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9 Attorneys for Plaintiffs

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF RIVERSIDE

12 JANE DOE 1; JANE DOE 2, a minor by and )  
13 through her guardian ad litem Sophie Agopian; )  
14 JANE DOE 3, a minor by and through her )  
15 guardian ad litem [REDACTED]; JANE DOE 4, )  
16 a minor by and through her guardian ad litem )  
17 [REDACTED], )

Case No.: CVRI 2202973

18 Plaintiffs,

COMPLAINT FOR DAMAGES; DEMAND FOR JURY TRIAL

v.

19 CHILDNET YOUTH AND FAMILY )  
20 SERVICES, INC.; FOSTER FAMILY )  
21 NETWORK; COUNTY OF RIVERSIDE and )  
22 DOES 1 through 50, inclusive, )  
23 )  
24 Defendants. )

25 Plaintiffs hereby allege as follows:

26 1. Fictitious names are being used for plaintiffs, and for their foster and adoptive parents, in  
27 order to protect plaintiffs’ privacy as victims of childhood abuse and neglect, particularly in light of the  
28 immense publicity that has surrounded them in recent years.

29 2. Plaintiffs Jane Doe 2 (date of birth [REDACTED]), Jane Doe 3 (date of birth [REDACTED])  
30 [REDACTED] and Jane Doe 4 (date of birth: [REDACTED]) are minors and dependents of the Juvenile  
31 Court of the County of Riverside. On December 1, 2021, the Juvenile Court appointed attorney Sophie  
32 Agopian as Jane Doe 2’s and Jane Doe 3’s guardian ad litem for purposes of civil litigation and  
33 appointed attorney Colleen Crowley as Jane Doe 4’s guardian ad litem for purposes of civil litigation.

1           3.       Defendants ChildNet Youth and Family Services, Inc. and Foster Family Network  
2 (collectively “ChildNet”) are related business entities with their principal places of business in  
3 California. They are licensed by the State of California as foster family agencies and are in the business  
4 of recruiting, certifying and training foster parents, placing children in foster homes and overseeing  
5 children when they are living in its certified foster homes.

6           4.       Defendant Does 1 through 50 are individuals and/or entities doing business or residing in  
7 California whose true names and capacities are unknown to plaintiff, who therefore sue such defendants  
8 by such fictitious names. Plaintiff will amend the complaint to show the true names and capacities of  
9 each such Doe defendant when ascertained. Each such defendant is legally responsible in some manner  
10 for the events, happenings and/or tortious and unlawful conduct that caused the injuries and damages  
11 alleged in this complaint.

12           5.       Each defendant is the agent, servant, and/or employee of the other defendants, and each  
13 defendant was acting within the scope of his, her or its authority as an agent, servant, and/or employee  
14 of the other defendants. Defendants, and each of them, are individuals, corporations, partnerships, and  
15 other entities which engaged in, joined in, and conspired with the other wrongdoers in carrying out the  
16 tortious and unlawful activities described in this complaint, and defendants, and each of them, ratified  
17 the acts of the other defendants as described in this complaint.

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19                           Defendants’ Failure to Protect Plaintiffs from Severe Abuse and Neglect

20           6.       In early 2018, the County of Riverside removed plaintiffs and their nine other siblings  
21 from their biological parents (David and Louise Turpin) because of a long history of abuse and neglect.  
22 Plaintiffs had been imprisoned in their home and allowed virtually no contact with the outside world for  
23 most or all of their lives. As defendants clearly understood, these children were in a very fragile state,  
24 both physically and emotionally, and therefore needed to be placed in a home where they could recover  
25 from their trauma and learn how to integrate into society. The County asked ChildNet to find a  
26 placement for plaintiffs and two of their siblings.

27           7.       Mr. and Ms. O. were a married couple whom ChildNet had certified to act as foster  
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1 parents. Defendants knew that they were unfit to be foster parents, particularly for children as  
2 vulnerable as plaintiffs, because they had a prior history of abusing and neglecting children who had  
3 been placed in their care. Defendants were aware of credible reports of abuse and neglect committed by  
4 this couple and their adult daughter. However, defendants did not act upon that information. They  
5 failed in their duties as a foster family agency, as a child protective services agency and as mandated  
6 reporters. As to ChildNet, it had a financial motive to continue placing a large number of children in  
7 this foster home and thereby strengthen its relationship with the County of Riverside, and it put that  
8 financial motive ahead of its responsibility to children.

