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6 IN THE CIRCUIT COURT FOR THE STATE OF OREGON  
7 FOR MULTNOMAH COUNTY  
8

9 **TANIA HUMPHREY**

10  
11 Plaintiff

12 vs

13 **MERCY CORPS**

14  
15 Defendant

Case No.

**COMPLAINT**

Intentional Infliction of  
Emotional Harm

Amount in Controversy: \$1.00  
Subject to Mandatory Arbitration  
Filing Fee Authority: ORS 21.160(1)(a)  
Jury Trial Requested

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17 **1.**

18 **FACTUAL ALLEGATIONS**

19  
20 During the 1980s and 1990s, plaintiff was an unwilling victim and witness to  
21 a child sex abuse and trafficking conspiracy perpetrated by leaders at Mercy Corps.

22 **2.**

23 In October 2019, plaintiff went public with the child sex abuse she had  
24 endured and witnessed, and in doing so, she harmed the public reputation of Mercy  
25 Corps, resulting the resignation of various Mercy Corps leaders.  
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2 **3.**

3 In May 2020, in an effort to rebuild its public trust under false pretenses,  
4 Mercy Corps hired an interrogation group led by the former director of the FBI to  
5 systematically intimidate and bully plaintiff with ongoing, relentless harassment.  
6

7 **4.**

8 Mercy Corps intended to use the guise of an internal investigation to carry out  
9 its goals of neutralizing plaintiff's account of the sex abuse she suffered and  
10 witnessed at the hands of Mercy Corps executives, board members and staff, and  
11 minimizing Mercy Corps' role in the child sex abuse and trafficking conspiracy in the  
12 eyes of the community.  
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15 **5.**

16 From June 2020 to November 2021, Mercy Corps, through its various agents,  
17 including Board Chair Gisel Kordestani, Interim Chief of Staff Mary Wheat, Freeh  
18 (now AlixPartners), a risk management firm, and Vox, a global PR firm,  
19 intentionally engaged in a coercive campaign intended to frighten, belittle, confuse,  
20 harm and quiet plaintiff. As Mercy Corps intended, the intimidation and bullying  
21 caused plaintiff severe and ongoing emotional harm.  
22

23 **6.**

24 Mercy Corps is just one of a long list of powerful corporate entities that has  
25 recently begun using the guise of an independent investigation to minimize  
26 executive misconduct, to neutralize witnesses, and to rebuild public trust based on  
27 false pretenses.  
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**7.**

Plaintiff files this lawsuit to hold Mercy Corps accountable before a local jury, so the conscious of the community can decide on the record, whether Mercy Corps' behavior constituted an extraordinary transgression of the bounds of socially tolerable conduct, and exceeded the reasonable limits of social toleration.

**8.**

Plaintiff was born in 1970. She endured years of unspeakable sexual, physical, and emotional abuse at the hands of her father, Mercy Corps co-founder Ellsworth Culver, from early childhood into her teens. Ellsworth Culver and other Mercy Corps-affiliated members raped, sodomized and trafficked plaintiff, approximately from 1973 to 1989, through Mercy Corps headquarters, locally, nationally, and to other countries. They also encouraged other men to sexually abuse plaintiff and other girls. This experience primed plaintiff's emotional response to the systematic intimidation and bullying plaintiff later endured at the hands of Mercy Corps in 2020 and 2021.

**9.**

Mercy Corps leaders and staff had been aware of the sexual misconduct at least since plaintiff internally reported it in the 1990's. However, they decided to acknowledge the misconduct only after *The Oregonian* published a documentary about the abuse in October 2019.

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2 **10.**

3 In May 2020, Mercy Corps used money from its nonprofit to pay Freeh (now  
4 AlixPartners), a risk management firm led by former FBI Director Louis Freeh with  
5 a team of criminal interrogators, ostensibly to investigate the abuse plaintiff  
6 suffered, find survivors and perpetrators, to uncover the extent of abuse, to report to  
7 law enforcement and funding organizations along with other appropriate action.  
8 Mercy Corps staff worked with AlixPartners as a team to “investigate.” In reality,  
9 this Mercy Corps team spent approximately one year interrogating and harassing  
10 plaintiff in order to produce an “Investigative Report” for the public that contained  
11 false statements, diminished the misconduct, and buried the were numerous  
12 protected perpetrators connected to and affiliated with Mercy Corps who are still  
13 alive and who have unhindered access to vulnerable children.  
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17 **11.**

18 From approximately 1980 to 1989, Ellsworth Culver also transacted with  
19 friends, colleagues, and foreign dignitaries abroad to rape and abuse plaintiff and  
20 other girls in exchange for corporate favors. According to a source, among those  
21 benefiting from Ellsworth Culver’s backdoor diplomacy were representatives of the  
22 Middle East and Central America. Sometimes, videos and photos were taken during  
23 the attacks. Ellsworth Culver and his associates also abused other children,  
24 including refugees.  
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2 **12.**

3 In the summer of 1980, plaintiff was nine years old when she witnessed the  
4 murder of a similarly aged Thai refugee girl at the hands of Ellsworth Culver and a  
5 Food for the Hungry leader. Culver, a lauded founder of prominent international aid  
6 organizations, leader in diplomacy, and frequent White House guest, and the other  
7 man made the naked girls pose for photos and dance for their entertainment. The  
8 men fed the children drugged food. Plaintiff ate very little. Then, while raping them,  
9 Culver violently choked both girls, while the other man assisted. The Thai girl  
10 slipped in and out of consciousness during the attack. After the men were finished  
11 abusing both girls for the evening, Ellsworth Culver told plaintiff to “take care of”  
12 (e.g., help) the Thai girl and laid the refugee’s body next to plaintiff on the bed.  
13 Ellsworth Culver and the other high profile individual left. There was nothing  
14 plaintiff could do to help the other girl.  
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19 **13.**

20 Culver put the responsibility of the Thai girl’s life into the hands of nine-year-  
21 old plaintiff, furthering her trauma by making plaintiff feel that the refugee girl’s  
22 life was in her hands. The Thai girl was likely dead at that point, yet plaintiff stroked  
23 her cheeks, sang to her, and did whatever else she could do in a vain attempt to  
24 provide comfort. In the morning, it was clear the Thai girl was dead. This experience  
25 primed plaintiff’s emotional response to the systematic intimidation and bullying  
26 plaintiff later endured at the hands of Mercy Corps in 2020 and 2021.  
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2 **14.**

3 Later, two Asian men entered the room. Those men raped and abused the girl's  
4 corpse. They also urinated on plaintiff. Shortly after, a woman entered the room and  
5 brusquely washed away the evidence on plaintiff's body. The Asian men took the  
6 Thai girl's body away, presumably to hide evidence of the child's vicious murder.  
7 This experience primed plaintiff's emotional response to the systematic intimidation  
8 and bullying plaintiff later endured at the hands of Mercy Corps in 2020 and 2021.  
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11 **15.**

12 In 1983, when plaintiff was twelve years old, she became pregnant due to being  
13 sexually assaulted by several predators, including a Donald Trump ally and another  
14 Mercy Corps leader. The Trump ally and Ellsworth Culver sought to cover up the  
15 pregnancy, taking plaintiff out of school, preventing friends from coming to the  
16 house, and eventually forcing a miscarriage through forced physical trauma inside  
17 her vagina and uterus using hands and a metal fire poker. This experience primed  
18 plaintiff's emotional response to the systematic intimidation and bullying plaintiff  
19 later endured at the hands of Mercy Corps in 2020 and 2021.  
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22 **16.**

23 Plaintiff was left to suffer by herself after being instructed that "her body  
24 would know how to take good care of a baby." That choice of words ascribed further  
25 guilt and shame to the twelve-year-old since she did not understand the nature of  
26 the biological process she was enduring. She hid in the woods alone during a  
27 rainstorm and suffered a long and painful miscarriage. The combination of severe  
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1  
2 blood loss and hypothermia created serious health complications. After the birth,  
3 plaintiff buried the dead fetus in the woods.

