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INFORMATION/PRESS RELEASE

It is only under very unusual circumstances that we release a press statement on behalf of one of our clients. However, the remarkable events of the past several months surrounding Doug Lay and his interactions with his former church, First Christian Church of Florissant (“FCCF”), and its pastor, Steve Wingfield, present such a situation. The continuing pattern of misinformation and deception that has characterized the tragic situation with the former FCCF youth leader, Brandon Milburn, requires us to respond directly and firmly. This pattern of misinformation has included a frivolous lawsuit filed on April 16, 2015 by Steve Wingfield and FCCF against Mr. Lay and three other individuals, Kari and Titus Benton and Dawn Varvil, filed in St. Louis County Circuit Court and styled *Steve Wingfield and the First Christian Church of Florissant v. Douglas Lay, Titus Benton, Kari Benton, Dawn Varvil and Jane Doe (aka “Annie Shankin” and “Reform FCCF”)*, Cause Number 15SL-CC0132.

The most recent series of misrepresentations has surrounded the so-called “dismissal” of the lawsuit. Mr. Wingfield, his attorney, and his elders at FCCF are telling their congregation and others that they dismissed this lawsuit as a good-faith gesture because they have offered an “independent Christian mediation process” to resolve their differences with Mr. Lay and the

other defendants. These representations are untrue on multiple counts. In actuality, the lawsuit was dismissed 48 hours before a court hearing was scheduled on Mr. Lay's motion to dismiss the case in St. Louis County Circuit Court. We believe there was a 90% likelihood that the motion would be granted as the petition that was filed in this case did not contain a single valid claim against any of the defendants. The plaintiffs' so-called "dismissal" of the lawsuit, which is attached, is really not a finalized dismissal. Rather, Mr. Wingfield and his attorney have dismissed the case *without prejudice*, which means they can refile it again anytime within the statute of limitations. This maneuver allowed them to avoid the near certainty that the trial judge would dismiss their case *with prejudice*, which would have eliminated their ability to ever refile this case again.

It is worth noting that Mr. Wingfield's initial effort to obtain an injunction designed to restrain the defendants from criticizing Mr. Wingfield was summarily denied on April 17, 2015 by a St. Louis County Circuit Judge. The ruling was based upon clearly established law in Missouri that a preliminary injunction cannot be issued based on alleged defamation until there is a judicial or jury determination of fault.

Another misrepresentation that Mr. Wingfield and his supporters have made is that they tried to resolve their differences with Doug Lay and the other lawsuit defendants both before they filed the lawsuit and even after it was pending, but that Doug refused to cooperate with these efforts. This representation is inaccurate and untrue. Prior to the filing of the lawsuit, Mr. Lay made numerous attempts to try to resolve his differences with FCCF and Mr. Wingfield. For example, on March 28, two days before Mr. Milburn was to be sentenced, Mr. Lay went to a

meeting with the FCCF elders that was supposed to include Mr. Wingfield. Mr. Wingfield failed to appear, claiming that he was too busy working on his sermon for Sunday. On Thursday, April 30, 2015, we arranged for an attempted settlement discussion involving Mr. Wingfield, his attorney, and Mr. Lay and his attorney. Prior to the settlement meeting, all parties signed a confidentiality agreement which precluded anyone from disclosing what went on in the meeting, which is standard procedure in this type of situation. We were not successful in resolving the case and Mr. Wingfield ended up abruptly leaving the meeting, claiming he had some other important task to complete. It did not take long for Mr. Wingfield to breach the confidentiality agreement that he signed before the settlement discussion. In a May 8 meeting with Titus and Kari Benton, he made several disclosures about what allegedly was said by Mr. Lay in the settlement discussion. The statements he made not only violated the confidentiality agreement, but as has become a familiar pattern with Mr. Wingfield, he distorted and misrepresented several statements that he claims Doug made during the course of the settlement discussions.

As for the “independent Christian mediation” process that Mr. Wingfield says has been offered, once again, this is simply untrue. On Thursday afternoon, May 7, 2015, Doug Lay was contacted by a FCCF Elder and advised that some type of special mediation had been set up at FCCF involving two leaders of the Christian Church who were pastors of another church in St. Charles County. Due to the short notice, it was impossible for Mr. Lay to meet with this group. Additionally, legal counsel was leaving town for the weekend and given our experience with Mr. Wingfield, participating in yet another settlement meeting without some clearly defined boundaries and rules would not have been recommended.

Mr. Wingfield and his Elders at FCCF have continued to demonstrate bad faith and dishonesty by maintaining a website at FCCF that discusses the lawsuit and the surrounding circumstances but greatly distorts and misstates the facts. Among other things the website alleges that FCCF leaders “have been falsely accused of having knowledge of Brandon Milburn’s despicable acts,” that the lawsuit was “seeking zero financial penalties” and that church leaders were attempting to “reach out” to Doug, Kari, Titus and Dawn to try to resolve their differences. As has been well documented in previous communication from this office, none of these statements is true. (See the attached letter from Al W. Johnson to James Wyrsh from April 27, 2015). Conspicuously absent from the church’s website is any mention of the original trial judge’s denial of their temporary restraining order as well as any mention of the pending motion to dismiss that we believe precipitated the dismissal of the case.

While contemplating his current legal options, Mr. Lay has submitted his resignation St. Louis Christian College (“SLCC”) effective Tuesday May 19, 2015. Mr. Lay respects the leadership at SLCC, including Dr. Guthrie Veece and Mike Chambers. However, his continued communications regarding this matter were creating substantial pressure at SLCC because of the close relationship between the college and First Christian Church of Florissant. Consequently, Mr. Lay felt that he needed to resign so he could continue to communicate both to defend himself from the continued false allegations that are being perpetuated by Mr. Wingfield and his elders as well as to continue to reach out and communicate with the victims and their families. As a survivor of child abuse himself, Mr. Lay regrets that the events of the past six weeks have distracted both him and the church from what should be the primary goal in this situation: to make sure that the current known victims, as well as unknown victims, receive the care and

counsel that they desperately need in this difficult time.

We have made a demand that FCCF make a final dismissal of its lawsuit against Mr. Lay and the other defendants, with prejudice, so that they will all be free to speak and address specific issues raised in the lawsuit. Additionally, if Mr. Wingfield and his church really want to achieve the goal of a measured reconciliation with Mr. Lay, they would immediately take down the material that is currently on their website which includes a copy of the petition together with a series of deceptive misrepresentations, as highlighted above.

Mr. Lay will continue to consider his own legal options, including a lawsuit for abuse of process and defamation as it is clear that the Wingfield lawsuit was filed with no other purpose but to attempt to silence Mr. Wingfield's critics and all of these actions since the filing of the lawsuit have been consistent with that. More importantly, Mr. Lay plans to continue the process of caring for the known victims of Mr. Milburn's abuse and attempt to locate and minister to those victims that have not yet felt free to come forward.

Doug Lay and his attorney, Al W. Johnson, believe that there are many sincere and decent people at the First Christian Church of Florissant. Unfortunately, Pastor Steve Wingfield and the current leadership of the Church have failed in their leadership duties to their members as well as to the victims of Mr. Milburn's horrific crimes.