

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

█████, as mother and natural guardian of
JANE █████ 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.

**PLAINTIFF'S MOTION TO COMPEL DEFENDANT, IGNITE LIFE CENTER, INC.'S
RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION**

COMES NOW, Plaintiff, █████, as mother and natural guardian of JANE █████ DOE, a
minor child ("Plaintiff"), by and through her undersigned counsel and pursuant to Florida Rule of
Civil Procedure 1.380, and hereby moves this Court for an Order compelling Defendant, IGNITE
LIFE CENTER, INC. ("Ignite") to respond to Plaintiff's Amended First Request for Production
served upon them on August 4, 2025, and as further grounds would state:

1. Plaintiff's Amended First Request for Production was served upon the Defendant,
Ignite, on August 4, 2025. See attached Exhibit "A".
2. As of the date of this motion, Ignite has not responded to this Request for Production.
3. Under Fla. R. Civ. P. 1.350, a defendant has thirty days to serve a written response to a
request for production.
4. Under Fla. R. Civ. P. 1.380(a)(2)(F), "[a] discovering party may move for an order
compelling a response if a party fails to produce documents and things under rule 1.350(b)."

5. Under Fla. R. Civ. P. 1.380(a)(4)(A), “[i]f the motion [to compel] is granted and after opportunity for hearing, the court must require the party or deponent whose conduct necessitated the motion, or the party or counsel advising the conduct, to pay to the moving party the reasonable expenses incurred in obtaining the order that may include attorneys’ fees, unless the court finds that the movant failed to certify in the motion that a good faith effort was made to obtain the discovery without court action. . .”

7. Defendants have made a good faith effort to obtain the requested records without the need for a hearing as evidenced by correspondence, which is attached hereto as Exhibit “B”.

8. Plaintiff would request this Court enter an Order granting Plaintiff’s Motion to Compel Defendant Ignite’s response to Plaintiff’s Request for Production.

CERTIFICATE OF GOOD FAITH

The undersigned attorney certifies that he had a Good Faith Conference with Defendant’s counsel set on Monday, September 22, 2025 at 2:00 P.M.

WHEREFORE, the Plaintiff moves this Court order compliance with the above discovery request and impose a monetary sanction for the fees and costs connected with the filing of this motion.

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 24th day of October, 2025: to Madeline S. Villani, Esq., (mvillani@garrisonyount.com; kickler@garrisonyount.com; and smarch@garrisonyount.com).

STEVEN A. BAGEN & ASSOCIATES, P.A.

/S/ Christopher R. Chenevey

Christopher R. Chenevey, Esq. FBN 0090536

Kyle J. Bagen, Esq. FBN 112827

P. O. Box 5757

Gainesville, FL 32627

(352) 377-9000; Fax (352) 373-9000

Attorney for Plaintiff

litigationfiling@bagenlaw.com (e-filing only)

Email to: chris@bagenlaw.com & wendy@bagenlaw.com

EXHIBIT A

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

■, ■ mother and natural guardian of
JANE ■ DOE, a minor child,

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

Plaintiff,

v.

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

Defendants.

**PLAINTIFF'S AMENDED FIRST REQUEST FOR PRODUCTION
TO DEFENDANT IGNITE LIFE CENTER, INC.**

Plaintiff, ■, as mother and natural guardian of JANE ■ DOE, a minor child, by and through undersigned counsel and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, requests the Defendant to produce the following documents at the offices of BAGEN LAW, 6241 NW 23rd Street, Suite 300, Gainesville, FL 32653, within the time and manner prescribed by law pursuant to the Florida Rules of Civil Procedure.