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5 **17.**

6 The Mercy Corps team's long interrogations forced plaintiff to provide details  
7 about the incident, like the fetus's size and other aspects of its appearance. The  
8 summer of 2020, Mercy Corps Board Chair Gisel Kordestani and others were  
9 informed of the crime, but it appears none reported the forced pregnancy or the  
10 brutal attack on plaintiff. Mercy Corps leaders Kordestani, interim Chief of Staff  
11 Mary Wheat, former interim CEO Beth de Hamel, and Board member Iman Dakhil  
12 sent plaintiff flowers meant to memorialize and symbolize the baby's death and the  
13 murdered Thai girl, validating plaintiff's descriptions of events.  
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16 **18.**

17 To date, neither Mercy Corps' role in the cover-up of the abuse nor the powerful  
18 Christian and political figures in the US and abroad who abused plaintiff and other  
19 children have been held publicly accountable for their heinous actions.  
20

21 **19.**

22 Repeatedly from approximately August of 2020 through May 2021, and to help  
23 bury the truth about the incidents and those involved, Mercy Corps convinced  
24 plaintiff that naming the other perpetrators in the Investigative Report would open  
25 Mercy Corps, AlixPartners and plaintiff to several defamation suits. Plaintiff was  
26 made to feel like she had to protect them. During this same time period, and others  
27 reinforced this statement in discussions with plaintiff. During fact-finding for their  
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1  
2 so-called “Investigative Report,” plaintiff was told that no efforts were made by the  
3 Mercy Corps team to interview the perpetrators or associated witnesses that could  
4 shed light on the crimes. Instead, the report was apparently designed to bury  
5 abhorrent criminal activity to protect Mercy Corp’s high-profile board members,  
6 staff, and other dignitaries.  
7

8 **20.**

9  
10 The May 19, 2021 Investigative Report claims that the Mercy Corps team  
11 interviewed 66 people for the investigation. They do not divulge whom they  
12 interviewed. Plaintiff was given no evidence that the Mercy Corps team reported the  
13 perpetrators’ crimes to the proper authorities.  
14

15 **21.**

16 The Mercy Corps website describes its mission to “alleviate suffering, poverty,  
17 and oppression... build secure, productive and just communities...and [Mercy Corps  
18 has] a unique role to play in amplifying the voices of communities around the world.”  
19 In reality, Mercy Corps executives, board members, and other affiliates created  
20 systemic suffering, destroyed the lives of children, and silenced their voices. And in  
21 at least one case, a Thai girl’s voice was silenced permanently by killing her.  
22

23 **22.**

24  
25 From the 1990’s to present, Mercy Corps has been aware of serious crimes  
26 against children and should have contacted police and the FBI immediately to  
27 perform a real criminal investigation rather than covering it up through expensive  
28 hired guns. Since none of these criminals have been brought to justice, it’s further



1  
2 evidence of Mercy Corps' efforts to hide the truth and protect criminals rather than  
3 victims. No law enforcement body ever contacted plaintiff to investigate, so it  
4 appears highly doubtful that Mercy Corps took the legally appropriate action given  
5 the nature of the crimes committed.  
6

7 **23.**

8 Evidence and testimony from plaintiff since the 1990's, and other sources  
9 demonstrate crimes and wrongdoing, including items like endangering the welfare  
10 of children, failure to report child abuse, conspiracy to endanger the welfare of  
11 children, and more.  
12

13 **24.**

14 Therefore, it appears that the Mercy Corps Board and staff have criminally  
15 aiding and abetting in the commission of a crime, hindering prosecution, and  
16 compounding.  
17

18 **25.**

19 Mercy Corps' past lip service, from 2019 to date, also claimed their  
20 organization and staff supported her during their investigation. Nothing was further  
21 from the truth. AlixPartners is a risk-mitigation firm hired by Mercy Corps' east  
22 coast lawyers as a thinly veiled attempt to use third-party "credibility" to downplay,  
23 discredit, and hide the truth of what plaintiff and other girls endured.  
24  
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26 **26.**

27 Mercy Corps failed plaintiff while claiming to act in her best interests. Worse,  
28 Mercy Corps is guilty of further victimizing and defaming an already-traumatized

1  
2 victim. From June 2020 through November 2021, Mercy Corps and its agents  
3 mentally abused, manipulated, and took advantage of plaintiff while she was in an  
4 extremely fragile condition, including PTSD and long covid. All this was done to  
5 cover up Mercy Corps' involvement in international criminal activity targeting  
6 vulnerable children.  
7

8 **27.**

9  
10 Despite over 200 hours of interviews and meetings with plaintiff from June  
11 2020 through May 2021, the Investigative Report appears purposely incomplete.  
12 Critical facts were omitted, downplayed, or ignored. Furthermore, even when  
13 witnesses came forth offering testimony in support of plaintiff's statements, the  
14 Mercy Corps team failed to speak with a majority of them despite repeated requests  
15 from plaintiff. It appears the Mercy Corps team deliberately avoided talking to the  
16 perpetrators of the heinous crimes despite having many of their names and locations.  
17

18 **28.**

19  
20 These actions demonstrate that uncovering the truth in order to hold the  
21 perpetrators accountable was never Mercy Corps' goal. In fact, from November 2020  
22 through the summer of 2021, its main focus was on "messaging" of the Investigative  
23 Report. Mercy Corps put plaintiff through hell during this time period – using former  
24 law enforcement and military interrogators to re-question her about the murder of  
25 the Thai girl, repeatedly threatening that she could be sued for defamation over the  
26 Investigative Report, refusing to indemnify or pay for an attorney if she is sued over  
27 the Investigative Report, telling her that if they are sued, that all of her personal  
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2 journals would be exposed to the public. They also threatened that one of the  
3 perpetrators in particular could sue her. Mercy Corps knew that she was terrified  
4 of the men who raped her.

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6 **29.**

7 By January 2021, the abuse was so damaging, that she needed an additional  
8 therapist to deal with the onslaught. It took weeks for Mercy Corps to agree to  
9 another therapist. And, the abuse continued.

10  
11 **30.**

12 As a child, plaintiff had been suicidal or self-harmed at times to deal with the  
13 overwhelming and unrelenting trauma. Enduring the shame and horror of Mercy  
14 Corps' psychological manipulation from June 2020 through May 2021, plaintiff's  
15 PTSD increased with a vengeance. The interrogations inflicted more torture on  
16 plaintiff. As a result, plaintiff engaged in self-harm to deal with this abuse. She also  
17 became depressed, had repeated suicidal thoughts and impulses including jumping  
18 off a high-rise building, burning herself, and drowning.

