

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

JANE DOE 1,

Plaintiff,

v.

No. D-202-CV-2024-09445

STEELBRIDGE MINISTRIES,
LEGACY CHURCH, INC., and
TRAVIS CLARK,

Defendants.

COMPLAINT FOR DAMAGES DUE TO SEXUAL ABUSE

Plaintiff Jane Doe 1, by and through her attorneys, Huffman Wallace & Monagle, LLC, hereby states the following for her Complaint for Damages Due to Sexual Abuse against Defendants Steelbridge Ministries, Legacy Church, Inc., and Travis Clark:

PARTIES, JURISDICTION, & VENUE

1. Plaintiff Jane Doe 1 is a resident of Bernalillo County, New Mexico.
2. Defendant Steelbridge Ministries is a New Mexico domestic nonprofit corporation with its principal place of business in Albuquerque, New Mexico.
3. Defendant Legacy Church, Inc. is a New Mexico domestic nonprofit corporation with its principal place of business in Albuquerque, New Mexico.
4. Defendant Travis Clark is a resident of Bernalillo County, New Mexico.
5. The Court has jurisdiction over the parties and venue is proper pursuant NMSA 1978, Section 38-3-1.

FACTUAL BACKGROUND

The Relationship Between Steelbridge Ministries and Legacy Church

6. Defendant Steelbridge Ministries (“Steelbridge”) is a religious based organization that, among other things, provides treatment services to individuals suffering from substance use disorders.

7. According to its website, Steelbridge’s services aim to help “individuals rebuild their lives and reintegrate into society.”

8. According to its website, Steelbridge claims it helps “transform the lives of those served and enhance[] our community’s overall safety and well-being.”

9. Upon information and belief, Steelbridge also operates a church at its facility that is referred to as “Steelbridge Church.”

10. Prior to 2017, Steelbridge was known as the Albuquerque Rescue Mission.

11. Legacy Church, Inc. (“Legacy Church”) and/or its senior pastor, Steve Smothermon, assumed control of Steelbridge’s operations in approximately 2019.

12. Legacy Church’s 2023 Annual Report states that “Steelbridge Ministries became a part of the Legacy Church Family in 2019.”

13. Steve Smothermon is the President and senior pastor of Legacy Church.

14. Steve Smothermon is chair of the board of directors of Steelbridge.

15. Upon information and belief, all members of Steelbridge’s Board of Directors are also affiliated with Legacy Church.

16. Employment positions for Steelbridge are posted on Legacy Church’s website, legacychurch.com. Job seekers are instructed to submit their applications for employment directly through Legacy Church’s website.

17. Upon information and belief, Legacy Church’s executives, including Smothermon, make all hiring decisions with regard to Steelbridge.

18. Upon information and belief, Steelbridge employees are paid by Legacy Church.

Jane Doe 1 is Sexually Abused at Steelbridge’s Inpatient Residential Services

19. Plaintiff Jane Doe 1 (“Plaintiff”) has suffered from a substance use disorder since approximately 2017.

20. From at least December 2020 to August 2024, Plaintiff has cycled between regular periods of incarceration, homelessness, and drug rehabilitation centers.

21. On or about November 6, 2020, Plaintiff was incarcerated at the San Juan Adult Detention Center.

22. On December 7, 2020, Judge Daylene Marsh ordered Plaintiff to “successfully complete” the Steelbridge Discipline Inpatient Drug Program (for in-patient residential addiction recovery treatment) as a condition of her probation.

23. At the time that Plaintiff arrived at Steelbridge, Travis Clark was the Executive Director of Steelbridge.

24. Upon information and belief, Legacy Church hired Clark in January 2019 to work at Steelbridge.

25. In 2012, Clark was a high school teacher and coach at Liberty High School in Colorado Springs.

26. In 2012, Clark was charged with “sexual assault on a child by one in a position of trust,” a charge relating to alleged sexual contact with a minor female student at Liberty High School in Colorado Springs.

27. Prior to hiring Clark as the director of Steelbridge, Steelbridge and/or Legacy Church knew (or should have known, by conducting a cursory online background check) that Clark had prior accusations of inappropriate and illegal sexual contact against a minor female student.

28. Despite allegations that Clark abused his position as a coach and teacher to sexually exploit a vulnerable minor, Steelbridge and/or Legacy Church entrusted Clark with a role involving another vulnerable population—women in recovery from addiction.

29. In addition to working with patients in recovery from addiction at Steelbridge, Clark was a member of the pastoral team and would lead sermons at the “Steelbridge Church.”

30. Upon information and belief, Clark was also a member of the pastoral team at Legacy Church and gave sermons at Legacy on one or more occasions.

31. When Plaintiff arrived at Steelbridge, Clark began providing Plaintiff with pastoral counseling, ostensibly as a requirement of the residential treatment program.

