

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF ALABAMA  
 WESTERN DIVISION

J.G.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Civil Action No. _____
Jeffrey Dale Eddie, Highland Park	)	
Baptist Church, and Loving the Shoals	)	
United Appeal Fund, Inc.,	)	
	)	
Defendants.	)	

---

**COMPLAINT**

---

**COMES NOW** the Plaintiff, J.G., (“Plaintiff”) and for his complaint against the Defendants, Jeffrey Dale Eddie, Highland Park Baptist Church, and Loving the Shoals United Appeal Fund, Inc., states as follows:

**PARTIES**

1. The Plaintiff, J.G., is an adult resident and citizen of Ascension Parrish, Louisiana.
  
2. The Defendant, Jeffery Dale Eddie, is an adult resident and citizen of Colbert County, Alabama. Jeffrey Eddie was charged with thirty-six (36) counts related to child sex abuse. On March 7, 2014, Jeffrey Eddie pled guilty to 16 counts of sodomy for oral sex, 3 counts of sexual abuse of a child under the age of 12 and one count of possession of child pornography.

Jeffrey Eddie was sentenced to thirty (30) years in prison.

3. The Defendant, Highland Park Baptist Church is a Southern Baptist Church in association with the Colbert-Lauderdale Baptist Association, the Alabama State Board of Missions and the Southern Baptist Convention. It is located in Colbert County, Alabama. Defendant Jeffrey Eddie was employed by Highland Park Baptist Church from 1998 until 2014 and held the position of Administrative/Children's Pastor.

4. The Defendant Loving the Shoals United Appeal Fund, Inc., is a corporation formed in Colbert County, Alabama. The purported nature of the business is to, "glorify God by raising funds to support the benevolence activities of The Highland Park Baptist Church of Muscle Shoals, Alabama." Jeffrey Eddie is listed as an incorporator, director and registered agent of this Defendant.

### **FACTUAL BACKGROUND**

5. Beginning in approximately 2001, Defendant Jeffrey Eddie attempted to, and did, commit sexual acts including, but not limited to, fondling the plaintiff's testicles, physical masturbation and attempted oral sex on J.G. who was approximately 11 years old at the time.

6. Defendant Jeffrey Eddie continued to perpetrate these acts on

J.G. until approximately November 2013.

7. Those acts of sexual abuse took place in various locations at Highland Park Baptist Church, including Jeffrey Eddie's office and a storage closet attached to Jeffrey Eddie's closet. Those acts of sexual abuse also took place on Highland Park Baptist Church sponsored trips including, but not limited to, camp retreats at Earle Trent Assembly Camp and church sleepovers at Jeffrey Eddie's home. Further, the acts of sexual abuse took place while Jeffrey Eddie was driving the church van shuttling youth to Highland Park Baptist Church sponsored events.

8. At all times relevant to the acts of sexual abuse against J.G., Jeffrey Eddie was employed with Highlands Park Baptist Church as the Administrative/Children's Pastor.

9. At all times relevant to the acts of sexual abuse, J.G.'s wellbeing had been entrusted to Highlands Park Baptist Church by his parents.

10. Upon information and belief, Highlands Park Baptist Church provided Jeffrey Eddie with little to no oversight, monitoring or supervision. Jeffrey Eddie's office at Highlands Park Baptist Church was isolated from all other administrative offices. Jeffrey Eddie covered the only window in his office with a bulletin board which prevented anyone from looking in his office. Jeffrey

Eddie also closed the blinds on the door to his office and frequently locked his office door while individual children were present in his office. Jeffrey Eddie was given sole control over the installation and monitoring of security cameras. Highlands Park Baptist Church provided Jeffrey Eddie with two cellular phones – one of which had a different carrier and separate billing record from all other church phones. Jeffrey Eddie’s computer and phone activity were never monitored during his fourteen year employment.

11. Upon information and belief, child pornography was stored on the Highlands Park Baptist Church computer located in Jeffrey Eddie’s office.

12. Upon information and belief, Highlands Park Baptist Church waited ten (10) days after a reported incident and insisted on doing its own investigation before disclosing the sexual abuse to the police. This delay was in violation of Alabama law which requires clergy to report suspected abuse immediately.

13. Upon information and belief, Jeffrey Eddie repeatedly and consistently sexually abused other children during his fourteen (14) year tenure with Highlands Park Baptist Church.