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21 **31.**

22 In the 1990s, plaintiff told women at a prayer meeting about her father's abuse.  
23 One of these women told her husband, who was a lawyer at Davis Wright Tremaine.  
24 Bob Newell also practiced at the firm, which provided pro bono legal services to  
25 Mercy Corps and was Ellsworth Culver's personal law firm. Newell was also a Mercy  
26 Corps board member. Newell intimidated and threatened plaintiff by calling her  
27 and demanding to know if she would share that the allegation was true.  
28

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2 **32.**

3 Then board president, Raymond (“Ray”) Vath, psychiatrist and eating disorder  
4 specialist, was a founding board member of Mercy Corps and a friend of Ellsworth  
5 Culver. Vath appointed himself, co-founder Dan O’Neill, and Bob Newell to form a  
6 committee to conduct an investigation. The “investigation” was biased, abusive,  
7 protected victims, and had a pre-determined outcome absolving the attacker of a  
8 crime.  
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11 **33.**

12 The committee consulted with Dr. Elizabeth Loftus, now famous for testifying  
13 in lawsuits about “false memories,” for legal teams such as those representing  
14 Giselle Maxwell and Harvey Weinstein. Dr. Loftus did not see any medical or  
15 counseling records or interview plaintiff. The committee decided plaintiff was  
16 experiencing false memories. To counter this conclusion, plaintiff produced medical  
17 and child welfare records documenting the childhood sexual abuse she suffered.  
18 Newell claimed they did not see these records. Vath appears to have gone along with  
19 Culver’s defense that plaintiff was sexually abused by a different man.  
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22 **34.**

23 Two women who accompanied plaintiff when she was interviewed in the 1990s  
24 have characterized the meeting as contentious. Vath told plaintiff he had worked on  
25 many similar cases and did not believe her allegations. The investigation concluded  
26 with the board being informed that Ellsworth Culver was merely guilty of being a  
27 “poor financial manager.” Despite this conclusion, the board instructed Culver to  
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1  
2 take a 30- day leave and see a therapist recommended by Vath. Culver bragged that  
3 the new CEO, Neal Keny-Guyer, could never force him to do it, and he didn't.

4  
5 **35.**

6 Mercy Corps leadership was re-structured, but Culver remained at Mercy  
7 Corps as Senior Executive VP until his death 10 years later. He continued to enjoy  
8 salary increases, cash bonuses, and ongoing access to children to rape or attack  
9 during his humanitarian aid trips.

10  
11 **36.**

12 In 2018, Plaintiff again approached Mercy Corps and again was brushed off by  
13 Mercy Corps' lawyers. At first, CEO Keny-Guyer lied and denied having any  
14 information about the allegations. The Oregonian exposed this lie in its award  
15 winning documentary "No Mercy" in 2019. Mercy Corps allowed Keny-Guyer to  
16 resign. Plaintiff had a panic attack when she heard of his resignation because she  
17 had been primed to protect Mercy Corps employees. It took over an hour for her to  
18 stop crying.

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21 **37.**

22 For its part, the board issued a press release praising him. They also quietly  
23 wrote him a check for \$437,000. Approximately one year later, the payout was to  
24 become public via tax records. The day prior to publication, Mary Wheat informed  
25 plaintiff of the payout and said no lawyers were involved. She claimed it was a  
26 standard business practice. This was very upsetting to plaintiff given his cover-up  
27 of the abuse and his prior defamatory statements about her. What Mercy Corps hid  
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2 from plaintiff was that they also paid Keny-Guyer \$377,000 in 2020 even though he  
3 had only earned \$132,350 by the time he resigned. So, it appears the full payout to  
4 Keny-Guyer was a whopping \$682,347. This rewarding payout and continued deceit  
5 is traumatizing to plaintiff.  
6

7 **38.**

8 From approximately May 2020 through August 2020, the Mercy Corps team  
9 promised to seek the truth, “put the pieces of the puzzle together” to find  
10 perpetrators, find other victims, and help prevent further child abuse. To date,  
11 Mercy Corps boasts of using “trauma-informed” and “survivor-centered” techniques  
12 during the investigation. These were false and empty claims.  
13  
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15 **39.**

16 From approximately May 2020 until August 2020, Mercy Corps repeatedly  
17 assured plaintiff she had “an army of supporters” and “experts” behind her to help  
18 protect her and other children in the future. Plaintiff was lured in by these promises,  
19 and by her lifelong brainwashing that she had a moral duty to protect Mercy Corps  
20 and its beneficiaries. They were aware that she had been brainwashed, as part of  
21 the abuse, to protect Mercy Corps. Instead, they used and abused her to bury the  
22 horrific truth.  
23  
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25 **40.**

26 From June 2020 through May 2021, Mercy Corps (including former sex abuse  
27 law enforcement officer Mary Wheat) manipulated and deceived plaintiff to gain  
28 exclusive access to her explosive information. In June 2020, plaintiff provided

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2 AlixPartners’ celebrity investigator, Kathleen McChesney, with journals on the  
3 condition that she get regular de-briefing on the status of the review. After she  
4 turned over all of the documents, they only gave her one de-briefing, -- despite her  
5 repeated requests and clear anxiety. Plaintiff made it clear to the Mercy Corps team  
6 that this caused her severe anxiety and fear. Still, they continued to break promises.  
7

8 **41.**

9  
10 In the fall of 2020, after they got what they wanted and realized the enormity  
11 of the potential for exposure, Mercy Corps abruptly cut her off and changed the  
12 entire dynamic and methods of communication. From that point forward, they  
13 focused on burying the story and avoiding litigation.  
14

15 **42.**

16 This icing out by her “army of supporters and experts” right after disclosing  
17 highly sensitive information about specific perpetrators caused plaintiff great fear,  
18 emotional distress, and severe depression like she has never felt in her life. She  
19 began engaging in self harm and had suicidal thoughts. For her part, Kordestani  
20 had boasted to plaintiff, “the first rule of PR is to get out in front of the story.” She  
21 even thanked plaintiff for giving them that opportunity.  
22

23 **43.**

24  
25 The only person who benefitted from a fast delivery of the Investigative Report  
26 was Mercy Corps. Despite plaintiff’s pleading for more time, Mercy Corps unduly  
27 pressured her to speed her testimony as if an official deadline existed. Mary Wheat  
28 used nefarious tactics such as telling plaintiff, things like, “This is your only chance

1  
2 to tell your story,” or “I can ask for more time but cannot guarantee it,” or “I only  
3 have this team now and if you don’t tell us everything you won’t have a chance later  
4 because the team will be gone.” Plaintiff responded, “I’m going as fast as I can I  
5 promise,” and suffered more anxiety due to the artificially imposed deadlines.  
6 Interestingly, plaintiff was repeatedly informed of deadline changes after the fact.  
7 She was often not given a reason, and the inconsistent communication, and refusal  
8 to give her more time added to her fear and anxiety.  
9

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11 **44.**

12 Wheat also threatened by saying things like, “I’d hate for you to lose this  
13 opportunity to build relationships with people at Mercy Corps. You’re not gonna  
14 have it again.” When plaintiff expressed fear or asked questions, Wheat said things  
15 like, “I can help you out, but you can’t go to my boss and tell on me anymore.” Plaintiff  
16 had confided to Kordestani that Wheat was behaving unreasonably at some point.  
17 Plaintiff took this as a threat that Wheat would cut her off if she ever complained  
18 again. This created more fear and anxiety.  
19

20  
21 **45.**

22 During this time, plaintiff suffered from ongoing PTSD, anxiety issues,  
23 depression, and long coronavirus. It appeared that Mercy Corps’ wildly  
24 inappropriate and insensitive tactic was intended to take advantage of an individual  
25 who should have been in bed recovering from coronavirus. She reported her inability  
26 to breathe, inability to think or communicate clearly, and numerous other covid-  
27 related symptoms. At one point, she suffered neurological symptoms that warranted  
28



1  
2 an MRI and two aneurysms were discovered. This warranted another scan to  
3 confirm the aneurysms. Plaintiff had to ask for a break from the interrogations to  
4 get the second scan and was clearly anxious about it. They charged ahead  
5 regardless. Mercy Corps stepped far beyond acceptable boundaries to extract  
6 information from plaintiff.  
7

8 **46.**

9  
10 Mercy Corps also purposefully made it very difficult for plaintiff to provide  
11 input about the Investigative Report, kept her waiting, and continually changed the  
12 status, making the future unpredictable. Much of plaintiff's input was rejected.  
13

