

STATE OF ILLINOIS)
)SS
COUNTY OF DUPAGE)

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS

GRETCHEN WILKINSON,)	
JANE DOE,)	
JANE DOE II,)	
MELODY FEDORIW)	
CHARIS BARKER,)	
RACHEL FROST,)	
RACHEL LEES,)	
JANE DOE III,)	
JAMIE DEERING, and)	
RUTH COPLEY BURGER,)	
)	
Plaintiffs,)	CASE NO. 15 L 000980
)	
v.)	Hon. Judge Popejoy
)	
INSTITUTE IN BASIC LIFE PRINCIPLES, INC., and)	JURY DEMANDED
WILLIAM W. GOTHARD, JR.,)	BY PLAINTIFFS
)	
Defendants.)	

COMPLAINT AT LAW

NOW COME the Plaintiffs, GRETCHEN WILKINSON, JANE DOE, JANE DOE II, MELODY FEDORIW, CHARIS BARKER, RACHEL FROST, RACHEL LEES, JANE DOE III, JAMIE DEERING, and RUTH COPLEY BURGER, by and through their attorneys, GIBBS LAW FIRM, P.A. and JONATHAN P. REMIJAS, and complain of the Defendants, INSTITUTE IN BASIC LIFE PRINCIPLES, INC. (“IBLP”) and WILLIAM W. GOTHARD, JR. (“Bill Gothard”), as follows:

NATURE OF THE ACTION

1. This action is brought to seek redress and damages for personal injuries based on the intentional, reckless, negligent, and willful and wanton acts and omissions of the Defendants with regard to sexual abuse and sexual harassment, and similar allegations of malfeasance suffered by the Plaintiffs: Gretchen Wilkinson, Jane Doe, Jane Doe II, Melody Fedoriw, Charis Barker, Rachel Frost, Rachel Lees, Jane Doe III, Jamie Deering, and Ruth Copley Burger.

VENUE AND JURISDICTION

2. This Court has venue and jurisdiction of this action as the Defendant IBLP's principle place of business is in DuPage County, State of Illinois, and the negligent and willful acts and omissions alleged originated and/or occurred in whole or in part in DuPage County, Illinois.

THE PARTIES

3. Between 1991 and 1993, Plaintiff GRETCHEN WILKINSON was a participant in IBLP programs and was later an employee of IBLP, all while she was a minor. Ms. Wilkinson is currently a resident of the state of Virginia.

4. Plaintiff JANE DOE was a participant in IBLP seminars, a volunteer for IBLP, and later was an ATI program participant. JANE DOE is currently a resident of the state of Michigan. Plaintiff JANE DOE seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

5. Plaintiff JANE DOE II was a participant in IBLP programs and was an IBLP volunteer. Her family joined ATI in 1991, when she was approximately four (4) years old and she continued to be enrolled in ATI until 2009. JANE DOE II's last contact with Bill

Gothard was in 2008. JANE DOE II is currently residing in the state of Colorado. Plaintiff JANE DOE II seeks to proceed anonymously for good cause shown, in accord with 735 ILCS 5/2-401(e).

6. Plaintiff MELODY FEDORIW was an IBLP program participant, volunteer, and employee between 2011 and 2012. Melody Fedoriw is currently a resident of North Carolina.

7. Plaintiff CHARIS BARKER was involved with IBLP from 1986 to 2001. She was a participant in IBLP programs, an intern for IBLP, and later was an employee of IBLP. Ms. Barker is currently a resident of the state of Georgia.

8. Plaintiff RACHEL FROST was a participant in IBLP programs, an intern for IBLP, and later an employee of IBLP. Ms. Frost was present at IBLP headquarters, where most of the sexual harassment occurred, for periods of time between 1992 and 1995. She later worked as a TESL instructor for IBLP in various locations. Ms. Frost is currently a resident of the state of Minnesota.

9. Plaintiff RACHEL LEES was a participant in IBLP's ATI program for more than ten years. From 1992 to 1993 she was Bill Gothard's personal secretary at IBLP headquarters. She was twenty years old at the time she went to headquarters. After returning to New Zealand for immigration reasons, she continued to work for IBLP for several years. Rachel Lees is a citizen of New Zealand.

10. Plaintiff JANE DOE III was an IBLP ATI program participant from 2003 to 2012. She went to IBLP headquarters in 2011, specifically for the purpose of being counseled by Bill Gothard personally. JANE DOE III is currently a resident of the state of Missouri.

Plaintiff JANE DOE III seeks to proceed anonymously for good cause shown, in accord with 735 ILCS 5/2-401(e).

11. Plaintiff JAMIE DEERING was a participant in the IBLP ATI program beginning in 1992 at the age of 13. In 1994, at the age of 14, she was invited by Bill Gothard to come to IBLP headquarters. Ms. Deering's involvement with IBLP continued until 1999, when she was 20 years old. Jamie Deering is currently a resident of the state of Colorado.

12. Plaintiff RUTH COPLEY BURGER is the adopted daughter of Kenneth Copley, a former IBLP employee. Ruth Copley Burger resided at the Indianapolis Training Center and participated in IBLP activities and events from 1994 to 1995.

13. At all relevant times, Defendant, Institute In Basic Life Principles, Inc. ("IBLP"), was and is a not-for-profit Illinois corporation, with its principle place of business / headquarters in DuPage County, Illinois.

14. Defendant WILLIAM W. GOTHARD, JR. is the Founder and was President of the Institute in Basic Life Principles ("IBLP") until his resignation in 2014. He was a member of IBLP's Board of Directors at the time of his resignation in 2014. Bill Gothard is a resident of the state of Illinois.

15. Throughout its history and at all the relevant time frames asserted by the Plaintiffs, the IBLP has been maintained, managed, and controlled by a core group of male executives, management employees, and male directors to its Board of Directors that have been employed and/or appointed due to their adherence and loyalty to the teachings and policies of Bill Gothard, including but not limited to all past Board of Directors and the current Board of Directors, namely TIMOTHY LEVENDUSKY (a resident of the state of Illinois), JOHN STANCIL (a resident of the state of Tennessee), ANTHONY BURRUS (a

resident of the state of Texas), GILL BATES (a resident of Tennessee), CHARLES STEPHEN PAINE, JR. (aka Stephen Paine) (a resident of the state of Oklahoma), and DAVID YORK (a resident of the state of Wisconsin). The aforementioned male executive management employees and male board of directors were all agents of the Defendant IBLP and were charged with the responsibility of knowing and/or being aware of the inner workings of the Defendant IBLP and being blindly loyal to Defendant Bill Gothard at all times that are relevant hereto and placed the welfare and reputation of the IBLP and Bill Gothard above and beyond the welfare, rights, and dignity of the ten (10) young female Plaintiffs named herein, amongst the numerous young females that attended the IBLP and/or were employees thereof. Hereinafter, these male executive management employees and male board of directors shall be referred to herein as the past and present “Control Group of the IBLP” or “Control Group”. This past and present Control Group¹ are the agents and employees of IBLP that should have protected the Plaintiffs, and others who are similarly situated, but who have not yet come forward.

16. From at least 1991 until the date of this filing, the CONTROL GROUP of the IBLP (with the recent exception of JOHN STANCIL and ANTHONY BURRUS who recently resigned from the IBLP Board of Directors due to disagreements with the Board and a lack of representation by counsel for the IBLP/Board), have failed in their obligation to protect the young women who were present on the IBLP property as participants, interns, volunteers, counselees, or employees (through the IBLP’s various agents and

¹ The precise identity of these individuals will be subject to identification via written and oral discovery, as the secretive nature of IBLP and the patriarchal its patriarchal inner workings are not public knowledge or discoverable by other means.

employees) and that failure has caused harm to the ten (10) Plaintiffs named herein, amongst others, for reasons set forth in more detail below.

FACTS COMMON TO ALL ALLEGATIONS

17. At the times relevant to their claims, the Plaintiffs were participants, interns, volunteers, and/or employees of IBLP.

