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JUN 30 2009  
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FOR MULTNOMAH COUNTY

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR MULTNOMAH COUNTY

**08970**

LEIGH QUINLAN, )  
)  
Plaintiff, )  
)  
v. )  
)  
JONATHAN "NATE" JAQUA, LOS )  
ANGELES GALAXY, a California )  
corporation, and HOUSTON DYNAMO, a )  
Texas corporation, MAJOR LEAGUE )  
SOCCER, LLC, a New York Limited )  
Liability Company, and John Doe Major )  
League Soccer Teams 1-5. )  
)  
Defendants. )

Case No.: **0906-08970**  
COMPLAINT: Civil Sex Abuse  
CLAIM NOT SUBJECT TO MANDATORY  
ARBITRATION  
(Amount in controversy exceeds  
\$50,000.00)  
JURY TRIAL DEMANDED

PLAINTIFF alleges:

**NATURE OF THE ACTION**

1.

Plaintiff Leigh Quinland ("Plaintiff") brings this action for damages and other relief stemming from sexual assault occurring on July 1, 2007.

**JURISDICTION**

2.

This Court has jurisdiction over Plaintiff's claims for monetary and other relief under the Oregon Constitution Article VII §9.

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3.

Plaintiff is a resident of Victoria, British Columbia, and was at the time of the events alleged in this Complaint, a resident of Lane County, Oregon and student at the University of Oregon.

4.

Defendant Jonathan "Nate" Jaqua ("Jaqua") is currently a resident of Washington State. At the time of the events alleged in this Complaint, Jaqua was a professional soccer player employed by the Los Angeles Galaxy or Houston Dynamo.

5.

Defendant Los Angeles Galaxy is a Major League Soccer ("MLS") team licensed to do business in California, and having as its primary place of business Carson, Los Angeles County, California.

6.

Defendant Houston Dynamo is a MLS team licensed to do business in Texas, and having as its primary place of business Houston, Harris County, Texas.

7.

At the date of filing, Plaintiff is unable to ascertain which MLS team employed Jaqua as of July 1, 2007. Plaintiff has named both likely teams and John Doe Major League Soccer Teams 1-5, and will amend the Complaint to conform to discovery.

8.

Major League Soccer, LLC is a New York Limited Liability Company.

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**GENERAL ALLEGATIONS**

9.

On July 1, 2007, Plaintiff, while attending the University of Oregon on a soccer scholarship, went to "Rennie's Landing" in Eugene. She was accompanied to Rennie's Landing by a teammate on the soccer team and others.

10.

Also at Rennie's Landing were Jaqua and other soccer players. Plaintiff, Jaqua, and other players engaged in conversation for some time, discussing the business of soccer, college and major league differences, training, and other trade-related issues.

11.

Defendant Jaqua held himself out as a representative player of Major League Soccer.

12.

Because of Jaqua's status as a MLS player, Plaintiff felt comfortable with him and found him credible and trustworthy.

13.

Around midnight, Plaintiff left Rennie's Landing and began walking home, alone.

14.

Plaintiff was approached by Jaqua, who asked if he could walk with her as far as 22<sup>nd</sup> Street. Plaintiff agreed, in part because she found him credible and trustworthy as a MLS player.

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15.

While passing the cemetery, Jaqua attacked Plaintiff and subjected her to a brutal, forcible sexual assault in violation of multiple provisions of ORS 163, including but not limited to:

- a. fondling and touching of Plaintiff's private parts;
- b. digital penetration of Plaintiff's vagina;
- c. penile penetration of Plaintiff's vagina and anus;
- d. ejaculation on Plaintiff; and
- d. urinating on Plaintiff.

16.

As a result of Jaqua's assault on Plaintiff, she has suffered physical injury to her private parts, as well as pain, mental suffering, emotional distress, humiliation, sexual confusion, loss of care, comfort, companionship, and society, she is afraid to be alone, to leave her house, and is fearful of men. After the attack, Plaintiff could no longer attend the University of Oregon or play on its soccer team because of the mental distress it caused her.

17.

As a result of the assault on Plaintiff, Plaintiff has incurred economic damages in the amount of \$5,000 for mental health therapy, or such greater amount as may be proved at trial.

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18.

As a result of the assault on Plaintiff, Plaintiff will incur economic damages in the amount of \$50,000 for mental health therapy, or such greater amount as may be proved at trial.

19.

As a result of the assault on Plaintiff, Plaintiff has incurred economic damages for sexually transmitted disease testing, for \$150, or such greater amount as may be proved at trial.

20.

As a result of the assault on Plaintiff, Plaintiff has suffered non-economic damages as outlined above in the amount of \$5 million, or such greater amount as may be proved at trial.

21.

Plaintiff may at a future date seek the Court's permission to amend this Complaint to seek the recovery of punitive damages.

**CLAIM 1  
BATTERY  
(AGAINST JAQUA)**

22.

Plaintiff realleges paragraphs 1 through 21 above.

23.

As a direct and proximate cause of the attack by Jaqua as outlined above in Paragraph 15, Plaintiff has suffered and will continue to suffer indefinitely, as outlined above.

1 CLAIM 2  
2 VICARIOUS LIABILITY  
3 (AGAINST GALAXY, DYNAMO, MLS, AND JOHN DOES)

4 25.

5 Plaintiff realleges paragraphs 1-21 above.

6 26.

7 At the times Jaqua befriended Plaintiff and induced her to trust him, thus  
8 enabling him to perpetrate a sexual assault upon her, Jaqua was motivated, at least in  
9 part, to serve his teams, Galaxy and Dynamo, and MLS, LLC, was operating largely  
10 within the time and space of his employment, and was engaged in work he was hired to  
11 perform.

12 27.


13 WHEREFORE, Plaintiff asks the Court for the following relief:

14 CLAIM 1: \$55,150 in economic damages, or such greater amount as may be  
15 proved at trial, and \$5 million in non-economic damages; and

16 CLAIM 2: \$55,150 in economic damages, or such greater amount as may be  
17 proved at trial, and \$5 million in non-economic damages.

18 DATED this 30 day of June 2009.

19 RANDALL VOGT, PC

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