



████████████████████ at 6400 Woodrow Road, Lithonia, Georgia 30038-2437 in DeKalb County.

4.

Defendant Longfellows Youth Academy, Inc. (“Longfellows”) is a nonprofit corporation organized under the Laws of the State of Georgia, with its principal office located at 6400 Woodrow Road, Litonia, Georgia 30038-2437 in DeKalb County.

5.

Service of process may be perfected upon Longfellows by serving Defendant’s registered agent, Morris Manning & Martin, LLP, 3343 Peachtree Road, Suite 1600, Atlanta, Georgia 30326 in Fulton County.

6.

Jurisdiction is proper in this Court.

7.

Venue is proper in this Court.

**FACTUAL ALLEGATIONS**

8.

Defendant Long is the Bishop, senior pastor and chief executive officer of Defendant New Birth Missionary Baptist Church, Inc.

9.

New Birth has grown to over 25,000 members since Defendant Long first served as pastor in 1987.

10.

Defendant New Birth’s website proclaims, “[A]s a man of vision, Bishop Long is revered

locally, nationally and internationally as a dynamic man of leadership, integrity and compassion.”

11.

In addition to acting as the Bishop, head pastor and chief executive officer of Defendant New Birth, Defendant Long also heads several offshoot ministries, including Defendant Longfellows Youth Academy.

12.

Defendant Longfellows Youth Academy is a tuition based program for young men, aged 13 through 18, which purports to train young men to love, live and lead as they proceed on their “masculine journey.” The Longfellows program reputedly seeks to create committed men of God, and learning life lessons and key leadership principles.

13.

Defendant Long personally participates in the Longfellows program as a pastor, counselor, mentor and confidant to the young men enrolled.

14.

At all times material hereto, Defendant Long has established a confidential relationship with Plaintiff Parris, while acting as Plaintiff Parris’s spiritual advisor, Bishop, and leader of the Defendants’ ministries.

15.

Defendant Long has utilized his spiritual authority as Bishop and leader of Defendants’ ministries to coerce certain young male members and employees of Defendant New Birth and pupils of Defendant Longfellows into engaging in sexual acts and relationships for his own personal sexual gratification.

16.

Defendant Long has a pattern and practice of singling out a select group of young male church members and using his authority as Bishop over them to ultimately bring them to a point of engaging in a sexual relationship.

17.

Although the majority of Defendants' congregation is likely unaware of the aforesaid practices, many of Defendant Long's victims are known throughout the Church as the "Spiritual Sons" of Defendant Long.

18.

Defendant Long typically engages in a private spiritual ceremony described as a "covenant" between himself and each young Spiritual Son (the "Covenant Ceremony").

19.

The Covenant Ceremony includes an exchange of vows and assurances by Defendant Long that he will forever protect the young man from harm by anyone.

20.

Defendant Long uses various rituals in the Ceremony including candles, exchange of jewelry, and discussion of Biblical verses that reinforce the spiritual and God-like connection between himself and the young man.

21.

During services to the congregation at large, Defendant Long uses pastoral sessions to discuss Biblical verses that indicate to his "sons" that the Spiritual Son should follow his master. Meanwhile, the congregation at large is mostly unaware of the "Covenant Ceremony" that has already taken place privately between Defendant Long and his "sons".

22.

Defendant Long uses monetary funds from the accounts of Defendant New Birth and Defendant Longfellows, among other corporate and non-profit corporate accounts, to entice the chosen Spiritual Sons with cars, clothes, jewelry, and electronics.

23.

Defendant Long's Spiritual Sons are taken on public and private jets to U.S. and international destinations, housed in luxury hotels and given access to numerous celebrities including entertainment stars and politicians.

24.

Defendant Long's Spiritual Sons are placed on the payroll of Defendant New Birth and become paid employees of Defendant New Birth.

25.

Typically, when the young males, confused by the sexual contact with Defendant Long, find girlfriends or engage in sexual contact with females pursuant their own personal desires, Defendant Long initially attempts to block those relationships by increased contact and spiritual talk as to the covenant between the Spiritual Son and himself.

26.

Plaintiff Jamal Mohammad Michael Parris is one of the young male Spiritual Sons described above.

27.

Jamal Mohammad Michael Parris ("Plaintiff Parris") was born [REDACTED] 1987. He currently resides in Colorado Springs, Colorado.