14 **47.**

15 The Investigative Report was a whitewash, and despite plaintiff's specific  
16 requests, Mercy Corps glossed over details surrounding the horrific murder of a Thai  
17 girl. The Investigative Report also neglected to note that plaintiff was sodomized and  
18 raped by Mercy Corps leaders and a middle eastern man in multiple rooms of the  
19 Mercy Corps headquarters. Plaintiff was also trafficked for favors to well-known  
20 emissaries while on Mercy Corps property and trips. These cases were never  
21 investigated despite Mercy Corps team's brutal and excruciatingly detailed  
22 interrogations.  
23  
24

25 **48.**

26 The Investigative Report selectively notes the "bad guys" are gone, signifying  
27 there is no more threat and giving a false sense of security to others. Mercy Corps is  
28 diverting attention from the fact that known perpetrators are potentially raping and

1  
2 abusing more children, and enabled by Mercy Corps. This caused foreseeable harm  
3 in that plaintiff disclosed from the start that her goal was to find perpetrators, find  
4 survivors, and prevent further sexual abuse of children. Had plaintiff known Mercy  
5 Corps' true intentions, she never would have participated in this harmful process and  
6 she might not still be suffering from long covid, fear, anxiety and distress.  
7

8 **49.**

9  
10 Much of the Investigative Report criticizes the tactics used by those who  
11 originally investigated plaintiff's story in the 1990's. However, Mercy Corps again  
12 used many of the same techniques. For example, Mercy Corps did not allow plaintiff  
13 to have legal counsel or other advocates present during the 100 hours of interviews  
14 despite the fact plaintiff was ill with coronavirus and severely distressed. The harm  
15 caused by these tactics was known and foreseeable.  
16

17 **50.**

18  
19 During the investigation, and after plaintiff named her abusers, Mercy Corps  
20 brought in an older white male lawyer – Warren Hamel, from Venable, LLC, to sit  
21 in on meetings. Mercy Corps was aware that plaintiff's abusers were powerful older  
22 white men.  
23

24 **51.**

25  
26 Hamel has no apparent experience working with victims like plaintiff. His bio  
27 notes that he chairs "Venable's Investigations and White Collar Defense Practice."  
28 The bio notes, "Warren conducts internal investigations and aggressively defends  
individual, corporate, and nonprofit clients in a wide range of white-collar and

1  
2 environmental criminal defense and civil enforcement litigation. Clients also seek  
3 his advice on compliance and internal controls, including information governance,  
4 managing whistleblower issues, FCPA compliance, and Sarbanes-Oxley–related  
5 matters. Before joining Venable in 2002, Warren served as an assistant U.S.  
6 attorney for the District of Maryland and was chief of Environmental Crimes and  
7 Enforcement for that office.”  
8

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10 **52.**

11 The bio notes, “He has led internal investigations for a broad range of clients,  
12 including, most recently, a U.S.-based financial services and insurance company, an  
13 India-based generic pharmaceutical company, and the South American subsidiary of  
14 a major U.S.-based retailer.” None of these clients are individual rape victims. They  
15 are high-paying corporations.  
16

17 **53.**

18 Further, the bio notes Hamel’s international experience, yet it does not appear  
19 he used that experience to defend plaintiff or find the perpetrators who raped her  
20 and other girls. “In addition to the demands of managing a national practice, recent  
21 investigations and enforcement actions have taken Warren to locations in Europe,  
22 South and Central America, Singapore, Africa, and India.”  
23  
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25 **54.**

26 The Venable, LLC website further illustrates its mission to protect corporate  
27 clients: “We regularly assist management in its decisions related to the  
28 investigations, such as those regarding whether the company should discipline or

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2 terminate employees involved; How to deal with employees who may be  
3 whistleblowers, or otherwise cooperating, with a government entity; What remedial  
4 measures are warranted and how to implement them; Whether to self-report any  
5 conduct discovered; and Whether to waive attorney-client privilege.” None of these  
6 capabilities represent plaintiff in any way. They serve their paying client, Mercy  
7 Corps.  
8

9  
10 **55.**

11 Hamel sat in on meetings with plaintiff even though Mercy Corps knew he  
12 intimidated her. His presence successfully silenced her and triggered her PTSD.  
13

14 **56.**

15 In early 2020, Mercy Corps CEO Tjada D'Oyen McKenna, Kordestani, and  
16 other high-level Mercy Corps individuals, including board member Iman Dakhil,  
17 acted as if they were friends, were “on the same team,” “partners” and cared about  
18 plaintiff. They even said plaintiff was part of the Mercy Corps family. After the main  
19 interrogations ended in August 2020, they denied her any crumb of justice, broke  
20 promises, abruptly shunned her, and continued to bury systemic child rape and  
21 abuse. Mercy Corps twisted reality to support the sadistic perpetrators and their  
22 enablers with rewards such as large cash payouts, legal protection, and public  
23 praise. Privately, in October 2020, Kordestani acknowledged the severity of crimes  
24 by saying she was worried she was dealing with a “pedophile ring.”  
25  
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1  
2 **57.**

3 While Mercy Corps spent over 100 many back-to-back hours interrogating her  
4 on the issue of victims and perpetrators, a mental endurance battle which almost  
5 killed her more than once as she became suicidal and walked into traffic in a haze of  
6 PTSD where the investigator had to pull her out of the way and then joked that they  
7 had to hold her arm, there was less than a page in the entire thirty-three page report  
8 on the content of these interviews.  
9

10  
11 **58.**

12 In April and May of 2021, plaintiff went into hiding in another state out of fear  
13 of being harmed as a result the Investigative Report being released to the board and  
14 attorneys. She was specifically afraid of one of the perpetrators coming after her.  
15 When she asked for a security system on her home, Kordestani suggested plaintiff  
16 pay for it. Kordestani also said she should just call the police and tell them about  
17 her fears. Wheat repeatedly told plaintiff that her fears were unfounded. This  
18 flippant attitude and gaslighting from her “army of supporters” caused severe fear  
19 and anxiety.  
20  
21

22 **59.**

23 When the Investigative Report was released to the board of directors and  
24 plaintiff, she was alone in hiding and had a breakdown. She felt the massive weight  
25 of a report about the abuse and murder. She created an alter on the beach in memory  
26 of those killed and abused at the hands of Mercy Corps. When the Investigative  
27 Report was issued publicly on May 19, 2021, plaintiff was again alone, in hiding, in  
28

1  
2 a hotel room. The whitewashing of the truth being released was devastating. This  
3 was the beginning of a deep depression.