14. Upon information and belief, Highlands Park Baptist Church now provides and continues to provide Jeffrey Eddie’s full compensation to

his wife – a nonemployee. Such compensation includes Jeffrey Eddie’s full salary, benefits and free cellular phone service.

**JURISDICTION AND VENUE**

15. Jurisdiction is proper in this Court by virtue of 28 U.S.C. §1332, diversity of citizenship, and the amount in controversy exceeds Seventy Five Thousand Dollars (\$75,000.00) exclusive of interest and costs. Venue is appropriate in this Court since all activities made the subject of this action originated and occurred within this judicial district.

**COUNT I  
(infliction of emotional distress)**

16. Defendant Jeffrey Eddie negligently and/or wantonly inflicted emotional distress upon the Plaintiff when he perpetrated sexual acts on him over a period of approximately 12 years.

17. Plaintiff was damaged as a result of the Defendants’ actions.

**COUNT II  
(invasion of privacy)**

18. Defendant Jeffrey Eddie did negligently and/or wantonly invade the Plaintiff’s privacy when he perpetrated sexual acts on him over a period of approximately 12 years.

19. Plaintiff was damaged as a result of the Defendant’s actions.

**COUNT III**  
**(assault and battery)**

20. Defendant Jeffrey Eddie did negligently and/or wantonly commit assault and battery upon the Plaintiff when he perpetrated sexual acts on him over a period of approximately 12 years.

21. Plaintiff was damaged as a result of the Defendant's actions.

**COUNT IV**  
**(false imprisonment)**

22. Defendant Jeffrey Eddie did negligently and/or wantonly falsely imprison the Plaintiff when he perpetrated sexual acts on him over the course of approximately 12 years.

23. Plaintiff was damaged as a result of the Defendant's actions.

**COUNT V**  
**(negligence)**

24. Defendant Jeffrey Eddie did act negligently when he perpetrated sexual acts on the Plaintiff over the course of approximately 12 years.

25. Plaintiff was damaged as a result of the Defendant's actions.

**COUNT VI**  
**(outrage)**

26. Defendant Jeffrey Eddie committed the tort of outrage when he

perpetrated sexual acts on the Plaintiff over the course of approximately 12 years.

27. The act of sexual abuse on a minor is utterly reprehensible and cannot be tolerated in a civilized society.

28. Plaintiff was damaged as a result of the Defendant's actions.

**COUNT VII**  
**(breach of fiduciary duty)**

29. At all times relevant to the acts of sexual abuse against J.G., Jeffrey Eddie was employed with Highlands Park Baptist Church as the Administrative/Children's Pastor and had a position of authority and power over J.G. as a result of his employment.

30. At all times relevant to the acts of sexual abuse against J.G., Jeffrey Eddie was acting as a spiritual counselor and was providing spiritual guidance and instruction to J.G. As such, a fiduciary duty existed between Jeffrey Eddie and J.G.

31. Jeffrey Eddie breached his fiduciary duty by sexually abusing J.G. over the course of approximately 12 years.

32. Plaintiff was damaged as a result of the Defendant's actions.

**COUNT VIII**  
***(respondeat superior and/or agency)***

33. At all times relevant to the acts of sexual abuse against J.G., Jeffrey Eddie was employed with Highlands Park Baptist Church as the Administrative/Children's Pastor and had a position of authority and power over J.G. as a result of his employment.

34. At all times relevant to the acts of sexual abuse against J.G., Jeffrey Eddie perpetrated the sexual abuse at the physical location of Highlands Park Baptist Church or during a church approved trips where J.G.'s well-being had been entrusted to the church.

35. Jeffrey Eddie's conduct and contact with J.G. leading up to the sexual abuse fell within his scope of employment with Highlands Park Baptist Church. As such, the sexual abuse was an outgrowth and was engendered by his employment with Highlands Park Baptist Church.

36. The significant job-created authority possessed by Jeffrey Eddie enabled him to sexually abuse J.G., and other minors entrusted to the care of Highlands Park Baptist Church.

37. Instrumentality furnished by Highlands Park Baptist Church, such as computers and cell phones, vans and offices were used to further the



sexual abuse of J.G. and other minors entrusted to their care.

38. The sexual abuse of J.G. by Jeffrey Eddie would not have occurred but for Jeffrey Eddie's employment by Defendant Highland Park Baptist Church.

39. Defendant Highland Park Baptist Church knew or should have known the Jeffrey Eddie posed a serious threat to the minors entrusted in their care.