9 8. Against the advice of some of its own employees, ChildNet placed plaintiffs and two of  
10 their siblings in foster care with Mr. and Ms. O. Soon thereafter, defendants were put on notice that  
11 these foster parents and their adult daughter were sexually, physically and emotionally abusing and  
12 severely neglecting plaintiffs. At least one of plaintiffs' siblings had conversations with defendants'  
13 social workers in which she disclosed the abuse and neglect and asked for help. The abuse and neglect  
14 that plaintiffs were subjected to included:

- 15 a. Mr. O. sexually abused plaintiffs by, among other things, grabbing and fondling their  
16 buttocks, legs and breasts, kissing them on the mouth and making sexually suggestive  
17 comments.
- 18 b. The foster parents and their daughter physically abused plaintiffs, including but not  
19 limited to hitting them in the face with sandals, pulling their hair, hitting them with a belt  
20 and striking their heads.
- 21 c. The foster parents subjected plaintiffs to severe emotional abuse, including but not  
22 limited to:
  - 23 i. As "punishment," making a child sit by herself, sometimes outside, for many  
24 hours at a time.
  - 25 ii. Making the children sit in a circle and recount in detail the horrors that they had  
26 experienced while living with their biological parents.
  - 27 iii. Preventing the children from communicating with their adult siblings.

- iv. Verbally abusing plaintiffs, cursing at them, and telling them that they were worthless, would never be loved and should commit suicide.
- v. Threatening to return the children to their biological parents.
- vi. Threatening to put their hands in an electric socket.
- vii. Forcing plaintiffs to eat excessive amounts of food, which led to eating disorders.
- viii. Forcing them to eat their own vomit.
- ix. Forcing them to watch as a foster child in the adult daughter's care was severely physically abused and tortured.

d. The foster parents subjected plaintiffs to severe neglect, including failure to provide them with sufficient or appropriate food.

9. Defendants had a duty to protect plaintiffs, but instead protected the foster parents by failing to report the abuse and neglect of plaintiffs to child protective services or to law enforcement and by failing to intervene and interfere when abuse and neglect was reported by others. Defendants allowed plaintiffs to remain in the home for three years.

10. Eventually, in March 2021, an investigation by the Riverside County Sheriff's Department led to the arrest of Mr. and Ms. O. and their daughter for lewd acts with a child, inflicting injury on a child, willful child cruelty and false imprisonment, and plaintiffs were removed from their home. By then, plaintiffs had suffered physical and psychological injuries and severe emotional distress as a result of three years of abuse and neglect. These injuries were particularly severe because plaintiffs were in a very vulnerable state to begin with.

FIRST CAUSE OF ACTION – Violation of Child Abuse and Neglect Reporting Act

(Against All Defendants)

11. Plaintiffs hereby incorporate by this reference all paragraphs of this complaint as if fully set forth herein.

12. Pursuant to the Child Abuse and Neglect Reporting Act ("CANRA"), Penal Code sections 11164 et. seq., defendants, by and through their employees and agents, are "mandated reporters" and must report any reasonable suspicion of child abuse or neglect. Defendants knew or

1 reasonably suspected that plaintiffs and others experienced abuse and neglect in the foster home, but  
2 repeatedly failed to report that to either child protective services or law enforcement. Indeed, defendants  
3 actively withheld this information from the authorities. Moreover, defendants failed to properly train  
4 their employees regarding the duties of mandated reporters. Had defendants properly reported the abuse  
5 and neglect by the foster parents, it is likely that plaintiffs never would have been placed in their home  
6 in the first place or would have been removed much earlier.

7 13. As a result of defendants' violation of CANRA, plaintiffs sustained injuries and damages  
8 as alleged herein.

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10 SECOND CAUSE OF ACTION – Negligence

11 (Against defendants CHILDNET YOUTH AND FAMILY SERVICES, INC.; FOSTER FAMILY  
12 NETWORK and DOES 1 through 50, inclusive )

13 14. Plaintiffs hereby incorporate by this reference all paragraphs of this complaint as if fully  
14 set forth herein.

15 15. Defendants owed a duty of care to plaintiffs to protect them from abuse and neglect. This  
16 duty arose from defendants' role as the foster family agency that certified Mr. and Ms. O. as foster  
17 parents, placed plaintiffs in the home and oversaw plaintiffs while they lived in the home, including  
18 visiting them on a weekly basis. This duty also arose from the special relationship that defendants had  
19 with plaintiffs and with the foster parents and from the relevant statutes and regulations governing foster  
20 family agencies, including but not limited to Title 22, California Code of Regulations, sections 88000 et.  
21 seq.

22 16. Defendants breached this duty of care by, among other things, failing to report the abuse  
23 and neglect by the foster parents to child protective services or law enforcement, actively withholding  
24 this information from the authorities, placing plaintiffs in the home and allowing plaintiffs to remain in  
25 the home for three years despite being aware of the ongoing abuse and neglect detailed above.

