

IN THE CIRCUIT COURT OF TANEY COUNTY, MISSOURI

JOHN DOE X,

Plaintiff,

vs.

Case No.

PETER "PETE" D. NEWMAN,

Serve: Jefferson City Correctional Center  
8200 No More Victims Road  
Jefferson City, Missouri 65101

Defendant.

ORIGINAL PETITION

COMES NOW, Plaintiff, through the undersigned counsel, and for his original petition

states:

General Allegations

1. Venue is proper in Taney County, Missouri under R. S. Mo. § 508.010, as this is the location where Plaintiff first was damaged.
2. Plaintiff is an adult man proceeding by pseudonym and his true name will be provided to Defendant.
3. At all times pertinent herein, Plaintiff was a citizen and resident of Texas. Plaintiff John Doe X is currently a resident and citizen of Texas.
4. Defendant Peter ("Pete") D. Newman is an individual who resides in Missouri at the Jefferson City Correctional Center in Cole County, Missouri.
5. This action is brought within the Missouri statute of limitations.

**Statement of Facts Applicable to All Counts**

6. At all times pertinent hereto, Kanakuk owned and operated residence camps for children known as Kanakuk camps where children would come sleep and attend camp activities for periods of time ranging from one to three weeks.
7. During the camps, children would have no phone or computer access to their family.
8. Kanakuk camps include but are not limited to K-1, K-2, K-West and K-Kountry.
9. Defendant Newman was a counselor, then assistant Kamp Director as well as Kamp Director.
10. Newman remained in the position of Kamp Director until he received a double life sentence plus 30 years for sexually abusing Kanakuk attendees.
11. During the time he was a Kanakuk employee, he was a serial abuser and sexually abused at least 60 children.
12. Defendant Newman continued to engage in communications with “kampers” after the “kampers” returned home from summer residential camp in Missouri.
13. Newman’s activities as counselor and director included interacting with children and recruiting them to attend Kanakuk Kamps during (1) small group Bible studies; (2) lunch at children’s schools; (3) club activities; (4) leadership activities; (5) small group activities; (6) para Kamp activities; (7) “hot tub” ministry at a house Kanakuk gave to Newman; (8) father-son retreats at K-Colorado, at which Newman acted as father to Plaintiff; and (9) Winter Trail marketing visits to Plaintiff’s home.
14. After Plaintiff’s first year at Kanakuk kamps, Newman had a preexisting relationship with Plaintiff.
15. Sexual abusers spend an unusual amount of time with children.
16. Newman spent an unusual amount of time with Plaintiff.

17. Child molesters seek jobs that put them in proximity to and allow for continuous access to children.
18. Newman sought a job at Kanakuk that put him in proximity to and allowed him continuous access to children.
19. Child molesters find ways to isolate themselves with children when no adults or parents are present.
20. Pete Newman isolated himself with Plaintiff when no adults or parents were present.
21. Grooming, like sexual assault, progresses through various phases becoming more outrageous and this tactic is used on the victim and his parents.
22. During grooming, the predator uses the parents' blessing and trust as a way to interpose himself between the child and parent and to minimize the wrongfulness of the predator's behavior.
23. Newman groomed Plaintiff and used Plaintiff's parents' blessing to minimize the wrongfulness of Newman's behavior.

**Newman – The Textbook Pedophile**

24. In fact Newman fits every description of a typical pedophile in that he:
  - a. Displayed keen, often excessive interest in children;
  - b. Sought opportunities to be alone with children;
  - c. Found legitimate access to children through employment and volunteer opportunities;
  - d. Associated with and developed friendships with children;
  - e. Seduced children with attention, affection and gifts;
  - f. Was tuned into children's needs and was highly skilled at engendering the trust and confidence of children;

- g. Was very sensitive to children's feelings and weaknesses and had a facility for putting children at ease; and
- h. Befriended a child's family and became a babysitter, went on vacation with the family, and took the child on special outings.