40. For the reasons stated above, Highlands Park Baptist Church is liable under the theory of *respondeat superior* and/or agency for the infliction of emotional distress, invasion of privacy, assault and battery, false imprisonment, negligence, outrage and breach of fiduciary duty (Counts I–VII) committed by Jeffrey Eddie.

**COUNT IX**  
**(failure to supervise, train and hire)**

41. Defendant Highlands Park Baptist Church negligently and/or wantonly failed to supervise, train and hire its employees, including but not limited to Jeffrey Eddie.

42. Defendant, Loving the Shoals United Appeal Fund, Inc., upon information and belief, negligently and/or wantonly failed to supervise, hire and train its employees and agents, including but not limited to Jeffrey Eddie.

43. Despite being entrusted with hundreds of children, Defendant Highlands Park Baptist Church failed to adequately train its staff regarding the identification and reporting of child abuse and failed to adequately hire staff that could identify and would report child abuse.

44. Defendants failed to provide oversight, monitoring and/or supervision for Jeffrey Eddie - the employee entrusted with the minor children. Defendants allowed Jeffrey Eddie to possess an office which was isolated from all other administrative offices, to visually conceal all activity which occurred in that office, to be alone with individual children in that isolated office, and to lock the door of his office when he was alone with those children. Defendants allowed Jeffrey Eddie to operate autonomously and outside of ordinary channels.

45. Defendants negligently and/or wantonly failed to monitor the phone history, computers and other electronic devices of its employees, including Jeffrey Eddie.

46. Defendants negligently and/or wantonly failed to provide oversight and supervision when it allowed an adult male pedophile to have one-on-one contact and authority over J.G. and on the other children who were placed in their care.

47. Defendants negligently and/or wantonly failed to train their employees to identify and report the ongoing sexual acts which were perpetrated on J.G. and on numerous other children placed in their care.

48. Defendants negligently and/or wantonly failed to institute and/or enforce policies which would safeguard against an adult male having unsupervised intimate contact with the children placed in their care.

### **Prayer for Relief**

1. The negligent, wrongful and/or wanton conduct of the Defendants Jeffrey Eddie, Highlands Park Baptist Church, and Loving the Shoals United Appeal Fund, Inc., have resulted in the following damages:

- (a) The Plaintiff was caused to suffer physical injury;
- (b) The Plaintiff was traumatized by the acts of sexual abuse and was caused to suffer and continues to suffer mental anguish;
- (c) The Plaintiff was caused to be permanently injured;
- (d) The Plaintiff was caused and will be caused in the future to expend money in the nature of doctor, hospital, drug, counseling and other medical expenses in an effort to cure and/or assist with tolerating his injuries; and
- (e) The Plaintiff was caused to be permanently unable to pursue many of his normal and usual activities.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff seeks an award of compensatory and punitive damages in excess of the jurisdictional minimum of this Court, and in an amount determined by a jury to be fair and reasonable based on the evidence presented in this case.

**PLAINTIFF HEREBY DEMANDS A TRIAL BY STRUCK JURY**

*/s/ Erik S. Heninger*

ERIK S. HENINGER (ASB-1189-k46h)

GAYLE L. DOUGLAS (ASB-6974-e63d)

BRANDY L. ROBERTSON (ASB-2737-d65r)

Attorneys for Plaintiff

*Of Counsel:*

HENINGER GARRISON DAVIS, LLC

2224 1<sup>ST</sup> Avenue North

Post Office Box 11310 (35202)

Birmingham, Alabama 35203

205.326.3336 (phone)

205.326.3332 (facsimile)

[erik@hgdllawfirm.com](mailto:erik@hgdllawfirm.com)

[gdouglas@hgdllawfirm.com](mailto:gdouglas@hgdllawfirm.com)

[brobertson@hgdllawfirm.com](mailto:brobertson@hgdllawfirm.com)

**DEFENDANTS TO BE SERVED VIA CERTIFIED MAIL:**

Highland Park Baptist Church  
501 West 6<sup>th</sup> Street  
Muscle Shoals, AL 35661

Jeffrey Dale Eddie AIS# 00293645  
Bibb County Correctional Facility  
565 Bibb Lane  
Brent, AL 35034

Jeffrey Dale Eddie  
c/o William J. Underwood, Esquire  
Post Office Box 245  
Tuscumbia, AL 35674-2036

Loving the Shoals United Appeal Fund  
c/o Highland Park Baptist Church  
501 West 6<sup>th</sup> Street  
Muscle Shoals, AL 35661