

**VIRGINIA:  
IN THE CIRCUIT COURT FOR THE COUNTY OF PRINCE WILLIAM**

**JNJ,  
Plaintiff,**

**v.**

**CASE No. 18-8520**


**THE LIFE CHURCH DC  
dba "The Life Church"  
dba "TLC"**

**And  
JORDAN D. BAIRD,**

**Serve:  
THE LIFE CHURCH DC  
H. Robert Showers, Registered Agent  
Simms Showers, LLP  
305 Harrison St SE 3rd FL  
Leesburg, VA 20175  
(Loudoun County)**

**Serve:  
Jordan D. Baird  
510 Colony Court  
Warrenton, Virginia 20186  
(Fauquier County)**

**Defendants.**

**FILED**  
2018 OCT 12 PM 2:46  
CIRCUIT COURT OF ESKS OFFICE  
PRINCE WILLIAM COUNTY, VA  
BY  DEPUTY

**COMPLAINT**

Comes now the Plaintiff, JNJ, and for her Complaint states as follows:

1. The events described herein took place between November 1, 2014 to November 30, 2014, within Prince William County, Virginia.

2. The principal place of business of Defendant THE LIFE CHURCH DC dba "The Life Church" is in Prince William County at 11234 Balls Ford Road, Manassas, Virginia 20109.
3. Between November 1, 2014 to November 30, 2014, JNJ was sixteen (16) years old.
4. The Defendant JORDAN D. BAIRD at the time of these events was employed by "The Life Church" in Prince William County on Balls Ford Road, Manassas, Virginia 20109.
5. The Defendant JORDAN D. BAIRD at the time of these events was employed by "The Life Church" as its Worship Director and also worked as a music instructor within its "Life Music Academy."
6. At the time of these events, the Defendant JORDAN D. BAIRD's father, David C. Baird, and his mother, Jo Ann Baird, were the Senior Pastors of "The Life Church."
7. At the time of these events, the Defendant JORDAN D. BAIRD's wife, Michelle Baird, was the Director of "Life Music Academy" within "The Life Church."
8. The parents of JNJ paid a fee to "The Life Church" for JNJ's music lessons within the "Life Music Academy" for the month of November, 2014.

9. At the time of these events, the "Life Music Academy" was operated on the grounds of the "The Life Church" on Balls Ford Road, Manassas, Virginia 20109.
10. The Plaintiff JNJ received private vocal music lessons from Defendant JORDAN D. BAIRD in "Life Music Academy" on the grounds of the "The Life Church" on Balls Ford Road, Manassas, Virginia 20109.
11. The Plaintiff JNJ's private vocal music lessons from Defendant JORDAN D. BAIRD in "Life Music Academy" were arranged by an employee of "The Life Church," Michelle Baird, the director of the "Life Music Academy."
12. The Defendant JORDAN D. BAIRD was born in May, 1991.
13. Between November 1, 2014 to November 30, 2014, Defendant JORDAN D. BAIRD was twenty-three (23) years old.
14. Between November 1, 2014 to November 30, 2014, the 23 year-old Defendant JORDAN D. BAIRD sexually abused the 16 year-old minor girl, JNJ.
15. Between November 1, 2014 to November 30, 2014, at the time JORDAN D. BAIRD sexually abused the minor girl, JNJ, she was under his supervision in his church, "The Life Church," where he was

the Worship Director and her private vocal music teacher within the "Life Music Academy."

16. Between November 1, 2014 to November 30, 2014, JORDAN D. BAIRD sexually abused the minor girl, JNJ, while he was giving her a private vocal music lesson in his church, "The Life Church," in his employment capacity as the Worship Director for "The Life Church" and JNJ's voice teacher within the "Life Music Academy."
17. The Defendant "The Life Church" is liable in *respondeat superior* for the tortious acts of its employee Defendant JORDAN D. BAIRD because the sexually molestation of the minor girl JNJ occurred while Defendant JORDAN D. BAIRD was performing his employer's business and acting within the scope of his employment at his employer's location when the tortious acts were committed against Plaintiff JNJ.
18. Providing private vocal music lessons to Plaintiff JNJ was within the scope of the duties of Defendant JORDAN D. BAIRD's employment and in the execution of the service for which he was employed by Defendant "The Life Church".
19. The service itself, of providing private vocal music lessons in general and to Plaintiff JNJ specifically, was within the ordinary

course of the work of "The Life Church" and Defendant JORDAN D. BAIRD's employment.

