

IN THE SUPERIOR COURT OF TOOMBS COUNTY  
STATE OF GEORGIA

MATTHEW STANLEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. _____
	)	
JIM COLLINS Jr.	)	
and DOES 1-50,	)	
	)	
Defendants.	)	
_____	)	

**COMPLAINT**

COMES NOW Plaintiff Matthew Stanley and brings this action against Jim Collins for injuries and damages sustained as a result of childhood sexual abuse perpetrated by Collins. In support of this Complaint, Plaintiff states as follows:

**INTRODUCTION**

1. The story behind this lawsuit is tragically familiar: for years, a sexual predator, taking advantage of his position with a religious institution, used his authority to abuse some of the church’s most vulnerable members.
  
2. Compounding the sexual predator’s malfeasance, the church for which he worked failed to screen its volunteers appropriately, failed to institute safeguards for the children under its care, and failed to act decisively upon learning of the predator’s actions.

3. In this case, that sexual predator was Jim Collins. The victim brave enough to come forward is Matthew Stanley.

### **PARTIES**

4. Plaintiff Matthew Stanley is a resident of Athens, Georgia, born January, 1984.

5. Defendant Jim Collins is a resident of Toombs County, Georgia.

6. Plaintiff Matthew Stanley is currently unaware of the names of the defendants sued here as Does 1-50 (“the Doe Defendants”), many of whom served at relevant times as leaders at the First Baptist Church, Vidalia. Plaintiff will amend this complaint upon learning of a Doe Defendant’s true name and capacity. Plaintiff is informed and believes that the Doe Defendants are liable for the injuries suffered by Plaintiff.

### **JURISDICTION AND VENUE**

7. As a resident of Toombs County, Defendant Collins is subject to the jurisdiction of this Court. Venue is accordingly proper in this Court under Ga. Const. Art. 6, § 2, ¶ VI.

### **FACTUAL ALLEGATIONS**

#### **Overview of Child Sexual Abuse**

8. According to the U.S. Department of Justice's National Sex Offender Public Registry Child, sexual abuse affects approximately 1.8 million adolescents

in the United States. Studies from the Centers for Disease Control suggest that at least one in four girls, and one in six boys, are sexually abused at some point in their lives.

9. The full scope of child sexual abuse is, however, difficult to determine because victims and their families often choose not to report it. The reasons are myriad: the disproportionate power in a relationship between a child and an adult; intimidation by an adult perpetrator; the well-documented tendency of a victim to blame himself or herself and to keep the abuse secret, often for decades; a family's desire not to make the abuse known publicly; and, until recently, the unavailability of legal redress for incidents that occurred years before the victim reached adulthood. For all of these reasons, experts widely agree the actual incidence of child sexual abuse far exceeds what is reported to authorities.

10. Familiar persons, not strangers, are responsible for most of the sexual abuse visited upon children. According to a 2003 National Institute of Justice report, three out of four child victims knew their abusers well – as family members, religious leaders, youth volunteers, teachers, coaches and in other ways – at the time abuse occurred.

11. Child abusers also often build upon their access to victims through what experts call "grooming" behavior. This grooming behavior often takes the

form of providing travel, gifts, personal attention, and other forms of special treatment.

12. Child abusers also often exploit a position of power in their relationships with their victims through their age and experience, size and strength, and/or their status vis-à-vis their victims or the victims' parents or guardians. By using their power and status to gain the trust and confidence of victims, child abusers instill fear and are able to coerce victims both into engaging in sexual acts and preventing victims from reporting that abuse to their parents or the authorities.

13. Childhood sexual abuse often devastates the lives of its victims. Victims typically suffer from depression, anxiety, low self-esteem, dysfunctional adult relationships, and abnormal or distorted views of sex. Like other sufferers of Post-Traumatic Stress Disorder, victims of childhood sexual abuse often self-medicate with alcohol, drugs, or sex; or grow withdrawn, mistrustful of adults, and suicidal. According to the U.S. Department of Health and Human Services' Child Welfare Information Gateway, boys who have suffered multiple incidents of sexual abuse are 4,000 times more likely later in life to use intravenous drugs, and nine times more likely to become involved in criminal activity than those who were not sexually abused as children.

