

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

GAWAIN BAXTER, LAURA BAXTER
and VALESKA PARIS,

Plaintiffs,

V.

DAVID MISCAVIGE; CHURCH OF
SCIENTOLOGY INTERNATIONAL,
INC.; RELIGIOUS TECHNOLOGY
CENTER, INC.; IAS
ADMINISTRATIONS, INC.; CHURCH
OF SCIENTOLOGY FLAG SERVICE
ORGANIZATION, INC.; and CHURCH
OF SCIENTOLOGY FLAG SHIP
SERVICE ORGANIZATION, INC.,

Defendants.

CIVIL ACTION

NO. 8:22-cv-00986

FIRST AMENDED COMPLAINT

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I. INTRODUCTION

1. Plaintiffs bring this action against Defendants pursuant to the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. §§1581-1597. As children, all three Plaintiffs grew up in, and were raised by Scientology.¹ This was not a peaceful or loving environment; instead, it was a world filled with abuse, violence, intimidation, and fear. Defendants considered Plaintiffs to be possessions, void of any rights, whose sole purpose was to serve Defendants. Plaintiffs were placed on a ship they could not leave and routinely punished by being humiliated, interrogated, and imprisoned, for the sole purpose of ensuring Plaintiffs would continue to perform back-breaking free labor for the Defendants.

2. Defendants in this action are David Miscavige, Church of Scientology International, Inc., Religious Technology Center, Inc., IAS Administrations, Inc., Church of Scientology Flag Service Organization, Inc., and Church of Scientology Flag Ship Service Organization, Inc. (together, “Defendants”). Plaintiffs allege Defendants violated the TVPRA by committing, attempting, and conspiring to commit, and/or by participating in a trafficking venture that committed, attempted, and conspired to commit,

¹ “Scientology” and “Church of Scientology” are umbrella terms used to refer to the entire universe of entities and organizations affiliated with Defendants. “Scientologist” refers to any person who is a member of any constituent entity or organization of Scientology, including members of Sea Org. Scientologists who are not members of Sea Org are often referred to as “public” members.

forced labor and other human trafficking offenses against Plaintiffs in violation of Chapter 77 of Title 18 of the United States Code. Defendants, directly and through the venture, coerced persons, including Plaintiffs, to join the Defendants' "Sea Org" and provide unpaid labor and services for a decade or longer on Defendants' ocean going cruise ship vessel, the "Freewinds."² Defendants knowingly obtained valuable benefits, including but not limited to financial enrichment, and free labor and services, like construction work, landscaping, and food preparation at "Flag Base," in Clearwater, Florida, and aboard the Freewinds. The receipt of money and unpaid labor also enabled David Miscavige to maintain a façade of legitimacy, a luxurious lifestyle, power over every aspect of the organization's global operations, and influence over members, including celebrities who joined and promoted Scientology publicly. Persons working under Miscavige also benefitted from their participation, financially and/or by obtaining the enhanced status, power, and authority that he bestowed on them. As a result, all Defendants knew or should have known about the venture's offenses, and all participants in the venture are jointly and severally liable for the physical, emotional, psychological, and economic harm caused to the Plaintiffs.

² All Scientology-affiliated entities and organizations alleged herein are managed and controlled exclusively by members of Sea Org, described *infra*, ¶¶ 16, 20, 21.

3. This action concerns abusive practices within Defendants' Sea Org and its subsidiary organization for young children known as "Cadet Org."³ Through the highly-regimented Cadet Org and Sea Org, children raised in Scientology are indoctrinated, manipulated, and pressured into coercive circumstances from a young age, in which they are compelled to provide age-inappropriate labor and services to Defendants with little or no preparation or training, safety precautions, or compensation, and from which there are no reasonable means of escape. Because Scientology's distinction between children and adults is fuzzy, at best, children are informed that they are considered adults and that they must behave and expect to be treated as adults. There is thus no acknowledged transition from childhood to adulthood; rather, minors transition from Cadet Org to Sea Org in their mid-teens and continue to labor away in Defendants' coercive environment without ever comprehending that they may have a legal right to their own agency.

4. Plaintiffs seek compensatory and punitive damages against Defendants under 18 U.S.C. §1595(a) for the injuries inflicted upon them by Defendants, directly and through their venture, in violation of 18 U.S.C. §§1581, 1589 and 1590.

³ Unless otherwise specified, references to Sea Org herein include Cadet Org.