jana was next required to work part time at two Order Business, Arrow Real Estate and Property Compliance, which were in the same building, where she prepared selling packets, assisted in the sale of houses, and reported directly reported to Leah Kendall.

433. A few months later and while still a minor, Jana was required to work fulltime at Standard Restaurant Supply, which is also an Order owned and controlled business. Her responsibilities at Standard Restaurant Supply were primarily marketing.

434. At the age of 15, it was decided that Jana needed to be married and she was told to seek direction to be engaged to Daniel Ortell Kingston.

435. As the leader of the Order, Paul Elden Kingston conducted an engagement meeting during which he, Patricia Kingston, Daniel Ortell Kingston, Kent William Johnson, Nataleen Johnson, 15-year-old Jana, and others were present.

436. During the meeting, Paul Elden Kingston determined and declared that Jana and Daniel Ortell Kingston were engaged and would be wed, thus, unlawfully trafficking her into an unlawful, unwanted marriage and unwanted sexual relations.

437. At the time of the engagement, Jana was 15, and her first cousin, Daniel Ortell

Kingston, was an adult.

438. Accordingly, on or about March 9, 2019, Daniel Ortell Kingston and Jana were secretly and unlawfully married at the Order's recreation center triggering Daniel Ortell Kingston's unwanted sexual relations with Jana.

439. During the marriage Paul Elden Kingston gave a speech and Patricia Kingston performed and also spoke.

440. Kent William Johnson officiated at the ceremony by reading from an old piece of paper provided to him by Paul Elden Kingston.

441. Kent William Johnson would not have officiated at the illegal marriage without the approval of Paul Elden Kingston who stood by and then reclaimed the old paper after it was read.

442. Jana did not want to marry Daniel Ortell Kingston, and, as a minor, she could not consent to marrying him even if he were not her first cousin by blood, which made the marriage void.

443. It is a common and intentional practice in the Order to require girls and women to submit sexually to their husbands even if the sexual submission is against their will because having children results in workers for the benefit of the Order.

444. It is also a common and intentional practice in the Order for girls to be impregnated and have children when they are young so they cannot leave, which also benefits the Order.

445. Accordingly, after the wedding, Daniel Ortell Kingston began to initiate sexual relations with Jana.

446. Jana did not want to have sex or any other sexual relations with Daniel Ortell Kingston, and, as a minor in a void marriage, could not consent to sexual relations with him.

447. Jana continuously tried to make excuses, avoid, and distract Daniel Ortell Kingston

so that he would understand by her actions and words that she did not want to have sexual intercourse with him nor engage in any other sexual conduct.

448. For his part, Daniel Ortell Kingston expected her to be a submissive and obedient wife and repeatedly initiated sexual relations despite Jana's repetitive refusals.

449. Frustrated by her usually successful avoidance and refusals, Daniel Ortell Kingston told members of the Order that Jana was not being an obedient wife and was attempting to deny him children.

450. Daniel Ortell Kingston correctly and frequently informed Jana that the Order did not approve of her disobedience and threatened to continue telling leaders and members of the Order if Jana refused to consent to sex.

451. The Order's disapproval of Jana's sexual disobedience placed her in a hopeless position and on several occasions during their illegal marriage, Daniel Ortell Kingston sexually abused or raped her.

452. On one such occasion, Daniel Ortell Kingston took Jana to Hawaii and informed her that she was obligated to have sex with him.

453. Jana was menstruating and did not want to have sex with him, so she used that as an excuse, voiced her objection, and tried to avoid his sexual advances, but he ignored her objections and raped her anyway.

454. On other occasions, Jana refused Daniel Ortell Kingston's sexual advances, but he sexually assaulted her against her will and objections.

455. Daniel Ortell Kingston admitted to Paul Kingston, Patricia Kingston, Kent William Johnson, and other members of the Order that he was insisting on having sex with Jana and asked for advice on how to pressure her more successfully.

456. In addition to raping Jana, Daniel Ortell Kingston frequently forced her to watch pornography with him and listen to his detailed sex fantasies.

457. Approximately one year into the illegal marriage, Jana was directed to attend counseling sessions with Paul Elden Kingston to help her correct her shortcomings within the marriage.

458. Jana was told that these meetings were necessary because she had failed to become pregnant and was refusing to satisfy Daniel Ortell Kingston sexually.

459. In addition to these sessions, Jana's electronic communications were monitored, her whereabouts tracked, and she was regularly escorted anytime she left her home.

460. In these sessions, Paul Elden Kingston required her to detail the sexual encounters and conduct she experienced, asked her various questions about why she was denying and attempting to avoid sex with his son, and, at one point late in the marriage, confronted her about taking birth control which was considered sinful.

461. Jana informed Paul Elden Kingston that she did not want to be in a marriage to Daniel Ortell Kingston, but he told her that she was the problem in her marriage and instructed her to repent and make amends to Daniel Ortell Kingston.

462. Paul Elden Kingston informed her that it was her duty to repair her marriage, saying this could only be achieved by conceiving a child.

463. During her void and illegal marriage, Jana lived in a state of fear and these sessions left her feeling violated and dirty.

464. Without Paul Elden Kingston's direction to marry his son, Jana would never have had to marry Daniel Ortell Kingston, and without Paul Elden Kingston's approval she could not end the marriage.

465. Jana felt relieved when Daniel Ortwill Kingston illegally married additional wives because it reduced the frequency of his sexual advances toward her.

466. Jana was the first of three plural wives, and, upon information and belief, Daniel Ortell Kingston's subsequent wives were a first cousin and a niece, and his third wife was also a minor when they were illegally married to him.

467. While Daniel Ortell Kingston's attention was diverted from Jana, she was able to befriend some people outside the Order and obtain a prescription for birth control.

468. Jana began taking the birth control in hopes that she would not conceive a child and be locked into the Order and illegal marriage.

469. Daniel Ortell Kingston, who regularly searched Jana's belongings, found Jana's birth control, and flew into a rage.

470. Daniel Ortell Kingston called Jana's father, Kent William Johnson, and informed him that Jana was taking birth control. They then arranged for Jana to be taken to an Order Business, American Digital Systems, where she was held against her will.

471. Jana was forced to sleep on the floor of the office building without access to any of her personal belongings. She was only permitted to leave the room for bathroom breaks.

472. During this confinement, Daniel Ortell Kingston, along with others, went through Jana's phone and forced her to send messages to the individuals she had befriended outside of the Order to inform them that she no longer wanted their friendship and that they could not contact her further. She was then forced to block their calls and texts.

473. Jana's sessions with Paul Elden Kingston had continued, and, due to her birth control disobedience, she was now not even allowed to leave the office until she agreed to begin a repentance process with him.

474. Once she was coerced into this process and allowed to leave the office, Jana was heavily supervised and not allowed to go anywhere alone.

475. Further, Jana felt betrayed after these sessions when she became aware that Paul Elden Kingston did not keep the sessions private.

476. Paul Elden Kingston shared details from the sessions with various members of the Order shaming, pressuring, and further trafficking Jana into the role of a submissive and sexually obedient “wife” and producer of children for the Order.

477. Although Paul Elden Kingston shared details from his sessions with Jana, he failed to report the sexual assaults and rapes to law enforcement.

478. Paul Elden Kingston, Patricia Kingston, and others also gave Jana sex toys and unsolicited sex advice to influence, pressure, and remind her of her responsibility to be a dutiful wife and produce children for the Order.

479. Having had enough, Jana explicitly informed Daniel Ortell Kingston that she had no desire to be married to him, that she did not want to have his children until she loved him, which she did not, and again emphasized stated that she did not want or like having sex with him.

480. As she fled the Order and her illegal marriage, Daniel Ortell Kingston, who had recorded some of their conversations sent recordings to various members of the Order.

481. Daniel Ortell Kingston, acting with intent, caused sexual contact with Jana that was harmful and offensive, and caused Jana to suffer injuries.