18. As stated in each individual Count below, each of the individual Plaintiffs were the victim of sexual abuse, sexual harassment, and inappropriate/unauthorized touching, many times while they were minors, at the hands of the IBLP, by and through its agents and employees, and suffered as a result thereof. Much of the sexual abuse and harassment occurred while the Plaintiffs were receiving counseling from the perpetrators/IBLP employees. The unsupervised counseling received by young women, such as the Plaintiffs, by patriarchal figures (who were agents and employees of IBLP) was a standard part of IBLP programs and activities.

19. On information and belief, at the times relevant to their claims, Defendant IBLP's agents, employees and/or directors were aware or should have been aware of serious allegations of sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to certain IBLP participants, interns, volunteers and/or employees, including but not limited to the Plaintiffs, initiated by IBLP's agents/employees, but neither the Defendant IBLP nor its agents, employees, or directors reported these serious, potentially criminal allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, in accord with their duties and their statutory responsibilities.

20. Defendant IBLP, through its management and Control Group, as well as other agents and employees, frequently received reports of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to certain interns, employees, and participants of its programs, as initiated by IBLP's agents/employees and others, but failed to take any type of corrective, investigative or reporting action until February of 2014.

21. In February of 2014, Defendant IBLP – after decades of allegations and internal reports of various types of sexual abuse, sexual harassment, inappropriate/unauthorized touching and stalking - finally announced an “investigation” because of Internet pressure.

22. As indicated by the Affidavit of William W. Gothard, Jr., attached as “Exhibit A,” Defendant IBLP, hired the Christian Law Association (“CLA”) to conduct the internal investigation. (Exhibit A at ¶ 13.)

23. CLA was selected to conduct the investigation by Bill Gothard, the primary party it was hired to investigate. Despite the conflict of interest, the Control Group, specifically its then current Board of Directors, approved of CLA's selection and authorized IBLP to pay CLA fifty thousand dollars (\$50,000.00) to conduct the “investigation.”

24. CLA is a fundamental Independent Baptist organization that operates predominately as a King James Bible preaching ministry for its seventy-one year old President. CLA's President is a personal friend of Bill Gothard and IBLP, who speaks regularly at IBLP events. On information and belief, CLA had no staff or employees with qualifications to conduct an appropriate investigation and CLA has a national reputation of covering up immoral actions by ministry leadership.

25. CLA was hired and the fee was paid for the purpose of producing an internal investigation that was preordained and nothing more than a cover-up of the allegations of

sexual abuse, sexual harassment, inappropriate/unauthorized touching, and stalking that had occurred at the Defendant IBLP.

26. The written report of the investigation that was conducted (if one exists) was never released for public review nor was it referred to appropriate law enforcement authorities for their review and investigation. (See Exhibit A at ¶ 15.)

27. Despite the fact that some of the Plaintiffs had made allegations of sexual abuse of minors and some had even contacted Defendant IBLP directly, CLA did not contact or interview any of the Plaintiffs. (See Exhibit A at ¶ 14.) CLA even refused to return telephone calls from at least one victim who contacted the organization at its Ohio office, during the investigation.

28. Rather than providing the necessary oversight required of a board of directors, the IBLP's current Board of Directors allowed Bill Gothard to personally select the organization that investigated his sexual misconduct and that of other IBLP employees. (See Exhibit A at ¶ 13.)

29. The members of the IBLP Board were not selected for their independence and willingness to provide the oversight necessary for a multimillion-dollar organization. Rather, the current board members "were selected for their loyalty to the ministry and [Bill Gothard's] teaching." (See Exhibit A at ¶ 8.)

30. As a result of the internal investigation commissioned and paid for by the Defendant IBLP, Defendant IBLP, by its management and its Board of Directors (aka the current Control Group), concluded, without further independent inquiry and investigation into claims of sexual abuse, sexual harassment, and inappropriate touching occurring to

minors and adults, that no criminal or reportable conduct had occurred, and further announced on November 17, 2014 that:

At this point, based upon those willing to be interviewed, no criminal activity has been discovered. If it had been, it would have been reported to the proper authorities immediately, as it will be in the future if any such activity is revealed However, the review showed that Mr. Gothard has acted in an inappropriate manner, and the Board realizes the seriousness of his lack of discretion and failure to follow Christ's example of being blameless and above reproach.

31. IBLP, through its Board of Directors, intentionally publicly disclosed this false information from its sham CLA investigation despite their knowledge that such disclosure would result in severe emotional distress to the Plaintiffs and other victims, who suffered sexual abuse and harassment at the hands of Bill Gothard and other IBLP employees.

32. IBLP, through its Board of Directors, and Bill Gothard acted intentionally or knew that there was a high probability that their conduct would cause severe emotional distress.

33. Defendant IBLP's denouncement of the existence/truthfulness of the serious allegations of sexual abuse, sexual harassment, and inappropriate/unauthorized touching that occurred to certain interns, volunteers, employees, and participants of IBLP, including the Plaintiffs, effectively slandered and disavowed the damaged victims of that abuse, including the Plaintiffs.

34. Despite the IBLP's denials, even Defendant Bill Gothard himself acknowledges at least some degree of wrongdoing by stating: "I have encouraged the Board of IBLP to meet with legal counsel for the plaintiffs and to meet with these ladies and their lawyers. It is sad to me that these ladies are not being listened to by the Board of IBLP." (See Exhibit A at ¶ 18.) "I assume that the IBLP Board thought that the plaintiffs and their counsel were bluffing and that they would not sue. Obviously, that is not the case." (See Exhibit A at ¶ 21.) "The IBLP Board has responded to this lawsuit unwisely and not even

contacted me for information or assistance. The Board is handling the case unwisely as I have the information they need. This is a shameful waste of donors money.” (See Exhibit A at ¶ 23.)

35. Additionally, Bill Gothard has attempted to apologize for actions that he is willing to admit and deems inappropriate, in person and in writing, to the Plaintiffs and other victims. (See “Exhibit B.”)

36. Despite its public statement, cited above, the Defendant IBLP removed its former President (Gothard), and in its current status, the Defendant IBLP is no longer fulfilling its purpose as an organization and under the principles for which it purportedly exists. Rather, Defendant IBLP continues to exist by liquidating assets, which total over One Hundred Million Dollars and which were accumulated over decades. (See Exhibit A at ¶ 4, 16, & 17.)

37. Defendant IBLP has now announced plans to sell off its significant holdings in the State of Illinois, where the majority of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurred, and where the negligent and willful and wanton acts and omissions, including the cover-up thereof, occurred. Defendant IBLP has now also announced its intentions to relocate its headquarters to the State of Texas, in an attempt to flee the jurisdiction (State of Illinois) where this wrongful conduct occurred. (See Exhibit A at ¶ 17.)

38. The Plaintiffs, due to various mental, psychological and psychiatric conditions resulting from the sexual abuse, sexual harassment, and multiple/constant episodes of inappropriate/unauthorized touching which amounted to grooming, and pre-abuse and

post-abuse stalking by Defendant Bill Gothard, did not discover and/or were compelled to conceal the wrongdoing alleged herein until after 2014.

39. For these reasons, the Plaintiffs seek the imposition of a constructive trust on all of Defendant IBLP's assets, liquidated or unliquidated, during the pendency of this matter to ensure that the Plaintiffs' claims, as set forth in the following counts, will be properly compensated.

**COUNT I
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF GRETCHEN WILKINSON**

40. Plaintiff, GRETCHEN WILKINSON, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

41. Plaintiff, Gretchen Wilkinson, was a participant in IBLP programs and was later an employee of IBLP. This occurred between 1991 and 1993.

42. During this period of time, Ms. Wilkinson was a minor.

43. While Ms. Wilkinson was a minor and was present at IBLP headquarters in Hinsdale, Illinois, she was sexually molested by IBLP President, Bill Gothard.

44. Bill Gothard's molestation of Ms. Wilkinson most frequently occurred while Bill Gothard was counseling Ms. Wilkinson in his home office. The home was provided by IBLP. The counseling that Ms. Wilkinson was receiving was a regular part of Bill Gothard's duties as President of IBLP.

45. The molestation included Bill Gothard placing his hands on Ms. Wilkinson's breasts and on her thighs - up to her genitals, while she was clothed.

46. Because Ms. Wilkinson was a minor at the time this sexual abuse occurred, Bill Gothard's "sexual conduct" constitutes "childhood sexual abuse" under 735 ILCS 5/13-202.2, and is a criminal offense.

