

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND  
FOR ORANGE COUNTY, FLORIDA.

K.S., as mother and natural guardian of  
JANE AS DOE, a minor child,

CASE NO.: 2025-CA-001701-0  
DIVISION: 39

Plaintiff,

vs.

CHRISTIAN VARGAS, FLORIDA  
MULTICULTURAL DISTRICT COUNCIL  
OF THE ASSEMBLIES OF GOD, INC. and  
IGNITE LIFE CENTER, INC.

Defendants.

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**PLAINTIFF'S INITIAL DISCOVERY DISCLOSURE PURSUANT TO FLORIDA RULE  
OF CIVIL PROCEDURE 1.280(A)(1)**

Comes now, Plaintiff, by and through the undersigned counsel, and submits this Initial  
Discovery Disclosure as required under Florida Rule of Civil Procedure 1.280(a)(1):

- 1. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information and the subjects of that information that Plaintiff may use to support its claims or defenses, unless the use would be solely for impeachment.**

**RESPONSE:**

- a. Plaintiff, K.S., as mother and natural guardian of JANE AS DOE, a minor child, and her husband and the child's father, F.S.  
c/o Christopher Chenevey, Esquire  
Bagen Accident Injury lawyers  
6241 NW 23<sup>rd</sup> St., Suite 300  
Gainesville, FL 32653

The Plaintiff and her parents have knowledge regarding the subject claim, information about the dates of alleged tortious acts, and claimed damages and amounts sought in the lawsuit.

- b. Christian Vargas  
21324 NW 217<sup>th</sup> Dr.  
High Springs, FL

This Defendant has knowledge regarding the subject claim, information about the dates and specific circumstances of the tortious acts alleged in this case.

- c. [REDACTED], Natural Guardian of Minor Child K.C.  
[REDACTED]  
Apt [REDACTED]  
Gainesville, FL 32606

Upon information and belief, this witness and her daughter may have specific information about alleged acts of abuse committed by Defendant Christian Vargas, as well as the information reported to the Church (Ignite Life Center and Multicultural District Council of the Assemblies of God) about the alleged abuse, and information about the church's response and/or coverup.

- a. [REDACTED]  
[REDACTED]  
[REDACTED]  
Gainesville, FL 32606

This witness was a Federal employee of "Urban Strategies" with the title of Prevention of Sexual Abuse Compliance Manager, who worked on the campus of Ignite Life Center, Inc. church. He has information regarding the reporting of abuse and other wrongdoing to the church, and information on the church and their leaderships response and whether or not it was adequate

- d. Pastors Mark and Lisa Vega  
21324 NW 217<sup>th</sup> Dr.  
High Springs, FL

These witnesses, husband and wife, are Pastors of Ignite Life Center Church and have information about the reporting of abuse and other wrongdoing to the church, and information on the church and their leaderships response and alleged negligence of the Church. The alleged tortfeasor is also their Son, and so they may have specific information about statements he has made regarding the alleged acts.

■ [REDACTED]

(address unknown)

Upon information and believe, this witness may have information about the alleged tortious acts that make up the subject matter of this lawsuit.

c. [REDACTED]

(address unknown)

Upon information and believe, this witness may have information about the alleged tortious acts that make up the subject matter of this lawsuit.

d. All employees, leaders, and board members of Ignite Life Center, Inc.

Upon information and belief various employees and board members of Ignite Life Center, Inc. may have information about the alleged acts of abuse that were reported to the church leadership, and the church's negligence and/or response.

[REDACTED]

■ [REDACTED] has information on Christian Vargas and his leadership roles within the church, as well as information on the church's policies and procedures and other areas.

e. [REDACTED]

[REDACTED]

This witness has information on Christian Vargas's leadership role within the church and may have information on areas of the case.

f. [REDACTED]

[REDACTED]

[REDACTED]

This witness has information on Christian Vargas's leadership role at the church, and possibly other relevant info.

[REDACTED]

[REDACTED]

h. [REDACTED] (address unknown currently)

Witness has information on Christian Vargas's leadership role at the church and other information as a church member.

i. [REDACTED] (address unknown currently)

Witness has information on Christian Vargas's leadership role at the church and other information as a church volunteer and former employee of Refugio.

j. Agustin Boissen (address unknown)  
1443 NW 140<sup>th</sup> Way  
Newberry FL 32643

Witness sent a letter to K.S. detailing prior incidents they were made aware of while serving as associate pastors at Ignite Life Center.

k. Erick Godinez (moved to Ocala but still owns home in Gainesville, which he rents to a friend and comes and visits regularly, address in Gainesville 15615 NW 141<sup>st</sup>

st Alachua, FL 32615) (lived with Mark Vega for some time, was former associate pastor at Ignite)

Witness sent a letter to K.S. detailing prior incidents they were made aware of while serving as associate pastors at Ignite Life Center.

l. Mariano Rivera (Address unknown)

Witness with knowledge of policies, procedures at Ignite Life Center church.

m. Doug Clay (address unknown)

Witness with knowledge of these issues as a leader with the Assemblies of God.

n. Abner Adorno (address unknown)

Witness who is a District leader, with knowledge of the Multicultural District's policies and procedures as well as the response to allegations of sexual abuse.

o. Nicole Gomez

15574 NW 121<sup>st</sup> PL Alachua FL 32615 currently selling her home.

This witness is a graduate of the Ignite School of Ministry, current associate pastor of Ignite and former director of Refugio and has direct knowledge of the abuse that was reported to Ignite Life Center. Witness sent a letter to K.S. detailing prior incidents they were made aware of while serving as associate pastors at Ignite Life Center.

p. Esther Omeben

24793 NW 201<sup>st</sup> RD

High Springs FL 32643

This witness is a graduate of the Ignite School of Ministry, current associate pastor of Ignite and former director of Refugio and has direct knowledge of the abuse that was reported to Ignite Life Center. Witness sent a letter to K.S. detailing prior incidents they were made aware of while serving as associate pastors at Ignite Life Center.

q. Nicholas Bruce

Lives with Mark Vega, this is his nephew and associate pastor at Ignite.