WHEREFORE, Plaintiff Jana Nicole Johnson prays for relief as set forth below.

**SEVENTEENTH CAUSE OF ACTION BY JANA NICOLE JOHNSON FOR
CONSPIRACY TO COMMIT BATTERY AND SEXUAL ABUSE OF A CHILD**

482. Plaintiff Jana Nicole Johnson (“Jana”) incorporates herein the allegation contained

in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order.

483. The Defendants named in this cause of action as part of the Order intentionally, knowingly, or recklessly, solicited, instructed, commanded, encouraged and/or intentionally aided Daniel Ortell Kingston to commit the sexual battery, abuse, and rape of Jana.

484. These Defendants as part of the Order conspired and combined together for the purpose of causing Daniel Ortell Kingston to commit the sexual battery, abuse, and rape of Jana.

485. The object of the conspiracy was illegal and carried out as the result of a calculated plan between these Defendants as part of the Order.

486. These Defendants as part of the Order commanded and acted in concert with Daniel Ortell Kingston in committing the sexual battery, abuse, and rape of the child Jana.

487. There was a meeting of the minds among these Defendants as part of the Order regarding this object or course of action.

488. These Defendants as part of the Order committed one or more unlawful and overt acts in furtherance of their conspiracy.

489. Unlawful and overt acts were committed in Utah by these Defendants in furtherance of the Order.

490. The conduct of these Defendants constituted an unlawful conspiracy.

WHEREFORE, Plaintiff Jana Nicole Johnson prays for relief as set forth below.

**EIGHTEENTH CAUSE OF ACTION BY JANA NICOLE JOHNSON FOR
NEGLIGENT SEXUAL BATTERY AND ABUSE OF A CHILD**

491. Plaintiff Jana Nicole Johnson (“Jana”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden

Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order.

492. The Defendants named in this cause of action negligently interjected themselves in and furthered Jana's unlawful marriage, Daniel Ortell Kingston's efforts to impregnate Jana, the continuation of the unlawful marriage, and the repeated sexual abuse and rape of Jana.

493. These Defendants knew or should have known that their acts and omissions furthered Jana's unlawful marriage, Daniel Ortell Kingston's efforts to impregnate Jana, the continuation of the unlawful marriage, and the repeated sexual abuse and rape of Jana.

494. Through their conduct, these Defendants had and assumed duties not to negligently cause or further Jana's sexual abuse and rape.

495. These Defendants breached their duties to Jana.

496. The negligent conduct of these Defendants caused sexual abuse and rape that was harmful and offensive to Jana and caused her to suffer injuries.

WHEREFORE, Plaintiff Jana Nicole Johnson prays for relief as set forth below.

**NINETEENTH CAUSE OF ACTION BY JANA NICOLE JOHNSON FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

497. Plaintiff Jana Nicole Johnson ("Jana") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order.

498. In addition to being trafficked into an illegal and void marriage for sexual purposes, Jana was forced and coerced to begin working for the Order at approximately age 15.

499. Jana's supervisors at the Order Bank, Century Office, Fidelity Lending, Arrow Real Estate and Property Compliance benefitted themselves and the Order by obtaining her labor for the Order and by sending her earnings directly to the Order Bank.

500. Despite being forced and coerced to work for various Order Businesses, Jana never received a paycheck, instead, she was promised that she would be able to access her wages at the Order Bank.

501. The Order claims that member earnings are tracked with their individual statements, and that their earnings are accounted for in these statements.

502. Earnings, however, are taken out of the statements of minors without lawful consent and those withdrawals are not accounted for on their statements.

503. In this manner, the Order makes children martyrs and unlawfully reaps the benefit of the children's largely uncompensated labor.

504. Jana was not permitted to access or spend her money freely. To use any of her money at a business outside the Order, Jana needed to get permission.

505. Despite working for years as a minor, Jana's statement never showed more than \$2,000 in earnings.

506. To date, Jana has not been fairly compensated for her labor at any of the Order Business where she was required to work.

507. The Defendants named in this cause of action directly benefited from trafficking Jana for sexual and labor purposes.

508. Jana was a trafficking victim of these Defendants because they committed some or all of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or

(e) benefitting from human trafficking under Section 76-5-309.

509. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Jana Nicole Johnson prays for relief as set forth below.

**TWENTIETH CAUSE OF ACTION BY JANA NICOLE JOHNSON FOR
INFLECTION OF EMOTIONAL DISTRESS**

510. Plaintiff Jana Nicole Johnson (“Jana”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order.

511. The conduct of the Defendants named in this cause of action was outrageous and intolerable in that it offended society’s generally accepted standards of decency and morality.

512. These Defendants intentionally and negligently caused or acted in reckless disregard of the likelihood of causing, Jana severe emotional distress.

513. As a proximate result of the conduct of these Defendants Jana suffered severe emotional distress.

WHEREFORE, Plaintiff Jana Nicole Johnson prays for relief as set forth below.

**TWENTY-FIRST CAUSE OF ACTION BY JULIE RUTH NICHOLS FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

514. Plaintiff, Julie Ruth Nichols (“Julie”), incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Elden Paul Kingston.

515. Julie became part of the Order when her mother, Martha Nichols, secretly gave birth to her on December 6, 1998 in a home located on Wilson Avenue in Salt Lake City, Utah.

516. Julie’s father, Jason Ortell Kingston, born in or about August 22, 1974, is one of

the Seven Kingston Brothers and a Numbered Man, assigned number 49.

517. Jason Ortell Kingston is not listed on Julie's birth certificate because in the Order it is typical for fathers not to be listed on their children's birth certificates to create confusion, avoid criminal prosecution for fathering children in underage, plural or incestuous marriages, and/or for illicit labor and tax reasons.

518. Julie's mother, Martha Nichols, is Jason Kingston's fourth wife.

519. Jason Ortell Kingston has 11 plural wives and nearly 100 children.

520. The Order requires obedience through The Law of One Above Another, meaning, in Julie's case that she was under her mother, who was under her father, who was under her grandfather, Paul Elden Kingston.

521. As a female child growing up in the Order, Julie attended Order schools and Order classes to learn what was required of her, including the Order's expectation that she would marry her Number One Choice.

522. At age 12, Julie first learned that her Number One Choice and future husband had been identified but she was not told who he was; instead, at 12, she was shown who he was at her grandmother's home in a way that made it clear to her who she would marry.

523. As part of the manipulation, she was later told that she had already picked her Number One Choice before she was born on earth, so the choice had actually been hers, but she has no recollection of doing that.

524. Julie learned that her Number One Choice was her full blood uncle, Elden Paul Kingston, who is the son of Paul Elden Kingston, some 10 years older, and a man with other wives.

525. All of Julies full sisters had been married unlawfully and incestuously in the Order to other sons of Paul Elden Kingston and Patricia Kingston to preserve the Pure Kingston Blood.

526. On information and belief, this has resulted in babies with birth defects.

527. It is a common and intentional practice in the Order for illegal marriages to be directed and arranged by Order members, subject to approval by Paul Elden Kingston.

528. That practice was followed in Julie's case in approximately June 2016, when she met with Paul Elden Kingston, his son, Elden Paul Kingston, and other close family members in Paul Elden Kingston's home for an engagement meeting at which Paul Elden Kingston authorized the illegal union which would make Julie the fifth and incestuous wife of Elden Paul Kingston.

529. Accordingly, on December 15, 2016, Julie was trafficked into an Order marriage to Elden Paul Kingston, which took place on the Order's property known as John's Market Place.

530. Under Utah law, the marriage was illegal and void.

531. Growing up, Julie was taught the Order's requirement for girls and women to submit sexually to the will of their husbands to have children for the Order.

532. Despite this, on most occasions when sexual relations occurred between Julie and Elden Paul Kingston, she communicated that she did not want to have sexual intercourse with him, and, on several of these occasions, he ignored her lack of consent and forcibly raped her.