**John Doe X**

- 25. John Doe X attended the K Kountry Kanakuk camp and resided on Kanakuk Kamp property, making him a "kamper" at these camps from ages 9 to 11 during the summers of 2003, 2004, and 2005. At the request of Kanakuk Director Pete Newman, John Doe X also participated in other Kanakuk activities including a father-son K Colorado retreat during his 6<sup>th</sup> Grade year and a visit to Pete Newman's house in early March, 2009.
- 26. Acting as a Kanakuk employee, Defendant Newman took an interest in John Doe X and sought them out as part of Defendant Newman's "grooming" process.
- 27. These actions were intended to and did make John Doe X believe that he had a special relationship with Defendant Newman and led John Doe X to more completely trust and believe Defendant Newman.
- 28. During the period from 2003-2009, Defendant Newman continued the grooming process of John Doe X with phone calls, visits to his home in Texas as part of marketing Kanakuk to Texans, inviting John Doe X to be Newman's "son" on father-son events, taking John Doe X to sporting events, bringing John Doe X to the Kanakuk camps in the winter for athletic activities and mentoring, and hosting John Doe X for multi-day sleepovers at Newman's house by Kanakuk camps.
- 29. Defendant Newman, as a director of Kanakuk Kamps, and as part of his Kanakuk Extra Kamp Ministry, was responsible for doing the work of Kanakuk and in fact did that work and involved Plaintiff in it.

30. Plaintiff was involved in Newman's "para-Kamp" and "extra-Kamp" ministry.
31. Defendant Newman abused the Plaintiff at Newman's home.
32. Newman continued contact with campers such as Plaintiff and his family during the non-camp months in extra Kamp and para Kamp activities such as Bible study, winter trail, father son events, sports and small groups.
33. Newman talked about his hot tub ministry in a speech, wherein Newman stated not a night of the week went by that there wasn't someone to minister to in the hot tub.
34. When John Doe X began attending Kanakuk kamps in 2003 and continuing thereafter, Defendant Newman had private visits with John Doe X after lights out, and took John Doe X out of group activities for one on one time with Defendant Newman. Defendant Newman also took every opportunity for physical interaction with John Doe X, including lying with him in the foam pit of the "upper James" (upper gymnasium) while talking about sexual metaphors in the Song of Solomon.
35. In 2004, John Doe X became uncomfortable with Defendant Newman's conduct, and repeatedly called his mother requesting her to pick him up early from camp. Defendant Newman overheard these calls and took the receiver from John Doe X and told his mother that the best thing for John Doe X was for him to stay at camp and told her that John Doe X was doing well there.
36. During John Doe X's 6<sup>th</sup> grade year, Defendant Newman took John Doe X to a Kanakuk sponsored father son retreat called K-Colorado.
37. During John Doe X's 8<sup>th</sup> grade year, Defendant Newman invited John Doe X to visit him in early March 2009. During this visit, Defendant Newman took John Doe X to a Branson High School playoff basketball game; took John Doe X to workout at the

Kanakuk K-Kauai gym, and took John Doe X on a tour of the Kanakuk kamps as Newman prepared the kamps for summer use. Also during this visit, Defendant Newman sexually abused John Doe X in a hot tub, and brutally sodomized him in the shower at Newman's home during "hot tub ministry time".

38. Defendant Newman used his position at Kanakuk Kamps as a means to abuse children such as John Doe X by developing the children's trust and friendship. This, coupled with Defendant Newman's mantle of authority as a director of Kanakuk Kamps, allowed Defendant Newman to sexually abuse and molest multiple boys through masturbation, nudity, and sodomy.
39. During each of these activities Defendant Newman falsely represented to the young Plaintiff that these behaviors were okay or normal.
40. During each of these activities, Defendant Newman used his position as director of Kanakuk Kamps to sexually abuse John Doe X.

#### **Newman's Arrest And The Victims**

41. In February 2010, Defendant Newman pleaded guilty in Taney County to several counts of statutory sodomy and child enticement involving child abuse of a boy on Kanakuk property and received two life sentences plus 30 years in the Missouri Department of Corrections.
42. Prior to Newman's arrest, there were at least 60 victims of Newman.

#### **COUNT I -- INVASION OF PRIVACY**

43. Plaintiff incorporates by reference, as if set forth at length herein, all factual allegations set forth in the foregoing paragraphs.