32. During the initial counseling sessions, Clark introduced inappropriate sexual topics, questioning Plaintiff about her sex life and sexual preferences.

33. Clark knew that Plaintiff was in recovery for a substance use disorder and was recently released from jail.

34. Within two weeks of Plaintiff's arrival at Steelbridge, Clark began granting her “special privileges,” including taking her out of the facility in his vehicle. Upon information and belief, the residential treatment program prohibited clients from leaving so early in their tenure.

35. Clark quickly transitioned into making sexual demands of Plaintiff.

36. Plaintiff felt coerced into engaging in sexual activity with Clark, as he wielded the power to approve her graduation from the program and, conversely, to send her back to jail if he chose to allege that she failed to meet the program's requirements.

37. Clark continued to sexually abuse Plaintiff regularly while she was at Steelbridge.
38. Clark granted more “privileges” to Plaintiff by paying her to clean his home. During the times that Plaintiff would be at Clark’s home to clean, he would engage in sexual contact with her.
39. Clark owns a cleaning company called Complete Cleaning Solutions, LLC.
40. Clark exploited the labor of Plaintiff and other female residents of Steelbridge by having them clean homes and businesses in the Albuquerque area.
41. Plaintiff was told by other women at the facility that Plaintiff was not the only victim of Clark’s sexual abuse.
42. At one point, Clark told Plaintiff something to the effect of “I hold everyone’s freedom in my hands,” referring to the residents in treatment at Steelbridge.
43. Clark’s sexual abuse of Plaintiff continued for several months until Plaintiff could no longer take the abuse and prematurely left the program.
44. Because Plaintiff did not “successfully complete” the requirements of the Steelbridge Discipline Inpatient Drug Treatment Program, she violated the conditions of her probation and was sent back to jail in approximately April or May 2021.
45. In approximately the late spring or early summer of 2021, Plaintiff told her aunt Bertha Gomez that she had sexual contact with Clark while she was in treatment at Steelbridge.
46. Bertha Gomez is an “elder” and respected figure at Legacy Church.
47. Upon information and belief, Bertha Gomez reported Clark’s sexual abuse of Plaintiff to the leadership of Legacy Church.
48. Upon information and belief, Clark’s employment with Steelbridge ended in July, 2021.

49. Upon information and belief, Clark's employment with Steelbridge ended as a direct result of his sexual misconduct with Plaintiff.

50. Upon information and belief, the leadership of Steelbridge and/or Legacy Church allowed Clark to quietly resign his position at Steelbridge rather than terminating him.

51. Clark was subsequently hired to work with vulnerable women recovering from addiction at Crossroads for Women in Albuquerque.

52. Upon information and belief, Clark went on to sexually abuse other vulnerable women recovering from addiction in the course of his work at Crossroads for Women.

53. Steelbridge and/or Legacy Church failed to inform Crossroads for Women of Clark's history of sexual misconduct with vulnerable women in the course of his work at Steelbridge.

54. In the alternative, Steelbridge and/or Legacy Church did warn Crossroads for Women of Clark's history of sexual misconduct with vulnerable women in the course of his work at Steelbridge, but Crossroads for Women disregarded those warnings and hired Clark anyway.

55. Plaintiff was recently released from the San Juan Adult Detention Center in August 2024 and relocated to Albuquerque.

56. Between December 2020 and August 2024, Plaintiff was incapacitated due to her substance use disorder, which put her on a continuing cycle of spending the majority of her time in between jail, residential drug rehabilitation centers, homelessness, and multiple relapses.

57. While trapped in this incapacitating cycle between December 2020 and August 2024, Plaintiff blamed herself for the sexual contact that had occurred with Clark – which directly interfered with her ability to recognize Clark's behavior as abusive.

58. Plaintiff had been conditioned to believe that Clark was a “good person” and that Plaintiff was a “bad person,” which further interfered with her ability to recognize Clark as an abuser and facilitated her self-blame.

59. Clark continued to contact Plaintiff after she left Steelbridge and continues to attempt to contact her to date.

60. Over the past 2-3 years, Clark has given money to Plaintiff – who remains in recovery from her substance use disorder – in exchange for her silence about his sexual abuses at Steelbridge.

**COUNT I – NEGLIGENCE AND PREMISES LIABILITY:
STEELBRIDGE AND/OR LEGACY CHURCH**

61. Plaintiff realleges all facts and allegations set forth above.

62. When Plaintiff was in treatment at Steelbridge between December 2020 and April or May 2021, Travis Clark was an agent of Steelbridge and/or Legacy Church.

63. Steelbridge and/or Legacy Church owed a duty of reasonable care to Plaintiff to hire, supervise, and retain a director who would not sexually abuse Plaintiff or other women in the residential treatment program.

64. Steelbridge and/or Legacy Church breached this duty.

65. Steelbridge and/or Legacy Church had a duty to supervise its employees, including Clark, to assure that they were not engaging in inappropriate sexual contact with women in the residential treatment program.