20. The conduct of the Defendant JORDAN D. BAIRD in which he sexually molested the minor girl JNJ was intentional.
21. The conduct of the Defendant JORDAN D. BAIRD in which he sexually molested the minor girl JNJ was done with lascivious intent.
22. The conduct of the Defendant JORDAN D. BAIRD in which he sexually molested the minor girl JNJ was outrageous and intolerable.
23. The conduct of the Defendant JORDAN D. BAIRD in which he sexually molested the minor girl JNJ has caused her severe emotional distress.
24. The conduct of the Defendant JORDAN D. BAIRD in which he sexually molested the minor girl JNJ and the emotional distress of the minor girl JNJ are causally connected and the distress of the minor girl JNJ is severe.
25. Following the sexual molestation, JNJ has needed professional care and counseling to help her deal with the severe emotional pain caused by the sexual molestation.
26. The statute of limitations on the cause of action for the sexual abuse which took place between November 1, 2014 to November 30,

2014 has been stayed by operation of law pursuant to Virginia Code § 8.01-249(6), which states among other things, that: "The cause of action in the actions herein listed shall be deemed to accrue ... [i]n actions ... resulting from sexual abuse occurring during the infancy ... of the person, upon removal of the disability of infancy. ... As used in this subdivision, 'sexual abuse' means sexual abuse as defined in subdivision 6 of § 18.2-67.10 and acts constituting rape, sodomy, object sexual penetration or sexual battery as defined in Article 7 (§ 18.2-61 et seq.) of Chapter 4 of Title 18.2."

**Count I:  
PROPOSING THAT JNJ, A CHILD UNDER THE AGE OF 18, TOUCH DEFENDANT'S  
SEXUAL PARTS.**

27. The paragraphs stated above are hereby incorporated into this Count by reference.
28. Between November 1, 2014 to November 30, 2014, the Defendant JORDAN D. BAIRD with lascivious intent, knowingly and intentionally did propose to JNJ that JNJ touch his sexual parts.
29. At the time the Defendant JORDAN D. BAIRD did so, JNJ was a sixteen (16) year-old child.
30. At the time the Defendant JORDAN D. BAIRD did so, the Defendant JORDAN D. BAIRD was 23 years old.

31. As a result of the Defendant JORDAN D. BAIRD proposing to JNJ that JNJ touch his sexual parts., JNJ suffered shame, humiliation, embarrassment, indignity to her feelings, and financial loss.

**Count II:  
INTENTIONALLY EXPOSING HIS SEXUAL PARTS TO JNJ, A CHILD UNDER THE AGE  
OF 18.**

32. The paragraphs stated above are hereby incorporated into this Count by reference.

33. Between November 1, 2014 to November 30, 2014, the Defendant JORDAN D. BAIRD with lascivious intent, knowingly and intentionally did expose his sexual parts to JNJ

34. At the time the Defendant JORDAN D. BAIRD did so, JNJ was a sixteen (16) year-old child.

35. At the time the Defendant JORDAN D. BAIRD did so, the Defendant JORDAN D. BAIRD was 23 years old.

36. As a result of the Defendant JORDAN D. BAIRD exposing his sexual parts to JNJ, JNJ suffered shame, humiliation, embarrassment, indignity to her feelings, and financial loss.

**Count III:  
SEXUAL ASSAULT AND BATTERY.**

37. The paragraphs stated above are hereby incorporated into this Count by reference.
38. Between November 1, 2014 to November 30, 2014, Defendant JORDAN D. BAIRD, knowingly and intentionally did feel or handle the sexual or genital parts of JNJ, and sexually abused the child JNJ.
39. As a result of the sexual assault and battery by Defendant JORDAN D. BAIRD, JNJ suffered physical injury, shame, humiliation, embarrassment, indignity to her feelings, and financial loss.

**Count IV:  
TAKING INDECENT LIBERTIES WITH A MINOR WHILE IN A SUPERVISORY OR  
CUSTODIAL RELATIONSHIP IN VIOLATION OF VIRGINIA CODE § 18.2-370.1(A).**

40. The paragraphs stated above are hereby incorporated into this Count by reference.
41. Defendant JORDAN D. BAIRD, a 23 year-old, maintained a supervisory relationship over a JNJ while she was 16 years-old.
42. Defendant JORDAN D. BAIRD, with lascivious intent, knowingly and intentionally (i) proposed that JNJ feel or fondle his sexual or genital parts and that Defendant JORDAN D. BAIRD feel or handle the sexual or genital parts of JNJ, and (ii) exposed Defendant JORDAN D. BAIRD's sexual or genital parts to the child JNJ, and (iii)



caused the child JNJ to feel or fondle the sexual or genital parts of Defendant JORDAN D. BAIRD, and (v) sexually abused the child JNJ as defined in § 18.2-67.10(6).

43. As a result of Defendant JORDAN D. BAIRD, taking indecent liberties with JNJ, JNJ suffered physical injury, shame, humiliation, embarrassment, indignity to her feelings, and financial loss.

Wherefore, JNJ, by her counsel, prays that this court will award her compensatory and punitive damages jointly and severally against Defendant JORDAN D. BAIRD and by *respondeat superior*, the Defendant THE LIFE CHURCH DC dba "The Life Church," for a total verdict amount of twenty-one million three hundred fifty-one thousand dollars (\$21,351,000.00); for pre-judgment and post-judgment interest pursuant to § 8.01-382 at the legal rate of interest, for all allowable court costs, and for such other and further relief as the Court should deem mete and proper in the circumstances.

Pursuant to Rule 3:21, a trial by jury is demanded.

JNJ,  
By Counsel



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