533. In or about October 2017, Julie was thinking of leaving the Order and believed she was being tracked by the Order, so she started to stay away from Elden Paul Kingston.

534. At about this time, she met with Paul Elden Kingston and asked for a divorce or "unsealing" from her husband, but her request was refused.

535. Julie would not have been married without Paul Elden Kingston's approval and she could not get out of it without his approval.

536. To prevent Julie from leaving the marriage, she was taken by her grandmother, Patricia Kingston, to Pennsylvania under the guise of going to the beach in California.

537. Once there, Patty Kingston told Julie she had to stay in Pennsylvania in an Order member's home and her phone was disabled so she could not access the internet, make calls, or send texts.

538. Julie was kept against her will in Pennsylvania in a failed effort to get her to stay in her void Order marriage in which she would have been subjected to Elden Paul Kingston's ongoing sexual advances and rapes.

539. By this time, she had already become pregnant once, had a miscarriage, and had been accused of killing the baby. She was desperate to get out.

540. As a child, Julie had been forced and coerced into working for Order Business, starting at age 12 or 13. The requirement that she work for the Order or be punished continued until she finally was able to flee.

541. First, she worked in her mother's basement filing the annual 10% Forms required from all Order members.

542. Julie was next required to work at the Order Office where she stuffed member statements into envelopes, stamped checks with Order members' signatures so the Order could take money from Order members' statements/accounts, and physically forged members' signatures on checks.

543. At the Order Bank, Julie reported to various order members, including her father, who trained and oversaw her work under the ultimate direction of Paul Elden Kingston.

544. Julie also worked for other Order Businesses, including Garco, a business run by Order members that purchased cars at auctions, and at an Order daycare, located in the Vanguard school building, where her supervisor was Collene Miller

545. When Julie worked for Order Business her paychecks always went directly to the

Order Bank and any withdrawals from her Order account had to be approved by either her mother or Elden Paul Kingston.

546. As both a minor and an adult, Julie's money was systematically taken out of her Order account by the Order without her consent. Much of the money that she was able to withdraw went back to Order business for such things as her living expenses, car, and her unwanted wedding.

547. In the Order young girls are impregnated so they cannot leave. This is one of the main reasons Julie wanted to get out of her void marriage, and another reason was that she did not want babies with birth defects.

548. After she was able to leave the Order member's home in Pennsylvania and get to an airport, she flew back to Utah, and was finally able to flee the Order.

549. To date, Julie has not gone back to the Order Bank to recover the rest of the money she earned working for Order Businesses.

**TWENTY-SECOND CAUSE OF ACTION BY JULIE RUTH NICHOLS FOR
CONSPIRACY TO COMMIT SEXUAL BATTERY AND ABUSE OF A CHILD**

550. Plaintiff Julie Ruth Nichols ("Julie") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order.

551. The Defendants named in this cause of action as part of the Order intentionally, knowingly or recklessly, solicited, instructed, commanded, encouraged and/or intentionally aided Elden Paul Kingston to commit the sexual battery, abuse, and rape of Julie.

552. These Defendants as part of the Order conspired and combined together for the purpose of causing Elden Paul Kingston to commit the sexual battery, abuse, and rape of Julie.

553. The object of the conspiracy was illegal and carried out as the result of a calculated

plan between these Defendants as part of the Order.

554. These Defendants as part of the Order commanded and acted in concert with Elden Paul Kingston in committing the sexual battery, abuse, and rape of Julie.

555. There was a meeting of the minds among these Defendants as part of the Order regarding this object or course of action.

556. These Defendants as part of the Order committed one or more unlawful and overt acts in furtherance of their conspiracy.

557. Unlawful and overt acts were committed in Utah by these Defendants in furtherance of the Order.

558. The conduct of these Defendants constituted an unlawful conspiracy.

WHEREFORE, Plaintiff Julie Ruth Nichols prays for relief as set forth below.

**TWENTY-THIRD CAUSE OF ACTION BY JULIE RUTH NICHOLS FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

559. Plaintiff Julie Ruth Nichols (“Julie”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order.

560. In addition to being trafficked into marriage for sexual purposes by the Ones Above her, Julie was similarly forced and coerced to begin working for the Order at age 12 or 13.

561. Julie’s supervisors at the Order Business where she was required to work benefitted themselves and the Order by obtaining her labor for the Order and by sending her earnings directly to the Order Bank.

562. Despite being forced and coerced to work for various Order Businesses, Julie never received a paycheck, instead, she was promised that she would be able to access her wages at the

Order Bank.

563. When Julie worked for Order Business, however, any withdrawals from her Order statement or account had to be approved by her parents.

564. The Order claims that member earnings are tracked with their individual statements, and that their earnings are accounted for in these statements.

565. Earnings, however, are taken out of the statements of minors without lawful consent and those withdrawals are not accounted for on their statements.

566. In this manner, the Order and the parents of children make martyrs of the children and unlawfully reap the benefit of the children's largely uncompensated labor.

567. Despite working for years as a minor, Julie's statement never showed her total earnings because her money was systematically taken by the Order.

568. Julie has not been fairly compensated for her labor at any of the Order Business where she was required to work.

569. The Defendants named in this cause of action directly benefited from trafficking Julie for sexual and labor purposes.

570. Julie was a trafficking victim of these Defendants because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

571. The conduct of the Defendants named in this cause of action was willful and

malicious.

WHEREFORE, Plaintiff, Julie Ruth Nichols, prays for relief as set forth below.

**TWENTY-FOURTH CAUSE OF ACTION BY JULIE RUTH NICHOLS FOR
INFLICTION OF EMOTIONAL DISTRESS**

572. Plaintiff Julie Ruth Nichols (“Julie”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order.

573. The conduct of the Defendants named in this cause of action was outrageous and intolerable in that it offended society’s generally accepted standards of decency and morality.

574. These Defendants intentionally and negligently caused or acted in reckless disregard of the likelihood of causing, Julie severe emotional distress.

575. As a proximate result of the conduct of these Defendants Julie suffered severe emotional distress.

WHEREFORE, Plaintiff, Julie Ruth Nichols, prays for relief as set forth below.

**TWENTY-FIFTH CAUSE OF ACTION BY JULIE RUTH NICHOLS FOR
NEGLIGENT SEXUAL BATTERY AND ABUSE**

576. Plaintiff Julie Ruth Nichols (“Julie”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order.

577. The Defendants named in this cause of action negligently interjected themselves in and furthered Julie’s unlawful marriage, Elden Paul Kingston’s efforts to impregnate Julie, the continuation of the unlawful marriage, and the repeated sexual abuse and rape of Julie.

578. These Defendants knew or should have known that their acts and omissions furthered Julie’s unlawful marriage, Elden Paul Kingston’s efforts to impregnate Julie, the

continuation of the unlawful marriage, and the repeated sexual abuse and rape of Julie.

579. Through their conduct, these Defendants had and assumed duties not to negligently cause or further Julie's sexual abuse and rape.

580. These Defendants breached their duties to Julie.

581. The negligent conduct of these Defendants caused sexual abuse and rape that was harmful and offensive to Julie and caused her to suffer injuries.

WHEREFORE, Plaintiff, Julie Ruth Nichols, prays for relief as set forth below.

**TWENTY-SIXTH CAUSE OF ACTION BY MELISSA RUTH HANSEN FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

582. Plaintiff Melissa Ruth Hansen ("Melissa") incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendant Mark Reynolds.

583. Melissa became part of the Order when she was born on December 13, 1984 to Suzanne Mary Hansen and Francis Mark Hansen ("Melissa's parents") at a home in Bountiful, Utah.

584. Francis Mark Hansen is a numbered man in the Order and assigned number 76.

585. As a young child in the Order, Melissa was taught that her sole purpose in life was to marry young, be a good wife, bear children, and, through obedience, secure her place in the Order.