47. IBLP, through its employee Bill Gothard, was aware of this abuse and its failure to report this childhood sexual abuse, as required by 325 ILCS 5/4, is also a criminal offense.

48. Ms. Wilkinson published an account of her sexual abuse by Bill Gothard on a website titled Recovering Grace under the pseudonym "Charlotte." Due to this publication, Ms. Wilkinson's abuse was brought to the attention of the IBLP's current Board of Directors.

49. As a result of their knowledge of Ms. Wilkinson's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of Ms. Wilkinson and other IBLP victims in 2014.

50. Defendants Bill Gothard, and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to Ms. Wilkinson and the other IBLP victims.

51. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and from the psychological and emotional harm that results from sexual abuse. (See *Wisniewski v.*

Diocese of Belleville, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

52. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Wilkinson by failing to protect her from further and continuing psychological and emotional harm.

53. The conduct of the sham investigation and the dissemination of false information about Ms. Wilkinson's sexual abuse by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Wilkinson additional severe emotional distress, beyond that which was originally caused by Bill Gothard's childhood sexual abuse of Ms. Wilkinson. The IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Wilkinson's childhood sexual abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

54. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff, Gretchen Wilkinson, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

55. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized

touching, IBLP failed to report these allegations to law enforcement authorities or the Illinois Department of Children & Family Services and said wrongful conduct was allowed to continue;

- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies and the Illinois Department of Children & Family Services;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, GRETCHEN WILKINSON, demands judgment against Defendants IBLP and Bill Gothard, in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT II
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
GRETCHEN WILKINSON

56. Plaintiff, GRETCHEN WILKINSON, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

57. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Wilkinson and IBLP's other sexual abuse victims was extreme and outrageous.

58. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

59. The Defendant IBLP, through its directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse. In some cases, as in Ms. Wilkinson's case, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to the Control Group that this conduct would result in severe emotional distress to Ms. Wilkinson and to IBLP's other sexual abuse victims.

60. The conduct of the Defendants Bill Gothard, and IBLP actually caused Ms. Wilkinson severe emotional distress.

WHEREFORE, Plaintiff, GRETCHEN WILKINSON, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT III
WILLFUL & WANTON –AS TO PLAINTIFF GRETCHEN WILKINSON

61. Plaintiff, GRETCHEN WILKINSON, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

62. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Gretchen Wilkinson, in one or more of the following ways.

- a. Defendant Bill Gothard committed childhood sexual abuse against Ms. Wilkinson on numerous occasions between 1991 and 1992 in violation of 735 ILCS 5/13-202.2, a criminal offense;
- b. Defendant IBLP failed to report the childhood sexual abuse of Gretchen Wilkinson in violation of 325 ILCS 5/4, a criminal offense;
- c. When the IBLP became aware of Bill Gothard's childhood sexual abuse of Ms. Wilkinson and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Wilkinson and other IBLP sexual abuse victims; and
- e. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Gretchen Wilkinson, and the other IBLP sexual abuse victims.

63. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Gretchen Wilkinson, in one or more of the following ways.

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities or the Illinois Department of Children & Family Services and other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;

- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its agents and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

64. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of the Defendants Bill Gothard and the IBLP set forth in this Amended Complaint, Plaintiff, Gretchen Wilkinson, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, GRETCHEN WILKINSON, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT IV
CIVIL CONSPIRACY –AS TO PLAINTIFF GRETCHEN WILKINSON**

65. Plaintiff, GRETCHEN WILKINSON, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

66. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended

to inflict severe emotional distress to Plaintiff, Gretchen Wilkinson, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Wilkinson.

67. This conduct was tortious in nature.

68. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

69. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Gretchen Wilkinson, and the other IBLP sexual abuse victims.

70. These overt acts were done pursuant to the Defendants' common scheme.

71. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 15 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Gretchen Wilkinson, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, GRETCHEN WILKINSON, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT V
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JANE DOE**

72. Plaintiff, JANE DOE, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

73. Plaintiff JANE DOE's family became involved with IBLP in 1979 or 1980.

74. She attended IBLP conferences in approximately 1982, when she was approximately 12 or 13 years old, and continued attending IBLP conferences until 1988.

75. JANE DOE was a minor until 1988.

76. JANE DOE was adopted and was born with significant medical issues that continue to this day. These medical conditions are related to her biological mother's alcohol and drug use and medical neglect by her adoptive parents.

77. JANE DOE literally spent the first year of her life in a hospital. Because of this circumstance, her adoptive parents and grandparents signed a document stating that they would take care of her medical needs until she was 21 years of age.

78. JANE DOE was severely abused by her adoptive family. She was abused psychologically, physically, and sexually. As she states: "I was abused in every form and physically neglected." She was beaten severely. Her hair was yanked, she was hit in the face, and she was bruised. Her beatings left marks and scars. She was beaten so severely by her adoptive family that she would duck and flinch anytime someone came near.

79. JANE DOE was also sexually abused by her adoptive father, brother, and grandfather. The sexual abuse continued for years.

80. On several occasions – including when JANE DOE was 14, 15, and 16 years old, JANE DOE informed Bill Gothard of her physical, psychological, and sexual abuse. Bill Gothard’s response was to advise her to “let go of her bitterness,” to “let go of her rights,” and to “stop being rebellious.” Bill Gothard always made the abuse JANE DOE’s fault.

81. In approximately 1989, Bill Gothard performed a prayer over JANE DOE to “cast demons out” of her, because she confided in Bill Gothard about her abusive situation.

82. When she was approximately 15 years old, JANE DOE became aware of Bill Gothard’s teaching that adopted children should be “given back” to their biological parents or to the state. Bill Gothard taught that due to the “curse of the sins of the forefathers” adopted children were doomed to repeat the evils of their biological parents. Bill Gothard also taught that adoptive children tainted a family’s biological children. – Thus the reason they should be given back.

83. Bill Gothard attributed his teachings about adopted children to “demonic forces” that he claims affect these children. He taught that if adoptive children were not “returned,” they should at least be ordered to “earn their keep” in the family home. It was his teaching that they should be treated more like slaves than children.

84. As a result of Bill Gothard’s teachings, JANE DOE was kicked out of the home of her adoptive family and was disowned near the age of 19. Being disowned also meant that JANE DOE’s adoptive family refused to comply with their agreement to provide her medical care until she was 21 years old.

85. JANE DOE's health was seriously impacted by the decision of her adoptive family to disown her, as guided by Bill Gothard's teachings.

86. On the day she was told to leave her adoptive home, JANE DOE was struck by her adoptive mother over one hundred (100) times.

87. Near that time, JANE DOE returned to speak to Bill Gothard again about the abuse. She also expressed concern for her siblings, who she suspected were being abused, including her brother, who was being physically abused.

88. Despite the repeated reports of physical and sexual abuse over a period of years, Bill Gothard never took any action to report or stop the abuse of JANE DOE or the abuse that it was believed JANE DOE's sisters were suffering.

89. Rather, Bill Gothard's teachings taught that abuse was JANE DOE's fault, because she was adopted.

90. JANE DOE wrote the IBLP Board regarding the fact that she had reported her abuse to Bill Gothard, but the IBLP Board never took any steps to report the abuse to the authorities. JANE DOE has also documented her involvement with Bill Gothard and IBLP in numerous notebooks. After she reported the abuse to IBLP and Bill Gothard and with their complete lack of action or even support, JANE DOE was rendered psychologically unable to report either the actual abuse or the actions or omissions of IBLP or Gothard until 2014 she was able to be supported by other victims.

91. The failure of Bill Gothard and IBLP to report this physical, emotional, and childhood sexual abuse, as required by 325 ILCS 5/4, is a criminal offense.

92. As a result of their knowledge of JANE DOE's allegations and those of others like her, the Control Group (including the current Board of Directors, as listed in Paragraph 15

of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding JANE DOE's abuse and the abuse of other IBLP victims in 2014.

93. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to JANE DOE and the other IBLP victims.

94. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from physical, psychological, and sexual abuse and from the psychological and emotional harm that results from sexual abuse. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

95. Through their actions, Defendants Bill Gothard and IBLP breached their duty to JANE DOE by failing to protect her from further and continuing psychological and emotional harm.