14. Victims often do not learn until much later that the abuse they suffered as children accounts for troubles they have suffered in their adult lives.

The confusing experience of child sex abuse, subsequent psychological pain, and self-destructive coping behaviors intended to assuage the pain make it difficult for victims to apprehend later in life that their problems with addiction, relationships, and mental health arise from the sexual abuse.

15. Spearheaded by groups like Voice Today and SOL-Reform, a national movement has arisen to increase access to justice for child sex abuse victims, including by liberalizing punitive statutes of limitations that prevent adult survivors from acting on the recognition that their current injuries trace back to the abuse they suffered as children.

### **Overview of Georgia Hidden Predator Act**

16. In July 2015, the Georgia General Assembly passed, and Governor Nathan Deal signed into law, House Bill 17, the Hidden Predator Act (the “Act”). The Official Code of Georgia codifies the Act at § 9-3-33.1.

17. The Act permits “plaintiffs of any age who were time barred from filing a civil action for injuries resulting from childhood sexual abuse due to the expiration of the statute of limitations in effect on June 30, 2015, . . . to file such actions against the individual alleged to have committed such abuse before July 1, 2017, thereby reviving those civil actions which had lapsed or technically expired under the law in effect on June 30, 2015.”

18. Georgia's Hidden Predator Act thus eliminated a major legal technicality for adults seeking redress for the abuse they suffered as children. As Representative Jason Spencer, the Act's legislative sponsor, stated at the time of its passage, "Georgia will no longer be the worst state in the country in providing justice to victims of childhood sexual abuse. For too long our laws protected pedophiles and the institutions that harbored them. The Hidden Predator Act will reverse this and empower the victims to confront their perpetrators and their accomplices in the courtroom."

### **Collins' Sexual Abuse of Matt Stanley**

19. Matthew Stanley grew up attending First Baptist Church in Vidalia, Georgia, with his family. Until he left for college in 2002, he could be found at First Baptist Church about twice a week, participating in worship services, Sunday school, the church's youth group, and Bible study.

20. Like many others reared in devout families, Matt Stanley was taught to respect and obey the religious leaders in his faith community.

21. As soon as he could, when he reached the seventh grade, Matt Stanley began participating in First Baptist Church's youth group. It was there he met and grew to know Jim Collins.

22. During Matt Stanley's early adolescence, Jim Collins served as a volunteer in First Baptist Church's youth program. Collins' involvement in First

Baptist's program progressed, and in 1997, when Matt Stanley was 12, the leaders of First Baptist Church appointed Collins to be the Church's Youth Pastor.

23. Collins invested considerable time and energy into developing relationships with Matt Stanley and other boys at First Baptist. Collins would often invite Matt and the other boys to his home, provide them with food and drink, and host gatherings to watch sporting events, including sleepovers. He became in many ways a trusted authority figure to Matt Stanley and the other boys.

24. In 1999, Collins, taking advantage of the relationship that he had developed with the church's youth, initiated a purported weekly Bible study at his home, inviting Matt Stanley and other boys to participate.

25. First Baptist Church leaders and the parents and guardians of the boys allowed the boys gather at Collins' house because of Collins' affiliation with the Church and because the meetings were purportedly for religious purposes.

26. At first the group studied the Bible. Within a few weeks, however, Collins steered the group's activities in a decidedly different direction.

27. Under Collins's direction, the group began to view pornography together at Collins's home. He encouraged each boy to engage in individual sexual acts, both privately and in a group setting. On at least one occasion, Collins videotaped these sexual acts as well, causing additional harm to Matt Stanley.

28. Collins also engaged in highly inappropriate, sexualized physical contact with many of the boys, including Matt Stanley.

