



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

CJ25 1796 -
Ma

- (1) JANE DOE 1,
- (2) JANE DOE 2,
- (3) JANE DOE 3 and
- (4) JANE DOE 4,

Plaintiffs,

v.

- (1) THE CHURCH OF THE NAZARENE,
INC.,
- (2) OKLAHOMA DISTRICT CHURCH OF
THE NAZARENE, INC.,
- (3) THE DISTRICT ADVISORY BOARD
OF THE SOUTHEAST DISTRICT OF
OKLAHOMA OF THE CHURCH OF
THE NAZARENE,
- (4) SHAWNEE FIRST CHURCH OF THE
NAZARENE,

Defendants.

CJ-2025-1796
Case No.

JURY TRIAL DEMANDED

ATTORNEYS' LIEN CLAIMED

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

MAR 17 2025

**RICK WARREN
COURT CLERK**

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PLAINTIFFS' ORIGINAL PETITION

COMES NOW Plaintiffs JANE DOE 1, JANE DOE 2, JANE DOE 3, and JANE DOE 4 and assert the following causes of action against Defendants THE CHURCH OF THE NAZARENE, INC., OKLAHOMA DISTRICT CHURCH OF THE NAZARENE, INC., THE DISTRICT ADVISORY BOARD OF THE SOUTHEAST DISTRICT OF OKLAHOMA OF THE

CHURCH OF THE NAZARENE, and SHAWNEE FIRST CHURCH OF THE NAZARENE and would respectfully show this Honorable Court the following:

I. INTRODUCTION

1. For years, a sexual predator named Charles Sulivant stalked and abused the minor children of Shawnee First Church of the Nazarene.

2. For years, leaders of the Church of the Nazarene knew Sulivant was stalking and abusing minor children of the Shawnee First Church of Nazarene, but didn't tell anyone outside the church, including law enforcement. Even worse, they actively covered it up by threatening anyone who talked about it or tried to report it outside of the church.

3. Recently was the scope of Defendants' cover up exposed as Sulivant was arrested and charged in November 2024 with Lewd or Indecent Acts to a child under 16 years old.

4. For years, Plaintiffs suffered in silence because Defendants refused to protect them. Only recently did Plaintiffs learn that those they trusted within the church knew about Sulivant all along and could have easily prevented their suffering.

II. PARTIES

5. Plaintiffs JANE DOE 1 is an individual and lawful resident and citizen of the State of Oklahoma.

6. Plaintiffs JANE DOE 2 is an individual and lawful resident and citizen of the State of Oklahoma.

7. Plaintiffs JANE DOE 3 is an individual and lawful resident and citizen of the State of Oklahoma.

8. Plaintiffs JANE DOE 4 is an individual and lawful resident and citizen of the State of Oklahoma.

9. Defendant THE CHURCH OF THE NAZARENE, INC. (“CON, Inc.”) is a corporation organized and existing under the laws of the State of Missouri, with its principal place of business in Lenexa, Kansas. CON, Inc. does business in the State of Oklahoma and according to the Oklahoma Secretary of State filings, may be served with process by serving its registered agent James N Posey at 7300 NW 23rd, Oklahoma City, OK. However, it appears that Mr. Posey passed away in June 2024. Therefore, Plaintiff will serve Mr. Metcalf of ODCN and Mr. Rowland of the District Board.

10. Defendant OKLAHOMA DISTRICT CHURCH OF THE NAZARENE, INC. (“ODCN”) is a not-for-profit corporation church organized and existing under the laws of the State of Oklahoma, with its principal place of business in Bethany, Oklahoma. ODCN does business in the State of Oklahoma and may be served with process by serving its registered agent J. Keith Metcalf at 3807 N. Asbury Ave. Ste. 104, Bethany, Oklahoma 73008, Oklahoma County.

11. Defendant THE DISTRICT ADVISORY BOARD OF THE SOUTHEAST DISTRICT OF OKLAHOMA OF THE CHURCH OF THE NAZARENE (“District Board”) is a not-for-profit corporation organized and existing under the laws of the State of Oklahoma, with its principal place of business in Shawnee, Oklahoma. The District Board does business in the State of Oklahoma and may be served with process by serving its registered agent Terry Rowland at 1802 Henson Ct., Shawnee, Oklahoma 74804, Pottawatomie County.

12. Defendant SHAWNEE FIRST CHURCH OF THE NAZARENE (“SFCN”) is a not-for-profit corporation church organized and existing under the laws of the State of Oklahoma, with its principal place of business in Shawnee, Oklahoma. SFCN does business in the State of Oklahoma and may be served with process by serving its registered agent Leland D. Watkins at 401 N. Market Ave., Shawnee, Oklahoma 74801, Pottawatomie County.

13. Defendants CON, Inc., ODCN, the District Board, and SFCN are collectively referred to collectively as “Defendants” because each is an agent and/or alter ego of each other and operate as a single business enterprise. Each defendant was acting within the scope and course of his or its authority as an agent, servant, and/or alter ego of the other and each of them engaged in, joined in and conspired with the other wrongdoers in carrying out the tortious and unlawful activities in this petition.

III. VENUE

14. Venue is proper in this Court under 12 O.S. §§ 134, 137, 1653; and 18 O.S. § 471.

IV. FACTUAL BACKGROUND

A. Organizational Structure of The Church of the Nazarene

15. The Church of the Nazarene (“CON”) is a global faith-based organization with about 2.5 million members and over 30,000 congregations in 165 world areas.¹

16. The structure of CON’s religious body is comprised of three entities: the General Assembly, district assemblies, and local churches.²

17. The local churches of each district are represented proportionally in their district assembly, and each district is represented proportionally in the General Assembly.