96. The conduct of the sham investigation and the dissemination of false information about JANE DOE's abuse in 2014 by Defendants Bill Gothard and IBLP caused JANE DOE additional severe emotional distress, beyond that which was originally caused by JANE DOE's adoptive family. The IBLP, by its Control Group (including the Board of Directors), and its President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding JANE DOE's abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

97. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, JANE DOE has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

98. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to report physical, psychological, or sexual abuse;
- b. Despite Defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, and reports of physical, psychological, and sexual abuse among IBLP families, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of physical, psychological, and sexual abuse from scrutiny by law enforcement agencies and child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of physical, psychological, and sexual abuse;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT VI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE

99. Plaintiff, JANE DOE, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

100. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding JANE DOE and IBLP's other abuse victims was extreme and outrageous.

101. Bill Gothard's instructions to JANE DOE's family to abandon her, because she was adopted (as taught by IBLP and promoted by the Control Group) was extreme and outrageous.

102. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress by these actions.

103. The Defendant IBLP, through its Control Group and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of physical, psychological, and sexual abuse. In some cases, as in JANE DOE's case, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to the Control Group that this conduct would result in severe emotional distress to JANE DOE and to IBLP's other sexual victims.

104. The IBLP, through its Control Group and President, Bill Gothard, had knowledge of JANE DOE's abuse and IBLP's failure to report such abuse, because JANE DOE specifically wrote the Board on this subject.

105. The conduct of the Defendants Bill Gothard and IBLP actually caused JANE DOE severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT VII
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE**

106. Plaintiff, JANE DOE, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

107. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE, in one or more of the following ways:

- a. Defendant Bill Gothard and IBLP failed to report physical, psychological, and childhood sexual abuse against JANE DOE on numerous occasions between 1982 and 1988 in violation of 325 ILCS 5/4, a criminal offense;
- b. When the Control Group and IBLP became aware of JANE DOE's physical, psychological, and childhood sexual abuse and that of other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website, through JANE DOE's letter, and through other means, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- c. The Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, and IBLP approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE and other IBLP sexual abuse victims; and

- d. By these actions, Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York, each individually), along with Defendant Bill Gothard, and IBLP showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE, and the other IBLP sexual abuse victims.

108. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities or to child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior physical, psychological, and sexual abuse, of its program participants, and sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies or state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further failure to report physical, psychological or sexual abuse, or sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

109. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended

Complaint, Plaintiff, JANE DOE, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT VIII
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE**

110. Plaintiff, JANE DOE, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

111. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE.

112. This conduct was tortious in nature.

113. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

114. Defendant IBLP, through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of failure to report allegations of physical,

psychological, and sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JANE DOE, and the other IBLP sexual abuse victims.

115. These overt acts were done pursuant to the Defendants' common scheme.

116. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT IX
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE II**

117. Plaintiff, JANE DOE II, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

118. Plaintiff, JANE DOE II, was a participant in IBLP programs and was an IBLP volunteer. Her family joined ATI in 1991, when she was approximately four (4) years old. JANE DOE II's contact with IBLP continued until 2009, and her contact with Bill Gothard continued until 2008.

119. JANE DOE II experienced extreme physical, emotional, and sexual abuse within her home, along with her siblings. She was raped by her father and other relatives. She was also sold for sex by her father through sexual exploitation and human trafficking.

120. JANE DOE II reported this severe sexual abuse and human trafficking to IBLP staff, including Jenny Speed, as confirmed by internal IBLP emails.

121. Involvement with IBLP led to JANE DOE II spending months away from her home, volunteering at training centers, and attending IBLP conferences in various states. Because many of these conferences and activities were expensive, she received scholarships from either IBLP or Bill Gothard to attend these programs.

122. JANE DOE II was raped by Kenneth Copley, a counselor at the ATI Indianapolis Training center, in his counseling office in approximately 1994.

123. As part of his duties for IBLP, Kenneth Copley served as a counselor for JANE DOE II and other children at the Training Center.

124. At the time Kenneth Copley raped JANE DOE II, he was acting as a counselor for and was an employee of IBLP.

125. At different times over a period of years, JANE DOE II reported the rape to IBLP staff.

126. In January of 2014, Dr. Joann Roof, who worked at the Indianapolis Training Center at the time of the rape, but is now the Director and Dissociative Disorder Specialist with House Ephraim, wrote a letter on behalf of JANE DOE II confirming that she was confident that JANE DOE II was a victim of “severe prolonged sexual, and emotional abuse.” It was through this process and through the support of other victims of IBLP abuse that JANE DOE II was able to recall and report the prior abuse in 2013.

127. Kenneth Copley's daughter, Ruth Copley Burger, has also reported that she was sexually abused by her father, Kenneth Copley. Ruth Copley Burger is also now a plaintiff in this lawsuit.

128. On at least five occasions, JANE DOE II told Bill Gothard that she was being sexually abused by her father and that her younger siblings were also being abused. Bill Gothard took pleasure in the details presented and kept pressing JANE DOE II for more explicit details of the abuse that took place.

129. On one occasion, when JANE DOE II disclosed details about her abuse and the abuse of her siblings, Bill Gothard called JANE DOE II's father on a speakerphone and asked if the allegations were true. JANE DOE II's father denied the allegations. JANE DOE II was humiliated by this process. The last time JANE DOE II tried to disclose abuse, Bill Gothard personally threatened her. Bill Gothard taught that parents were to be believed over children and that children were to obey their parents no matter what, even if they were being sexually abused.

130. In addition to Bill Gothard, IBLP staff members Jenny and Paul Speed, Nathan Richie, and Rodger and Judy Gergeni were present for the phone call to JANE DOE II's father.

131. Shortly after the incident, where JANE DOE II's father was put on the speakerphone, Bill Gothard asked JANE DOE II to come to his office alone at night after curfew. After she came to his office, Bill Gothard took JANE DOE II to his private suite. In his private suite, Bill Gothard had sex with JANE DOE II in the bed that she had made earlier in the day, while working for Judy Gergeni in housekeeping.

132. When Bill Gothard took JANE DOE II to his private suite, he had her undress by his window, touched her breasts, and then had sexual intercourse with her.

133. This sexual intercourse was without JANE DOE II's consent. In fact, JANE DOE II would not have been capable of consent, given her mental state at the time.

134. When JANE DOE II was still a minor and was at the Indianapolis Training Center as a student, she experienced medical issues (passing out, paralysis on one side of her body, headaches, high blood pressure, and constant shaking) as a result of her history of sexual abuse.

135. Psychosomatic medical issues like these are common with survivors of human trafficking and severe sexual abuse.

136. Stephen Paine, an employee of IBLP at the Indianapolis Training Center (now an IBLP Director), examined JANE DOE II at the time. After examination, he told her that nothing was wrong medically, but that it would appear there was extreme stress present in her life. He left her a protein bar and suggested that she eat it.

137. The Directors, Rodger and Judy Gergeni, knew about the sexual abuse at the time JANE DOE II was examined by Stephen Paine. Stephen Paine worked under their leadership.

138. Kenneth Copley's sexual assault of JANE DOE II was a criminal offense.

139. Bill Gothard's sexual assault of JANE DOE II was criminal sexual abuse in violation of 720 ILCS 5/11-1.50, and was a criminal offense.

140. IBLP, through its employee, Bill Gothard, was aware of this abuse, and its failure to report JANE DOE II's abuse, as required by 325 ILCS 5/4, including the fact that she

was being trafficked for purposes of commercial sexual exploitation, is also a criminal offense.

141. In 2013, JANE DOE II sent an email to the IBLP Board to make them additionally aware of her abuse.

142. As a result of their knowledge of JANE DOE II's allegations and those of others like her, the Control Group (including those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, the Control Group, Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of JANE DOE II and other IBLP victims in 2014.

143. The Control Group, Bill Gothard, and IBLP intended or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE II and the other IBLP victims.

144. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and from the psychological and emotional harm that results from sexual abuse. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

145. Through their actions, Defendants Bill Gothard and IBLP breached their duty to JANE DOE II by failing to protect her from further and continuing psychological, emotional, and physical harm.