4  
5 **60.**

6 Compounding the harm, shortly after the report was released, D'Oyen  
7 McKenna disparaged and defamed plaintiff in a presentation to 5,000 Mercy Corps  
8 employees and members by falsely claiming that the names of perpetrators were not  
9 released because plaintiff did not want them released. This made Mercy Corps  
10 appear like heroes – “survivor centered.” This lie caused more distress for plaintiff.  
11

12 **61.**

13 In May 2021, Matt Dolan told 5,000 Mercy Corps employees that the Mercy  
14 Corps team could not identify other victims because they lacked enough information  
15 to find them. This was false, harmful and defamatory. Plaintiff desperately wanted  
16 to find other victims and had given the Mercy Corps team both photos and locations.  
17 Plaintiff had given them her journals containing dates, towns, names, and  
18 descriptions.  
19  
20

21 **62.**

22 In the beginning, the Mercy Corps team told plaintiff that it had the technology  
23 and resources to find victims in Honduras and indicated they were willing to do it,  
24 and plaintiff agreed to assist. However, they did not follow up on the leads. Plaintiff  
25 did not see this presentation until August 2021. Wheat supervised her as she cried  
26 through the presentation. At that point, it was clear to her that she had been duped.  
27  
28

1  
2 **63.**

3 Mercy Corps also disparaged and defamed plaintiff by blaming her for its  
4 failure to track down victims. Yet, plaintiff had supplied the names and locations  
5 that Mercy Corps never investigated. As noted by Mercy Corps staff, “pedophiles do  
6 not just stop raping.” Mercy Corps staff and board knowingly paved the way for these  
7 men to continue raping children. This was the opposite intent of plaintiff when she  
8 agreed to participate in the investigation.  
9

10  
11 **64.**

12 Mercy Corps’ outside lawyers, without input from plaintiff, hired AlixPartners  
13 (formerly Freeh Group International Solutions, LLC). AlixPartners’ own press  
14 release describes Freeh as:  
15

16 A global risk management firm serving in the areas of business integrity  
17 and compliance, safety and security, and investigations and due diligence.  
18 FGIS is a dynamic company with the experience, credibility and global reach  
19 that allow us to deliver prompt and effective solutions. FGIS has built a  
20 reputation for working closely with each client to efficiently assess their  
21 circumstances, provide independent counsel, and jointly develop or enhance  
22 effective risk mitigation strategies.  
23

24  
25 **65.**

26 Mercy Corps supposedly hired AlixPartners to investigate child sex abuse,  
27 trafficking, and murder. However, it appears their real goal was protecting Mercy  
28 Corps leaders through FGIS’s “risk mitigation strategy” playbook.

1  
2 **66.**

3 Both AlixPartners and Mercy Corps boasted about their use of “trauma-  
4 informed” and “survivor-centered” techniques. This was proven a bald-faced lie. For  
5 example, the request was denied when plaintiff asked to hold the interviews in a  
6 place that felt safe to her, like the beach. Instead, the lawyers held the interviews in  
7 a hotel like the ones where plaintiff and other girls were raped, sodomized, and  
8 physically abused. The location triggered plaintiff with flashbacks of the attacks she  
9 endured at the hands of rapists and enflamed her already-terrible PTSD and anxiety  
10 issues.  
11  
12

13 **67.**

14 From June 2020 through January 2021, the Mercy Corps’ team interrogated  
15 plaintiff with probing, provocative, and highly insensitive questions, including  
16 details about another child’s rape and murder. These interrogations caused plaintiff  
17 to remember, for the first time, much of the abuse she suffered at the hands of Mercy  
18 Corps leaders. The marathon questioning also triggered memories of the identities  
19 of her abusers.  
20  
21

22 **68.**

23 Mercy Corps orchestrated the conversation in a manner that any expert would  
24 know would trigger a victim’s PTSD. They succeeded. The interrogation was callous  
25 and brutal. For example, they asked plaintiff to describe the smell of the room and  
26 perpetrators, what she heard, the temperature of the body, and whether the Thai  
27  
28



1  
2 girl defecated or urinated on herself. These questions and details were completely  
3 unnecessary, yet Mercy Corps continued to probe for them.

4  
5 **69.**

6 These questions were wildly out of line and tortured plaintiff again by making  
7 her revisit incidents in detail that understandably traumatized her as a child. For  
8 example, Mercy Corps' team was determined to interrogate her twice on the death  
9 of the Thai girl. Why? They wanted to report that the Thai girl "might have" died.  
10 When plaintiff objected, they interrogated her again, made her defend herself, and  
11 tried to make her question the truth.  
12

13  
14 **70.**

15 Mercy Corps refused to investigate a murder despite obtaining substantial and  
16 specific detail from plaintiff during their wildly inappropriate interrogation.

17  
18 **71.**

19 This is another excellent example of how Mercy Corps hired AlixPartners to  
20 protect its interests, rather than seeking justice for plaintiff and other child victims  
21 who suffered at the hands of sadistic pedophiles protected by Mercy Corps.

22  
23 **72.**

24 From June 2020 through August 2020, the team interrogated plaintiff so  
25 relentlessly (over 100 hours of day-long interviews) that plaintiff curled into a fetal  
26 position and put a blanket over her head in an effort to cope with flashbacks and  
27 panic attacks. Rather than halting the interviews, the Mercy Corps team encouraged  
28 her to breathe, gave her candy, but continued their aggressive questioning.

1  
2 **73.**

3 In August 2020, plaintiff contemplated taking her own life. Plaintiff was  
4 disassociating from flashbacks, as evidenced by her almost walking into traffic, in  
5 front of the Mercy Corps team, during their joint lunch breaks and more. Both  
6 Kordestani and Wheat later admitted to plaintiff that they recognized she was  
7 suicidal. Kordestani also said she saw the light go out of plaintiff and that she had  
8 gone dark. Kordestani said this hurt to see and she hoped plaintiff would get her  
9 spark back some day. Yet, the abuse continued.  
10  
11

12 **74.**

13 Mercy Corps' team repeatedly badgered plaintiff with other highly sensitive  
14 questions. Before the interviews, plaintiff warned the team that these lines of  
15 questioning about her past rapes made her mentally re-live the torture she endured  
16 in her childhood. She also shared how frightened she was after living through a  
17 similar series of questions in the 1990s when the reality of Mercy Corps' rape of  
18 children was first coming to light. Mercy Corps showed no sensitivity to this, as  
19 demonstrated by their questions and aggressive interview tactics.  
20  
21

22 **75.**

23 In August 2020, AlixPartners' attorney Kristin Tovias interrogated plaintiff  
24 and adopted an intimidating and aggressive approach to her questioning. Plaintiff  
25 had to step away and had a panic attack in the bathroom. When she returned,  
26 plaintiff told Tovias that the aggressive style was triggering and that she had a panic  
27 attack. Tovias said she would change her style. However, she continued with the  
28

1  
2 same aggressive style. A junior investigator finally interrupted the inappropriate  
3 grilling.

4  
5 **76.**

6 During the various interrogations from June 2020 through January 2021,  
7 plaintiff was not permitted to have a lawyer, a therapist, an advocate, or any support  
8 person present.

9  
10 **77.**

11 In August 2020, plaintiff shared that a high-profile perpetrator sexually abused  
12 her during her childhood during a Mercy Corps-sponsored event. Mercy Corps did  
13 not investigate or otherwise pursue the predator.

14  
15 **78.**

16 In the 1990's, Mercy Corps interviewed a witness who, as a child, saw  
17 Ellsworth Culver commit sexual crimes, including sex acts with children on Mercy  
18 Corps property. She also confirmed that she saw child pornography. The Mercy  
19 Corps team minimized this in the Investigative Report. It was clear the witness was  
20 also a victim, but Mercy Corps leaders had not reported it to law enforcement. Mercy  
21 Corps leaders are also responsible to report incidents to USAID and/or other  
22 international grant funding organizations. Plaintiff has no evidence that the reports  
23 were made.  
24  
25

26  
27 **79.**

28 In September 2020, Mercy Corps informed Plaintiff that they planned to report  
her recollections of child sexual abuse and the names of the perpetrators involved to

1  
2 the FBI – with corroborating evidence it had uncovered. However, Mercy Corps  
3 refused to allow her to accompany them when they allegedly made this report or to  
4 consider any kind of compromise solution (for example, plaintiff could join for only  
5 the most relevant parts of the meeting, or even enter the building. . According to  
6 Mercy Corps, it would be more difficult to talk about the case if plaintiff was there,  
7 and told her that they were the “only ones with clearance.” As an insulting  
8 consolation, Mercy Corps leaders allowed plaintiff to view candles at Mercy Corps  
9 headquarters for the victims. The FBI has never contacted plaintiff.  
10  
11