66. Steelbridge and/or Legacy Church breached this duty.

67. Steelbridge and/or Legacy Church had a duty to screen and vet its hires to ensure that they were not hiring employees who had a prior history of sexual predation, like Clark.

68. Steelbridge and/or Legacy Church breached this duty.

69. Steelbridge and/or Legacy Church knew or should have known that Clark was using his position to coerce women in the residential treatment program to have sexual contact with him.

70. Steelbridge and/or Legacy Church had a duty to remove employees like Clark from its organizations' premises and to prevent all sexual contact between Clark and women in the residential treatment program.

71. Steelbridge and/or Legacy Church breached that duty.

72. The negligence of Steelbridge and/or Legacy Church created unsafe premises at the Steelbridge facility while Plaintiff was a resident at Steelbridge.

73. The negligence of Steelbridge and/or Legacy Church, as described above, proximately caused harm to Plaintiff.

74. The conduct of Steelbridge and/or Legacy Church was reckless, willful, intentional, wanton, and/or taken in utter disregard of the safety and well-being of others, including Plaintiff, and subjects Steelbridge to punitive damages.

**COUNT II – VICARIOUS LIABILITY
STEELBRIDGE AND/OR LEGACY CHURCH**

75. Plaintiff realleges all facts and allegations set forth above.

76. The sexual abuse of Plaintiff by Travis Clark constituted various torts under New Mexico law.

77. When Plaintiff was in treatment at Steelbridge between December 2020 and April or May 2021, Travis Clark was an agent of Steelbridge and/or Legacy Church.

78. Regardless of the scope of employment of the Executive Director of Steelbridge, Steelbridge and/or Legacy Church are vicariously liable for the torts of Travis Clark under New Mexico's legal theory of "aided-in-agency."

79. But for the fact that Travis Clark was the Executive Director of Steelbridge, with all the duties, responsibilities, substantial power and authority that being the Executive Director of Steelbridge entailed in the mind of Plaintiff (as a vulnerable woman coping with a substance use disorder and trying to complete recovery treatment to stay out of jail), Travis Clark would not have had the ability to sexually abuse Plaintiff.

80. But for the fact that Travis Clark had the power (as Executive Director of Steelbridge) to remove Plaintiff from the Steelbridge program and send her back to jail, Travis Clark would not have had the ability to sexually abuse Plaintiff.

81. The sexual abuse inflicted upon Plaintiff by Travis Clark was the proximate cause of harm to Plaintiff, as described above, for which Steelbridge is vicariously liable.

82. The sexual abuse inflicted upon Plaintiff by Travis Clark was reckless, willful, intentional, wanton, and/or taken in utter disregard of the safety and well-being of others, including Plaintiff, and subjects Steelbridge to liability for any punitive damages arising from his conduct.

**COUNT III – SEXUAL BATTERY
TRAVIS CLARK**

83. Plaintiff realleges all facts and allegations set forth above.

84. When Plaintiff was in treatment at Steelbridge between December 2020 and April or May 2021, Travis Clark acted as a minister of Steelbridge and/or Legacy Church and provided pastoral counseling to Plaintiff.

85. Sexual contact between a pastoral counselor and the recipient of pastoral counseling is “forceful and coercive” as a matter of New Mexico law.

86. Travis Clark coerced Plaintiff into sexual contact by threatening to prevent her from successfully completing the in-patient treatment program at Steelbridge, which was a requirement of Plaintiff’s probation.

87. When Plaintiff was in treatment at Steelbridge between December 2020 and April or May 2021, she was suffering from the mental illness of substance use disorder.

88. When Plaintiff was in treatment at Steelbridge between December 2020 and April or May 2021, Travis Clark acted as a substance abuse counselor of Steelbridge and/or Legacy Church and provided substance abuse counseling to Plaintiff.

89. Sexual contact between a substance abuse counselor and the recipient of substance abuse counseling is “forceful and coercive” as a matter of New Mexico law.

90. As a direct result of Travis Clark’s sexual abuses, Plaintiff has suffered and continues to suffer great mental anguish and emotional damage.

91. The sexual abuse inflicted upon Plaintiff by Travis Clark was reckless, willful, intentional, wanton, and/or taken in utter disregard of the safety and well-being of others, including Plaintiff, and subjects Travis Clark to liability for punitive damages.

WHEREFORE, Plaintiff Jane Doe 1 respectfully requests judgment against Defendants Steelbridge Ministries, Legacy Church, Inc., and Travis Clark in an amount reasonable to compensate her for damages, including punitive damages, for interest including pre-judgment interest, costs, and for such other and further relief as this Court may deem appropriate, including any equitable relief fashioned by the Court.

Respectfully submitted,

HUFFMAN WALLACE & MONAGLE, LLC

/s/ *Shayne C. Huffman*

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