146. The conduct of the sham investigation and the dissemination of false information about JANE DOE II's sexual abuse by Kenneth Copley and Bill Gothard in 2014 by

IBLP, through the Control Group, and by Defendant Bill Gothard caused JANE DOE II additional severe emotional distress, beyond that which was originally caused by Kenneth Copley's and Bill Gothard's sexual abuse of JANE DOE II. The IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding JANE DOE II's sexual abuse by Kenneth Copley and Bill Gothard. (See Exhibit A at ¶ 9.)

147. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff JANE DOE II has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

148. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;

- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, JANE DOE II, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT X
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE II**

149. Plaintiff, JANE DOE II, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

150. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and publicly disseminating false information regarding JANE DOE II and IBLP's other sexual abuse victims was extreme and outrageous.

151. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

152. Defendant IBLP, through the Control Group and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse. In some cases, as in JANE DOE II's case, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these

Directors that this conduct would result in severe emotional distress to JANE DOE II and to IBLP's other sexual abuse victims.

153. The conduct of the IBLP, through the Control Group, and the conduct of Defendant Bill Gothard actually caused JANE DOE II severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE II, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XI
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE II**

154. Plaintiff, JANE DOE II, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

155. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE II, in one or more of the following ways:

- a. Defendant Bill Gothard committed criminal sexual abuse in violation of 720 ILCS 5/11-1.50 against JANE DOE II, a criminal offense;
- b. Kenneth Copley, an IBLP counselor and employee, committed sexual assault against JANE DOE II, while she was a minor;
- c. Defendant IBLP failed to report the childhood sexual abuse of JANE DOE II by her family, by Bill Gothard, or by Kenneth Copley in violation of 325 ILCS 5/4, a criminal offense;
- d. When IBLP became aware of the abuse of JANE DOE II by her family, by Kenneth Copley, and by Bill Gothard, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- e. IBLP, by its Control Group (including its Board of Directors then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York, each, individually - see Exhibit A at ¶ 9), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE II and other IBLP sexual abuse victims; and

- f. By these actions IBLP by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York, each individually) and Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff JANE DOE II and the other IBLP sexual abuse victims.

156. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE II, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and

Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

157. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, JANE DOE II, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE II, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XII
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE II**

158. Plaintiff, JANE DOE II, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

159. Defendant IBLP, by and through its agents and employees, and the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE II, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE II.

160. This conduct was tortious in nature.

161. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

162. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and

Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JANE DOE II, and the other IBLP sexual abuse victims.

163. These overt acts were done pursuant to the Defendants' common scheme.

164. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the members of the Board of Directors as listed in Paragraph 15, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE II, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE II, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XIII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF MELODY FEDORIW

165. Plaintiff, MELODY FEDORIW, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

166. Plaintiff, Melody Fedoriw, was an IBLP program participant, volunteer, and employee between 2011 and 2012. She first attended the IBLP Journey to the Heart program in 2011. She started working at headquarters in March 2012. Ms. Fedoriw

returned home for a three (3) week period during June of 2012, but then returned to IBLP headquarters until she finally left in October of 2012.

167. During the period from March 2012 to October 2012, Ms. Fedoriw was a minor; she was fifteen (15) years old.

168. While Ms. Fedoriw was a minor and was present at IBLP headquarters in Hinsdale, Illinois, she was sexually molested by IBLP President, Bill Gothard.

169. Bill Gothard would call Ms. Fedoriw into his office late at night for Bible study and to mentor her. During this time, Bill Gothard would always want to sit on the couch with Ms. Fedoriw. Bill Gothard and Ms. Fedoriw, a minor, were alone and unsupervised.

170. During the Bible study and mentoring process, Ms. Fedoriw reported the fact that she was being abused by a parent to Bill Gothard.

171. Bill Gothard then called Ms. Fedoriw's parents and disclosed the abuse information that she had disclosed in confidence to her abuser.

172. By the second instance of late night Bible study/mentoring, Bill Gothard was putting his arm around Ms. Fedoriw and pulling her closer to him.

173. Despite the fact that Ms. Fedoriw confronted Bill Gothard about his conduct, it continued.

174. Bill Gothard continued to touch Ms. Fedoriw in ways that made her uncomfortable, including rubbing her back and legs. While Bill Gothard was rubbing Ms. Fedoriw's legs, he would move his hands to her upper thigh. Bill Gothard was touching Ms. Fedoriw very close to her vaginal area, when he rubbed her upper thighs.

175. Ms. Fedoriw made a report to the Hinsdale Police Department, who investigated this matter in March of 2014.

176. Bill Gothard's conduct was classified as criminal – a misdemeanor - but was not prosecuted, because it was outside the statute of limitations.

177. IBLP, through its employee, Bill Gothard, was aware of this abuse, and its failure to report this sexual abuse, as required by 325 ILCS 5/4, is also a criminal offense.

178. Bill Gothard, IBLP, and the Control Group were aware of the report to the Hinsdale Police Department in 2014, because an associate of Bill Gothard's made an FOIA request for a copy of the police report that year.

179. As a result of their knowledge of Ms. Fedoriw's allegations and those of others like her, IBLP, through the Control Group (including the then current Board of Directors), and Defendant Bill Gothard undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, the current Control Group, Bill Gothard, and IBLP intentionally disclosed false information regarding the sexual abuse allegations of Ms. Fedoriw and other IBLP victims in 2014.

180. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct would cause severe emotional distress to Ms. Fedoriw and the other IBLP victims.

181. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and from the psychological and emotional harm that results from sexual abuse. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

182. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Fedoriw by failing to protect her from further and continuing psychological and

emotional harm. Furthermore, the unwanted and unauthorized sexually charged touchings by Defendant Bill Gothard, as an employee and agent of IBLP, constituted an assault and sexual abuse upon Ms. Fedoriw.

183. The conduct of the sham investigation and the dissemination of false information about Ms. Fedoriw's sexual abuse by Bill Gothard that was authorized and conducted in 2014 by Defendants Bill Gothard and IBLP caused Ms. Fedoriw additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual abuse of Ms. Fedoriw. IBLP, by its Control Group (including the Board of Directors) and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Fedoriw's sexual abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

184. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendants set forth in this Amended Complaint, Plaintiff, Melody Fedoriw, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

185. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois

Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;

- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, MELODY FEDORIW, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XIV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
MELODY FEDORIW**

186. Plaintiff, MELODY FEDORIW, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

187. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Fedoriw and IBLP's other sexual abuse victims was extreme and outrageous.

188. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

189. Defendant IBLP, through its Directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse. In some cases, as in Ms. Fedoriw's case, the allegations included sexual abuse of a minor. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Fedoriw and to IBLP's other sexual abuse victims.

190. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Fedoriw severe emotional distress.

WHEREFORE, Plaintiff, MELODY FEDORIW, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XV
WILLFUL & WANTON –AS TO PLAINTIFF MELODY FEDORIW

191. Plaintiff, MELODY FEDORIW, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

192. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Melody Fedoriw, in one or more of the following ways:

- a. Defendant Bill Gothard sexually abused Ms. Fedoriw on numerous occasions in 2012, a criminal offense;
- b. Defendant IBLP failed to report the sexual abuse of Ms. Fedoriw in violation of 325 ILCS 5/4, a criminal offense;

- c. When IBLP became aware of Bill Gothard's sexual abuse of Ms. Fedoriw and other IBLP sexual abuse victims as a result of their disclosure via the Recovering Grace website and through other means, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Fedoriw and other IBLP sexual abuse victims;
- e. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Melody Fedoriw, and the other IBLP sexual abuse victims.

193. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Melody Fedoriw, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and

- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

194. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Melody Fedoriw, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, MELODY FEDORIW, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XVI
CIVIL CONSPIRACY –AS TO PLAINTIFF MELODY FEDORIW**

195. Plaintiff, MELODY FEDORIW, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

196. Defendant IBLP, by and through its agents and employees, the Control Group (including John Stancil, Anthony Burrus, Timothy Levendusky, Gil Bates, Stephen Paine, and David York) and Defendant Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Melody Fedoriw, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Fedoriw.

197. This conduct was tortious in nature.

198. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

199. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Melody Fedoriw, and the other IBLP sexual abuse victims.