This witness is a graduate of the Ignite School of Ministry and has direct knowledge of the abuse that was reported to Ignite Life Center.

- r. Sgt. Pandek, Detective Figueroa, and Detective Johnson of the Gainesville Police Department (addresses unknown)

Witnesses have information about the criminal case against Christian Vargas.

**2. Description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims and defense, unless the use would be strictly for impeachment.**

At this time, Plaintiff is in possession, custody, and control of:

- a. Medical records and billing regarding treatment rendered to A.S.:
  - a. Medical records from Comprehensive Women's Health are in possession of Bagen Law.
- b. Witness statements and documentary evidence from several of the witnesses identified above.
  - a. Sworn affidavit of [REDACTED], already provided to Opposing Counsel Madeline Villani.
  - b. Statement of witness [REDACTED] including pictures, videos and screenshots. Possessed by Bagen Law.
  - c. Other witnesses identified above are currently working on letters and/or statements as well as any evidence they can provide, not yet in the law firms possession.
  - d. Anonymous letter detailing other witnesses and allegations related to ignite life church and allegations of sexual abuse.
  - e. Email from K.S. to Sgt Pandak of GPD inquiring into status of criminal case.
  - f. Report intended for submission to the FBI and the letter of complaint intended for the associated organizations: Urban Strategies, Assemblies of God (AG), Florida Multicultural district (FMD) & Latin Coalition etc. These were provided by K.S. and F.S.
  - g. Noel Cruz investigative report, obtained by public records request.

- h. Articles and press releases related to other victims of sex abuse at Ignite Life Center.
    - i. Pictures of Christian Vargas serving in the different capacities at Ignite Life Center including Children's areas and attending leadership meetings.
  - c. Screenshots of the text messages between Christian Vargas and A.S., in possession of Bagen Law.
  - d. State of Florida's discovery documents which were requested by public record request and paid for by the law firm. In possession of Bagen Law.
3. **A computation of each category of damages claimed by the disclosing party- who must also make available for inspection and copying unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**
- A. Medical Expenses Incurred in the Past: An amount to be awarded by a fair and impartial jury.
  - B. Lost Earnings in the Past: An amount to be awarded by a fair and impartial jury.
  - C. Medical Expenses to be Incurred in the Future: An amount to be awarded by a fair and impartial jury.
  - D. Loss of Earning Capacity in the Future: An amount to be awarded by a fair and impartial jury.
  - E. Past Non-Economic Damages
    - 1. Pain and Suffering: An amount to be awarded by a fair and impartial jury.
    - 2. Disability: An amount to be awarded by a fair and impartial jury.
    - 3. Physical Impairment: An amount to be awarded by a fair and impartial jury.
    - 4. Disfigurement: An amount to be awarded by a fair and impartial jury.
    - 5. Mental Anguish: An amount to be awarded by a fair and impartial jury.
    - 6. Inconvenience: An amount to be awarded by a fair and impartial jury.
    - 7. Aggravation of a disease of physical defect: An amount to be awarded by a fair and impartial jury.
    - 8. Loss of Capacity for the Enjoyment of Life: An amount to be awarded by a fair and impartial jury.
  - F. Future Non-Economic Damages
    - 1. Pain and Suffering: An amount to be awarded by a fair and impartial jury.
    - 2. Disability: An amount to be awarded by a fair and impartial jury.
    - 3. Physical Impairment: An amount to be awarded by a fair and impartial jury.
    - 4. Disfigurement: An amount to be awarded by a fair and impartial jury.
    - 5. Mental Anguish: An amount to be awarded by a fair and impartial jury.
    - 6. Inconvenience: An amount to be awarded by a fair and impartial jury.
    - 7. Aggravation of a disease of physical defect: An amount to be awarded by a fair and impartial jury.

8. Loss of Capacity for the Enjoyment of Life: An amount to be awarded by a fair and impartial jury.
4. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.
- a. Great American Assurance Company Policy (for Ignite Life Center, Inc.)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served and filed via the Florida Court's E-portal, to the following, on this 20th day of May, 2025 to: Madeline S. Villani, Esq., ( [mvillani@garrisonyount.com](mailto:mvillani@garrisonyount.com); [kickler@garrisonyount.com](mailto:kickler@garrisonyount.com); and [smarch@garrisonyount.com](mailto:smarch@garrisonyount.com);) and Keith Shevenell, Esq. ([courtdoc@salmon-salmon.com](mailto:courtdoc@salmon-salmon.com); [Kshevenell@salmon-salmon.com](mailto:Kshevenell@salmon-salmon.com); and [preading@salmon-salmon.com](mailto:preading@salmon-salmon.com))

**STEVEN A. BAGEN & ASSOCIATES, P.A.**

**/S/ Christopher R. Chenevey**

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