586. She saw examples of this all around her, including her older sister who was considered a problem child and allowed to marry at age 14 to a man more than twice her age with the approval and encouragement of Paul Elden Kingston and John Daniel Kingston, Sr. who were at the wedding.

587. Although Melissa knew that having children with her assigned husband was her most important responsibility because having children was necessary to increase the Order and supply workers, as a young girl she did not appreciate the purposes of the Order's illicit enterprise.

588. In furtherance of the Order's enterprise, at 16, Melissa was betrothed to 32-year-old Andrew Gustafson, and, later, Paul Elden Kingston approved the engagement and attempted to traffic her into an unwanted marriage and unwanted sexual relations.

589. Without the direction and approval of Paul Elden Kingston, Melissa and Andrew Gustafson would never have been engaged to marry.

590. With the approval of Paul Elden Kingston, Andrew Gustafson was also engaged to another girl at the same time.

591. Melissa did not want to be in a polygamous marriage and was not allowed to stop it, so she went to her mother, Suzanne Mary Hansen Hansen, who, remarkably and at some risk to herself, helped end Melissa's engagement to Andrew Gustafson.

592. As a result of her defiance, however, Melissa was considered a troubled child and seen as sinful in the Order. Later, her mother, who had resisted Melissa's marriage, left the Order.

593. The scorn and pressure Melissa was under for defying Paul Elden Kingston and not marrying as directed, caused her to become depressed and feel isolated.

594. At 17, Melissa ran away from home only to be found by her family and brought back into the Order.

595. Once home, Melissa lost all freedom. She was not allowed to leave the house, attend school, attend church, or go anywhere without being accompanied and supervised by an Order member. She was not even allowed to go to the Order job she had been forced and coerced to work.

596. To earn some of her freedom back, Melissa was told she would need to get married.

Specifically, she was told she had to marry one of three men on a list given to her, and that she could not refuse.

597. Of the three names on the list, only one man, Mark Reynolds, was not already married.

598. Out of fear, conditioning, coercion, and a desire for a taste of freedom, Melissa was coerced and trafficked into marrying the only man not currently married, Mark Reynolds, for the purposes of having children to increase and work for the Order.

599. Paul Elden Kingston convened an engagement meeting at the Order's Standard Restaurant Supply building at which he approved Melissa's marriage to Mark Reynolds and had them pick a date for the wedding.

600. Melissa did not want to marry Mark Reynolds, but on April 29, 2003, and six weeks after the engagement meeting, she was required to marry him.

601. Melissa and Mark Reynolds would never have been engaged or married without the approval and direction of Paul Elden Kingston.

602. Paul Elden Kingston attended the wedding, entrusted Bill Stoddard, a Numbered Man in the Order with an old well-used piece of paper from which he read the Order's marriage ceremony and observed as Bill Stoddard officiated the ceremony.

603. After the wedding, Mark Reynolds initiated sexual relations with Melissa, who was expected to obediently comply to bear as many children as possible in the Order.

604. Throughout their 10-year marriage, Melissa frequently told Mark Reynolds that she did not want to have sex with him, but despite her objections, Mark Reynolds raped her.

605. During the marriage, Melissa gave birth to four children all of whom she deeply loves and wanted her whole life but were nevertheless also all a result of Mark Reynold's rapes

and the product of trafficking.

606. Despite having four children, Mark Reynolds was not satisfied and continued to rape Melissa, becoming increasingly violent.

607. On September 8, 2012, while their four children slept in the same room, Mark Reynolds violently raped Melissa for the last time resulting in Melissa's body being badly bruised.

608. After this incident, Mark Reynolds admitted to Melissa's parents that he had raped her and Melissa's father, an attorney, wrote a letter to Melissa confirming that she had, indeed been raped. Melissa's mother wrote a similar letter.

609. Melissa fled the Order after this rape and reported it to the Salt Lake City Police Department resulting in report no. 2012-164206.

610. Before leaving the Order, Melissa had been required and coerced into working for several Order Businesses.

611. At the age of 13, she was forced to start working for Family Stores True Value on Redwood Road, where she did various things, including stocking and clerking.

612. At age 15, Melissa was required to work at Standard Restaurant and Supply where she was trained to do accounting, but after she had run away, she was reassigned to again work at Family Stores True Value.

613. Next, Mellissa was required to work at A-1 Disposal and then another Order Business in the A-1 Disposal building known as AAA Communications.

614. At these businesses she took phone calls, dispatched drivers, did accounting work, watched alarms at night, and reported to her boss, John Daniel Kingston, Sr., who at about this time was on work release from prison.

615. While working at A-1 Disposal, Melissa also handled telephone calls from David

Ortell Kingston, who was in prison for incest, and forwarded his calls to whichever wife he wanted to speak to.

616. After her marriage, Melissa was required to go to work at the Kingston coal mine, where she did accounting and human resources work before ending up in the engineering department. In the engineering department, Melissa drafted blueprints for the mine.

617. For a time, she also worked for Washakie Renewable Energy preparing blueprints for a housing development planned at Washakie, and, in the course of that Order job, attended meetings where the fraud perpetrated against the federal government was discussed.

618. Melissa never received a paycheck, instead all of her earnings were sent directly to the Order Bank, which restricted her access to her money.

619. When Melissa left the Order she had nearly \$5,000 in her Order Bank account which she was not allowed to take. The Order claimed her funds were a donation, but she did not intend her earnings to be a donation.

WHEREFORE, Plaintiff, Melissa Ruth Hansen, prays for relief as set forth below.

**TWENTY-SEVENTH CAUSE OF ACTION BY MELISSA RUTH HANSEN FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

620. Plaintiff Melissa Ruth Hansen (“Melissa”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Mark Reynolds, Paul Elden Kingston, John Daniel Kingston, Sr., and the Order.

621. Not only was Melissa forced and coerced into an Order marriage, she was also coerced and forced into Order jobs, which she was required to work until she was able to flee the Order and go to the police.

622. At the age of 13, she was forced to start working for the Order and understood that

she had not choice, Her punishment would have been severe if she had refused.

623. She was also coerced with the promise of earning money for her future, but she never received a paycheck, instead all of her earnings were sent directly to the Order Bank, and when she left the Order, she lost her earnings.

624. The Defendants named in this cause of action benefited from trafficking Melissa for sexual and labor purposes.

625. To date, Melissa has not been fairly compensated for her labor at any of the Order Business where she was required to work.

626. Melissa was a trafficking victim of these because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

627. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Melissa Ruth Hansen prays for relief as set forth below.

**TWENTY-EIGHTH CAUSE OF ACTION BY MICHELLE MICHAELS FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

628. Plaintiff Michelle Ruth Michaels (“Michelle”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Jesse Orvil Kingston, Michele Afton Michaels, Debra Williams, Jolene Andrews, Joshua Paul

Kingston, Rachael Orlean Young, Paul Elden Kingston, and the Order.

629. Michelle became part of the Order when her mother secretly gave birth to her on May 2, 2000 in her mother's home located in South Salt Lake, not at her grandmother's home as stated on her Utah Birth Certificate.

630. Michelle's mother, Michelle Afton Michaels (also known as Michelle Afton Brown), was born on or about November 18, 1974.

631. Michelle's father, Jesse Orvil Kingston, was born on or about July 17, 1967. He is not listed on Michelle's birth certificate.

632. It is a common practice in the Order to not list fathers on their children's birth certificates to intentionally cause confusion, avoid criminal prosecution for fathering children in underage, plural, or incestuous marriages, and/or for illicit tax reasons.

633. In Michelle's case, a fictitious father, Steven James Michaels, with a fictitious birth date were listed on her Utah Birth Certificate.

634. Jesse Orvil Kingston is the son of John Ortell Kingston and one of the Seven Kingston Brothers that lead the Order. He is a numbered man in the Order and assigned number 48.

635. Jesse Orvil Kingston and Michelle Afton Michaels ("Michelle's parents") are related by blood in that Jesse Orvil Kingston is Michelle Afton Michael's uncle and she is his niece.

