UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA
JURY TRIAL DEMANDED

Lady Olivia: Mallonee "OLIVIA ROSE MALLONEE", a minor, by and through her guardian ad litem Lord devin: mallonee "Devin Ian James Mallonee",

Plaintiff,

v.

EMILY ROSE JONES; DAVID THOMAS LANGENDERFER; SHARON MOORE; KAREN MOORE; MICHELLE NGUYEN; JAMES METZ; WESTON LIMOS; RTX CORPORATION; and the UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1332679

COMPLAINT FOR DAMAGES

PRELIMINARY STATEMENT

1. This is an action for rape, kidnapping, torture, and child sex trafficking of a young child, brought under the Trafficking Victims Protection Reauthorization Act, 18 U.S.C. § 1595, and related federal and state law.
2. Plaintiff Olivia Rose Mallonee was born on November 1, 2021, and was four years old on August 1, 2025. She is an enrolled member of the Tribal Nations. She was held without being returned to her legal guardian, Lord devin: mallonee "Devin Ian James Mallonee", beginning on or about that date. She remains missing.
3. The individual Defendants represented themselves as members or agents of the United States Department of Defense. Defendant RTX Corporation employed or contracted with personnel who participated in the venture. The United States, through the Department of

Defense, employed or affiliated with the individual Defendants and failed to stop the kidnapping, trafficking, and torture.

PARTIES

4. **Plaintiff Olivia Rose Mallonee** is a minor and an enrolled member of the Tribal Nations. She brings this action by and through her guardian ad litem, Devin Ian James Mallonee, pursuant to [court order appointing guardian ad litem / state guardianship order / tribal court order], attached as **Exhibit A**.
5. **Defendant Emily Rose Jones** is an individual whose last known address is **3745 Heathwood, White Lake, Michigan 48383**. Upon information and belief, she represented herself as an employee, service member, or agent of the United States Department of Defense.
6. **Defendant David Thomas Langenderfer** is an individual whose last known address is [address]. Upon information and belief, he represented himself as an employee, service member, or agent of the United States Department of Defense.
7. **Defendant Sharon Moore** is an individual whose last known address is [address]. Upon information and belief, she represented herself as an employee, service member, or agent of the United States Department of Defense.
8. **Defendant Karen Moore** is an individual whose last known address is [address]. Upon information and belief, she represented herself as an employee, service member, or agent of the United States Department of Defense.
9. **Defendant Michelle Nguyen** is an individual whose last known address is [address]. Upon information and belief, she represented herself as an employee, service member, or agent of the United States Department of Defense.
10. **Defendant James Metz** is an individual whose last known address is [address]. Upon information and belief, he represented himself as an employee, service member, or agent of the United States Department of Defense.
11. **Defendant Weston Limos** is a business entity.
12. **Defendant RTX Corporation** is a Delaware corporation with its principal place of business at 1000 Wilson Boulevard, Arlington, Virginia 22209. It is a publicly traded aerospace and defense company.
13. **Defendant the United States of America** is sued under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671–2680, for the negligence of the Department of Defense and its employees.

JURISDICTION AND VENUE

14. This Court has subject-matter jurisdiction under **28 U.S.C. § 1331** and **28 U.S.C. § 1346(b)**. The Court has supplemental jurisdiction over the state-law claims under **28 U.S.C. § 1367**.
15. Venue is proper under **28 U.S.C. § 1391(b)** and **28 U.S.C. § 1402(b)**.
16. **Exhaustion of tribal remedies.** NO. ATN-2026-035, ATN-2026-034, 2026-08-31-A

FACTUAL ALLEGATIONS

A. The Child

17. Plaintiff was born on November 1, 2021. She was four years old on August 1, 2025.
18. Plaintiff is an enrolled member of the Tribal Nations. Her enrollment is documented in **Exhibit B**.
19. Plaintiff's legal guardian is Lord devin: mallonee “Devin Ian James Mallonee”.

B. The Taking

20. On or about August 1, 2025, Plaintiff was held without being returned to her legal guardian.
21. She was held against her will and has not been returned.
22. During the period of captivity, she was raped, tortured, and trafficked.
23. She remains missing as of the date of this filing.

C. The Individual Defendants

24. Each individual Defendant participated in, facilitated, or knowingly benefited from the detention and trafficking of Plaintiff.
25. Each individual Defendant represented himself or herself to Plaintiff as a member or agent of the United States Department of Defense.

D. RTX Corporation

26. RTX Corporation is a defense contractor that provides personnel, systems, and services to the United States Department of Defense.
27. Upon information and belief, one or more of the individual Defendants was employed by, contracted with, or affiliated with RTX Corporation.
28. Upon information and belief, RTX Corporation furnished personnel, facilities, or services that were used in connection with the detention or movement of Plaintiff, and received consideration in connection with that participation.

E. The Sworn Testimony and Investigation

29. Plaintiff's account is the subject of sworn testimony on the record in [identify proceeding, court, or agency, and date], attached as **Exhibit C**.
30. The conduct is under investigation by the Department of the Interior [case or report number].

F. The Department of Defense's Failures

31. The Department of Defense employed, commissioned, contracted with, or otherwise affiliated with one or more of the individual Defendants.
32. The Department failed to stop the kidnapping, trafficking, and torture of Plaintiff.
33. The Department failed to investigate reports of the conduct described above.
34. These failures are ongoing because Plaintiff has not been recovered.