18. CON, Inc. is the legal body representing and embodying the entire CON organization.³

19. CON, Inc.’s headquarters is in Lenexa, Kansas.

20. The General Assembly controls and has “supreme doctrine-formulating, lawmaking, and elective authority” over all levels of CON’s structure.⁴

¹ <https://www.nazarene.org/who-we-are/organization/ministries/global-missions/about-us/gm-about-us>

² The Manual of the Church of the Nazarene (2023) at 39 [*hereinafter* Manual].

³ Manual at 64 (“the international General Board, which represents the entire church”).

⁴ Manual at 159.

21. The General Assembly level of CON's organization controls and has authority over the operations of CON throughout the world.

22. The General Assembly promulgates the Manual of the Church of the Nazarene ("Manual"), which is CON's official statement of faith, practice, and organizational governance.⁵ The latest version of the Manual was issued in 2023.⁶

23. The Manual is an authoritative guide for action at all levels of CON's organization.⁷

24. The General Assembly is responsible for electing members of the Board of General Superintendents and the General Board.⁸

25. The General Board serves as the board of directors for CON, Inc. and is the primary authority on all non-ecclesiastical policies and plans.⁹

26. The Board of General Superintendents presides over the General Assembly, oversees the general church, and has the power to create districts, determine their bounds, and dissolve them.¹⁰

27. Each district assembly elects a District Advisory Board and District Superintendent responsible for the management and oversight of local churches within the district.

28. The District Superintendent serves as the chairperson for the District Advisory Board and, in conjunction with the District Advisory Board, is responsible for the licensing, review, and discipline of pastors within the district.

⁵ Manual at 7.

⁶ Manual at 6.

⁷ Manual at 6.

⁸ Manual at 159.

⁹ Manual at 175.

¹⁰ Manual at 117, 158.

29. The District Superintendent is responsible for organizing, recognizing, and superintending local churches within his or her district subject to the approval of the General Superintendent having jurisdiction.¹¹

30. The District Superintendent may disorganize a local church with the approval of the General Superintendent in the jurisdiction and a two-thirds vote from the District Advisory Board.¹²

31. If a District Advisory Board or local church incorporates, it is governed by the Manual.¹³

32. The District Superintendent is responsible for appointment and reappointment of pastors in local churches, whose authority is subject to that of the Board of General Superintendents and, ultimately, the General Assembly, represented by CON, Inc.¹⁴

33. All official acts of the District Superintendent are subject to review and revision by the district assembly and subject to appeal to CON's district and general courts of appeals.¹⁵

34. Every local church has a local church board, of which the church's pastor is a member.¹⁶

35. Local churches are directed to "elect as church officers active members of the local church who profess the experience of entire sanctification and whose lives bear public witness to the grace of God that calls [them] to live a holy life; who are in harmony with the doctrines, polity, and practices of the Church of the Nazarene; and who support the local church faithfully in attendance, active service, and with tithes and offerings."¹⁷

¹¹ Manual at 134.

¹² Manual at 71.

¹³ Manual at 68, 143.

¹⁴ Manual at 83.

¹⁵ Manual at 139, 255-56.

¹⁶ Manual at 94.

¹⁷ *Id.*

36. Upon information and belief, pastors are employees of CON, Inc., and CON, Inc. has the ultimate authority in the appointment, suspension, removal, and punishment of local pastors.

B. Church of Nazarene Discipline

37. CON's disciplinary process for a layperson begins when the pastor receives a written accusation of "unchristian conduct" signed by two church members.¹⁸ Subject to the District Superintendent's approval, the pastor must appoint an investigating committee to create a written investigation report.¹⁹ Based on this report, two church members may then file charges against the accused with the local church board.²⁰ The pastor appoints a Local Board of Discipline to hear the charges and dispose of the case.²¹ The Local Board of Discipline may absolve the accused or administer discipline such as "reprimand, suspension, or expulsion from membership in the local church."²² This decision may be appealed to CON's District Court of Appeals.²³

38. Once a layperson is released from membership, he or she may only rejoin the church with the District Advisory Board's approval.²⁴

39. However, a formal accusation need not be made, as CON directs that "[a] response is appropriate any time a person with authority to respond becomes aware of information that a prudent person would believe to be credible."²⁵ A response is also appropriate upon learning "information which would cause a prudent person to believe that harm is likely to come to the

¹⁸ Manual at 250.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ Manual at 250.

²⁵ Manual at 246.

church, to potential victims of misconduct, or to any other person as a result of misconduct by a person in a position of trust or authority within the Church.”²⁶

40. Where a layperson is implicated in credible reports of misconduct, the “[p]astor of the local church where the conduct in question takes place” has authority to respond to the reports.²⁷ CON further directs that the pastor should notify leadership at the district, regional, and/or global level about the accusations and may enlist the help of others in fact-finding or response.²⁸ Even if no accusation is made, an investigation should be made to prevent harm or reduce the impact of harm already done.²⁹

41. CON recognizes that “[l]aypersons serving in leadership roles are held to a high standard[,]” and “[w]hen misconduct occurs, the impact is often very serious.”³⁰ Thus, “[a]n individual guilty of sexual misconduct involving minors should not be permitted to serve in any position of responsibility for or ministry with minors, or be elected or appointed to any leadership role in the local church.”³¹

42. The Manual states, “When placing people in positions of trust or authority, the Church of the Nazarene will presume that past conduct is usually a reliable indicator of likely future behavior. The Church will withhold positions of authority from people who have previously used a position of trust or authority to engage in sexual misconduct or abuse of the unempowered, unless appropriate steps are taken to prevent future wrongful behavior.”³² Expressions of remorse do not overcome this presumption “unless the expressions of remorse are accompanied by an observable change of conduct for a sufficient length of time, to indicate that a repeat of the

²⁶ *Id.*

²⁷ Manual at 247.

²⁸ *Id.*

²⁹ *Id.*

³⁰ Manual at 251.