12 **80.**

13 Mercy Corps instilled dread and attempted to silence plaintiff by repeatedly  
14 stating she could be sued for defamation should she speak out about Mercy Corp’s  
15 involvement in systemic rape and abuse of children worldwide.  
16

17 **81.**

18 Mercy Corps’ reverse-accusation tactics deliberately terrorized plaintiff. They  
19 even provided her with a “defamation lawyer” to convince her that the threat of a  
20 lawsuit against her was imminent. Plaintiff followed board Chair Kordestani’s  
21 private advice to ask for indemnification. She did, and Mercy Corps refused her  
22 request to provide her with any indemnification or payment for a lawyer should she  
23 be sued over their Investigation Report. This, along with being cut off from  
24 communication, being treated like a dangerous, dehumanized risk, made plaintiff  
25 feel betrayed by her “army of supporters” and that she was on her own to deal with  
26 any retaliation.  
27  
28

1  
2 **82.**

3 Psychological manipulation tactics created fear in plaintiff already suffering  
4 from long coronavirus and PTSD. Mercy Corps took advantage of plaintiff to dilute  
5 an extremely damaging story that would publicly shame high profile Mercy Corps  
6 staff and board members. Since major Mercy Corps donors did not realize they were  
7 financing an international ring of abusive pedophiles, the organization did all  
8 possible to bury the information.  
9  
10

11 **83.**

12 Failing complete coverup attempts, Mercy Corps also took steps to “rebrand”  
13 itself as a trustworthy organization that supports and defends victims like plaintiff.  
14 They had the opposite intentions. In addition to Mercy Corps’ fear tactics, they used  
15 plaintiff through manipulative tactics to prevent the story from spreading.  
16

17 **84.**

18 To assist Mercy Corps in sabotaging plaintiff’s story from further visibility,  
19 Mercy Corps hired Vox Global for “crisis management” efforts to protect and salvage  
20 Mercy Corps’ reputation as needed. Vox’s website states its mission when hired for  
21 this type of activity:  
22

23 “It’s not whether your organization will face a crisis; it’s when. In this crucial  
24 moment, you need experts at your side. We help identify vulnerabilities, plan  
25 scenarios, and respond quickly and effectively. We’ll help take back control, recover  
26 your reputation, and position you for future success.”  
27  
28

1  
2 **85.**

3 The site offers further specifics about their experience, "...a failure to respond  
4 quickly leads to rampant speculation – damaging careers and bottom lines." Vox has  
5 experience protecting high-paying corporate clients, but they mention no credentials  
6 whatsoever as advocates for victims of rape, sodomy, and violence like plaintiff.  
7

8 **86.**

9  
10 Furthermore, the Vox site states a specific three-step methodology used to  
11 "recover reputation." Or, from plaintiff's perspective, the approach Vox used to  
12 mitigate her reputational risk to Mercy Corps:

13 *A: We discover the facts, uncover the context, and classify the gravity of*  
14 *the situation. Then we define the operational measures needed immediately."*

15  
16 In practice, though, Vox failed to explore all the facts and context related to  
17 plaintiff. The only "gravity" they addressed was that of Mercy Corps.

18 *B: A crisis situation can quickly become a blame game. We identify the*  
19 *appropriate strategy and engage all stakeholders transparently – throughout*  
20 *the entire process" Yes, the Mercy Corps situation did involve a blame game –*  
21 *Mercy Corps pointed the blame at plaintiff.*

22  
23 *C: We drive constant communication with all stakeholders, listening and*  
24 *responding swiftly to issues and concerns."* Plaintiff's needs were tertiary  
25 consideration at best.  
26  
27  
28

1  
2 **87.**

3 Mercy Corps portrayed plaintiff as a “front woman” for their public relations  
4 campaign to cover up and minimize the most egregious forms of child abuse  
5 imaginable. For example, Mercy Corps involved plaintiff in press releases, website,  
6 news, etc.  
7

8 **88.**

9  
10 After securing plaintiff’s detailed accounts during interrogations, Mercy Corps  
11 controlled how much of that information was released and when.

12 **89.**

13 Plaintiff told Kordestani that she was ill-equipped and felt unsafe choosing a  
14 public relations person; therefore, Kordestani asked Vox to recommend another PR  
15 person for her, but that person lacked the appropriate skills and information. That  
16 PR person did not even have a national press list, let alone the contacts Vox had at  
17 national media outlets. This was an obvious, deliberate, and pre-planned attempt to  
18 kill the story rather than share the truth. No PR person on a national matter would  
19 be caught without a national press list, especially considering a PR person’s most  
20 critical role is media relations. Certainly, Vox knew she was an inappropriate choice  
21 for the job.  
22  
23  
24

25 **90.**

26 Plaintiff’s PR person was so terrified from Mercy Corps’ threats, that she was  
27 wary to reach out to reporters.  
28

1  
2 **91.**

3 Trauma expert and silence breaker Louise Godbold requested PR help from  
4 SKDK—the TIME’S UP PR firm. SKDK contacted Mike Baker, a NYT reporter.  
5 Since the reporter was on deadline, the only source and verification for his story the  
6 next day was the Mercy Corps report which provided a filtered and whitewashed  
7 version of events.  
8

9  
10 **92.**

11 By controlling reporters’ access to information, only a few reporters had an  
12 opportunity to write about it. After that first “wave” of articles, the story loses public  
13 momentum because many reporters consider a topic already covered as “old news.”  
14 Mercy Corps effectively killed the story.  
15

16 **93.**

17 When an employee asked what Mercy Corps was doing that benefitted  
18 plaintiff, Matt Dolan said, “We’re survivor-centered, and she has had access to  
19 counseling and support the whole time.” This was a falsehood. Plaintiff’s access to  
20 counseling and support was severely limited by Mercy Corps.  
21

22 **94.**

23 In a webcast presentation to 5,000 Mercy Corps employees about the  
24 investigation and its conclusions, Mercy Corps’ team disparaged plaintiff, dodged  
25 questions, and misled the staff throughout the presentation. They also prevented  
26 plaintiff from attending or having a copy of the presentation materials.  
27  
28



1  
2 **95.**

3 Wheat later boasted to plaintiff that they had prepared how to answer or dodge  
4 questions during the webcast so as to not give away any perpetrators. This was a  
5 premeditated tactic used to protect perpetrators. The moderator also filtered  
6 questions to control what was answered and what was said.  
7

8 **96.**

9 The investigation is and was falsely advertised by Mercy Corps as “external  
10 and independent.” In reality, Mercy Corps employee Wheat was involved in every  
11 step as plaintiff’s handler. Wheat used her role to intimidate and gaslight plaintiff,  
12 and to protect Mercy Corps at plaintiff’s expense. Wheat also stepped in as an  
13 interrogator once plaintiff started naming names.  
14  
15

16 **97.**

17 Wheat rushed plaintiff throughout the investigation, made her feel guilty for  
18 asking for information or support, and threatened plaintiff. Not only did plaintiff  
19 fear Wheat, Kordestani confided to plaintiff that she also feared Wheat. The  
20 selection of Wheat as plaintiff’s handler, and often her only point of contact, was  
21 strategic. Wheat kept plaintiff in fear.  
22

23 **98.**

24 Falsely, Mercy Corps claims its first concern in an investigation is for the  
25 survivor and their safety, health, and well-being.  
26  
27  
28

1  
2 **99.**

3 The defamation lawyer Mercy Corps paid to “help” plaintiff overlooked the  
4 egregious behavior. Once again, plaintiff was left alone to read all legal documents  
5 and advocate for herself while suffering from the effects of covid. This inflicted  
6 further stress and anxiety on plaintiff, who was left alone to defend herself against  
7 Mercy Corps and its hired guns.  
8

