

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR ORANGE COUNTY

K.S., as Mother and Natural Guardian of
JANE A.S. DOE, a Minor Child,

Plaintiff,

CASE NO.: 2025-CA-001701-O

v.

DIVISION: 39

CHRISTIAN VARGAS,
FLORIDA MULTICULTURAL
DISTRICT COUNCIL OF THE
ASSEMBLIES OF GOD, INC., and
IGNITE LIFE CENTER, INC.

Defendants.

**DEFENDANT FLORIDA MULTICULTURAL DISTRICT COUNCIL OF
THE ASSEMBLIES OF GOD, INC.'S RESPONSE TO
AMENDED FIRST REQUEST FOR PRODUCTION PROPOUNDED BY
PLAINTIFF K.S., AS MOTHER AND NATURAL GUARDIAN OF
JANE A.S. DOE, A MINOR CHILD**

COMES NOW, the Defendant, FLORIDA MULTICULTURAL DISTRICT COUNCIL OF THE ASSEMBLIES OF GOD, INC., by and through its undesigned counsel, and pursuant to the provisions of Rule 1.350, Florida Rules of Civil Procedure, responds to the Amended First Request for Production propounded by the Plaintiff, K.S., AS MOTHER AND NATURAL GUARDIAN OF JANE A.S. DOE, A MINOR CHILD, as follows:

1. REQUEST: All documents referring or relating to Plaintiff or anyone purporting to act on Plaintiff's behalf.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad and vague with respect to the term "all documents," which, as phrased, includes work product and materials protected by the attorney-client privileged, e.g. communications between Defendant and its counsel as to the ongoing litigation. Without waiving the foregoing objection, and reserving all

rights, with the exception of communications between Plaintiff's counsel and Defendant's counsel, if any, none.

2. REQUEST: All documents created in whole or in part by Plaintiff or on Plaintiff's behalf.

RESPONSE: With the exception of pleadings and discovery served in this matter, and communications between Defendant's counsel and Plaintiff's counsel, if any, none.

3. REQUEST: All documents created prior to the filing of this lawsuit referring or relating to Christian Vargas in your care, custody, and/or control.

RESPONSE: Defendant objects to this request in as much as it is overly broad, vague and ambiguous, and as posed, includes work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, see Defendant's Privilege Log.

4. REQUEST: All documents referring or relating to complaints, allegations, suspicions, rumors, and/or reports of sexually inappropriate behavior in conjunction with the youth activities, including, but not limited to, Christian Vargas prior to April 2021 in your care, custody or control.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous, with respect to the phrase "in conjunction with the youth activities" and with respect to time, e.g. whether "prior to April 2021" refers to the date of the alleged inappropriate behavior or the date of the documents. Moreover, the request, as phrased, is vague and ambiguous as to the location of the youth activities for which documents are requested. More specifically, it is not limited to Ignite Life Center, the location referenced in Plaintiff's Complaint. Defendant further objects to this request in as much as it is overly broad, vague and ambiguous, and as posed, includes

work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, see Defendant's Privilege Log.

5. REQUEST: All documents including emails, referring or relating to complaints, allegations, suspicions, rumors, and/or reports of sexually inappropriate behavior committed by anyone associated with Defendant Ignite Life Center against minor children prior to April 2021 in your care, custody and/or control.

RESPONSE: Defendant objects to this request in as much as it is overly broad, vague and ambiguous, particularly with regard to time, e.g. whether "prior to April 2021" refers to the date of the alleged inappropriate behavior or the date of the documents, and as posed, includes work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, see Privilege Log.

6. REQUEST: All documents referring or relating to all DISTRICT programs, groups, or activities with which Christian Vargas was associated at any time, including but not limited to rosters, volunteer applications, awards, trip applications, photographs, and media recordings.

RESPONSE: None.

7. REQUEST: All documents referring or relating to the relationship between DISTRICT and Defendant Ignite Life between 2015 and 2022.