636. Michelle's parents were married in the Order even though their marriage involved incest, bigamy, and Michelle's mother was 16.

637. Michelle Afton Michaels became the sixth of Jesse Orvil Kingston's plural wives. He has had as many as 16 wives.

638. Michelle Afton Michaels has given birth to at least 12 children, all of whom were fathered by Jesse Orvil Kingston.

639. Michelle and her siblings are 12 of the 300 or more children fathered by Jesse Orvil Kingston.

640. Michelle did not have a good relationship with her parents, largely because the family was controlled by the Order, her father had multiple families, and at age six or seven Michelle's mother increased her abuse of Michelle and her siblings at the direction of her father.

641. Michelle learned at age eight that her Order marriage to Paul Elden Kingston's son, Jason Kingston, had been arranged, and even before that had been taught that her sole purpose in life was to be a wife and mother.

642. As she grew up, Michelle watched and learned that in the Order girls are typically placed in arranged marriages, impregnated when they are young, and required to have as many children as possible so that the girl cannot leave the Order.

643. All this is designed and perpetrated to benefit the Order.

644. Michelle did not want to become trapped in an unwanted Order marriage as the mother of children forced to provide labor for Order Businesses subjected to abuse.

645. Michelle, in particular, did not want to be married to Jason Kingston. She had no interest in him and he already had other wives, including 3 of Michelle's half-sisters.

646. When Michelle was 17, an engagement meeting was scheduled for her to go with her parents to meet with Paul Elden Kingston so that Michelle could get engaged to Jason Kingston, but she left the Order to avoid becoming engaged, married, and pregnant.

647. When she told her mother that she did not want to marry Jason Kingston she was reminded that in the Order girls have no actual choice. Marriage or leaving were her only options.

648. Michelle had seen the destructive cycle that her parents and siblings were stuck in, so to break that cycle for herself, she secretly packed her things, called a cab, and was taken to a courthouse where she filed for emancipation.

649. When Michelle refused to be trafficked into marriage and left the Order, she was ostracized by her family. Her father, Jesse Orvil Kingston, instructed his family to sever all communication with her.

650. Michelle had begun working for the Order when she was approximately 4 years old at American Digital Systems, an Order Business that is managed and operated by Michelle's father, Jesse Orvil Kingston.

651. Michelle's tasks were primarily cleaning the office and shredding papers under the supervision of her parents. She was taught that they had to have her shred the papers because she could not read what they said.

652. At American Digital Systems, Michelle reported to her mother when was young and as she grew older to Joshua Paul Kingston and Stephanie Coleman.

653. Michelle primarily worked for American Digital Systems until she was about seven when she was assigned a "desk job" at the Order Bank. After that, she continued to work for American Digital Systems and other Order Businesses, but her primary Order job was at the Order Bank.

654. In February 2016, the Order feared that the FBI was about to serve a search warrant on American Digital Systems, and, as a result, Michelle was temporarily working there.

655. The Order had received a tip about the FBI's plan to execute search warrants and prepared an A, B, and C list with the Order Business most likely to be raided on the A list. Examples of Order Business on the A list were the Order Bank and the Order Law Firm. American

Digital was on the B list.

656. In response to the tip, Order members at American Digital Systems, including Michelle, took payroll and other records and hid them so that evidence of the Order's unlawful payment, employment, and child labor practices would not be discovered.

657. Other Order members also shredded documents, wiped, or manipulated electronic data so it would not be available to law enforcement, shoot bullets through hard drives, and children working for Order Business were told not to go to work.

658. Michelle witnessed and assisted as truckloads of records and filing cabinets were taken to an Order-owned storage facility on Redwood Road and other locations.

659. After assisting at American Digital Systems to prepare for the feared FBI raid, Michelle returned to her normal work at various Order jobs, including the Order Bank where the Order's members' money is kept and controlled as the center of the Order's secretive economy.

660. At the Order Bank, Michelle helped with member statements, entered service slips, entered checks, sorted paychecks, and added Order last names to legal last names, filed papers and did statements for Order Businesses, etc.

661. At the Order Bank, Michelle reported to Andrea LaDonna Michaels, Debra Williams, and Jollen Andrews, and ultimately to Paul Elden Kingston.

662. Under the direction of her mother, Michelle Afton Michaels, Michelle also completed forms with false information and signed other peoples' names on checks from the State of Utah, typically parent's names in relation to fake or fraudulent Order daycares businesses.

663. An example of a fraudulent daycare was the one run by Michelle's mother which, on information and belief, could not be operated under her mother's name because she had taken the blame for allegedly murdering a baby to protect her husband, Jesse Orvil Kingston.

664. An example of a fake daycare requiring Michelle to sign parents' signatures is the daycare business that only existed on paper because the children were actually kept in another Order daycare business that had already maximized the allowed government subsidy. For these daycares, Michelle would also be required to fill out forms fraudulently stating when parents dropped of and picked up their children at the fake daycare.

665. Michelle was taught and instructed by her mother to sign other members' names, sometimes alternating her right and left hands to make different members' signatures look different and to complete forms to maximize Bleeding the Beast for the benefit of the Order

666. Paul Elden Kingston and his right-hand, John Daniel Kingston, Jr., were aware of and ultimately controlled these fraudulent money earning schemes. No large amounts of money would go into or leave the Order without at least Paul Elden Kingston and his sister, Rachal Orlean Young, who helped him run the Order Bank, knowing and approving it.

667. Michelle never received a paycheck; all of her wages went to the Order Bank which controlled her earnings and gave her periodic statements.

668. Michelle worked for various Order Businesses for 13 years, and, at one point, had approximately \$80,000 in her account. Michelle was later informed that \$44,000 of that amount was paid on her mother's home and that Michelle would have to work off another \$6,000 plus interest. Ultimately, the \$50,000 went back to the Order.

669. After Michelle left the Order at 17, she went back to the Order Bank to withdraw her remaining funds, but she was refused her earnings and account records for various reasons: because she did not have parental consent, because her account was closed, and because she was no longer a member of the Order. She had not closed her Order account.

670. To date, Michelle has not been fairly compensated for her labor at any of the Order

Business where she was required to work.

671. The Defendants named in this cause of action directly benefited from trafficking Michelle for labor purposes.

672. Michelle was a trafficking victim of the Defendants named in this cause of action because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or
- (e) benefitting from human trafficking under Section 76-5-309.

673. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Michelle Ruth Michaels prays for relief as set forth below.

**TWENTY-NINTH CAUSE OF ACTION BY ALLISON EAMES FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

674. Plaintiff Allison Eames (“Allison”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants John Daniel Kingston, Sr., April Mckay, Valarie Martin, Paul Elden Kingston, and the Order.

675. On November 6, 1999, Allison was born into the Order in a building located at 765 North 300 West, Salt Lake City, Utah, and known in the Order as the “General Store.”

676. Allison’s father is John Daniel Kingston Sr., who, upon information and belief, was born on or about May 13, 1955.

677. John Daniel Kingston Sr. is a Numbered Man in the Order and assigned number 15.

678. Allison's mother is Kelli Collins, also known as Kelli Mattingly. Kelli Collins was born on or about February 28, 1969.

679. Upon information and belief, the marriage of John Daniel Kingston Sr. and Kelli Collins ("Allison's parents") was illegal in that Kelli Collins was 15 years old and John Daniel Kingston Sr. had 4 other wives.

680. Kelli Collins is the fifth of John Daniel Kingston Sr.'s 14 wives.

681. It is a common and intentional practice in the Order not to list fathers on their children's birth certificates in order to cause confusion, avoid criminal prosecution for fathering children in underage, plural or incestuous marriages, and/or for illicit tax and child labor reasons.

682. In Allison's case, her father is not listed on her birth certificate, nor is the address of the General Store where she was born listed. On her birth certificate, no father is listed and a false address in Kearns, Utah was used for the location of the birth.