³¹ *Id.*

³² Manual at 401.

wrongful misconduct is likely.”³³ CON also “calls for increased public awareness” of the problem of sexual abuse of children.³⁴

43. Yet at the same time, a principal goal of CON’s disciplinary policy is “to protect the reputation and resources of the church.”³⁵ CON clarifies that the purpose of its discipline is “not punitive or retributive” but centered on maintaining the holiness and orthodoxy of the church body.³⁶ To these ends, the Manual stresses that the church’s response must “seek to address the needs of the local church, the district and the general church concerning public relations, *protection from liability and protection of the integrity of the church*.”³⁷ CON shrewdly advises that “[t]hose who respond for the church must understand that what they say and do may have consequences under civil law.”³⁸ CON makes clear that “[t]he duty of the church to respond is based on Christian concern” and not justice under the law, which may expose it to liability or diminish its reputation.³⁹

C. Harm to Plaintiffs at Shawnee First Church of the Nazarene

44. Shawnee First Church of the Nazarene (SFCN) is a local church of about 240 members in Shawnee, Oklahoma.⁴⁰ SFCN is part of CON’s Oklahoma District.⁴¹ For 23 years, Johnny Stephens has been SFCN’s pastor.⁴²

45. Charles Sulivant was a church greeter at SFCN and is a former member of the local church board. He had attended SFCN since about 1973. He also served as an usher and handled the offering. Further, Sulivant would hand out candy to the children at church.

³³ Manual at 401–02.

³⁴ Manual at 401.

³⁵ Manual at 246.

³⁶ *Id.*

³⁷ Manual at 248 (emphasis added).

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ https://www.oknaz.org/_files/ugd/5285bc_0a22f653988e45a98d08cce8a0e47524.pdf.

⁴¹ <https://www.usacanadaregion.org/districts>;

https://www.oknaz.org/_files/ugd/5285bc_0a22f653988e45a98d08cce8a0e47524.pdf.

⁴² https://www.oknaz.org/_files/ugd/5285bc_0a22f653988e45a98d08cce8a0e47524.pdf.

46. During his extended time at SFCN, Charles Sulivant used the church as a venue to meet and prey on young girls, including Plaintiffs.

47. Charles Sulivant physically and sexually abused these girls across church property, including but not limited to:

- a. The SFCN church building;
- b. The SFCN church office;
- c. The SFCN church parking lot; and
- d. The SFCN gym.

Jane Doe 1

48. In or around 2008, when Jane Doe 1 was 15 years old, she was sexually assaulted by Charles Sulivant at the Shawnee First Church of the Nazarene.

49. At the time of the assault, Jane Doe 1 was in the administrative area of the church, in her mother's office, getting money from her mother's purse for a soda from the vending machine. While Jane Doe 1 was on the ground reaching into the purse, Charles Sulivant came up behind her and grabbed her by the hips and butt with both hands. Sulivant pulled Jane Doe 1 into him, and started rubbing his penis against her butt. Sulivant then reached up and grabbed her breasts and started squeezing them.

50. Jane Doe 1 elbowed Charles Sulivant in the groin and ran out of the room crying.

51. Jane Doe 1 alerted the first female she saw and asked the female to go get her (Jane Doe 1's) mother. Jane Doe 1 immediately told her mother what happened. Jane Doe 1's mother agreed to bring the allegations to the attention of Pastor Stephens.

52. After church that day, Jane Doe 1 and her mother met with Pastor Stephens in his office. Jane Doe 1's mother related to Pastor Stephens what Jane Doe 1 had told her that Charles Sulivant had done. Pastor Stephens responded in denial and defended Mr. Sulivant.

53. Pastor Stephens then had the mother leave the room so he could speak to Jane Doe 1 alone. While alone in his office, Pastor Stephens told Jane Doe 1 he believed her story but that she was a "bad kid" with a bad reputation in the church and that no one would believe her story. Stephens threatened that if Jane Doe 1 continued speaking up, Sulivant—who gave a lot of money to the church— would have to leave the church and be unable to tithe, which would cause her mother, who was a church employee, to lose her job.

54. Pastor Stephens then told Jane Doe 1's mother that he would call the police and that he would handle it. Unbeknownst to Jane Doe 1 or her family, Pastor Stephens never called the police at the time.

55. In 2024, in an interview with Shawnee Police Department, Sulivant stated "that he had already been in the office when [Jane Doe 1] walked in. Sulivant explained that he shared the office with [Jane Doe 1]'s mother. Sulivant stated that he could not remember but, [Jane Doe 1] could have been getting something from under the desk. When [the detective] asked if he remembered [Jane Doe 1] elbowing him, and running out of the office, Sulivant replied "yeah."

56. In March 2024, Jane Doe 1 discovered for the first time that Defendants were aware of allegations of sexual misconduct against Charles Sulivant prior to her assault in 2008, but that they had failed to report it, actively concealed it, and/or had not done anything to protect children from Sulivant. Thus, it wasn't until March 2024 that Jane Doe 1 knew or could have known of sufficient facts to state a cause of action against the Defendants for their failures outlined herein.

At all times, Jane Doe 1 and her family acted with reasonable diligence by reporting this incident to Pastor Stephens.

57. In March 2024, Jane Doe 1 had a conversation with her former Sunday school teacher about Charles Sulivant. During that conversation, the teacher revealed to Jane Doe 1 that Charles Sulivant had sexually harassed and assaulted her as well. According to the teacher, Charles Sulivant made comments about the size of her breasts and constantly tried to hug her and touch her breasts. The teacher said that Mr. Sulivant would touch and squeeze the teacher against her will and would let her go. This happened regularly throughout the late 90s and early 2000's.

58. During one of the incidents of harassment, the teacher screamed at Sulivant to stop touching her. She then reported the harassment to Pastor Stephens and his wife, but they both shook their head and ignored the report.