RESPONSE: None; Ignite Life Center has been a sovereign church since approximately 1990.

8. REQUEST: All documents referring or relating to child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines created,

implemented by, distributed, in effect, relied upon, and/or used by DISTRICT between 2015 and 2022.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

9. REQUEST: All documents referring or relating to the creation, implementation, reliance upon, use, and/or distribution of child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines by DISTRICT between 2015 and 2022.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

10. REQUEST: All documents referring or relating to how reports, complaints, suspicions, and/or rumors of child sexual abuse were to be handled by churches affiliated with DISTRICT, including how such information should be reported, investigated, and/or otherwise addressed, in effect between 2015 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a

sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

11. REQUEST: All documents referring or relating to the sexual abuse prevention training of employees, volunteers, and agents of the churches affiliated with DISTRICT, including, but not limited to, Defendant Ignite Life, in effect between 2015 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

12. REQUEST: All documents referring or relating to policies and procedures for sexual abuse prevention and/or reducing the risk of sexual abuse of children attending youth programming at the churches affiliated with DISTRICT in effect between 2015 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

13. REQUEST: All documents referring or relating to policies for evaluating, screening, selecting, approving, and/or deregistering individuals at churches affiliated with DISTRICT in effect between 2015 to 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

14. REQUEST: All handbooks, rules, guidelines, and/or regulations issued to or made available to Ignite Life ministers, leadership, employees, volunteers, parents, and/or children between 2015 and 2022, regardless of when the documents were created, in your care, custody and/or control, regarding the sexual abuse of children.

RESPONSE: None.

15. REQUEST: All documents referring or relating to the supervision of children attending programs at churches affiliated with DISTRICT in effect between 2015 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

16. REQUEST: All documents referring or relating to DISTRICT's involvement, however small, with the Ignite 'The Call Matters' between 2015 and 2022.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a

sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested.

17. REQUEST: All documents referring or relating to the corporate, business, agency, and/or other relationship between you and Defendant Church.

RESPONSE: None.

18. REQUEST: All communications between DISTRICT and Defendant Ignite Life regarding the allegations that are the subject of Plaintiffs Complaint.

RESPONSE: None.

19. REQUEST: All communications between DISTRICT and anyone else regarding the prevention, mitigation, and/or response to sexual abuse of children Defendant Ignite Life Center between 2015 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad and vague with respect to the term “anyone else,” and with respect to time, e.g. whether it refers to communications which occurred between 2015 and 2022, or whether it refers to alleged sexual abuse which occurred between 2015 and 2022. Moreover, the request appears to be incomplete, as phrased. Without waiving the foregoing objections and reserving all rights, none.

20. REQUEST: All documents referring or relating to the financial relationship between DISTRICT and Defendant Ignite Life Center between 2015 and 2022.

RESPONSE: None.

21. REQUEST: Copies of each edition of the Assemblies of God Constitution and Bylaws in effect from 2015 to the present, regardless of when created.

RESPONSE: See attached.

22. REQUEST: Copies of each edition of the Florida Multicultural District's Constitution and Bylaws in effect from 2015 to the present, regardless of when it was created.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested. Without waiving the foregoing objection, and reserving all rights, see attached.

23. REQUEST: All transcripts and/or videos of deposition or other sworn testimony given by your employees, administrators, volunteers, pastors, or other agents in matters alleging sexual abuse committed between 2015 and the present by adults associated with youth programs at churches affiliated with DISTRICT, regardless of when the testimony was given.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence. More specifically, Ignite Life Center was a sovereign church, i.e. not under the governance of Defendant, during the time period for which documents have been requested. Without waiving the foregoing objection, and reserving all rights, none.