28.

Plaintiff Parris and his mother joined the church in approximately 2001 when Jamal Parris was 14 years old.

29.

Within two weeks of joining the Church, Defendant Long met Plaintiff Parris, gave Plaintiff Parris his personal cell number and told Plaintiff Parris to call him.

30.

Plaintiff Parris' father had not been a positive figure in his life.

31.

Defendant Long spoke with Plaintiff Parris about his father and told him he would protect him and never let another man hurt him like his father did.

32.

Defendant Long obtained employment for Plaintiff Parris at New Birth Missionary Church Summer Camp as a counselor.

33.

Defendant Parris attended Church regularly and joined the New Birth Missionary Church Youth Choir.

34.

On many Sundays after Church, Plaintiff Parris would, at the request of Defendant Long, go to Defendant Long's office after church and speak with Defendant Long.

35.

The private office of Defendant Long at Defendant New Birth Missionary Baptist Church is complete with office, living room, bedroom and kitchen for the comfort and privacy of the

Bishop.

36.

During the 2004-2005 school year, Defendant Long started to spend one on one time with Plaintiff Parris.

37.

Defendant Long initially requested Jamal Parris to stay after church in the private office after everyone left.

38.

During 2004-2005, Defendant Long would also take Plaintiff Parris alone to “the guesthouse” on Snapfinger Road.

39.

Defendant Long would encourage Jamal Parris to call him “Daddy”.

40.

Initially, Defendant Long engaged in sexual touching during their encounters and then escalated the activity to oral sodomy and other acts of sexual gratification.

41.

Defendant Long would discuss the Holy Scripture to justify and support the sexual activity.

42.

At some point, Plaintiff Parris became an employee of Defendant New Birth Missionary Baptist Church as Defendant Long’s personal assistant at the request of Defendant Long.

43.

Defendant Long gave money, gifts, and trips to Plaintiff Parris.

44.

Plaintiff Parris would travel with Bishop Long in private airplanes owned by Defendant New Birth and/or other related corporations.

45.

Defendant Long accompanied Plaintiff Parris to Dallas, Houston, New York, Los Angeles, Orlando, Charlotte, Miami, San Francisco, New Jersey, Honduras, Nassau, Charleston, Trinidad, Chicago, and Arkansas.

46.

On these trips and in private meetings at the Bishop's private office located inside New Birth Missionary Baptist Church and the Snapfinger Road Guest House, Bishop Eddie Long engaged in oral sodomy, sexual massages, requested Plaintiff Parris to be nude in his presence, and engaged in other sexual activity with Plaintiff Parris.

47.

By 2009, Plaintiff Parris had a girlfriend and started to distance himself from the Defendant Long.

48.

By the end of 2009, Plaintiff Parris left the Church disillusioned, confused, and angry about his relationship with Defendant Long.

49.

In or about June 2010, Plaintiff Parris reached out to other Spiritual Sons of Defendant Long, believing they too had submitted to Bishop Long's religious rituals and sexual abuse.

50.

Employees and agents of Defendant New Birth, including [REDACTED]

[REDACTED] and [REDACTED] often accompanied Defendant Long and Plaintiff Parris on the overnight trips and knew that Defendant Long was sharing a bedroom with Plaintiff Parris.

51.

At all times relevant and pertinent to the claims alleged herein, Defendant Long was in a confidential relationship with Plaintiff Parris defined by O.C.G.A. § 24-9-22.

52.

At all times relevant and pertinent to the claims alleged herein, Defendant Long was Plaintiff's spiritual advisor as defined by O.C.G.A. § 24-9-22.

53.

At all times relevant and pertinent to the claims alleged herein, Defendant Long was in a confidential relationship with Plaintiff Parris and was thereby situated to exercise a controlling influence over the will, conduct, and interest of Plaintiff, as defined by O.C.G.A. § 23-2-58.

54.

At all times relevant and pertinent to the claims alleged herein, Defendant Long was involved in advising and counseling Plaintiff Parris in areas of Plaintiff's personal life.

55.

Defendant Long, through manipulation, coercion, deception and fraud resulting from the abuse of his confidential relationships with Plaintiff Parris, convinced Plaintiff Parris that engaging in a sexual relationship was a healthy component of his spiritual life.