200. These overt acts were done pursuant to the Defendants' common scheme.

201. As a proximate result of the aforesaid civil conspiracy by and between various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 15, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Melody Fedoriw, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, MELODY FEDORIW, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XVII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF CHARIS BARKER

202. Plaintiff, CHARIS BARKER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

203. Plaintiff, Charis Barker, was involved with IBLP from 1986 to 2000. Her family initially enrolled in IBLP's ATI program, when she was six (6) years old.

204. At the age of 17, in 1997, she attended an IBLP counseling seminar. During the session, Bill Gothard repeatedly made eye contact with her. Immediately after the session, Gothard motioned for Ms. Barker and her sister to come speak to him.

205. When Ms. Barker and her sister approached Bill Gothard, he invited them to his office, where he told Ms. Barker how he had noticed her attentiveness and her smile. He wanted to know if she would be willing to work for him at his headquarters in Oak Brook, Illinois.

206. Ms. Barker advised that she would be interested, but would need to have her parent's permission.

207. At the age of 18, in 1999, Ms. Barker left home to work as a volunteer at IBLP headquarters, while she was considering whether she was willing to make the one-year commitment that was necessary for paid employment.

208. During her six-month term as a volunteer, Ms. Barker was singled out for attention by Bill Gothard on a regular basis at various functions. She was also regularly sexually harassed by Bill Gothard.

209. At the mandatory staff lunches, Bill Gothard would often invite Ms. Barker to sit across the table from him. On these occasions, Gothard would touch her feet with his feet and would play “footsie” under the table.

210. When her six months of volunteering were over, Charis Barker signed up for another year and became a paid employee.

211. At lunch, at times in his office, while riding in his van, while sitting on his couch, wherever possible, Gothard’s feet would touch Ms. Barker’s feet, whenever he had opportunity.

212. Gothard’s sexual harassment of Ms. Barker got to the point that the only way she was able to prevent Gothard from touching her feet, while riding in his van, was for Ms. Barker to sit on her feet.

213. Whenever she sat on the couch in his office, he would sit very close to her and put his hands on her knee.

214. During church he would lay his head on her shoulder and he would at least pretend to fall asleep.

215. As this behavior continued, Ms. Barker grew more and more uncomfortable.

216. Bill Gothard also sexually harassed Ms. Barker by exposing himself to her. He would intentionally sit with his legs spread wide open on several occasions, while they were talking.

217. Ms. Barker called her parents and notified them of Gothard’s behavior, but they assured her that Bill Gothard would never inappropriately touch anyone.

218. Shortly afterward, on a trip to Northwoods Conference Center, Gothard again began touching Ms. Barker’s feet.

219. Although she was invited on other trips, including a trip to Russia, Ms. Barker declined, because she was uncomfortable with Gothard's behavior. For the entire 18 months that she was at headquarters, Bill Gothard continued to touch her in sexual ways that were unwelcome.

220. Ms. Barker began to doubt IBLP's character, due to Gothard's conduct and their illegal employment practices, which included directing employees not to turn in overtime hours for any work completed at conferences.

221. Although she was very uncomfortable with Bill Gothard's behavior, it was very important that Ms. Barker complete her year of employment with IBLP, because her parents had advised her that if she were sent home from headquarters, she should consider herself kicked out of their home, as well.

222. For all of the above reasons, including Gothard's sexual harassment, Charis Barker returned home, when her year of employment with IBLP was completed.

223. Ms. Barker published an account of her sexual harassment by Bill Gothard on a website titled Recovering Grace under the pseudonym "Grace." Due to this publication, Ms. Barker's harassment came to the attention of the Control Group, and IBLP.

224. As a result of their knowledge of Ms. Barker's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Bill Gothard, and IBLP intentionally published a statement in 2014 containing false information from the sham investigation regarding the sexual harassment allegations of Ms. Barker and other IBLP victims.

225. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to Ms. Barker and the other IBLP victims.

226. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual harassment and from the psychological and emotional harm that results from sexual harassment and abuse. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

227. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Barker by failing to protect her from further and continuing psychological and emotional harm.

228. The conduct of the sham investigation and the dissemination of false information about Ms. Barker's sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Barker additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual harassment of Ms. Barker. The IBLP Board of Directors and President, and thus, IBLP, as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Barker's sexual harassment by Bill Gothard. (See Exhibit A at ¶ 9.)

229. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff, Charis Barker, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

230. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, CHARIS BARKER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
CHARIS BARKER

231. Plaintiff, CHARIS BARKER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

232. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false information from the sham investigation regarding Ms. Barker and IBLP's other sexual abuse victims public was extreme and outrageous.

233. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

234. Defendant IBLP, through its Control Group and President, Bill Gothard, all knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Barker and to IBLP's other sexual abuse victims.

235. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Barker severe emotional distress.

WHEREFORE, Plaintiff, CHARIS BARKER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XIX
WILLFUL & WANTON – AS TO PLAINTIFF CHARIS BARKER

236. Plaintiff, CHARIS BARKER, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

237. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Charis Barker, in one or more of the following ways:

- a. Defendant Bill Gothard committed sexual harassment against Ms. Barker for the entire eighteen (18) month period that she was at IBLP headquarters, from 1999 to 2000;
- b. When IBLP became aware of Bill Gothard's sexual harassment of Ms. Barker and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- c. Defendant IBLP by the Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Barker and other IBLP sexual harassment, and abuse victims; and
- d. By these actions, IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York, each individually), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Charis Barker, and the other IBLP sexual abuse victims.

238. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Charis Barker, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;

- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

239. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Charis Barker, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, CHARIS BARKER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XX
CIVIL CONSPIRACY –AS TO PLAINTIFF CHARIS BARKER**

240. Plaintiff, CHARIS BARKER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

241. Defendant IBLP, by and through its agents and employees, the Control Group (including John Stancil, Anthony Burrus, Timothy Levendusky, Gil Bates, Stephen Paine,

and David York), and Defendant Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Charis Barker, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Barker.

242. This conduct was tortious in nature.

243. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the sham investigation. (See Exhibit A at ¶ 9.)

244. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Charis Barker, and the other IBLP sexual abuse victims.

245. These overt acts were done pursuant to the Defendants' common scheme.

246. As a proximate result of the aforesaid civil conspiracy by the various members of the Control Group (as listed in Paragraph 15, above), and Defendant Bill Gothard, as well

as other unknown co-conspirators, Plaintiff, Charis Barker, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, CHARIS BARKER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXI
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF RACHEL FROST**

247. Plaintiff, RACHEL FROST, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

248. Ms. Frost was present at IBLP headquarters, where most of the sexual harassment occurred, as a volunteer and employee for periods of time between 1992 and 1995.

249. Ms. Frost was a minor until October 1994.

250. While Ms. Frost was a minor and was present at IBLP headquarters in Hinsdale, Illinois, she was sexually harassed by IBLP President, Bill Gothard.

251. Ms. Frost's first personal contact with Bill Gothard occurred in 1992 at the final session of the Knoxville ATI conference.

252. When Gothard noticed her beneath the stage, he asked her name and how long her family had been in ATI.

253. Gothard's very next question was whether she was committed to courtship. Gothard then gave her an obvious "once over."

254. Almost immediately, Gothard asked her: "Have you ever considered coming to headquarters?" Ms. Frost advised him that she was only fifteen (15) years old and was too

young to work at IBLP. Gothard responded by directing her to write a letter about herself and what she had learned that week at the conference. He further directed her to give it to him before she left that day. Ms. Frost immediately wrote the letter.

255. After the final session, Ms. Frost was instructed by a security guard to hand the letter directly to Bill Gothard on stage. When she did so, Gothard responded by holding her hand as he said a long, drawn-out “God Bless you,” while he looked deep into her eyes. Overcome with gratitude, fifteen (15) year old Ms. Frost spontaneously hugged Gothard in front of hundreds of people. Gothard immediately stiffened like a board and drew back. Ms. Frost was horrified that she might have acted inappropriately.

256. Ms. Frost had barely arrived home from the conference, when Gothard called to say that her letter had touched him deeply and that he wanted her to come to headquarters as soon as possible. Gothard offered to pay for Ms. Frost’s plane ticket to Chicago.