26 17. As a result of defendants' breach of their duty of care, plaintiffs sustained injuries and  
27 damages as alleged herein.

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1    THIRD CAUSE OF ACTION – Breach of Mandatory Duties  
2    (Against All Defendants)

3            18. Plaintiff hereby incorporates by this reference all paragraphs of this complaint as if fully  
4 set forth herein.

5            19. In addition to CANRA, defendants violated various other mandatory duties intended to  
6 protect children from abuse and neglect and are therefore liable for plaintiff’s injuries. These mandatory  
7 duties include, but are not limited to:

8            a. California Department of Social Services (“CDSS”) regulation 31-125.1, which required  
9 defendants to determine whether the children were at risk of abuse or neglect and in need  
10 of child welfare services.

11           b. CDSS regulation 31-125.2, which required defendants to have in-person contact with  
12 all of the children alleged to have been abused or neglected, both at the time of an initial  
13 investigation and at the time of any follow-up investigation. This regulation also required  
14 in-person contact with the parents and “collateral contacts” with knowledge of the  
15 condition of the children.

16           c. CDSS regulations 31-101.5, 31-125.3, 31-125.4 and 31-125.5, which required  
17 defendants to determine whether child welfare services were, or were not, necessary and  
18 to document that decision. If services were determined to be necessary, defendants were  
19 required to create a case plan.

20           20. Defendants breached each of the aforementioned mandatory duties by, among other acts  
21 and omissions:

22           a. Not having the mandated in-person contacts and interviews with the children, their foster  
23 parents and collateral contacts. Had defendants done so, there would have been  
24 absolutely no doubt that the children were being subjected to abuse and neglect.

25           b. Not making a determination whether services were required and not providing the  
26 services that this family needed in order to avoid further abuse and neglect of the  
27 children. Defendants knew that services were necessary in order to protect the children,  
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1 but simply chose not to take the steps to provide those services or, if services were  
2 refused, to take other necessary steps to protect the children.

3 c. Not creating a case plan that would have provided a means for evaluating the ongoing  
4 safety of the children and whether they could safely remain in the home.

5 21. As a result of defendants' breaches of mandatory duties, plaintiffs sustained injuries and  
6 damages as alleged herein.

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8 FOURTH CAUSE OF ACTION – Breach of Duties Arising under Special Relationship

9 (Against All Defendants)

10 22. Plaintiffs hereby incorporate by this reference all paragraphs of this complaint as if fully  
11 set forth herein.

12 23. A special relationship was established between defendants, on the one hand, and  
13 plaintiffs, on the other hand, by virtue of defendants having entered upon the task of purporting to  
14 protect the children. This induced reliance and dependence on the part of the children and their siblings,  
15 who reasonably believed that defendants would take meaningful steps to protect them.

16 24. Defendants increased the danger to plaintiffs by ratifying and sanctioning the foster  
17 parents' abuse and neglect of the children. This led others, including mandated reporters and plaintiffs'  
18 siblings, to refrain from taking any further steps to protect the children. As a result of the special  
19 relationship, defendants owed a duty to exercise reasonable care. Defendants breached that duty, as  
20 discussed above, by failing to take meaningful steps to protect the children from abuse and neglect.  
21 Defendants knew that the children were being abused and neglected, that the abuse and neglect were  
22 almost certain to continue, that the children would suffer lasting damage as a result and that this family  
23 needed child welfare services, but defendants willfully chose to do nothing because that was the easier  
24 course to take. Defendants never considered trying to remove the children from the home and never  
25 made a discretionary decision to allow them to remain in the home.

26 25. As a result of defendants' breach of their duty of care, plaintiffs sustained injuries and  
27 damages as alleged herein.

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1 WHEREFORE plaintiffs pray for the following relief:

2 1. Compensatory damages for the physical and psychological injuries and emotional distress  
3 that plaintiffs suffered.

4 2. Costs of suit and such other and further relief as the Court deems just and proper.  
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6 Date: July 19, 2022

BOOTH LAW

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8 By:   
9 Roger E. Booth  
10 Attorneys for Plaintiffs  
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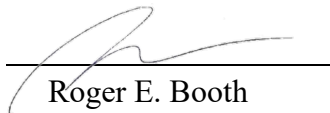


DEMAND FOR JURY TRIAL

Pursuant to Code of Civil Procedure section 631, plaintiffs demand a jury trial on all issues so triable.

Date: July 19, 2022

BOOTH LAW

By:   
Roger E. Booth  
Attorneys for Plaintiffs