683. Upon information and belief, Kelli Collins has given birth to 13 children, all of whom were fathered by John Daniel Kingston, Sr.

684. Upon information and belief, John Daniel Kingston Sr. has fathered at least 200 children with his 14 wives.

685. Allison did not have a good relationship with her parents, in part, because Allison's parents were verbally and physically abusive.

686. In fact, John Daniel Kingston Sr. is so violent and abusive that he has served time in prison for nearly beating to death one of his many daughters.

687. John Daniel Kingston Sr. is not afraid to use threats and physical violence to intimate and control members of the Order and his family.

688. John Daniel Kingston Sr. and some of his wives have been frequently investigated

by the Division of Child and Family Services (DCFS).

689. Allison was taught from a young age that her sole purpose was to be a good wife and bear children. Allison was taught that this was the only way a girl could establish her place in the Order.

690. Beginning at age 11, Allison, as one of John Daniel Kingston's daughters, was required to attend the Order's marriage preparation courses.

691. In these classes, Allison was taught the skills and duties of an Order girl and wife. Topics included, for example, learning obedience, learning how to get direction, learning how to properly become betrothed and engaged, learning how to budget for a large family, and how to maximize her fertility window to birth as many children as possible.

692. John Daniel Kingston Sr. taught Allison that girls are like large pots of soup and "when you cook the soup on the first night, it's a really good pot of soup. If you then put it in the fridge and reheat it, it gets grosser and grosser." He explained, "that's why girls in the Order go straight to marriage without dating first."

693. Material taught in the preparation for marriage classes were used during numerous Order functions, lessons at school, and lessons within the home.

694. In addition to attending marriage preparation classes, Allison attended numerous Order weddings involving minor girls, incest and/or bigamy.

695. In 2014, for example, at a wedding Allison attended, her half-sister and half-brother were married. This marriage was not only incestuous, it was also plural.

696. Allison was coerced and required by her parents to start working for Order businesses when she was approximately 8 years old. Refusing to work for the Order meant more physical punishment at the hands of her parents.

697. One of her first jobs was at an Order business known as A-1 Disposal where Allison worked in the kitchen, assisted with meal preparation for A-1 workers and other Order members, and then cleaned up after meals. A-1 Disposal was operated for the Order by her father, John Daniel Kingston Sr.

698. At approximately age 10, Allison was reassigned to work at the Washakie Farm. Allison's responsibilities on the farm included feeding animals, cleaning the barn, and other chores related to tending the farm. During this time, she directly reported to Valarie Martin who Allison was also assigned to live with during the week

699. At about age 12, Allison was reassigned by her father to work in the A-1 Disposal office. In the office she dispatched garbage truck drivers and answered phones. She was only assigned these tasks for a few weeks before customers from the outside began to question why a child was handling calls.

700. Allison's responsibilities then changed, and she was instructed on how to complete and file paperwork. She primarily reported to her mother Kelli Collins.

701. At about age 14, Allison was reassigned to work for April McKay, who handled most of the Order leaders' and members' tax filings.

702. Allison's responsibilities with April McKay included assisting April McKay as directed to fill out tax forms, make changes on tax forms, and otherwise prepare to send tax filings to the Internal Revenue Service ("IRS").

703. Under April's instruction, Allison would move "dependents" from one Order member's tax forms to another Order member's tax forms, invent addresses, and otherwise manipulate information to maximize tax returns for Order members.

704. Allison has come to understand that, as a minor, she witnessed and was instructed

by April McKay to assist April McKay in systematically defrauding the IRS for the Order and its members.

705. Allison was next assigned to work at the “Order Bank,” where she was primarily responsible for data entry and directly reported to Karen Bryant.

706. Then at approximately 15, Allison was again reassigned to a job at another Order business, John’s Market Place, where she worked in the bakery, helped with the preparation of food, and reported directly to one of the Gustafson sons.

707. Then while approximately still 15, Allison was reassigned again this time to work at Family Stores True Value, where her responsibilities were like that of a cashier, and she directly reported to Christen Wellington.

708. Despite being forced to work for these various Order businesses from the age of 8, Allison never received a single paycheck.

709. For years, Allison was informed and understood that her wages were being paid to the Order Bank and that she could only have access to her earnings through the Order Bank.

710. The Order claims that all members’ earnings are tracked with “statements,” and that any wages earned by Order members are accounted for in these statements.

711. Allison, however, was not permitted to access or use her money without obtaining permission, and she rarely received that permission.

712. Despite working full time for years, Allison’s Order Bank statement never showed more than a \$1,000 balance, her earnings were being siphoned away.

713. In fact, Allison noticed on numerous occasions that her statements’ balances systematically decreased even though she did not have access to, nor did she spend much of the money owed to her. When she asked where her money had gone, she was told “room and board.”

714. The Defendants named in this cause of action directly profited and benefited from forcing her to work without pay.

715. At 16, Allison witnessed her sister get married, and when this happened, Allison realized that she was the oldest unwed girl of John Daniel Kingston Sr. and Kelli Collins.

716. By this time, her father, John Daniel Kingston, Sr., was regularly meeting with Allison and informing her that it was her turn to be married.

717. Allison felt the pressure from her One Above and understood that she had no choice but to leave the Order if she was to avoid being married, so she ran away.

718. After she fled, Allison's parents tracked her down and forced her to return home, but she ran away again.

719. This time, Allison was able to initiate an emancipation court proceeding causing her parents to give up their parental rights.

720. When Allison successfully fled, the Order took the money from her statement.

721. To date, Allison has not been fairly compensated for her labor at any of the Order Business where she was required to work.

722. The Defendants named in this cause of action directly benefited from trafficking Allison for labor purposes.

723. Allison was a trafficking victim of these Defendants because they committed one or more of the following offenses against her:

- (a) human trafficking for labor under Section 76-5-308;
- (b) human trafficking for sexual exploitation under Section 76-5-308.1;
- (c) human trafficking of a child under Section 76-5-308.5;
- (d) aggravated human trafficking under Section 76-5-310; or

(e) benefitting from human trafficking under Section 76-5-309.

724. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Allison Eames prays for relief as set forth below.

**THIRTIETH CAUSE OF ACTION BY JEREMY ROBERTS FOR
SEXUAL BATTERY AND ABUSE OF A CHILD**

725. Plaintiff Jeremy Roberts (“Jeremy”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Lynn Roberts, John Daniel Kingston, Sr., and David Ortell Kingston.

726. Jeremy became part of the Order when his mother secretly gave birth to him on April 1, 1999, in Montana.

727. Jeremy’s mother is Jennifer Roberts, and his father is Daniel Lester Roberts.

728. As a child, Jeremy and his siblings were often punished and abused in their home.

729. At about age 7 or 8 when Jeremy was required to start working for Order Businesses at Hiawatha and Huntington, Utah, he was also subjected to sexual abuse at the hands of men in the Order, including Lynn Roberts, John Daniel Kingston, Sr., and David Ortell Kingston.

730. Lynn Roberts, John Daniel Kingston, Sr., and David Kingston each molested and raped Jeremy numerous times with the last acts of sexual abuse occurring when Jeremy was 16 or 17 years old.

731. The sexual abuse by Lynn Roberts, who is not a Numbered Man, occurred in Jeremy’s home. The sexual abuse by John Daniel Kingston, Sr., and David Kingston, who are Numbered Men, typically occurred at Pioneer Day celebrations in Bountiful, Utah in a van or at a bathroom in the church in Salt Lake City.

732. When Jeremy resisted, Lynn Roberts and John Daniel Kingston, Sr., used physical violence to rape Jeremy.

733. John Daniel Kingston, Sr. and David Ortell Kingston used a combination of religious justifications and threats of violence to accomplish their perverse ends and prevent Jeremy from talking about it.

734. After Jeremy left the Order at age 18 and announced that he was gay, he was tracked down and severely beaten by a group of six or seven Jenkins and Stowell boys, who used gay slurs and, on information and belief, were acting at the direction of the Order.

