

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

[REDACTED]

Plaintiff,

vs.

Civil Case No. _____

Steven Lopez,

Defendant.

COMPLAINT

1. This lawsuit seeks to remedy the injuries sustained by Plaintiff relating to sexual assault, abuse, molestation, and nonconsensual sexual touching and harassment by her teammate and coach, Defendant Steven Lopez.

PARTIES, JURISDICTION and VENUE

2. Plaintiff [REDACTED] is a citizen of California and was born in 1990.

3. Defendant Steven Lopez is a citizen of Texas and was born in 1978.

4. The value of the case exceeds the jurisdictional threshold value of \$75,000.00, exclusive of interest and costs, taking into account the nature and extent of the injuries and damages sustained by Plaintiff, and the reasonable economic and non-economic injuries and damages sustained by Plaintiff.

5. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1).

6. This Court has personal jurisdiction over the Defendant because the negligent acts occurred in Colorado, and venue is appropriate in this district because the conduct alleged here occurred in this judicial district.

FACTS

7. Defendant Steve Lopez has been the USOC's Taekwondo athlete and coach at the USOC Training facility in Colorado Springs, Colorado and at competitions around the world.

8. Defendant is the agent, servant, and/or employee of USA TKD and the USOC.

9. At all times, Defendant owed duty of care to athletes he trained with and who were under his supervision.

10. Plaintiff grew up in Spokane, Washington.

11. Plaintiff first met Defendant Steven Lopez when she attended his taekwondo camps at the University of Houston in 2003.

12. Defendant took a special interest in Plaintiff at the 2003 camp.

13. Plaintiff was 13 years old.

14. Defendant told her she was pretty and that she would grow up to be tall.

15. Plaintiff's family moved to the Houston area and Plaintiff began training with Defendant at the Lopez Elite Taekwondo school in Houston, Texas, in 2004, when she was 14 years old.

16. Plaintiff's parents never left Plaintiff alone with Defendant.

17. Sometime in 2007, Defendant then 29 or 30, began taking Plaintiff on "dates" when she was 17.

18. Defendant first sexually assaulted Plaintiff after taking her to see a movie in 2007.

19. Sometime in late 2007, Plaintiff was pressured by another Taekwondo coach to perform oral sex on him, and Defendant intervened.

20. After this incident, Defendant and Plaintiff went on a "date" during which Plaintiff, then 17, performed oral sex on Defendant.

21. At the time, Plaintiff was 17.

22. In February 2008, while Plaintiff was a minor, Plaintiff lost her virginity to Defendant Lopez.

23. During 2008, while Plaintiff was 17, Defendant had sexual intercourse with Plaintiff in several states.

24. Defendant was simultaneously having sexual relations with underage athletes at various tournaments around the world, including at the 2008 Olympic Games.

25. Defendant and Plaintiff had sex at the USOC- and USA TKD-sanctioned USA Taekwondo National Championships in 2008.

26. By the time of Plaintiff's 18th birthday in May 2008, she and Defendant Lopez's "relationship" was ending.¹

27. In June 2008, Defendant invited Plaintiff to a party at a friend's condo.

28. Plaintiff remembers drinking a Gatorade and vodka, then blacking out.

29. Plaintiff's next memory was waking up in the bed of the owner of the condo.

30. The owner of the condo drove her home and told her that while she was passed out, Defendant had raped her.

31. Defendant Lopez had put a drug in Plaintiff's drink that caused her to black out so he could rape her.

32. Plaintiffs are aware of other women who claim to have been drugged and raped by Defendant Lopez.

33. Plaintiff retired from Taekwondo after the 2012 Olympiad.

34. Plaintiff was damaged in that she has suffered discomfort, related physical manifestations thereof, sleep deprivation, physical illness, vomiting, severe emotional distress, shock, humiliation, fright, grief, embarrassment, loss of self esteem,

¹ Plaintiffs are in no way implying that a minor can consent to be in a sexual relationship with 29 or 30 year old man.

disgrace, loss of familial relationships, loss of enjoyment of life and will continue to suffer pain of mind and body, were prevented and will continue to be prevented from performing Plaintiffs' daily activities and obtaining the full enjoyment of life, and have sustained and continue to sustain loss of earnings and earning capacity; and have required and will continue to require treatment, therapy, counseling, and hospitalization to address the mental anguish and despair caused by Defendant's actions.

CLAIM FOR RELIEF: NEGLIGENCE

35. Plaintiff realleges and incorporate by reference the allegations contained in the previous paragraphs.

36. As her teammate, coach, and the appointed agent of USOC and USATKD, Defendant owed Plaintiff a duty to exercise reasonable care to ensure her safety and freedom from sexual assault, abuse, and molestation while interacting with him.

37. As her teammate, coach and the appointed agent of USOC and USATKD, Defendant breached the duties owed to Plaintiff and was negligent by sexually abusing her.

38. Defendant's nonconsensual sexual touching and assaults and rape were so reckless as to demonstrate a substantial lack of concern for whether an injury would result to Plaintiff.

39. Defendant's conduct in sexually assaulting, abusing, and molesting Plaintiff in the course of his employment, agency, and/or representation of the USOC and under the guise of serving as her "coach" was so reckless as to demonstrate a substantial lack of concern for whether an injury would result to Plaintiff.

40. Defendant demonstrated a willful disregard for precautions to ensure Plaintiff's safety.

41. Defendant demonstrated a willful disregard for substantial risks to Plaintiff.

42. Defendant breached duties owed to Plaintiff and was negligent when he conducted himself by the actions described above, said acts having been committed with reckless disregard for Plaintiff's health, safety, Constitutional and/or statutory rights, and with a substantial lack of concern as to whether an injury would result.

43. As a direct and/or proximate result of Defendant's actions and/or inactions, Plaintiff suffered injuries.

44. Plaintiff requests a jury trial on this count to determine the extent of her damages.

WHEREFORE, Plaintiff request this Court and the finder of fact to enter a Judgment in Plaintiff's favor against Defendant in an amount consistent with the proofs of trial, and seeks all appropriate damages, including compensatory damages.

Respectfully Submitted,

/s/ Rex A. Sharp

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