Jane Doe 2

59. In 2009, when Jane Doe 2 was nine years old, Charles Sulivant lured her to the church parking lot with the promise of a gift in his truck. There, he grabbed Jane Doe 2, started to touch her, trying to "get under her clothes," and kissed her neck. Plaintiff was "paralyzed with fear" and "couldn't scream." Though she tried to escape, she was unable to break free of his grip. Eventually though, Jane Doe 2 was able to free herself and flee to a restroom.

60. Jane Doe 2 recounts feeling disgusting, impure, unworthy, and used. To this day, she remembers what she was wearing, how scared she was, and how disgusting she felt. Jane Doe 2's her self-image was destroyed. To this day no guy can hug her or touch her without her remembering what Sulivant did.

61. In 2016, when Jane Doe 2's mother reported the abuse of her daughter to SFCN's pastor, Johnny Stephens, he had already known of at least four other girls that Charles Sulivant

had “tried something with.” Stephens even stated directly he was aware of another victim not included in the charges against Sulivant. Stephens freely admits he had “always heard” about Charles Sulivant’s conduct.

62. Pastor Stephens told Jane Doe 2’s mother that he had taken care of it by not allowing Sulivant to be way (*sic*) from the foyer if he was not with his wife.

63. In 2009, when Charles Sulivant abused Jane Doe 2, multiple victims had already reported Sulivant’s abuse and misconduct to Johnny Stephens, as detailed above.

64. Upon information and belief, even more victims had reported Charles Sulivant’s predatory behavior to Pastor Stephens before the incident involving Jane Doe 2 in 2009. Unbeknownst to Jane Doe 2 or her family, Pastor Stephens never called the police at the time.

65. In March 2024, Jane Doe 2 discovered for the first time that Defendants were aware of allegations of sexual misconduct against Charles Sulivant prior to her assault in 2009, and that Defendants had failed to report it, actively concealed it, and/or had not done anything to protect children from Sulivant. Thus, it wasn’t until March 2024 that Jane Doe 2 knew or could have known of sufficient facts to state a cause of action against the Defendants for their failures outlined herein. At all times, Jane Doe 2 and her family acted with reasonable diligence by reporting this incident to Pastor Stephens.

Jane Doe 3

66. In or around 2011, when Jane Doe 3 was 18 years old, she was sexually harassed and/or assaulted by Charles Sulivant at the Shawnee First Church of the Nazarene.

67. Jane Doe 3 was in the church gymnasium supervising her brother while her parents participated in a church board meeting.

68. While in the gym, Charles Sulivant came up behind her and began stroking her hair and rubbing her shoulders and back. Sulivant moved his hands down Jane Doe 3's neck , down her chest to the hem of her dress, and whispered to Jane Doe 3, "I could really go for a girl like you."

69. Sulivant attempted to prevent Jane Doe 3 from running off. He put his arms around her and wouldn't let go. Sulivant leaned in and kissed Jane Doe 3 on the cheek. As Jane Doe 3 tried to get away, Sulivant tried to kiss Jane Doe 3 on the lips, but she turned her head away and ran.

70. Jane Doe 3 immediately went and told her parents who had just gotten out of a church meeting.

71. Jane Doe 3 and her parents confronted Pastor Stephens and told him what had happened to Jane Doe 3. Pastor Stephens told Jane Doe 3 and her parents that he would talk to Charlie. Pastor Stephens then brought Sulivant into his office with Jane Doe 3's parents and questioned him about what happened. Sulivant did not deny the accusations.

72. To Jane Doe 3's knowledge the church did not report Sulivant to the police. Instead, Pastor Stephens said Sulivant was just confused and that he may be suffering from dementia.

73. Pastor Stephens told Jane Doe 3's parents that Sulivant would not be allowed anywhere but the lobby anymore, and that he would not be allowed to be alone with females anymore. Pastor Stephens did not disclose the prior incidents with Sulivant to Jane Doe 3 and/or her family, and did not report this to the police at the time.

74. In 2024, in an interview with Shawnee Police Department, Sulivant stated that he had apologized to [Jane Doe 3]'s parents for what he had done to her. Sulivant further stated that he told [Jane Doe 3] and her parents that he was sorry and that he owed them an apology. Near the

end of the interview, Sulivant confirmed that he had done what [Jane Doe 3] had said that he had done.

75. In March 2024, Jane Doe 3 discovered for the first time that Defendants were aware of allegations of sexual misconduct against Charles Sulivant prior to her assault in 2011, and that Defendants had failed to report it, actively concealed it, and/or had not done anything to protect children from Sulivant. Thus, it wasn't until March 2024 that Jane Doe 3 knew or could have known of sufficient facts to state a cause of action against the Defendants for their failures outlined herein. At all times, Jane Doe 3 and her family acted with reasonable diligence by reporting this incident to Pastor Stephens.

Jane Doe 4

76. From around 2008-2012, Sulivant victimized another minor female in the church, Jane Doe 4.

77. When Jane Doe 4 was approximately 8 years old, Sulivant picked her up and was holding her with his arm between her legs and his hand on her chest underneath her dress. Jane Doe 4 stated that Sulivant would kiss her on the mouth and spin her around and call her his "little girlfriend." Jane Doe 4 stated that she stopped wearing dresses to church because of what Sulivant was doing to her.

78. Sulivant engaged in this type of misconduct regularly with Jane Doe 4 until she was about 12 years old.

79. At one point, Jane Doe 4's mother reported Sulivant's inappropriate conduct to Pastor Stephens. Pastor Stephens replied that Sulivant was just being friendly. Pastor Stephens did not disclose the prior incidents with Sulivant to Jane Doe 4 and her family, and did not report this to the police at the time.