56.

Various individuals working for Defendant Long, Defendant New Birth Baptist Church, and the Longfellows Academy, including but not limited to [REDACTED] and [REDACTED] [REDACTED] knew of Defendant Long's sexually inappropriate conduct and did nothing to warn

or protect Plaintiff Parris.

57.

Defendant New Birth, had a duty to warn and protect Plaintiff Parris.

58.

Various individuals working for Defendant Long, Defendant New Birth Baptist Church, and the Longfellows Academy, including but not limited to [REDACTED] and [REDACTED] [REDACTED] knew of Defendant Long's conduct and did nothing to warn or protect Plaintiff Parris.

59.

At all times material hereto, Defendant Long, [REDACTED] and [REDACTED] acted within the course and scope of their employment for Defendants New Birth and Longfellows.

60.

The course of conduct by Defendant Long described herein was known to individuals working for Defendant New Birth Baptist Church, and Defendant Longfellows, including but not limited to [REDACTED] and [REDACTED]

**COUNT I**  
**BREACH OF FIDUCIARY DUTY**

61.

Defendant Long, as Plaintiff Parris's pastor, counselor, and bishop, was in a position to exercise a controlling influence over the will, conduct, and interest of Plaintiff Parris.

62.

Defendant Long had a fiduciary duty not to engage in any sexual relations with Plaintiff Parris.

63.

Defendant Long had a fiduciary duty not to request Plaintiff Parris to engage in any sexual relations with Defendant Long.

64.

Defendant Long had a fiduciary duty as the spiritual advisor of Plaintiff Parris not to coerce Plaintiff Parris to engage in sexual conduct and relationships with Defendant Long.

65.

Defendant Long had a fiduciary duty as the pastor to Plaintiff Parris not to mislead or advise Plaintiff Parris that the sexual conduct with Defendant Long was justified by the Holy Scripture and ordained by God.

66.

Defendant Long breached his fiduciary duty to Plaintiff Parris and abused his confidential clerical and pastoral relationship, by requesting and requiring Plaintiff Parris to participate in sexual acts with Defendant Long in such a manner as to be adverse to the interests of Plaintiff Parris.

67.

As a direct and proximate result of Defendant Long's breach of fiduciary duties, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering and adverse physical consequences.

68.

As a direct and proximate result of Defendant Long's breach of fiduciary duties, Plaintiff Parris has suffered physical pain and suffering.

69.

As a direct and proximate result of Defendant Long's breach of fiduciary duties, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT II**  
**NEGLIGENCE PER SE**

70.

Defendant Long had a legal duty as the spiritual advisor of Plaintiff Parris not to engage in sexual conduct with Plaintiff Parris pursuant to O.C.G.A. § 23-2-58.

71.

Defendant's breach of said duty constitutes Negligence Per Se.

72.

As a direct and proximate result of Defendant Long's Negligence Per Se, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

73.

As a direct and proximate result of Defendant Long's Negligence Per Se, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT III**  
**NEGLIGENCE**

74.

Defendant Long owed a duty to Plaintiff Parris to exercise ordinary care under the circumstances created by his pastoral relationship with Plaintiff Parris .

75.

Defendant breached this duty of care.

76.

As a direct and proximate result of Defendant Long's negligence, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

77.

As a direct and proximate result of Defendant Long's negligence, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT IV**  
**FRAUD**

78.

Defendant Long knowingly and intentionally made false representations of material fact to Plaintiff Parris by, among other things:

- (a) Representing that the Longfellows Youth Academy was a benevolent enterprises designed to foster the spiritual growth of young men;
- (b) By representing that sexual contact with Defendant Long was a healthy component of Plaintiff Parris's worship and affiliation with the Church;
- (c) By representing that sexual relations with Defendant Long were justified by the Holy Scripture and ordained by God.

79.

As a follower of Bishop Long, Plaintiff Parris justifiably relied on Defendant Long's false representations and was thereby coerced into participating in sexual acts and sexual relationships with Defendant Long.

80.

As a direct and proximate result of Defendant Long's fraudulent representations, Plaintiff

Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

81.

As a direct and proximate result of Defendant Long's fraudulent representations, Plaintiff Parris has suffered physical pain and suffering.

82.