CLAIMS FOR RELIEF

COUNT I — Violation of the TVPRA, 18 U.S.C. § 1595(a)

(Against the Individual Defendants and Weston Limos)

35. Plaintiff realleges and incorporates paragraphs 1–34.
36. 18 U.S.C. § 1595(a) creates a civil cause of action against any person who "knowingly benefits, financially or by receiving anything of value, from participation in a venture which that person knew or should have known has engaged in" a violation of 18 U.S.C. § 1591.
37. A claim under § 1595(a) requires: (1) an underlying § 1591 violation; (2) participation in a venture; (3) knowledge or constructive knowledge; and (4) knowing benefit.
38. **Underlying § 1591 violation.** Plaintiff, a child of four years, was caused to engage in a commercial sex act, and was recruited, enticed, harbored, transported, provided, obtained, or maintained for that purpose. 18 U.S.C. § 1591(a). Because Plaintiff was under eighteen years of age, the Government need not prove force, fraud, or coercion. 18 U.S.C. § 1591(b).
39. **Participation in a venture.** Each Defendant participated in a venture — the coordinated holding, movement, and trafficking of Plaintiff.
40. **Knowledge or constructive knowledge.** Each Defendant knew or should have known that the venture was engaged in a violation of § 1591 as to Plaintiff.
41. **Knowing benefit.** Each Defendant received something of value from participation in the venture.
42. Plaintiff is entitled to compensatory damages, punitive damages, reasonable attorneys' fees, and costs. *See* 18 U.S.C. § 1595(a).
43. **Statute of limitations.** The TVPRA claim is timely. 18 U.S.C. § 1595(c). Plaintiff is a minor; the period has not begun to run against her.

44. **Stay.** Plaintiff acknowledges that this action may be stayed during the pendency of any related criminal action under 18 U.S.C. § 1595(b)(1).

COUNT II — Violation of the TVPRA, 18 U.S.C. § 1595(a)

(Against RTX Corporation)

45. Plaintiff realleges and incorporates paragraphs 1–34.
46. RTX Corporation participated in a venture within the meaning of § 1595(a) as alleged in paragraphs 26–28, and knowingly benefited from that participation.
47. RTX Corporation knew or should have known that the venture was engaged in a violation of 18 U.S.C. § 1591 as to Plaintiff.
48. RTX Corporation is not an "interactive computer service," and this claim does not arise from its publication of third-party content. 47 U.S.C. § 230(c)(1) provides no immunity.

COUNT III — Negligence (FTCA)

(Against the United States)

49. Plaintiff realleges and incorporates paragraphs 1–34.
50. The United States, through the Department of Defense, owed Plaintiff a duty of reasonable care in screening, supervising, and stopping suspected child trafficking by its personnel and affiliates.
51. The United States breached that duty as alleged in paragraphs 31–34.
52. The breach proximately caused Plaintiff's injuries.
53. **Intentional tort exception.** Plaintiff does not seek recovery for the intentional torts themselves under this Count. Plaintiff seeks recovery for the negligence of the United States in failing to stop the trafficking. This claim is not barred by 28 U.S.C. § 2680(h).
54. **Feres doctrine.** The *Feres* doctrine does not bar this claim. Plaintiff is a civilian child, not a service member. *See Feres v. United States*, 340 U.S. 135 (1950).
55. **Exhaustion.** Plaintiff presented an administrative claim on Standard Form 95 on [date]. [More than six months have elapsed / final denial was issued on [date].]

COUNT IV — Negligent Hiring and Supervision (FTCA)

(Against the United States)

56. Plaintiff realleges and incorporates paragraphs 1–34.
57. The United States owed a duty to exercise reasonable care in hiring, retaining, and supervising employees and agents with access to children.
58. The United States breached that duty as alleged in paragraph 31.
59. The breach proximately caused Plaintiff's injuries.
60. This Count sounds in negligence and is not barred by § 2680(h).

COUNT V — Civil Conspiracy

(Against All Defendants)

61. Plaintiff realleges and incorporates paragraphs 1–34.
62. Defendants agreed among themselves to hold, move, conceal, and traffic Plaintiff.
63. Each Defendant committed overt acts in furtherance of the agreement.
64. The agreement and overt acts proximately caused Plaintiff's injuries.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants as follows:

1. **Compensatory damages** in an amount to be proven at trial, for physical injury, emotional distress, loss of liberty, and all past and future medical and psychological care;
2. **Punitive damages** against the individual Defendants and RTX Corporation, in an amount sufficient to punish and deter;
3. **Attorneys' fees and costs** under 18 U.S.C. § 1595(a);
4. **Injunctive relief** requiring all Defendants to disclose Plaintiff's location and to preserve all records related to her;
5. **Pre-judgment and post-judgment interest** as allowed by law;
6. Such other relief as the Court deems just and proper.

Plaintiff demands a trial by jury on all issues so triable. Fed. R. Civ. P. 38.

Dated: November 5, 2026

Respectfully submitted,

Lord devin: mallonee “Devin Ian James Mallonee”
707-941-4454
malloneetrust@gmail.com
Counsel for Plaintiff
(or Plaintiff pro se, if applicable)

Signature:_____/S/ /SS/_____

Lord devin: mallonee, Department of the Interior