80. In March 2024, Jane Doe 4 discovered for the first time that Defendants were aware of allegations of sexual misconduct against Charles Sulivant prior to her assaults, and that Defendants had failed to report it, actively concealed it, and/or had not done anything to protect children from Sulivant. Thus, it wasn't until March 2024 that Jane Doe 4 knew or could have known of sufficient facts to state a cause of action against the Defendants for their failures outlined herein. At all times, Jane Doe 4 and her family acted with reasonable diligence by reporting this incident to Pastor Stephens.

Other Victims

81. As discussed below, Pastor Johnny Stephens admitted to knowing about another victim, [unknown] that "had issues with Sulivant."

82. Upon information and belief there are several other women that were victimized by Sulivant as children at the church.

Pastor Johnny Stephens

83. In August 2024, two detectives from the Shawnee Police Department visited Pastor Stephens and his wife at their home.

84. The full text of the detective's written summary of his conversation with John Stephens attached to the Affidavit for Probable Cause for Issuance of Felony Arrest Warrant for Charles J Sulivant is as follows:

On 8/22/2024 at approximately 0945 hours, Det. M. Dougherty and I went to Johnny Stephens' residence to speak with him. Det. Dougherty and I made contact with Johnny and his wife (Debra Stephens) outside of the residence.

When I told Johnny that I was following up on an old report that was made in 2016, Johnny knew that I was there to talk about Sulivant. Johnny also asked initially before I told him what girls were involved if I was there to talk about [Jane Doe 1]. When I told him that it was actually the [Jane Doe 2] situation that was reported in 2016, Johnny advised that he was familiar with that situation too.

Johnny stated that he had been told that Sulivant had touched [Jane Doe 2] "inappropriately" when she was around 5 years-old. Johnny stated that after [Jane Doe 2]'s mother spoke to him about it, the issue got forgotten about until [Jane Doe 2] was approximately 12 years-old and it came back up. Johnny stated that at that point, he called Sulivant into his office and talked to him about the situation. Johnny stated that he told Sulivant that he "has to stop this." Johnny said that he had never seen Sulivant be inappropriate to any of the girls, but he had "always heard about it."

I explained to Johnny that I had talked to multiple girls that had told me that things had happened to them at the church from Sulivant. Johnny said "okay" and then stated that I may have talked to [Jane Doe 1]. Johnny confirmed that [Jane Doe 1] came to talk to him and told him what Sulivant had done to her at the time. However, Johnny stated that he did not know why [Jane Doe 1] feels like he just "fluffed it off." Johnny said that he told [Jane Doe 1] "Charlie is old. I don't know what this will do to his life. I don't know how you want to pursue it, but I am going to go talk to your mom." Johnny stated that after the incident with [Jane Doe 1] he talked to Sulivant again and told him "Charlie, if you don't stop this, you're going to jail son. You have go to stop this."

[Stephens] stated that he does not know what Sulivant did, and he just knows what he was hearing. Johnny and Debra both stated that they had seen him "flirting" with girls from the ages young girl to adult. Johnny confirmed what [Jane Doe 2's mother] said about the fact that he had to make Sulivant stay in the foyer or stay with his wife. Johnny stated that he told Sulivant "Charlie you have got to stay away from these young girls and we are watching you."

I asked if Johnny had ever reached out to anyone else, higher up in the church. Johnny said that he reached out to Terry Rowland, who was the district superintendent at the time. Johnny stated that Rowland told him that he needed to continue doing what he was doing to handle the situation. During the interview, Johnny stated that he was aware of another girl [Jane Doe 5] that had issues with Sulivant. However, Johnny stated that he knows that [Jane Doe 5] was not going to pursue anything against Sulivant, because he had heard the conversation in which she said that.

Johnny stated that at no point did he or anyone else in his church make any police reports, or OHS referrals about what Sulivant was doing. Johnny denied any knowledge of people's jobs being threatened or losing their jobs for doing the right thing in this matter. However, Johnny stated that those people should "sue somebody."

85. In a 2024 interview with the news media, Johnny Stephens was asked if he thinks he should have gone to the police. Stephens responded, "I don't know, I don't know all the rules, but I guess possibly, I might, might have."

86. In that same interview, Stephens stated "I'm thinking if I had to do it over again, ya, I would probably call the police. But I was trying to redeem him." Stephens added, "I was just at the moment trying to figure it all out. So that's what I did. Maybe it was wrong. . . . I don't doubt that it was wrong."⁴³

87. However, Stephens confirmed that despite what he knew about Sulivant's behavior, he still would not have ever removed Sulivant from the church, saying, "I'm not gonna excommunicate someone."

88. Finally, Stephens confirmed that he knew about the abuse of multiple children in his congregation and instead of calling the police Stephens said "I told Charlie, you've got to stop this, if you don't stop it, you are going to be in jail. So you must stop. That was after the second girl that I found out." Stephens added, "I tried my best to watch him."⁴⁴

Charles Sulivant

89. On August 23, 2024, a detective with the Shawnee Police Department interviewed Charles Sulivant at the Shawnee Police Department.

90. The full text of the detective's written summary of his conversation with Charles Sulivant attached to the Affidavit for Probable Cause for Issuance of Felony Arrest Warrant for Charles J Sulivant is as follows:

On 8/23/2024 at approximately 0945 hours, I interviewed Charles Sulivant at the Shawnee Police Department. The interview was conducted in the soft interview

⁴³ <https://kfor.com/news/local/several-girls-allegedly-molested-at-a-shawnee-church-former-pastor-i-shouldve-called-police/?ipid=promo-link-block1>

⁴⁴ <https://kfor.com/news/local/reports-fell-short-after-victims-of-alleged-abuse-come-forward/>

room, and it was voluntary. At no point in time was Sulivant under arrest, or detained during the interview. I explained to Sulivant prior to asking him any questions about the case, that he was not under arrest, and that the interview was voluntary and he was free to leave at any time.