9  
10 **100.**

11 In the summer of 2020 Mercy Corps began to treat plaintiff like the opposition  
12 rather than a “partner” or “teammate.” Their unprofessional conduct became worse  
13 after they extracted her information. This further antagonized plaintiff rather than  
14 supporting her.  
15

16 **101.**

17 The Investigative Report falsely claimed they followed “protocol” by not  
18 providing the Mercy Corps board with the specific names of perpetrators. In reality,  
19 AlixPartners informed Kordestani and Beth DeHammel of the identity of another  
20 Mercy Corps leader who had raped plaintiff. Kordestani then informed board  
21 members Iman Dakhil, Scott Brown, Roberto Boca, and CEO candidate D’Oyen  
22 McKenna (before she was even hired), and members of the Vox PR team.  
23  
24

25 **102.**

26 Kordestani confided that she was not sure whether to report the perpetrator  
27 and feared being sued by the Mercy Corps board of directors. Kordestani also told  
28 plaintiff that it was “not safe” to disclose the identity of the perpetrator because there

1  
2 were leaks on the board, and she knew one in particular. This terrified plaintiff, who  
3 already felt unsafe.

4  
5 **103.**

6 In October 2020, Kordestani discovered the identity of a third Mercy Corps  
7 perpetrator, who is also alive. Plaintiff lives in fear that these men continue to rape  
8 children and that they may come after her. One already attempted to contact her.

9  
10 **104.**

11 Wheat told plaintiff that she needed to inform D'Oyen McKenna's assistant,  
12 Mercy Corps internal PR person, and an internal HR person of the names of several  
13 perpetrators. Moreover, Wheat was informed of the identities of every single  
14 perpetrator as they were named. Plaintiff asked to be present when all of these  
15 people were informed, but Wheat refused. Plaintiff was terrified of the reactions and  
16 of people knowing these identities. Wheat told plaintiff to "be fair to them so they  
17 can process the news." Plaintiff had to process it alone and in fear. Plaintiff  
18 panicked while waiting for people to be informed. This was not survivor-centered. .  
19 Although the insiders were informed, it does not appear that law enforcement was  
20 properly informed.  
21  
22

23  
24 **105.**

25 In September 2021, more examples of Mercy Corps' effort to bury problems,  
26 reward staff for helping do it, and to distance the organization from the crimes came  
27 to light.  
28

1  
2 **106.**

3 D'Oyen McKenna disclosed to plaintiff that Mercy Corps was considering  
4 rebranding itself under a new name. This was an obvious attempt to distance Mercy  
5 Corps from its roots rife in child rape and murder. It would also make it harder for  
6 other victims to identify the organization and its leaders. Plaintiff expressed her  
7 anger with this idea, noting that survivors will have a harder time finding justice.  
8

9  
10 **107.**

11 In September 2021, Mercy Corps pushed plaintiff to agree that only one year  
12 of therapy would address all of her mental health needs related to the investigation.  
13 This small window of time is ridiculous considering the amount of trauma caused by  
14 the investigation and remembering the identities of her abusers. Mercy Corps also  
15 tried to limit the types of treatment she could receive.  
16

17 **108.**

18 Mercy Corps argued that some of the prescribed therapy was unnecessary and  
19 even mocked it. Mercy Corps made plaintiff defend her need for treatment. This  
20 caused more stress. . Kordestani callously told plaintiff, "This is just how business  
21 works."  
22

23 **109.**

24 As a reward for Wheat's aggressive and manipulative tactics against plaintiff,  
25 Mercy Corps promoted her to interim Chief of Staff in September 2021. According to  
26 Wheat's LinkedIn page, she remains in that position today. Her verbiage describing  
27 that role brags about her experience and completely whitewashes her role in  
28

1  
2 protecting Mercy Corps leaders rather than plaintiff. Her LinkedIn includes the  
3 “experience” below:

4           - Experience in global safeguarding, investigations, and crisis  
5 management. Managed safeguarding priorities and initiatives, conducted  
6 and supervised all types of global investigations, assisted in the  
7 restructuring of the investigations and ethics team at Mercy Corps.  
8

9           - Provided key leadership and management of a high profile  
10 organizational crisis and historical sexual abuse investigation involving  
11 the organization’s founder.  
12

13           - More than 30 years of public sector law enforcement,  
14 international consulting and military work, including international  
15 projects for USAID, INL, DAI, PADF, the Asia Foundation and ICITAP.  
16

17   **110.**

18           Mercy Corps used psychological interrogation tactics on plaintiff. Mercy Corps’  
19 team knows psychological torture tactics given their backgrounds with the FBI, law  
20 enforcement, and the military. Reid, a firm with expertise in interrogation tactics,  
21 provides an expert overview of interrogation techniques used commonly against  
22 criminal suspects. Mercy Corps used many of these techniques against plaintiff, yet  
23 she was not a suspect in any crime whatsoever. According to Reid’s list of “never do”  
24 items during interrogations, several were used by Mercy Corps against plaintiff:  
25  
26

27   **111.**

28 Do not threaten the subject with any physical harm or inevitable consequences.

1  
2 - Fact: Mercy Corps attempted to intimidate plaintiff by  
3 repeatedly telling her she could be sued for defamation.

4 - Fact: During interrogation, Mercy Corps reinforced plaintiff's  
5 risk of a defamation suit against her and the consequences of her  
6 statements. For example, they falsely claimed that her private journals  
7 would become public. Mercy Corps seemed more concerned about pushing  
8 their fear tactics than identifying perpetrators or victims.  
9

10  
11 - Fact: Plaintiff was repeatedly threatened by Mercy Corps' team,  
12 who pushed her unfairly and inappropriately with statements like, "This  
13 is your only chance to tell us what happened. You need to tell us now. This  
14 chance is not going to happen again. We have a great team now, not later.  
15 It won't matter if you tell us something later."  
16

17 **112.**

18 Do not conduct interrogations for an excessively long period.

19  
20 - Fact: Plaintiff endured over 200 hours of intense questioning,  
21 meetings, and full-day interrogations over multiple days in a row while  
22 suffering complications from coronavirus.  
23

24 **113.**

25 Do not deny the subject the opportunity to satisfy their physical needs

26 - Fact: Suffering with Covid complications, plaintiff was  
27 interviewed remotely in places like her car. During the marathon  
28

1  
2 interrogations, plaintiff had no access to a restroom. This left plaintiff no  
3 options other than to urinate in a jar.

4 - Fact: Plaintiff was sick, and she should not have been  
5 interrogated when she physically required bedrest.  
6

7 **114.**

8 Exercise special cautions when questioning juveniles or individuals with  
9 mental or psychological impairments.  
10

11 - Fact: Plaintiff was interrogated while suffering from severe  
12 PTSD and anxiety.

13 - Fact: During interrogations and when they ended, therapists or  
14 psychologists were not made available to plaintiff. Mercy Corps'  
15 interrogators simply walked away from plaintiff, leaving her completely  
16 alone to suffer the effects. After a particularly distressing session, they told  
17 her to call a friend for support, and left.  
18

19 - Fact: Mercy Corps' actions threw plaintiff into flashbacks, PTSD,  
20 and panic attacks to such a degree that she vomited after some interviews,  
21 curled up into the shower, hid underneath a table, in addition to crippling  
22 fear, sadness, anxiety, pain, and suicidal thoughts.  
23  
24

25 **115.**

26 The confession is not the end of the investigation - investigate the confession  
27 details to establish the authenticity of the subject's statement.  
28

1  
2 - Fact: Plaintiff had nothing to “confess” but was still subject to  
3 brutal and repetitive lines of questioning.