DOCUMENTS REQUESTED

1. All documents naming, referencing, or depicting the named Plaintiff or Plaintiff's immediate family members, including but not limited to membership records, Ignite Life Summer Internship rosters and other documents, yearbooks, photographs, church bulletins, and correspondence.
2. All documents created in whole or in part by Plaintiff or for Plaintiff.
3. All documents referring or relating to Christian Vargas. Such documents would include but are not limited to:
 - a. documents referring or relating to his membership with, involvement with, attendance at, employment with, training with, or participation in Ignite Life

Center (hereinafter, "Defendant Church") and/or Defendant's youth groups, programs, and/or activities, including the Ignite Life Summer Internship program;

- b. documents referring or relating to disciplinary action or investigations taken against him by either of the Defendants;
 - c. documents referring or relating to disciplinary actions or investigations taken against anyone else by either of the Defendants;
 - d. documents referring or relating to disciplinary actions or investigations taken against him by either of the Defendants due to allegations that he acted sexually inappropriately with youth involved in youth groups, programs, and/or activities, including the Ignite Life Summer Internship program; and
 - e. documents referring or relating to his involvement in disciplinary actions or investigations taken against anyone else by either of the Defendants due to allegations that anyone else acted sexually inappropriately with youth involved in youth groups, programs and/or activities, including the Ignite Life Summer Internship program.
- 4. All documents including but not limited to email referring or relating to complaints, allegations, information, and/or reports of sexually inappropriate behavior committed by Christian Vargas, or any other youth group, activity, and/or program volunteers associated with Defendant Church's prior to April 2021.
 - 5. All documents referring or relating to formal or informal, oral or written, complaints, allegations, or reports you received or were notified about at any time of sexually inappropriate behavior against minor children participating in Defendant Church's youth group, activities, and/or programs, including but not limited to the Ignite Life Summer Internship, prior to April 2021.
 - 6. All documents identifying the adult leaders, employees, volunteers, and agents participating in the 'The Call Matters' conference.
 - 7. All documents referring or relating to child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines created, implemented by, distributed, relied upon, and/or used by Defendant Church between 2016 and 2022.
 - 8. All documents referring or relating to the creation, implementation, reliance upon, use, and/or distribution of child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines by Defendant Church between 2016 and 2022.

9. All documents referring or relating to the rules and procedures for reporting suspicions that a child was sexually abused while participating in an Ignite Life program in effect between 2016 and 2023, regardless of when the document was created.
10. All documents referring or relating to the training of Ignite Life Center ministers, leaders, employees, volunteers, and agents involved Ignite Life's youth programs at any level from 2016-2023, regardless of when the documents were created, on matters of sexual abuse prevention, mitigation, and reporting. This request, includes, but is not limited to, printed and/or digital training materials.
11. All documents referring or relating to policies for evaluating, screening, selecting, approving, and/or deregistering individuals to participate as Ignite Life Center's youth group, activity, and/or program volunteers from 2016 to 2023.
12. All handbooks, rules, guidelines, and/or regulations distributed to or made available to youth participating in youth groups, activities, and/or programs associated with, supervised by, or sponsored by Defendant Church between 2016-2023.
13. All handbooks, rules, guidelines, and/or regulations distributed to or made available to Ignite Life Center youth program volunteers who volunteered with youth groups, activities, and/or programs, associated with, supervised by, or sponsored by Defendant Church between 2016-2023.
14. All documents referring or relating to the administration, supervision, control, and/or implementation of programming for youth at Defendant Church, between 2016 and 2022.
15. All documents depicting or explaining the corporate, business, agency, and/or other relationship between Defendant Church and Defendant District.
16. All documents depicting or explaining any ways in which Defendant Church is required to follow policies, rules, or regulations of Defendant District.
17. All documents depicting or explaining any ways in which Defendant District has the right to control the day-to-day-activities of Defendant Church.
18. All documents showing, referencing, or explaining the financial relationship between Defendant Church and Defendant District.
19. All documents referring or relating to the relationship between Ignite Life Center and the leaders, agents, employees, and/or volunteers of Defendant District between 2016 and 2022.