Initially in the interview, Sulivant stated that he did not remember much about the disclosures that were made against him. However, Sulivant did confirm that he had attended the Church of the Nazarene since 1972 or 1973. Sulivant stated that approximately 10 years ago he was on the board of the church.

During the interview, Sulivant stated multiple times that Johnny Stephens had called him into the office on multiple occasions and told him to stop touching the little girls. When I asked him why Johnny had to tell him multiple times to keep his hands off of the girls, Sulivant replied "stupidity I guess." I asked what the reason was that he kept putting his hands on the girls, and Sulivant stated that he did not know if he could explain it. Sulivant then said that it was "just something that he had at the time." Sulivant continued and said that he does not know what to call it, but stated "it's, you know you have those sexual drives, and things like that." Sulivant stated that he did those things to the girls to make himself feel good. Sulivant confirmed that he was feeling the sexual drive towards the girls. Sulivant later described the feeling that he felt towards the girls as being lust.

Sulivant stated that he never thought of the girls as being kids, and acknowledged that when he saw them, they made him feel aroused and he was acting on that.

When I asked if there was anything else that I needed to know about the situation, Sulivant said no, but stated that he has regretted it, and repented for it. Sulivant stated that he had apologized to some of them for it in the past. Sulivant stated that he had apologized to [Jane Doe 3]'s parents for what he had done to her. Sulivant stated that he told [Jane Doe 3] and her parents that he was sorry and that he owed them an apology. When I asked what he would tell the other girls that he had not already apologized to, Sulivant stated that he would tell them the same thing.

Near the end of the interview, Sulivant confirmed that he had done what [Jane Doe 3] had said that he had done. Sulivant could not remember many details of the incident with [Jane Doe 2]. However, when I asked him what he could remember about that incident, Sulivant stated that he remembers that "she [Jane Doe 2] was an attractive girl." It should be noted that [Jane Doe 2] was 9 years-old at the time that he assaulted her. Sulivant admitted that he did know [Jane Doe 4] but did not reply when I told him exactly what she said he had done to her. When I talked to Sulivant about the specifics of [Jane Doe 1]'s disclosures against him, Sulivant stated that he had already been in the office when [Jane Doe 1] walked in. Sulivant explained that he shared the office with [Jane Doe 1]'s mother. Sulivant stated that

he could not remember but, [Jane Doe 1] could have been getting something from under the desk. When I asked if he remembered [Jane Doe 1] elbowing him, and running out of the office, Sulivant replied “yeah.”

When I told Sulivant that I was going to forward the report to the DA's Office, and they would make the decision on whether or not to file charges against him, Sulivant said “you know, I had forgot all about this.” Sulivant continued and said “I know that I did regret it, and I apologized to some of them.” When I pointed out that the girls had not forgotten about it and that it had caused them issues for a long time, Sulivant replied “yeah.” Sulivant then said “well, all I can say is I'm sorry about it.” Sulivant stated “we all do a lot of stupid things ... and this was one of them.”

It should be noted that during the interview, Sulivant admitted that he knows that what he did to the girls was inappropriate, criminal, and wrong. Sulivant also stated that he had never done anything to his daughters or their friends in the past, and the only times that he had done anything to young girls was at the church.

91. In November 2024, Charles Sulivant was arrested and charged with Lewd or Indecent Acts to a child under 16 years old.

Defendants' Efforts to Conceal Sulivant's Misconduct

92. Despite the troubling and frequent nature of incidents like these, the policies of the Defendants are designed to protect the CON organization—and, incidentally, perpetrators like Charles Sulivant—from legal and reputational consequences at the expense of justice for victims of abuse. These policies unfortunately served their purpose here.

93. Though Charles Sulivant's behavior was reported to church authorities on multiple occasions, they not only refused to meaningfully act but even threatened the reporting individuals to secure their silence.

94. Despite having knowledge of Charles Sulivant's abuse, neither Johnny Stephens nor anyone else associated with Defendants made any reports to the police or the Oklahoma Department of Human Services (“DHS”) as required by Oklahoma law.

95. Johnny Stephens insisted on handling the matter without engaging in the appropriate reporting process. In one case, this insistence manifested in threats to a victim and their family.

96. Johnny Stephens maintained such secrecy so he could handle the matter himself. He did this by giving Charles Sulivant ineffective verbal warnings such as, “Charlie you have got to stay away from these young girls[,] and we are watching you.” Stephens claims he eventually decided not to allow Sulivant beyond the church foyer without his wife present. This admonishment is plainly insufficient and in violation of Oklahoma law. When Stephens did contact the District Superintendent at the time, Terry Rowland, Rowland simply told him to continue doing what he was doing to handle the situation—even though that response already proved useless.

97. Terry Rowland even personally took the same approach as Johnny Stephens, using his position of power to silence victims’ reports. To prevent Plaintiff Jane Doe 2’s mother from acting on their 2016 report, Rowland told Plaintiff Jane Doe 2’s mother that if she pursued the issue further, she would lose her minister’s license.

98. On another occasion, Drew Dinnel, then the associate pastor and youth pastor at the Choctaw Church of the Nazarene, unsuccessfully attempted to report Charles Sulivant’s abuse of Plaintiff to Terry Rowland. Rowland tried to keep Dinnel from reporting the incident and insisted that he leave it to the victims’ families to report.

99. When Drew Dinnel spoke with his lead pastor at the time, Mike Meeks, Meeks told him staff members of the church were not allowed to report incidents of abuse.

100. In support of this policy, the Defendants even tried to pass a board resolution preventing church staff from reporting abuse incidents to DHS.

101.Despite the Defendants' opposition, Drew Dinnel sent Terry Rowland and Mike Meeks the Oklahoma law making it mandatory to report abuse and made an anonymous report to DHS. Dinnel's employment with CON, Inc. was terminated about 6 months later.