257. As soon as Ms. Frost arrived at headquarters, Gothard called the apartment where she was staying and said that he wanted to see her in his office right away. Upon arrival in his office, Gothard welcomed her warmly and told her that he looked forward to getting to know her, and that his door was always open to her. At that point, Gothard pulled some cash out of his desk drawer and gave it to her to get whatever she needed.

258. On occasion, Gothard would ask Ms. Frost very probing questions about possible sins that she had committed and of which she needed to repent. There were few that she could think of, except for some rock songs that she liked and came to believe were ungodly. Gothard knelt with her in prayer beside his couch to help her confess her sins to God. While praying – for the first time – Gothard held her hand. As they prayed, she cried.

259. Gothard told Ms. Frost that he wanted to keep her close to him, so she started her work at headquarters as one of his personal assistants (secretaries). However, at the age of fifteen (15), she had poor secretarial skills and no understanding of how the organization ran or who was important. After a week in his office, Ms. Frost was moved to the ATI Department.

260. Gothard continued their contact by making a point to connect with Ms. Frost at either the morning staff meeting or at lunch almost every day. He would invite her to sit across from him at the head of the table.

261. On one of these occasions, while sitting across from Gothard at the head of the table, Ms. Frost felt Gothard's foot nudge hers. She instinctively pulled back and said: "Sorry." When she looked up, Gothard was smiling, not at all apologetic.

262. This same activity occurred several more times in the following days. He would put his foot against Ms. Frost's foot and nudge her slowly, or he would try to cross ankles with hers. On one occasion, she felt his socked foot against her leg and he started to explore up the back of her calf.

263. From that point forward, Ms. Frost kept her feet swung back under her chair to prevent Gothard from playing "footsie" again.

264. Gothard prevented any young men of Ms. Frost's age from having any sort of relationship with her. One young man who was seventeen (17) years old was sent home, simply because he talked with Ms. Frost a few times and had mildly flirted with her. Gothard wanted to keep Ms. Frost for himself.

265. Gothard advised Ms. Frost that she had a special place in his heart and advised her that he wanted her to remain at headquarters indefinitely.

266. Due to some family issues at home, Ms. Frost temporarily left headquarters after her initial three-week stay.

267. After a few weeks, Ms. Frost received an invitation from a group at headquarters and a personal phone call from Gothard inviting her on a trip to Australia and then to return to headquarters permanently. Because her family could not afford the trip, Gothard agreed that he or IBLP would pay whatever part of the cost her family could not raise.

268. After the Australia trip, Ms. Frost's parents permitted her to remain at headquarters two more months, but then insisted that she return home to take the GED test.

269. Following completion of the GED test, Ms. Frost returned to headquarters "indefinitely," and worked mainly in the Basic CARE Department.

270. Her work in the Basic CARE Department caused Ms. Frost to spend time in the copy room, which placed her within eyesight of Gothard, when he was at his desk. When she was in the copy room, Gothard would sometimes come in and close the door (or sometimes leave it open) and stroke Ms. Frost's back or arm, while she was using the copy machine. At times, he would give her a side hug, or hold her hand, or lean into her, all while praising her and telling Ms. Frost that she was "such an encouragement to [him]," that she was an "energy giver," or a "great example to the other girls."

271. This conduct caused Ms. Frost to feel very tense and it caused her to feel tight in her chest, whenever she saw Gothard coming over to her in the copy room. This was in part due to the fact that the copy room was a small intimate area. Ms. Frost would feel relief and find that it was easier to breath, when Gothard wasn't there. In these instances, she would try to complete her copy work as quickly as possible, in order to be done before Gothard returned.

272. During this time, Ms. Frost was sexually harassed in Gothard's van during trips to the Indianapolis Training Center. Ms. Frost was regularly invited on these trips, because her brother was at the Indianapolis Training Center. During these trips, Gothard would always sit with his legs as wide as possible so his thighs or knees touched Ms. Frost's. Frequently, Gothard's wandering foot would try to make contact with Ms. Frost's foot or he would let his hand or a few fingers rest on Ms. Frost's leg.

273. After Ms. Frost had returned to IBLP headquarters in the fall of 1994, on a road trip to the Northwoods Conference Center, Ms. Frost was sitting directly in front of Gothard, while a male assistant drove. After a few hours of driving, Gothard suddenly leaned forward and roughly grabbed almost all of her hair close to the nape of her neck in his fist and whispered through clenched teeth, "I love your hair."

274. As a result of the special treatment and physical attention that she received from Gothard, Ms. Frost was referred to as Gothard's "pet," his "type," his "favorite", or a "Gothard girl." The sexual harassment, and special attention were no secret. Gothard's conduct was common knowledge to the IBLP staff.

275. As Ms. Frost became more uncomfortable with Gothard's conduct, she advised her parents – over the phone – that Gothard's conduct made her uncomfortable.

276. Because she was uncomfortable with Gothard's sexual harassment, Ms. Frost began to find excuses to avoid staff meetings and road trips. She avoided eye contact with Gothard and tried to duck out of staff gatherings, where he could talk to her.

277. In 1992, when an opportunity became available to work for a prominent ATI family as a nanny, Ms. Frost accepted the opportunity. Gothard, although approving of

Ms. Frost's decision, advised Ms. Frost that he fully expected her to return after her one-year commitment.

278. Ms. Frost was at IBLP headquarters at approximately the same time as Rachel Lees, another sexual harassment victim of Gothard's. Ms. Frost's and Ms. Lees' experiences are very similar.

279. After this time, Ms. Frost only had limited contact with IBLP as an TESL instructor.

280. Ms. Frost published an account of her sexual harassment by Gothard on the Recovering Grace website in February 2014 using her real first name, "Rachel." Due to this publication, Ms. Frost's abuse was brought to the attention of the Control Group, including IBLP's current Board of Directors.

281. As a result of their knowledge of Ms. Frost's allegations and those of others like her, the current (not former directors or directors from another time period) Board of Directors (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Bill Gothard and IBLP intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Frost and other IBLP victims in 2014.

282. Defendants Bill Gothard and IBLP intended or knew that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to Ms. Frost and the other IBLP victims.

283. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse, sexual harassment, and from the psychological and emotional harm that results from sexual abuse and harassment. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

284. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Frost by failing to protect her from further and continuing psychological and emotional harm.

285. The conduct of the sham investigation and the dissemination of false information about Ms. Frost's sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Frost additional severe emotional distress, beyond that which was originally caused by Bill Gothard's childhood sexual harassment of Ms. Frost. IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Frost's childhood sexual harassment by Bill Gothard. (See Exhibit A at ¶ 9.)

286. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff, Rachel Frost, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

287. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and

inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;

- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, RACHEL FROST, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
RACHEL FROST**

288. Plaintiff, RACHEL FROST, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

289. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Frost and IBLP's other sexual abuse and sexual harassment victims was extreme and outrageous.

290. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

291. Defendant IBLP, through its Control Group and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, as in Ms. Frost's case, the allegations included sexual harassment of minors. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Frost and to IBLP's other sexual abuse and sexual harassment victims.

292. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Frost severe emotional distress.

WHEREFORE, Plaintiff, RACHEL FROST, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XXIII
WILLFUL & WANTON –AS TO PLAINTIFF RACHEL FROST

293. Plaintiff, RACHEL FROST, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

294. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Frost, in one or more of the following ways:

- a. Defendant Bill Gothard committed sexual harassment against Ms. Frost, a minor, on numerous occasions between 1992 and 1994;
- b. Gothard continued to commit sexual harassment against Ms. Frost, when she was an adult after October of 1994;
- c. Defendant IBLP failed to report the childhood sexual harassment of Ms. Frost in violation of 325 ILCS 5/4, a criminal offense;
- d. When Defendant IBLP became aware of Bill Gothard's sexual harassment of Ms. Frost and other IBLP sexual abuse victims as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- e. The Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Frost and other IBLP sexual abuse and harassment victims;
- f. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Frost, and the other IBLP sexual abuse victims.

295. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Frost, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;

- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

296. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Rachel Frost, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RACHEL FROST, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXIV
CIVIL CONSPIRACY –AS TO PLAINTIFF RACHEL FROST**

297. Plaintiff, RACHEL FROST, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

298. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board Members, listed in Paragraph 15, above), and Defendant

Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Rachel Frost, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Frost.