20. All Ignite Life Center constitutions, bylaws, and organizational charts in effect from 2016 to the present.
21. All transcripts and/or videos of deposition or other sworn testimony given by your employees, administrators, volunteers, pastors, or other agents in legal matters pertaining to allegations that a child was sexually abused while participating in Ignite Life Center activities or while in Ignite Life Center's care.
22. All documents referring or relating to any law enforcement, district attorney, state or federal government, agency, or other investigation of any facts alleged in Plaintiff's Complaint. Such documents include but are not limited to citations, summons, letters, memoranda, photographs, videos, statements, reports, or investigative materials provided by, received from, or given to any state or federal government agency or any other entity in connection with any investigation conducted regarding the facts alleged in the Complaint.
23. Documents reflecting all pastors, administrators, and employees of Defendant Church between 2016 and 2023.
24. Documents referring or relating to all communications between any pastor and Plaintiff, or anyone purporting to act on Plaintiff's behalf, regarding the subject matter of this lawsuit since Jan 2021. This includes, but is not limited to, text messages, direct messages, and emails.
25. All recorded or written statements taken by you, your agents, or representatives, including your insurance companies, of the parties to this action or any other people with knowledge of the facts alleged in the Complaint, referring or relating to the facts alleged in the Complaint.
26. All documents, including those created in anticipation of litigation, reflecting the names, addresses, and phone numbers of "occurrence witnesses," or any witnesses to the incidents alleged in the Complaint. In lieu of producing work product documents, Defendant may produce a list of occurrence witnesses, including their addresses and phone numbers.
27. All communications sent to, from, or between employees, administrators, pastors, representatives, or other agents of Defendants referring or relating to the incidents alleged in the Complaint or the existence of this lawsuit, regardless of when such communications were created. Such communications should include but are not limited to emails, text messages, and social media messages sent from, received by, and/or maintained on email accounts, cellular phones, social media accounts, and/or servers owned by, maintained by, or associated with Defendants.
28. All documents produced in discovery to any other party in this case.
29. All documents obtained by request or subpoena in this case.

30. All documents reflecting your communications with third-parties regarding the allegations in this case.
31. All documents relating to Defendant Church's participation, including any Church employee's, representative's, volunteer's, or agent's participation, in the criminal investigation(s) and prosecution(s) of Christian Vargas on charges relating to sexual conduct with children.
32. Christian Vargas' job application and all documents submitted by him in connection with seeking employment with Defendant Church.
33. All documents and other materials considered by Defendant Church in determining whether to employ Christian Vargas,
34. Any and all records reflecting job/character references submitted by Christian Vargas in connect with seeking employment and any records reflecting Defendant Church's contact with those references.
35. All records reflecting a termination or separation of employment between Defendant Church and Christian Vargas.
36. All contracts and/or documents describing Christian Vargas's relationship with Defendant Church, including a written job description, and description of all obligations, rights, duties, and responsibilities of Christian Vargas.
37. All correspondence and records of communication between Christian Vargas and any representative of Defendant Church referring or relating to the Plaintiff and/or the subject matter of this lawsuit.
38. All records of background checks, references, and other inquiries made by Defendant Church concerning Christian Vargas prior to or during his period of employment and/or affiliation with Defendant Church.
39. Any and all incident reports concerning Christian Vargas. Please submit a complete Privilege Log for any reports which Defendant will assert are protected work product.
40. Any and all recordings (digital, video, audio, security surveillance, or otherwise) of Christian Vargas or Plaintiff on the date(s) of the subject incident(s), or of anyone discussing the subject incident referenced in the Complaint.

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 4th day of August, 2025 to: Madeline S. Villani, Esq., (mvillani@garrisonyount.com; kickler@garrisonyount.com; and smarch@garrisonyount.com);).

STEVEN A. BAGEN & ASSOCIATES, P.A.