102.As a result of the Defendants' policies, actions, and inaction, Charles Sulivant's abuse was allowed to fade into obscurity. When law enforcement interviewed Sulivant in 2024, he mused, "you know, I had forgot all about this."

103.Upon information and belief, pastors are employees of CON, Inc. and receive compensation, directly or indirectly, from CON, Inc. for their services.

104.At all times relevant to the allegations in this complaint, Johnny Stephens, was an employee and agent of Defendants.

105.Pastors and District Superintendents and others holding positions of authority within the CON organization are employees and/or agents of CON, Inc. At all relevant times, their actions related to handling reports of child abuse were within the scope of their employment or agency in performing duties for and on behalf of CON, Inc.

106.Upon information and belief, at all times relevant to the allegations in this complaint, Charles Sulivant was an employee and agent of Defendants.

107.The Defendants knew or should have known that, over the course of decades with the church and his time serving on the local church board, Charles Sulivant was abusing multiple young children who were members of the church.

108.The Defendants knew or should have known that their acts or failures to act, including but not limited to, negligence, negligent hiring, supervision, training, and retention, and failure to report Sulivant to the authorities would result in foreseeable injury to Plaintiff and actual

pecuniary damages, pain and suffering, mental anguish, loss of reputation, lost wages, loss of earning capacity, and other damages set forth herein.

109. Plaintiff's actions are timely pursuant to Okla. Stat. tit. 12, § 95(6) and the discovery rule as pronounced by the Oklahoma Supreme Court.

110. As set forth herein, Defendants fraudulently concealed the facts and circumstances surrounding their knowledge of Sulivant's misconduct.

V. CAUSES OF ACTION

A. NEGLIGENCE

111. Plaintiffs adopt and incorporate by reference each and every allegation set forth above.

112. Defendants operate as part of a religious organization. As described herein, many church members hold positions of responsibility within the religious organization. These members act as agents for CON, Inc. and the entity with which they are directly involved (SFCN, ODCN, and/or District Board).

113. Plaintiffs Jane Does 1, 2, and 4 were minor members of the church and participated in church activities. Defendants owed a duty to protect minor children from harm.

114. Through its oaths, rules, policies, and procedures, Defendants assumed a duty to protect children in their organization, including Plaintiffs.

115. Plaintiff Jane Does 3 was a member of the church and participated in church activities. Defendants owed a duty to protect its members from harm.

116. Through its oaths, rules, policies, and procedures, Defendants assumed a duty to protect children and other members in their organization, including Plaintiffs. Defendants owed Plaintiffs duties to use ordinary care: (1) to avoid foreseeable risk to Plaintiffs; (2) aid or protect

Plaintiffs from peril when the peril was under Defendants' control; (3) to not place Plaintiffs in harm's way of foreseeable wrongful acts; and (4) to protect Plaintiffs from an unreasonable and foreseeable risk of harm on property CON, Inc. or SFCN owned, leased, or occupied, and where they retained control over the security and safety of the premises.

B. NEGLIGENT HIRING, SUPERVISION, TRAINING, AND RETENTION

117. Plaintiff adopts and incorporates by reference each and every allegation set forth above.

118. As employers, Defendants owed a duty to Plaintiffs as church members and members of a vulnerable group to use ordinary care to select, hire, supervise, train, and retain competent employees, including pastors, board members and church volunteers. Defendants owed a duty to Plaintiffs to exercise ordinary care in selecting, training, supervising, and retaining competent employees because these employees frequently interacted with Plaintiffs and Charles Sulivant, and were in a position to check Charles Sulivant's abuse of women and children.

119. Defendants also owed a duty to use ordinary care in exercising the control they had to select, train, supervise, and/or retain Charles Sulivant as a member of the church and the local church board. Defendants breached their duties by failing to exercise reasonable control over Charles Sulivant as it concerns properly enforcing reasonable boundaries for acceptable behavior, monitoring his interaction with Plaintiffs and other underage church members, and removing him from a position of power when they knew or should have known he presented a grave risk of harm to this vulnerable group. Instead, Defendants turned a blind eye to and actively hid Charles Sulivant's destructive behavior, recklessly allowing it to continue on their watch.

120. Specifically, Defendants breached their duties to Plaintiffs to use ordinary care to adequately research, select, hire, supervise, train, and/or retain their employees by, among other things:

- a. Hiring and/or retaining Charles Sulivant as a member of SFCN's local church board after church authorities received multiple reports about his sexual abuse of children;
- b. Allowing Charles Sulivant unchecked or nearly unchecked access to children attending SFCN after church authorities received multiple reports about his sexual abuse of children;
- c. Failing to supervise Charles Sulivant's actions;
- d. Retaining Charles Sulivant despite allegations of child abuse;
- e. Retaining Charles Sulivant when his predatory activities continued after multiple verbal warnings proved ineffective;
- f. Failing to have proper procedures and policies in place to handle reports of child abuse in a manner that protects children;
- g. Failing to require that employees monitor and/or report Charles Sulivant's activities once they received notice of the abuse to Plaintiff and others;
- h. Creating an environment in which employees like Johnny Stephens, Terry Rowland, and Mike Meeks looked the other way and tried to get others to do the same when they knew Charles Sulivant was taking physical and emotional advantage of Plaintiffs and others;
- i. Creating an environment in which employees like Johnny Stephens, Terry Rowland, and Mike Meeks actively hid the matter when they knew Charles Sulivant was taking physical and emotional advantage of Plaintiffs and others;

- j. Creating an environment in which employees allowed Charles Sulivant unsupervised access to Plaintiffs to engage in inappropriate physical behavior;
- k. Creating an environment in which employees failed to or ineffectively attempted to stop Charles Sulivant's unsupervised access to Plaintiffs and other children;
- l. Failing to remove employees from their positions for turning a blind eye to, actively hiding, or ineffectively attempting to stop Charles Sulivant's abuse of children; and
- m. Failing to have proper training, policies, procedures, and protocols in place to ensure that employees reported Charles Sulivant's improper conduct with children to the proper authorities and cut off his continued access to Plaintiffs and other children.