29. In addition, Collins sexually abused Matt Stanley and the other boys in these ways on church-sponsored out-of-town trips during which Collins served as First Baptist Church's adult chaperone for the boys.

30. Collins continued to abuse the trust and confidence he had gained with the boys and their families for several years, at least until 2002. In the case of Matt Stanley alone, Collins's sexual abuse occurred on more than 100 separate occasions from when Matt Stanley was 11 until he turned 18.

31. As he grew older, Matt Stanley objected to and sought to avoid Collins' abuse. Collins, however, ignored Matt's objections and persisted in sexually abusing him.

32. Collins's strategy of intimidation and silencing succeeded while Matt Stanley was a child. As is typical of many child sex abuse survivors, Matt did not tell his parents or anyone else what had happened to him at those First Baptist Church-sponsored events until years later.

### **Matt Stanley's Injuries as a Result of Collins's Sexual Abuse**

33. As a direct result of the wrongful conduct alleged herein, Matt Stanley has suffered, and continues to suffer, great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment,

loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Collins' actions have prevented and will prevent Matt Stanley from performing normal daily activities and obtaining the full enjoyment of life; have caused and will cause Matt Stanley to sustain loss of earnings and earning capacity; and have forced and will force Matt Stanley to incur expenses for medical and psychological treatment, therapy, and counseling.

### **COUNT I: BATTERY**

#### **(Against Collins)**

34. Plaintiff Matt Stanley re-alleges and incorporates by reference each allegation contained in Paragraphs 1 through 33 of this Complaint.

35. On numerous occasions between 1996 and 2002, Collins subjected Matt Stanley to illegal and unwanted sexual acts.

36. The illegal and unwanted sexual acts perpetrated against Matt Stanley by Collins include acts constituting child molestation or aggravated child molestation under the laws of the State of Georgia.

37. The illegal sexual acts perpetrated against Matt Stanley by Collins constitute childhood sexual abuse, as that term is defined in O.C.G.A. § 9-3-33.1.

38. Matt Stanley has suffered damages as a direct and proximate result of Collins's wrongful acts.

39. Moreover, Collins' pervasive sexual abuse of Matt Stanley showed willful misconduct, malice, wantonness, oppression, and an entire want of care that raises the presumption of Collins's conscious indifference to the consequences of his actions.

## **COUNT II: ASSAULT**

### **(Against Collins)**

40. Plaintiff Matt Stanley re-alleges and incorporates by reference each allegation contained in Paragraphs 1 through 39 of this Complaint.

41. On numerous occasions between 1996 and 2002, Collins engaged in, and attempted to engage in, illegal and unwanted sexual acts with Plaintiff.

42. Collins' attempts to engage in these acts reasonably caused Matt Stanley fear and/or apprehension of illegal and unwanted sexual contact.

43. These illegal and unwanted sexual acts perpetrated against Matt Stanley by Collins include acts constituting child molestation or aggravated child molestation under the laws of the State of Georgia.

44. The illegal sexual acts perpetrated against Matt Stanley by Collins constitute childhood sexual abuse, as that term is defined in O.C.G.A. § 9-3-33.1.

45. Plaintiff Matt Stanley has suffered damages as a direct and proximate result of Collins's wrongful acts.

46. Moreover, Collins's pervasive sexual abuse of Matt Stanley showed willful misconduct, malice, wantonness, oppression, and an entire want of care that raises the presumption of Collins's conscious indifference to the consequences of his actions.

**COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL  
DISTRESS**  
**(Against Collins)**

47. Plaintiff Matt Stanley re-alleges and incorporates by reference each allegation contained in Paragraphs 1 through 46 of this Complaint.

48. On numerous occasions between 1996 and 2002, Collins engaged in illegal and unwanted sexual acts with Plaintiffs. These include acts constituting child molestation or aggravated child molestation under the laws of the State of Georgia.