As a direct and proximate result of Defendant Long's fraudulent representations, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT V**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**(Defendant Long)**

83.

Defendant Long intentionally exercised undue influence and abused his position of power as Plaintiff Parris's spiritual counselor, advisor and pastor to induce and coerce Plaintiff Parris into engaging in sexual relations and prolonged sexual relationships with Defendant Long.

84.

Defendant Long physically impacted Plaintiff Parris by inducing and coercing him into engaging in sexual acts with Defendant Long.

85.

The sexual abuse, coercion and inducement perpetrated by Defendant Long against Plaintiff Parris was extreme and outrageous.

86.

As a direct and proximate result of Defendant Long's conduct, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical

consequences.

87.

As a direct and proximate result of Defendant Long's conduct, Plaintiff Parris has suffered physical pain and suffering.

88.

As a direct and proximate result of Defendant Long's conduct, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT VI**  
**NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS**

**(All Defendants)**

89.

Defendants were negligent as described above and below in exercising undue influence or allowing Defendant Long to exercise undue influence to coerce Plaintiff Parris into engaging in sexual relations and prolonged sexual relationships with Defendant Long.

90.

Defendants' conduct was extreme and outrageous and directly caused Plaintiff Parris to suffer severe psychological and emotional distress.

91.

Plaintiff Parris suffered and continues to suffer damages as a result of Defendants' conduct.

92.

As a direct and proximate result of Defendants' actions, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

93.

As a direct and proximate result of Defendants' actions, Plaintiff Parris has suffered physical pain and suffering.

94.

As a direct and proximate result of Defendants' actions, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT VII**  
**NEGLIGENT FAILURE TO WARN**

**(Defendants New Birth Missionary Baptist Church, and Longfellows Youth Academy)**

95.

Defendants New Birth and Longfellows Youth Academy, by and through their agents, servants, and employees, knew or should have known of Defendant Long's dangerous and exploitative propensities as a sexual predator and unfit agent.

96.

Despite knowledge of Defendant Long's dangerous and exploitative propensities as a sexual predator and unfit agent, Defendants New Birth and Longfellows Youth Academy failed to warn those, including Plaintiff Parris and his family, who came in contact with Defendant Long.

97.

Defendants New Birth and Longfellows Youth Academy's failure to warn Plaintiff Parris and his family of Defendant Long's propensities allowed Defendant Long to assume an unfettered position of trust and authority as Plaintiff Parris's spiritual counselor and pastor.

98.

Defendants New Birth and Longfellows Youth Academy's failure to warn Plaintiff Parris

of Defendant Long's propensities allowed Defendant to coerce and induce Plaintiff into engaging in sexual relationships with him.

99.

As a direct and proximate result of Defendants' failure to warn, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

100.

As a direct and proximate result of Defendants' failure to warn, Plaintiff Parris has suffered physical pain and suffering.

101.

As a direct and proximate result of Defendants' failure to warn, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT VIII**  
**NEGLIGENT FAILURE TO INTERVENE**

102.

Agents and employees of Defendant New Birth and Longfellows knew or should have known that Defendant Long acted negligently and/or coercively as the spiritual advisor to young male church members such as the Plaintiff Parris and negligently failed to intervene to prevent said conduct.

103.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

104.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered

physical pain and suffering.

105.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT IX**  
**NEGLIGENT FAILURE TO PROTECT**

**(Defendants New Birth Missionary Baptist Church, Longfellows Youth Academy)**

106.

Defendants New Birth and Longfellow undertook the spiritual care and protection for Plaintiff Parris within its church and ministries.

107.

Defendants New Birth and Longfellow failed to protect the Plaintiff Parris from Defendant Long's known propensity to coerce young male church members to engage in sexual acts with him.

108.

As a direct and proximate result of Defendants' failure to protect Plaintiff Parris, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

109.

As a direct and proximate result of Defendants' failure to protect Plaintiff Parris, Plaintiff Parris has suffered physical pain and suffering.

110.

As a direct and proximate result of Defendants' failure to protect Plaintiff Parris, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT X**  
**NEGLIGENT RETENTION**

**(Defendants New Birth Missionary Baptist Church and Longfellows Youth Academy)**

111.

Defendants New Birth and Longfellows knew, or should have known, that Defendant Long had a propensity to sexually contact and exploit young male members of the New Birth congregation and Longfellow Academy.