4  
5 **116.**

6 Mercy Corps was inconsistent throughout the investigation, and plaintiff never  
7 knew what to expect from their questions or approach.

8 - They would make promises and not follow through. For example,  
9 Wheat stressed that AlixPartners investigators did not have time to follow  
10 through on its promises to grant plaintiff’s basic requests and made  
11 plaintiff feel unreasonable for asking.  
12

13 - Open communication was discouraged and made complicated. It  
14 is unclear whether any of plaintiff’s statements to Wheat were shared as  
15 promised.  
16

17 - Plaintiff often suffered anticipatory anxiety waiting for the team  
18 to respond to reasonable questions.

19 - Wheat also made plaintiff feel guilty about “hurting the feelings”  
20 of others who heard about the horrors she suffered. For example, Wheat  
21 told plaintiff how hard it was for Kordestani to hear about the suffering  
22 because Kordestani had her own daughter. Wheat even asked plaintiff  
23 whether she just wanted to hurt Mercy Corps employees..  
24

25 - Wheat repeatedly told plaintiff it was her job to consider the  
26 feelings of others and implied plaintiff should too. Clearly, the survivor’s  
27 feelings did not take precedent.  
28



1  
2 - Wheat also told plaintiff she should not show Kordestani, Iman  
3 Dakhil, or anyone at Mercy Corps the painting plaintiff created illustrating  
4 her experience with the Thai girl. This reinforced plaintiff's feelings of guilt  
5 and fear about the effect her journals and other information related to her  
6 attacks had on others. Wheat was well aware of plaintiff's fears and used  
7 them to silence her and keep her fearful.  
8

9  
10 - When plaintiff asked for debriefs at the end of interrogations,  
11 Wheat told plaintiff to "respect the time of others" and especially consider  
12 Matt Dolan being on east coast time. Again, the team manipulated plaintiff  
13 to make her feel unreasonable.  
14

15 - Mercy Corps' investigation and behavior were not "survivor-  
16 centered." The team's interrogation and manipulative tactics proved just  
17 the opposite.  
18

19 - Mercy Corps also choked off lines of communication between  
20 plaintiff and her past contacts at Mercy Corps – such as D'Oyen McKenna,  
21 Kordestani, and Dakhil – who were instructed not to communicate with  
22 plaintiff. Previously, Kordestani treated plaintiff like a friend and partner,  
23 giving her gifts, sharing information and even photos of her family with  
24 plaintiff. D'Oyen McKenna told plaintiff via a direct Twitter message that  
25 she had an "open-door policy." They spoke on the phone and communicated  
26 well until D'Oyen McKenna rescinded that open-door policy. Further, in a  
27 Zoom call, Kordestani reminded plaintiff, "We're not friends, and we never  
28

1  
2 can be friends.” In May 2021, she said, in front of others, “I’ll use my  
3 privilege [money and power] when you sue me for not supporting you.” This  
4 was both heartbreaking and humiliating for plaintiff.  
5

6 **117.**

7 The interrogation tactics and stress forced upon plaintiff surfaced all the  
8 horrors she endured in her youth and re-triggered her PTSD. At one point, plaintiff  
9 suffered neurological problems. Although the Mercy Corps team and Kordestani  
10 were aware, they continued the interrogations. Among other health problems,  
11 plaintiff is still battling the ongoing symptoms of long Covid, which she originally  
12 suffered at the time of the Mercy Corps’ interrogations.  
13  
14

15 **118.**

16 In April 2020, Kordestani told plaintiff that the board planned a press release  
17 praising Neal Keny-Guyer, who had buried the sexual misconduct and had  
18 circulated a memo to approximately twenty-one staff and board members  
19 disparaging plaintiff for reporting sexual abuse in 2018. Kordestani showed plaintiff  
20 the memo which placed all of these leaders on notice of plaintiff’s allegations.  
21 Plaintiff felt embarrassed, belittled, humiliated, dismissed by the memo and upset.  
22  
23

24 **119.**

25 According to Kordestani, once this was discovered in 2020 by a Vestry Laight  
26 investigation into the 2018 report, a chart was created to determine the amount of  
27 responsibility each shared for ignoring the allegations. Kordestani showed plaintiff  
28 the chart. Kordestani told plaintiff that executives and board members were forced

1  
2 to resign. Vestry Laight kept this embarrassing information out of the report, and  
3 Mercy Corps kept it secret from the public, while it boasted about transparency and  
4 “no intentional wrongdoing” by leaders.  
5

6 **120.**

7 While Kordestani acknowledged that public praise of Keny-Guyer would inflict  
8 harm on plaintiff, Mercy Corps proceeded anyway after an empty apology. While still  
9 suffering from severe coronavirus, this news triggered plaintiff’s PTSD and she had  
10 difficulty speaking, including stuttering, inability to finish sentences, and she had  
11 trouble walking. Plaintiff saw a neurologist who indicated plaintiff had symptoms  
12 of brain damage. She failed a cognitive test and was tested for encephalitis. Plaintiff  
13 was mostly bed ridden. Regardless, the Mercy Corps team charged ahead with the  
14 cruelty, and plaintiff suffered through it because she had been primed to allow abuse  
15 from Mercy Corps her entire life. They made plaintiff feel like she had no choice.  
16 She had to help them.  
17  
18

19 **121.**

20  
21 Mercy Corps leaders like Kordestani often excused their behavior by telling  
22 plaintiff they had “fiduciary duties.” However, they breached their fiduciary duties  
23 to the organization by putting Mercy Corps at risk of litigation, harming its  
24 reputation through unethical conduct, including risking the life of a victim, in order  
25 to bury serious problems in the organization and to promote their personal  
26 reputations.  
27  
28

1  
2 **122.**

3 **CLAIMS FOR RELIEF**

4 **Intentional Infliction of Emotional Distress**

5  
6 As alleged in this complaint, defendant's behavior was intended to inflict  
7 severe emotional distress on plaintiff, and severe distress was certain or  
8 substantially certain to result from defendant's behavior. Defendant's intentional,  
9 outrageous and extreme behavior was an extraordinary transgression of the bounds  
10 of socially tolerable conduct and exceeded any reasonable limit of social toleration,  
11 and caused plaintiff to experience severe and ongoing emotional harm, especially in  
12 light of the special relationship between defendant and plaintiff, and the power  
13 differential between defendant and plaintiff. Accordingly, plaintiff seeks a judgment  
14 in her favor against defendant, holding defendant liable for intentional infliction of  
15 emotional distress, \$1.00 nominal damages, attorney fees, and costs and  
16 disbursements.  
17  
18  
19

20 **123.**

21 Plaintiff intends to amend this complaint before trial to include a claim for  
22 punitive damages, in an amount sufficient to deter powerful corporate entities from  
23 engaging in similar tactics in the future.  
24

25 **124.**

26 **REQUEST FOR JURY TRIAL**

27 Plaintiff respectfully requests a trial by a jury.  
28

1  
2 **125.**

3 **PRAYER**

4 Plaintiff seeks relief against Mercy Corps as requested above, and for any  
5 other relief this Court may determine is fair. Plaintiff reserves the right to amend  
6 this complaint to adjust the claims for compensation and damages and to add claims  
7 and additional defendants, including claims for punitive damages. Some of the  
8 complaint's allegations are based in part on the memory of witnesses, which may  
9 later prove to be inaccurate in parts, and so the complaint may later be amended  
10 before trial to conform the allegations to the evidence obtained throughout the case.  
11 This complaint is made on personal knowledge as to plaintiff's actions and based on  
12 information and belief as to the actions of others.  
13  
14  
15

16 September 7, 2022

17 **RESPECTFULLY FILED,**

18 

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