49. The illegal sexual acts perpetrated against Matt Stanley by Collins constitute childhood sexual abuse, as that term is defined in O.C.G.A. § 9-3-33.1.

50. As a result of Collins' wrongful acts, Matt Stanley has suffered, and continues to suffer, great pain of mind and body, shock, severe emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life.

51. Plaintiff Matt Stanley has suffered damages as a direct and proximate result of Collins's wrongful acts.

52. Moreover, Collins' pervasive sexual abuse of Matt Stanley showed willful misconduct, malice, wantonness, oppression, and an entire want of care that raises the presumption of Collins' conscious indifference to the consequences of his actions.

**COUNT IV: NEGLIGENCE**

**(Against Doe Defendants)**

53. Plaintiff Matt Stanley re-alleges and incorporates by reference each allegation contained in Paragraphs 1 through 52 of this Complaint.

54. Defendant Does 1-50 owed a duty of care to the members of and participants in activities sponsored by First Baptist Church.

55. Defendants were grossly negligent in hiring, retaining, and/or permitting Collins to be serve as a volunteer and as Youth Pastor at First Baptist Church, Vidalia; and/or in failing to put in place appropriate protocols to protect Plaintiff and other children from Collins's sexual abuse.

56. From 1996 to 2002, Defendants failed to enact appropriate policies that would protect children from child sex abuse by their youth pastors, teachers, employees, franchisees, or volunteers.

57. Defendants knew or should have known of the risk of child sex abuse posed by allowing First Baptist Church-sponsored youth activities to occur without proper training, supervision, or screening of volunteers and staff.

58. As a result of Defendants' failure to institute appropriate protections, Collins was able to engage in unlawful sexual abuse of Matt Stanley over a period of many years.

59. Matt Stanley has suffered damages as a direct and proximate result of Defendants' negligence.

60. Moreover, Defendants' hiring, retention, and/or permitting of Collins, and Defendants' failure to implement policies or procedures sufficient to protect minor children entrusted to their care from sexual abuse, demonstrate an entire want of care and conscious indifference to consequences such that punitive damages are warranted.

**COUNT V: CONSPIRACY TO COMMIT TORTIOUS  
ACTS OF CHILD SEXUAL ABUSE  
(As to All Defendants)**

61. Plaintiff re-alleges and incorporates by reference each allegation contained in Paragraphs 1 through 60 of this Complaint.

62. Collins and the other Defendants acted in concert to commit multiple acts of sexual abuse against Matt Stanley.

63. Collins and the other Defendants collectively arranged for and/or facilitated multiple overnight trips, during which Collins shared hotel rooms and overnight accommodations with Matt Stanley. These overnight trips facilitated Collins's unlawful sexual contact with Matt Stanley.

64. Collins provided Matt Stanley with gifts and other items. One purpose of providing these gifts and other items was to further Collins's unlawful sexual contact with Matt Stanley.

65. The unlawful sexual acts perpetrated against Matt Stanley constitute tortious conduct under the laws of the State of Georgia.

66. The illegal sexual acts perpetrated against Matt Stanley by Collins constitute childhood sexual abuse, as that term is defined in O.C.G.A. § 9-3-33.1.

67. Plaintiff Matthew Stanley has suffered damages as a direct and proximate result of the wrongful conduct alleged herein.

WHEREFORE, Plaintiff Matt Stanley respectfully prays that the Court:

- (a) Grant a trial by jury;
- (b) Award Plaintiff his general and special damages under Counts I through VII, in an amount to be proven at trial;
- (c) Award Plaintiff punitive damages under Counts I through V and pursuant to O.C.G.A. §51-12-5.1;
- (d) Award Plaintiff appropriate injunctive relief;
- (e) Award Plaintiff interest on any damages awarded;
- (f) Award Plaintiff attorneys' fees and costs incurred in bringing this action; and
- (g) Award Plaintiff such further relief as the Court deems proper.

Respectfully submitted this \_\_\_\_th day of October, 2015.

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