112.

Defendant Long, at all times pertinent and relevant to this Count of the Complaint, was acting under color of employment as an employee and officer of Defendant New Birth, and an employee of Defendant Longfellows Youth Academy.

113.

Defendants New Birth and Longfellows were negligent in retaining Defendant Long as an employee and officer of New Birth and employee of Longfellows, as said Defendants knew or should have known that Defendant Long was incompetent or otherwise unable to perform his job duties in an ordinary, reasonable, and lawful manner.

114.

Defendants New Birth and Longfellows were negligent in retaining Defendant Long as an employee and officer of New Birth and an employee of Longfellows, as said Defendants knew or should have known that Defendant Long was engaged in sexually inappropriate conduct with New Birth parishioners and employees, and pupils of the Longfellows Academy, including but not limited to the Plaintiff Parris.

115.

Defendants New Birth and Longfellows were negligent in retaining Defendant Long as an employee and officer of New Birth and an employee of Longfellows, since said Defendants knew or should have known that Defendant Long had a propensity to engage in sexually inappropriate conduct with congregants, employees and pupils he counseled.

116.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

117.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered physical pain and suffering.

118.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has been subjected to public scorn and ridicule.

**COUNT XI**  
**NEGLIGENT FAILURE TO SUPERVISE**

**(Defendants New Birth Missionary Baptist Church, Longfellows Youth Academy)**

119.

Defendants New Birth, and/or Longfellows negligently failed to supervise Defendant Long as an employee and officer of New Birth and an employee of Longfellows, as said Defendants knew or should have known that Defendant Long was incompetent or otherwise unable to perform his job duties in an ordinary, reasonable, and lawful manner.

120.

Defendants New Birth and Longfellows negligently failed to supervise Defendant Long

as an employee and officer of New Birth and employee of Longfellows, as said Defendants knew or should have known that Defendant Long was engaged in sexually inappropriate conduct with New Birth parishioners and employees such as Plaintiff Parris, and pupils of the Longfellows Academy such as Plaintiff Parris.

121.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered severe emotional distress, mental pain and suffering, and adverse physical consequences.

122.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has suffered physical pain and suffering.

123.

As a direct and proximate result of Defendants' negligence, Plaintiff Parris has been subjected to public scorn and ridicule.

#### **PUNITIVE DAMAGES**

124.

The purpose of punitive damages is to punish and deter the Defendants from engaging in harmful conduct to others both now and in the future.

125.

The Defendants acted with willful misconduct, malice, fraud, oppression, wantonness and an entire want of care raising the presumption of conscience indifference to the consequences. Defendants by and through their conduct, have acted willfully, with malice, intending and achieving fraud such that Plaintiff is entitled to an award of punitive damages in accordance with the enlightened conscience of an impartial jury.

The conduct of the Defendants amounts to a specific intent to cause harm as that term is defined by O.C.G.A. § 51-12-5.1 et seq.

WHEREFORE, Plaintiff Parris prays for the following relief:

- (a) That process and summons issue against Defendants;
- (b) For trial by jury of twelve (12);
- (c) That judgment for compensatory and special damages be entered against Defendants in an amount to be decided by a fair and impartial jury;
- (d) That Plaintiff be awarded all attorney's fees;
- (e) That Plaintiff be awarded all costs of Court;
- (f) That Plaintiff be awarded punitive damages in an amount to be determined by the enlightened conscience of a fair and impartial jury; and
- (g) That Plaintiff recover such other relief as may be just and proper under the facts

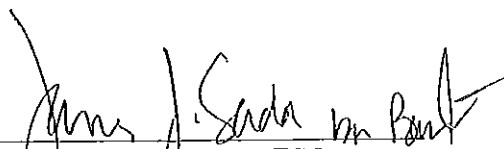
and circumstances of this case.

Respectfully submitted this 27<sup>th</sup> day of September, 2010.



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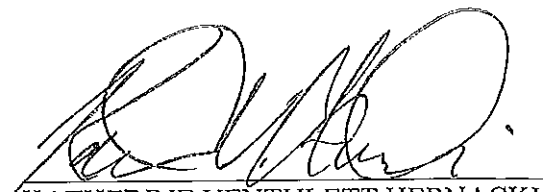
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