

MEMORANDUM

To: General Public

From: Greenberg Gross LLP and Jeff Anderson & Associates

Date: February 13, 2020

Re: Sochil Martin v. La Luz del Mundo, Naason Joaquin Garcia, et al.

Sochil Martin has filed this case to end the longstanding cycle of exploitation, abuse and retaliation against her and hundreds of others at the hands of La Luz del Mundo (LDM) and its leadership. Martin has endured a lifetime of manipulation, trafficking, forced labor, sexual assault, financial exploitation and harassment perpetrated by a sexual predator, Naason Joaquin Garcia, and the global institution built around and for the protection of that predator. Martin is seeking justice and redress under the TVPRA, RICO, the Forced Labor Standards Act, and the California Child Victims Act. Naason is currently in prison, charged with conspiracy, extortion and multiple sex crimes, including rape of a minor.

KEY POINTS

LDM is a religious sect currently led by the Apostle Naason Joaquin Garcia with a broad reach and sophisticated operations. LDM has more than 15,000 houses of prayer and has grown to reach more than 5 million people in 58 nations on 5 continents, including the United States and Mexico. Operations of LDM are managed by the Apostle's inner circle of bishops, who sit on the Council of Bishops, or "el Consejo de Obispos." Finances are overseen by senior ministers appointed to the Treasury or "la Tesorería," while media and propaganda are created by the LDM-led International Berea USA.

LDM is built around a doctrine of absolute faith, obedience and subservience to the Apostle that begins at a young age. LDM teaches that its Apostle is the only true servant of God, that he is infallible and cannot sin and that salvation can be attained only by following its Apostle. At age 13, a child is part of a "revival" ceremony to show absolute and unquestionable loyalty to the Apostle by kneeling for hours and declaring that they are nothing and their entire life is for the Servant of God. From her birth into the LDM inner circle, the "Unconditionals", Martin was taught to follow and obey the Apostle, and not to question him. Martin and the children of "Unconditionals" were not allowed to spend time out of school with friends or others who were not LDM members.

LDM leadership and members will procure and groom children to be sexually abused by the Apostle. When she was nine years old, Martin's aunt told her she had been chosen to serve Apostle Samuel, Naason's father. Martin, along with other children, was groomed to please Apostle Samuel, entertain him, perform erotic dances for him, and touch him sexually. Members of el Consejo de Obispos and their wives would also find attractive young children and bring them to the Apostle to curry favor with him. It was not uncommon for members of el Consejo de Obispos to bring their own children and grandchildren to Samuel for sexual servitude. Both before and after she escaped from the organization, Martin witnessed or learned of hundreds of other children and young women subjected to sexual abuse at the hands of the LDM leadership. This continued when Naason became the Apostle in 2014.

Apostle Naason sexually abused Martin as a child and adult, and would become violent when she refused to obey him. When Martin was 16 years old, she began working at what would become International Berea USA in Los Angeles under Naason, who at the time was not yet the Apostle. There he began to manipulate, molest and sexually abuse Martin. When Naason became the Apostle, he made Martin his sexual servant and groomer of new young girls. Martin's years of conditioning and

circumstances left her with no other choice. Martin was forced to engage in many sex acts with Naason and other LDM members. Naason's sexual demands grew more unbridled. He would keep pornographic images of children on electronic devices and order his groomers to perform sexual acts on children. When Martin would object or refuse to do so, he would rape or beat her. On one occasion, Naason ordered Martin to masturbate a fourteen-year-old boy while he watched. Martin refused. In anger at her refusal, Naason severely beat Martin, leaving her covered in bruises and unable to feel her right leg. Martin was not allowed to go to the hospital.

LDM trafficked children across California and between the United States and Mexico. Once sufficiently "trained" at age 12, Martin was instructed to travel to an event in Big Bear, California to perform erotic dances for Samuel in revealing clothing. When she was working for International Bera USA, Naason would order her to smuggle cash to Guadalajara during her trips for the company. Others were required to do the same. Martin witnessed or learned of many young children, often only 13 or 14 years of age, being trafficked for the purposes of providing sexual services to members of el Consejo de Obispos and other LDM leaders.

LDM members are expected to make major financial contributions to the institution and provide free labor, and are shamed and ostracized when they fail to do so. At least three types of donations are required of LDM members on a regular basis: an income tithing of at least ten percent, a weekly special offering to the Apostle himself, and a weekly "pro templo" contribution to the maintenance of their local temple. It is not uncommon for families to sign over the title to their homes to LDM leadership. LDM's labor force is made up of unpaid LDM members. The construction of temples and homes for the Apostle and other members of LDM leadership is staffed by unpaid LDM members. Martin started making these contributions at the age of 14. Martin was required to give up \$50,000 from a car accident settlement and \$60,000 from a student loan, which she is still paying to this day. Martin was also required to work at International Bera USA with no pay and even use her own money to cover the cost of equipment and travel. Martin estimates that she worked at least 30,000 unpaid hours.

The Apostle and LDM leadership enrich themselves and fund lavish lifestyles with the financial contributions and free labor of LDM members. Monies given to LDM for any purpose nearly always go directly to the Apostle and his family, which he then distributes in part to el Consejo de Obispos. Naason would often spend over \$150,000 on extravagant dinners for his friends, and purchase any number of luxury items for his own personal use, including bespoke designer clothing, flashy cars, Victorian furniture, and expensive art. On one occasion that Martin recalls, LDM members in Southern California were encouraged to donate to the Apostle any gold heirlooms and jewelry that they owned. The donations were then melted down and used to paint the molding in Naason's new home in Los Angeles.

Members who leave LDM are ostracized by their families and communities, smeared by LDM members and harassed. Since Martin left LDM in 2016, she has been ostracized, smeared and harassed by LDM leadership and members. Initially, LDM offered to pay Martin to stay silent. When she refused, LDM began a terrible smear campaign against Martin and her husband. They have received harassing threats online and in-person, including a visit from a known LDM "enforcer." Around June 30, 2019, two individuals acting on behalf of Naason entered Martin's home without her permission with the intention of intimidating her and preventing her from serving as a witness against Naason in his criminal trial for human trafficking. Martin and her family were forced to flee their home and now fight to end the exploitation of others by LDM, despite continued threats to their safety.