/s/ Christopher R. Chenevey

Christopher R. Chenevey, Esq. FBN 0090536

Kyle J. Bagen, Esq. FBN 112827

P. O. Box 5757

Gainesville, FL 32627

(352) 377-9000; Fax (352) 373-9000

Attorney for Plaintiff

litigationfiling@bagenlaw.com (e-filing only)

Email to: chris@bagenlaw.com & wendy@bagenlaw.com

EXHIBIT B

Chris Chenevey

From: Chris Chenevey
Sent: Tuesday, October 14, 2025 9:23 AM
To: Madeline Villani
Cc: Sabrina Marsh; Wendy Jenkins-Holton
Subject: RE: Overdue discovery- [REDACTED] v. Ignite et.al

Madeline,

I take it then you do not plan to respond to our RTP. So we will move forward with our MTC. I do not agree that documents can be withheld by a business under a '5th amendment' protection.

I just want to be clear, there is no purpose to wait ten days here.

Regards,



Chris Chenevey
Associate Attorney

Phone: (352) 377-9000
Fax: (352) 373-9000
Email: Chris@BagenLaw.com

6241 NW 23rd Street Suite 300
Gainesville, FL 32653
www.BagenLaw.com



The best compliment one can give is a referral to our firm.

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From: Madeline Villani <mvillani@garrisonyount.com>
Sent: Monday, October 13, 2025 2:09 PM
To: Chris Chenevey <Chris@BagenLaw.com>

Cc: Sabrina Marsh <smarsh@garrisonyount.com>; Wendy Jenkins-Holton <Wendy@BagenLaw.com>

Subject: RE: Overdue discovery- [REDACTED] v. Ignite et al

Apologies, I had requested the Mtn to Abate to be filed, and thought it had been, but it appears it was not. Filing now and will get it set for hearing

Madeline Villani, Esq.

Garrison, Yount, Forte & Mulcahy, L.L.C.

601 Bayshore Blvd., Suite 800

Tampa, Florida 33606-2760

(813) 275-0404 Main

(813) 275-0304 Fax

mvillani@garrisonyount.com

www.garrisonyount.com



From: Chris Chenevey <Chris@BagenLaw.com>

Sent: Monday, October 13, 2025 2:02 PM

To: Madeline Villani <mvillani@garrisonyount.com>

Cc: Sabrina Marsh <smarsh@garrisonyount.com>; Wendy Jenkins-Holton <Wendy@BagenLaw.com>

Subject: Overdue discovery- [REDACTED] v. Ignite et al

Importance: High

Madeline,

Your response to our first amended request for production is now overdue, including the two week extension I granted.

Please provide the response and documents within ten days or I will be forced to file a motion to compel. Please consider this my good faith request to resolve this issue.

Regards,



Chris Chenevey
Associate Attorney

Phone: (352) 377-9000

Fax: (352) 373-9000

Email: Chris@BagenLaw.com

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The best compliment one can give is a referral to our firm.

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From: Madeline Villani <mvillani@garrisonyount.com>
Sent: Monday, September 8, 2025 2:54 PM
To: Chris Chenevey <Chris@BagenLaw.com>
Cc: Pam Stuart <Pam@BagenLaw.com>; Sabrina Marsh <smarsh@garrisonyount.com>
Subject: RE: [REDACTED] v. Ignite, et al

Hey Chris, following up. Thanks

Madeline Villani, Esq.
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From: Madeline Villani
Sent: Wednesday, September 3, 2025 1:48 PM
To: Chris Chenevey <chris@bagenlaw.com>
Cc: Pam Stuart <pam@bagenlaw.com>; Sabrina Marsh <smarsh@garrisonyount.com>
Subject: [REDACTED] v. Ignite, et al

Hi Chris,

We are still working on getting the RFP documents together for you – would you be willing to grant us an additional 2 weeks to respond?

Thanks,

Madeline Villani, Esq.

Garrison, Yount, Forte & Mulcahy, L.L.C.

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