735. Lynn Roberts, John Daniel Kingston, Sr., and David Kingston, acting with intent, caused sexual contact with Jeremy that was harmful and offensive, and caused Jeremy to suffer injuries.

WHEREFORE, Plaintiff Jeremy Roberts prays for relief as set forth below.

**THIRTY-FIRST CAUSE OF ACTION BY JEREMY ROBERTS FOR
TRAFFICKING IN VIOLATION OF UTAH CODE SECTION 77-38-15**

736. Plaintiff Jeremy Roberts (“Jeremy”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Paul Elden Kingston and the Order.

737. Jeremy’s first Order job at 7 or 8 was at Ralph’s Milk Farm in Huntington, Utah, where he worked milking cows, cleaning stalls, driving tractors, and selling manure and meat to customers under the direction of Ralph Anderson, the steward of the Order’s farm. Jeremy worked year-round an average of 4 hours a day.

738. At about age 12, Jeremy paused his work with the cows and started to work 12-hour shifts in the summer at the Order owned town of Hiawatha, Utah. He worked under the

direction of Dana Jenkins, building fences and removing thistle by the root.

739. Dana Jenkins whipped Jeremy's younger brother, Kaden, to punish and make an example of them for the other minors working under Dana Jenkins, including some of the sons of David Kingston. Jeremy was also hit and whipped by Dana Jenkins.

740. Jeremy was told that he was being paid \$3.25 an hour for his work at Ralphs Milk Farm and at Hiawatha, but he did all sorts of other work for the Order, including work at the Order's coal mine, without being told how much he was earning.

741. Despite being forced to work for various Order Businesses during his childhood, Jeremy never received a paycheck. His earnings went directly to the Order Bank.

742. The Order claims their member's earnings are tracked with "statements," and the wages due to Order members are accounted for in these statements.

743. Jeremy was informed that he would be able to access his wages, but to do so, he had to go to the Order Bank in Salt Lake.

744. He was able to go to the Order Bank infrequently, but when he was able to go he learned that his money was being used by his parents, that there were restrictions on what he could get money for, and sometimes he was told his account had a negative balance.

745. To date, Jeremy has not been fairly compensated for his labor at Ralph's Milk Farm, Hiawatha, the mine or for any of the other work he was required to do for the Order.

746. As the leader of the Order, Paul Elden Kingston and the Order directly benefited from trafficking Jeremy for labor purposes.

747. Jeremy was a trafficking victim of the Defendants named in this cause of action because they committed one or more of the following offenses against him:

- (a) human trafficking for labor under Section 76-5-308;

- (b) human trafficking of a child under Section 76-5-308.5;
- (c) aggravated human trafficking under Section 76-5-310; or
- (d) benefitting from human trafficking under Section 76-5-309.

748. The conduct of the Defendants named in this cause of action was willful and malicious.

WHEREFORE, Plaintiff Jeremy Roberts prays for relief as set forth below.

**THIRTY-SECOND CAUSE OF ACTION BY JEREMY ROBERTS FOR
INFLECTION OF EMOTIONAL DISTRESS**

749. Plaintiff Jeremy Roberts (“Jeremy”) incorporates herein the allegations contained in the other paragraphs of this Complaint and alleges as follows against Defendants Lynn Roberts, John Daniel Kingston, Sr., and David Kingston.

750. The conduct of the Defendants named in this cause of action was outrageous and intolerable in that it offended Society’s generally accepted standards of decency and morality.

751. The Defendants named in this cause of action intentionally and negligently caused or acted in reckless disregard of the likelihood of causing, Jeremy severe emotional distress.

752. As a proximate result of the conduct of the Defendants named in this cause of action Jeremy suffered severe emotional distress.

WHEREFORE, Plaintiff Jeremy Roberts prays for relief as set forth below.

PUNITIVE DAMAGES

753. Plaintiffs incorporate herein each and every allegation contained in this Complaint and alleges as follows.

754. The conduct of the individual Defendants, as alleged herein, was willful and malicious or intentional conduct, or conduct that manifests a knowing and reckless indifference

toward, and a disregard of, the rights of each of the individual Plaintiffs.

755. The wrongful acts alleged herein were committed or specifically authorized by the Order and/or managerial agents of the Order.

WHEREFORE, Plaintiffs pray for punitive damages as set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand a trial by jury and pray for individual judgment as follows:

Plaintiff Amanda Rae Grant

1. On the First Cause of Action by Plaintiff Amanda Grant for Sexual Battery of a Child brought against Defendant John Paul Johnson, the following damages are sought:
 - a. General damages in an amount to be proven at trial;
 - b. Special damages in an amount to be proven at trial; and
 - c. Punitive damages in an amount to be awarded at trial.

2. On the Second Cause of Action by Plaintiff Amanda Rae Grant for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants John Daniel Kingston, Sr., Hyrum Dalton Kingston, Paul Elden Kingston, David Ortell Kingston, Jesse Orvil Kingston, and Jason Ortell Kingston, Rachael Kingston, and the Order, the following damages are sought:
 - a. General damages in an amount to be proven at trial;
 - b. Special damages in an amount to be proven at trial;
 - c. Punitive damages in an amount to be awarded at trial;
 - d. treble damages because these Defendants' acts were willful and malicious; and
 - e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

3. Plaintiff Amanda Grant also seeks costs, interest and such other and further relief

as the Court deems just and reasonable.

Plaintiff Jenny Kingston

4. On the Third Cause of Action by Plaintiff Jenny Kingston for Sexual Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

5. On the Fourth Cause of Action by Plaintiff Jenny Kingston for Conspiracy to Commit sexual Battery and Abuse of a Child brought against Defendants Jacob Daniel Kingston, Jr., Jacob Ortell Kingston, Sr., John Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

6. On the Fifth Cause of Action by Plaintiff Jenny Kingston for Negligent Sexual Battery and Abuse of a Child brought against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

7. On the Sixth Cause of Action by Plaintiff Jenny Kingston for Trafficking in

Violation of Utah Code § 77-38-15 brought against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John, Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial;
- c. Punitive damages in an amount to be awarded at trial;
- d. Treble damages because these Defendants' acts were willful and malicious; and
- e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

8. On the Seventh Cause of Action by Plaintiff Jenny Kingston for Infliction of Emotional Distress brought against Defendants Jacob Daniel Kingston, Jr., Jacob Kingston, Sr., John, Daniel Kingston, Sr., Paul Elden Kingston, Sally Kingston, John Daniel Kingston, Jr., and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

9. Plaintiff Jenny Kingston also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff LaDonna Ruth Lancaster

10. On the Eighth Cause of Action by Plaintiff LaDonna Ruth Lancaster for Sexual Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and

- c. Punitive damages in an amount to be awarded at trial.