121. Defendants knew, or through exercise of reasonable care, should have known, that their acts and omissions as set forth herein would subject Plaintiffs to an unreasonable risk of harm.

122. Defendants' acts and omissions as set forth herein proximately caused and/or contributed to the cause of Plaintiffs' injuries resulting in damage to Plaintiffs, as set forth herein.

C. GROSS NEGLIGENCE

123. Plaintiffs re-allege and incorporate by reference all the foregoing allegations as if fully set forth herein.

124. Defendants, and their agents, employees, or servants, owed a duty to Plaintiffs to use reasonable care to report known dangers, including sexual predators like Sulivant and to protect Plaintiffs from Sulivant.

125. As described above, Defendants, and their agents, employees, and/or servants, breached that duty by failing to report Sulivant to authorities, to remove him from the Church, or

to do anything in response to allegations that Sulivant was abusing minor children, thereby allowing him to continue abusing children, including Plaintiffs, causing harm to Plaintiffs.

126. As a direct and proximate cause of Defendants' negligence, and the negligence of their agents and employees (for which the Defendants are vicariously liable), Plaintiffs incurred the damages alleged herein, including damages for mental and physical pain and suffering, mental and physical anguish, emotional distress, and other damages and pecuniary losses.

127. Defendants' conduct involved reckless or callous indifference to Plaintiffs' rights in that Defendants acted in the face of and contrary to a perceived risk that their actions and/or the actions of their agents and employees violated residents' rights. Defendants were aware, or simply did not care, that there was a substantial risk that the policies and customs it promulgated, the practices it condoned, and the negligence and indifference of its agents and employees would—and were—causing serious harm to young girls at the church, including Plaintiffs. Therefore, Plaintiffs are also entitled to punitive damages.

**D. VIOLATION OF THE OKLAHOMA CHILDREN'S CODE,
10A OK STAT § 10A-1-2-101**

128. Plaintiff adopts and incorporates by reference each and every allegation set forth above.

129. Oklahoma law requires that every person having reason to believe that a child under the age of eighteen years is a victim of abuse or neglect immediately report the matter to DHS. 10A OK Stat § 10A-1-2-101(B)(1).

130. Plaintiffs are the type of victims the statute seeks to protect, and Plaintiffs' injuries are the type of injuries the statute seeks to prevent.

131. Defendants, directly and through their agents and employees, knew or had reasonable cause to suspect that Plaintiffs and others were being abused by Charles Sulivant.

132. Defendants willfully and knowingly failed to report such abuse and, therefore, were in violation of 10A OK Stat § 10A-1-2-101(B)(1).

133. Defendants willfully and knowingly failed to report such abuse and, therefore, were negligent per se.

134. Defendants' failure to report the abuse caused Plaintiffs to suffer injury and damages by being or continuing to be sexually and physically abused, for which Defendants are liable.

135. Through their policies, threats to reporting victims and parents, and the termination of the employment of pastor Drew Dinnel, Defendants willfully and knowingly violated the statute's mandate that "no employer, supervisor, administrator, governing body, or entity shall interfere with the reporting obligations of any employee or other person or in any manner discriminate or retaliate against the employee or other person who in good faith reports suspected child abuse or neglect[.]" 10A OK Stat § 10A-1-2-101(B)(5).

136. As Plaintiffs are "a child who is the subject of the report or other child . . . harmed by the discharge, discrimination[, or retaliation]" described above (the latter applying when another victim's report was at issue), Plaintiffs are entitled to recover damages, costs, and attorney fees from Defendants. 10A OK Stat § 10A-1-2-101(B)(5).

VI. PLAINTIFFS' DAMAGES

137. Plaintiffs adopt and incorporate by reference each and every allegation set forth above.

138. As a direct and proximate result of Defendants' conduct as described above, Plaintiffs have suffered bodily injury, severe mental anguish, including physical manifestations of mental anguish, humiliation, embarrassment, and confusion, which has in the past and will in the future interfere with her daily life, reputation, ability to earn a living, enjoy life, and otherwise carry out her day-to day responsibilities. Plaintiffs claim the following items of specific damages to date:

- a. Mental anguish and impairment in the past;
- b. Mental anguish and impairment in the future;
- c. Costs of suit;
- d. Punitive damages;
- e. Pre- judgment interest at the highest rate all owed by law; und
- f. Post-judgment interest at the highest rate allowed by law.

139. Plaintiffs assert that the amount sought as damages for all claims set forth herein is in excess of seventy-five thousand dollars (\$75,000).

140. In addition to actual damages, Plaintiff is entitled to an award of punitive damages from each Defendant in that each Defendant knew or should have known, in light of the surrounding circumstances, that their conduct would naturally and probably result in damages and that each Defendant continued such conduct with malice or in reckless disregard of the consequences from which malice may be inferred.

VII. JURY DEMAND

141. Plaintiffs hereby demands a trial by jury.

VIII. PRAYER

142. WHEREFORE, premises considered, Plaintiffs respectfully pray for judgment in their favor and against Defendants, jointly and severally, as follows:

143. Damages as set out above, including all actual and compensatory damages for the injuries to Plaintiffs, including but not limited to damages for physical injuries, mental pain and anguish, loss of enjoyment, all in an amount in excess of \$75,000.00;

- a. Punitive Damages;
- b. Cost of Litigation; and
- c. Any other relief to which Plaintiff is entitled.

Respectfully submitted,

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