44. Plaintiff was and is entitled to an expectation of privacy in his body, i.e., that his naked body will not be viewed without his consent.
45. Defendant Newman on multiple occasions convinced the minor Plaintiff to disrobe wherein Newman intentionally viewed the nude body of Plaintiff.
46. In doing so, Defendant intruded upon the seclusion of Plaintiff.
47. Plaintiff, as a minor, could not consent to these viewings or consent to the intrusion upon his seclusion.
48. Furthermore, Defendant Newman fostered in Plaintiff trust and admiration for Defendant Newman as a Kanakuk counselor.
49. Additionally, Defendant Newman taught Plaintiff that these nude observations were "normal" and not a cause for concern; therefore he did not understand the implications of the episodes.
50. Defendant Newman's viewing of the Plaintiff served no recognized valid purpose.
51. Defendant Newman's viewing of the Plaintiff intruded upon the Plaintiff's seclusion and reasonable expectation of privacy.
52. The manner of intrusion was objectively offensive to any reasonable third party.
53. As a direct, proximate, and foreseeable result of Defendant Newman's actions, Plaintiff suffered privacy invasion that caused him emotional distress, psychological damages that will require ongoing and future treatments, decreased economic earning potential; as well as damages to his privacy and the stigma of having been exposed to a convicted child abuser.

54. Defendant's actions were evil, wanton, willful, malicious and in conscious disregard of Plaintiff's rights and justify an award of punitive damages which would serve to punish Defendant and deter Defendant and others from engaging in like conduct in the future.
55. Plaintiff pleads that Defendant's actions in this case justify the fraud exception to the American Rule requiring that Defendant be ordered to pay Plaintiff's reasonable attorney's fees and costs.

**WHEREFORE**, Plaintiff prays this court enter judgment in his favor in a fair and reasonable sum, for punitive damages, for his attorney's fees, costs, and expenses incurred herein and for such other relief as the court deems just and proper

**COUNT II -- CHILDHOOD SEXUAL ABUSE: DEFENDANT NEWMAN**

56. Plaintiff incorporates by reference, as if set forth at length herein, all factual allegations set forth in the foregoing paragraphs.
57. During all relevant times, Plaintiff was a minor.
58. Defendant Newman engaged in childhood sexual abuse with Plaintiff.
59. Defendant Newman was convicted of sexual abuse.
60. As a direct and proximate result of Defendant Newman's actions, Plaintiff was injured and has suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress that are medically diagnosable and significant, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; was prevented and will continue to be prevented from performing his daily activities and obtaining the full enjoyment of life; has sustained loss of earnings and earning capacity; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.



61. Defendant Newman's actions were evil, wanton, willful, malicious and in conscious disregard of Plaintiff's rights and justify an award of punitive damages which would serve to punish Defendant and deter Defendant and others from engaging in like conduct in the future.

62. Plaintiff pleads that Defendant Newman's actions in this case justify the fraud exception to the American Rule requiring that Defendant Newman be ordered to pay Plaintiff's reasonable attorney's fees and costs.

**WHEREFORE**, Plaintiff prays this court enter judgment in his favor in a fair and reasonable sum, for punitive damages, for his attorney's fees, costs, and expenses incurred herein and for such other relief as the court deems just and proper.

**COUNT III - NEGLIGENCE -- Defendant Pete Newman**

63. Plaintiff incorporates the foregoing paragraphs by reference as if set forth more fully herein.

64. Defendant Newman was as an employee, director, counselor, extra Kamp supervisor, para Kamp supervisor and representative of Kanakuk Kamps when he damaged Plaintiff.

65. Defendant Newman had a duty to exercise ordinary care.

66. Defendant Newman breached this duty for the same reasons set forth in the prior paragraphs of this petition.

67. Defendant Newman's conduct was a substantial cause and/or proximate cause of the severe emotional and mental distress, harm, and injury John Doe X experienced in the past and in all likelihood will continue to experience in the future.

68. Defendant's actions were evil, wanton, willful, malicious and in conscious disregard of Plaintiff's rights and justify an award of punitive damages which would serve to punish Defendant and deter Defendant and others from engaging in like conduct in the future.

**WHEREFORE**, Plaintiff prays that this court enter judgment in his favor in a fair and reasonable sum, for punitive damages, for his attorney's fees, costs, and expenses incurred herein and for such other relief as the court deems just and proper.

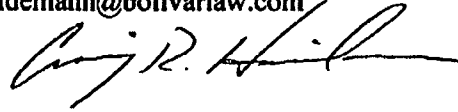
**JURY TRIAL DEMAND**

Plaintiff demands a trial by jury on all issues.

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