11. On the NINETH Cause of Action by Plaintiff LaDonna Ruth Lancaster for Conspiracy to Commit Sexual Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, Paul Elden Kingston, David Ortell Kingston, Jesse Orvil Kingston, Travis Ortell Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

12. On the Tenth Cause of Action by Plaintiff LaDonna Ruth Lancaster for Physical Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

13. On the Eleventh Cause of Action by Plaintiff LaDonna Ruth Lancaster for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order, the following damages are sought: General damages in an amount to be proven at trial;

- a. Special damages in an amount to be proven at trial;
- b. Punitive damages in an amount to be awarded at trial;
- c. Treble damages because these Defendants' acts were willful and malicious; and
- d. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

14. On the Twelfth Cause of Action by Plaintiff LaDonna Ruth Lancaster for Negligent

Sexual Battery and Abuse of a Child brought against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

15. On the Thirteenth Cause of Action by Plaintiff LaDonna Ruth Lancaster for Infliction of Emotional Distress brought against Defendants Travis Ortell Kingston, David Ortell Kingston, Jesse Orvil Kingston, Paul Elden Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

16. Plaintiff LaDonna Ruth Lancaster also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff LaDonna Ruth Lancaster as Mother and Natural Guardian of JJ

17. On the Fourteenth Cause of Action by Plaintiff LaDonna Ruth Lancaster as Mother and Natural Guardian of JJ for Sexual Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

18. On the Fifteenth Cause of Action by Plaintiff LaDonna Ruth Lancaster as Mother

and Natural Guardian of JJ for Negligent Sexual Battery and Abuse of a Child brought against Defendant Travis Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

19. Plaintiff LaDonna Ruth Lancaster as Mother and Natural Guardian of JJ also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Jana Nicole Johnson

20. On the Sixteenth Cause of Action by Plaintiff Jana Nicole Johnson for Sexual Battery and Abuse of a Child brought against Defendant Daniel Ortell Kingston, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

21. On the Seventeenth Cause of Action by Plaintiff Jana Nicole Johnson for Conspiracy to Commit Sexual Battery and Abuse of a Child brought against Defendant Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

22. On the Eighteenth Cause of Action by Plaintiff Jana Nicole Johnson for Negligent Sexual Physical Battery and Abuse of a Child brought against Defendant Paul Elden Kingston,

Patricia Kingston, Daniel Ortell Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

23. On the Nineteenth Cause of Action by Plaintiff Jana Nicole Johnson for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial;
- c. Punitive damages in an amount to be awarded at trial;
- d. Treble damages because these Defendants' acts were willful and malicious; and
- e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

24. On the Twentieth Cause of Action by Plaintiff Jana Nicole Johnson for Infliction of Emotional Distress brought against Defendants Paul Elden Kingston, Patricia Kingston, Daniel Ortell Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

25. Plaintiff Jana Nicole Johnson also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Julie Ruth Nichols

26. On the Twenty-First Cause of Action by Plaintiff Julie Ruth Nichols for Sexual Battery and Abuse of a Child brought against Defendant Elden Paul Kingston, the following

damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

27. On the Twenty-Second Cause of Action by Plaintiff Julie Ruth Nichols for Conspiracy to Commit Sexual Battery and Abuse of a Child brought against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

28. On the Twenty-Third Cause of Action by Plaintiff Julie Ruth Nichols for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial;
- c. Punitive damages in an amount to be awarded at trial;
- d. Treble damages because these Defendants' acts were willful and malicious; and
- e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

29. On the Twenty-Fourth Cause of Action by Plaintiff Julie Ruth Nichols for Infliction of Emotional Distress brought against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;

- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

30. On the Twenty-Fifth Cause of Action by Plaintiff Julie Ruth Nichols for Negligent Sexual Physical Battery and Abuse of a Child brought against Defendants Paul Elden Kingston, Patricia Kingston, Elden Paul Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

31. Plaintiff Julie Ruth Nichols also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Melissa Hansen

32. On the Twenty-Sixth Cause of Action by Plaintiff Melissa Hansen for Sexual Battery and Abuse of a Child brought against Defendant Mark Reynolds, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial; and
- c. Punitive damages in an amount to be awarded at trial.

33. On the Twenty-Seventh Cause of Action by Plaintiff Melisa Hansen for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Mark Reynolds, Paul Elden Kingston, John Daniel Kingston, Sr., and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial;
- c. Punitive damages in an amount to be awarded at trial;

- d. Treble damages because these Defendants' acts were willful and malicious; and
- e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

34. Plaintiff Melissa Hansen also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Michelle Michaels

35. On the Twenty-Eighth Cause of Action by Plaintiff Michelle Michaels for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Jesse Orvil Kingston, Michele Afton Michaels, Debra Williams, Jolene Andrews, Joshua Paul Kingston, Rachael Orlean Young, Paul Elden Kingston, and the Order, the following damages are sought:

- a. General damages in an amount to be proven at trial;
- b. Special damages in an amount to be proven at trial;
- c. Punitive damages in an amount to be awarded at trial;
- d. Treble damages because these Defendants' acts were willful and malicious; and
- e. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

36. Plaintiff Michelle Michaels also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Allison Eames

37. On the Twenty-Ninth Cause of Action by Plaintiff Allison Eames for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants John Daniel Kingston, Sr., April Mckay, Valarie Martin, Paul Elden Kingston, and the Order, the following damages are sought:

- f. General damages in an amount to be proven at trial;
- g. Special damages in an amount to be proven at trial;
- h. Punitive damages in an amount to be awarded at trial;

- i. Treble damages because these Defendants' acts were willful and malicious; and
 - j. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).
38. Plaintiff Allison Eames also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

Plaintiff Jeremy Roberts

39. On the Thirtieth Cause of Action by Plaintiff Jeremy Roberts for Sexual Battery and Abuse of a Child brought against Defendants Lynn Roberts, John Daniel Kingston, Jr., and David Ortell Kingston, the following damages are sought:

- k. General damages in an amount to be proven at trial;
- l. Special damages in an amount to be proven at trial; and
- m. Punitive damages in an amount to be awarded at trial.

40. On the Thirty-First Cause of Action by Plaintiff Jeremy Roberts for Trafficking in Violation of Utah Code § 77-38-15 brought against Defendants Paul Elden Kingston and the Order, the following damages are sought:

- n. General damages in an amount to be proven at trial;
- o. Special damages in an amount to be proven at trial;
- p. Punitive damages in an amount to be awarded at trial;
- q. treble damages because these Defendants' acts were willful and malicious; and

41. Attorney fees and costs, pursuant to Utah Code § 77-38-15(3).

42. On the Thirty-Second Cause of Action by Plaintiff Jeremy Roberts for Infliction of Emotional Distress brought against Defendants Lynn Roberts, John Daniel Kingston, Jr., and David Ortell Kingston, the following damages are sought:

- r. General damages in an amount to be proven at trial;

- s. Special damages in an amount to be proven at trial; and
 - t. Punitive damages in an amount to be awarded at trial.
43. Plaintiff Jeremy Robins also seeks costs, interest and such other and further relief as the Court deems just and reasonable.

DATED and SIGNED this 7th day of September 2022.

HOOLE & KING, L.C.

/s/ Roger H. Hoole

Roger H. Hoole (5089)

JR LAW GROUP, PLLC

/s/ Jaclyn J. Robertson

Jaclyn J. Robertson (11951)
Attorneys for Plaintiff

EXHIBIT A

EXHIBIT #A

Partial List of Businesses and Entities Owned by the Order

- A-1 Disposal
- A & W Restaurants
- AAA Communications
- AAA Security
- Advance Copy & Printing
- Advance Vending
- American Digital Systems
- American Wellness & Rehab Clinic, LLC
- Arrow Real Estate and Property Compliance
- Best Distributing
- Collin Media, LLC
- Commercial Agent Services, LLC
- Davis County Cooperative Society
- East Side Market
- Ensign Learning Academy
- Ensign Learning Center
- Ensign Shoe
- Factory Outlet Stores
- Family First Medicine
- Family Stores True Value
- Fidelity Funding Corporation
- Fountain of Youth Health and Athletic Club
- Fountain of Youth Spas
- Garco
- Garrard's Heating and Air Conditioning, Inc.
- Hiawatha
- John's Marketplace
- Kingston Corporation of the Church of Jesus Christ of Latter
- Latter Day Church of Christ
- LDCC
- Little Red School House Montessori
- Mountain Coin Machines Distributors
- Premier Catering & Food Services, LLC
- Ralph's Milk Farm
- Redwood Grocery & Health Foods
- Shoppers Pawn
- Sportsmans Pawn
- Standard Industries
- Standard Restaurant Supply
- Standard Restaurant Supply, Inc.
- Vanguard Academy
- Washakie Farm
- Washakie Renewable Energy
- World Enterprises
- Xtreme Pawn
- Zion Ponderosa Ranch Resort
- ZMPC9

EXHIBIT B

EXHIBIT #B

The Law Above Another Diagram