24. REQUEST: All documents referring to or relating to law enforcement, district attorney, state or federal government, agency, or other investigation of any facts alleged in Plaintiffs Complaint. Such documents include but are not limited to citations, summons, letters, memoranda, photographs, videos, statements, reports, or investigative materials provided by,

received from, or given to any state or federal government agency or any other entity in connection with any investigation conducted regarding the facts alleged in the Complaint.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks are work product. Moreover, the materials requested are public record and are equally available to Plaintiff. Plaintiff has failed to make the requisite showing that she is unable to obtain the materials requested, or the substantial equivalent of same, without undue hardship, as required by Rule 1.280, Florida Rules of Civil Procedure. See Defendant's Privilege Log.

25. REQUEST: Documents reflecting DISTRICT employees, volunteers and/or agents who were associated in any way with the Ignite Life Center Church at any time between 2015 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad and vague with respect to the phrase "associated in any way." Without waiving the foregoing objection and reserving all rights, none.

26. REQUEST: All recorded or written statements taken by you, your agents, or representatives, including your insurance companies, of the parties to this action or any other people with knowledge of the facts alleged in the Complaint, referring or relating to the facts alleged in the Complaint.

RESPONSE: None.

27. REQUEST: All documents, including those created in anticipation of litigation, reflecting the names, addresses, and phone numbers of "occurrence witnesses," or any witnesses to the incidents alleged in the Complaint. In lieu of producing work product documents, Defendant may produce a list of occurrence witnesses, including their addresses and phone numbers.

RESPONSE: None.

28. REQUEST: All communications sent to, from, or between employees, administrators, pastors, representatives, or other agents of Defendants referring or relating to the incidents alleged in the Complaint or the existence of this lawsuit, regardless of when such communications were created. Such communications should include but are not limited to emails, text messages, and social media messages sent from, received by, and/or maintained on email accounts, cellular phones, social media accounts, and/or servers owned by, maintained by, or associated with Defendants.

RESPONSE: Defendant objects to this request inasmuch as the documents it seeks include documents prepared in anticipation of litigation, work product and documents protected by the attorney-client privilege. See Privilege Log.

29. REQUEST: All documents produced in discovery to any other party in this case.

RESPONSE: None.

30. REQUEST: All documents obtained by request or subpoena in this case.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous with respect to the phrase “by request,” and as posed, appears to include work product and material protected by the attorney-client privilege. Without waiving the foregoing objection and reserving all rights, none.

31. REQUEST: All non-privileged documents reflecting your communications with third parties regarding the allegations in this case.

RESPONSE: None.

32. REQUEST: All non-privileged documents relating to the District's participation, including any District employee's, representative's, volunteer's, or agent's participation, in the

criminal investigation(s) and prosecution(s) of Christian Vargas on charges relating to sexual conduct with children.

RESPONSE: None.

33. REQUEST: All contracts and/or documents describing Christian Vargas' relationship with Defendant, including a written job description, and description of all obligations, rights, duties, and responsibilities of Christian Vargas and Defendant.

RESPONSE: None.

34. REQUEST: All correspondence and records of communication between Christian Vargas and any representative of Defendant referring or relating to the Plaintiff and/or the subject matter of this lawsuit.

RESPONSE: None.

35. REQUEST: All records of background checks, references, and other inquiries made by Defendant concerning Christian Vargas prior to or during his period of affiliation with the District.

RESPONSE: Not applicable; none.

36. REQUEST: Any and all incident reports concerning Christian Vargas.

RESPONSE: None.

37. REQUEST: Any and all recordings (digital, video, audio, security surveillance, or otherwise) of Christian Vargas or Plaintiff on the date(s) of the subject incident(s), or of anyone discussing the subject incident referenced in the Complaint.

RESPONSE: None.

38. REQUEST: For any documents withheld on the basis of privilege, provide a complete privilege log as required by Rule 1.280(b)(6).

RESPONSE: See Defendant's Privilege Log.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served and filed via the Florida Court's E-portal, to the following, on this 17th day of December, 2025:

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