299. This conduct was tortious in nature.

300. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

301. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Rachel Frost, and the other IBLP sexual abuse and sexual harassment victims.

302. These overt acts were done pursuant to the Defendants' common scheme.

303. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including members of the then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown

co-conspirators, Plaintiff, Rachel Frost, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RACHEL FROST, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXV
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF RACHEL LEES**

304. Plaintiff, RACHEL LEES, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

305. Rachel Lees was a participant in IBLP's ATI program for more than ten years. From 1992 to 1993, Ms. Lees was Bill Gothard's personal secretary at IBLP headquarters. She was twenty years old at the time she went to work at headquarters.

306. While Ms. Lees was working at IBLP headquarters in Hinsdale, Illinois, she was sexually harassed by IBLP President, Bill Gothard.

307. Ms. Lees' first personal contact with Gothard occurred in 1992, at a seminar in Auckland, New Zealand. She was nineteen or twenty years old at the time. He immediately asked her to come visit IBLP headquarters. Once Ms. Lees arrived at headquarters, Gothard asked her to work directly for him.

308. Shortly after Ms. Lees arrived at headquarters, Gothard had her come to his office. He wanted to make sure that she had everything she needed, and asked whether there was anything that he could get for her. Ms. Lees responded: "I am running out of money. I need a few winter things." Gothard leaned down and opened a desk draw and pulled out

cash. He handed her the bills and said: "Here go take this and go and get whatever you need." He advised her that if she needed more, she should just come back and ask.

309. On occasion, Gothard would ask Ms. Lees very probing questions. For example, on one occasion, while they sat on the couch in his office, he held her hand and said: "Can I ask you a personal question?" About a former boyfriend he asked: "Were you ever intimate with this boy? . . . I mean, were you ever intimate physically?" Wanting more details, Gothard pressed further and asked: "I mean . . . did you fail morally with him?"

310. At another "counseling session" on the couch in his office, Gothard held Ms. Lees' hands in his and said: "If you and I are to be one in spirit, we need to be open with each other." He said that he did not want her to be distracted by old relationships while she was there. He instructed her to cut all ties with her former boyfriend. This "counseling session" began when Gothard noticed that she was writing a letter to the former boyfriend.

311. One day, Ms. Lees was approached by another IBLP employee who had been at headquarters longer. The other employee asked whether Ms. Lees had been a secretary before. Ms. Lees said "no," this was her first job as a secretary. This conversation caused her to wonder why Gothard would have chosen her as his secretary. She asked Gothard. His response was that if he had wanted other girls at headquarters to be his secretary, he would have asked them. He said that he needed someone "special" to be his secretary.

312. Approximately six to eight weeks after Ms. Lees began working for Gothard, she noticed that he found reasons to touch her. The touching consisted of sitting so close to her that they were touching. He would sit close, so that his arm or hand would brush against hers. It progressed from there to other physical contact, which made Ms. Lees

uncomfortable. The other physical contact included lingering hugs and holding hands.

Gothard also began to find reasons to be alone with Ms. Lees.

313. Gothard told Ms. Lees that it was fun. He liked being with her, “just you and me.”

314. On one occasion at a hotel in Dallas, Gothard called Ms. Lees – alone – to his hotel suite late at night. Despite her concern for his reputation, Ms. Lees followed his directions and went to his room alone. While she was alone, sitting on the sofa, Gothard patted her hand briefly and then slipped his arm around the back of her neck, pulling her close to him. They sat like this for a long time. As she went to leave, he reached out for her and embraced her.

315. During the Dallas trip, Gothard told Ms. Lees that she was the best secretary that he had ever had. He went on to say: “You will always have my loyalty. You will always have my friendship. Nothing will change that.”

316. One Sunday, alone in his office, he held her in a close embrace and spoke softly into Ms. Lees’ ear: “You are my jewel. . . my gem” . . . “You are my energy-giver.”

317. On a long drive to Detroit, Ms. Lees felt Gothard put his hands on hers. Later, she felt his foot brush up against her leg. When she first felt his foot run up the back of her leg, she was startled. He locked his leg under hers, and she felt his foot rubbing against hers. He was playing “footsie” with her. But Ms. Lees describes Gothard’s actions as more intimate than that. His foot stroked the back of her leg, played with her toes, explored her leg all the way up her calf muscle and back down over and over again, while he was gripping her hand in between them. When Ms. Lees lifted her hand to intentionally break his hold, Gothard pulled her hand over his thigh. When she resisted, he held her hand tight and rested it on his thigh, covering her hand with his. He patted her

hand, massaged it, rubbed her fingers with his thumb, running his thumb slowly up and down between her fingers, over and over. Gothard would frequently hold hands with Ms. Lees during travel.

318. Gothard's emotional and physical attraction to Ms. Lees was no secret at IBLP. On one occasion, the wife of an IBLP Board member approached Ms. Lees and told her that people had expressed concerns about "the attachment between you and [Gothard]." "People are starting to notice that he is paying you special attention."

319. In 2013, Ms. Lees learned that Bill Gothard had actually sought the permission of the IBLP Board to marry her. She also learned that the IBLP Board had refused Gothard permission to marry Ms. Lees, and that the IBLP Board had actually placed a restriction on Gothard. He was not to have female personal assistants. Despite the Board's knowledge of the problems with Ms. Lees' case, the IBLP Board never enforced this regulation to prevent Bill Gothard from abusing more IBLP participants, interns, volunteers, and employees.

320. When Ms. Lees learned the fact that Gothard had actually sought the IBLP Board's permission to marry her, she was so shocked and suffered such emotional distress that she sought professional counseling. She realized that Gothard was a predator who had been grooming her.

321. On another occasion, one of Gothard's sisters approached Ms. Lees and asked her: "Do you want to marry my brother?" This occurred just after the trip to Dallas, shortly after a staff meeting ended and IBLP staff members were standing around. The sister continued: "You can go back home, the sooner, the better. I wish you had never come here." "I just want you to know that his family will not approve. You are just a . . . just a

girl.” Gothard’s physical and emotional attraction to Ms. Lees was common knowledge among the IBLP staff.

322. At about this time, Ms. Lees noticed that something had changed. Gothard was now becoming more affectionate and more physical with her. For example, he would rub her shoulders.

323. Gothard’s control began to extend to Ms. Lees’ body. He noticed that she had two skin tags on her neck, each about the size of a grain of rice. Gothard called them a distraction and wanted them removed. He arranged for his doctor to remove the skin tags to make Ms. Lees’ appearance more acceptable to him. Ms. Lees began to think that he was now taking control of her body, as well as her thoughts.

324. Ms. Lees ultimately departed IBLP headquarters in 1993, due to immigration issues.

325. Ms. Lees was at IBLP headquarters at approximately the same time as Rachel Frost, another sexual harassment victim of Gothard’s. Ms. Lees and Ms. Frost’s experiences are very similar.

326. Ms. Lees published an account of her sexual harassment by Gothard on the Recovering Grace website using the pseudonym “Meg.” Meg was Gothard’s nickname for Ms. Lees. It stood for “My/Major Energy Giver.” Due to this publication, Ms. Lees sexual harassment was brought to the attention of the IBLP’s Control Group, including its current Board of Directors.

327. As a result of their knowledge of Ms. Lees’ allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 15 of this Amended Complaint, above), Bill

Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Lees and other IBLP victims in 2014.

328. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touch would cause severe emotional distress to Ms. Lees and the other IBLP victims.

329. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse, sexual harassment, and from the psychological and emotional harm that results from sexual abuse and harassment. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

330. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Lees by failing to protect her from further and continuing psychological and emotional harm.

331. The conduct of the sham investigation and the dissemination of false information about Ms. Lees' sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Lees additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual harassment of Ms. Lees. The IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Lees' sexual harassment by Bill Gothard. (See Exhibit A at ¶ 9.)

332. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff, Rachel Lees, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

333. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite Defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, RACHEL LEES, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXVI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
RACHEL LEES**

334. Plaintiff, RACHEL LEES, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

335. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Lees and IBLP's other sexual abuse and sexual harassment victims was extreme and outrageous.

336. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

337. Defendant IBLP, through its Directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, the allegations included sexual abuse of minors. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Lees and to IBLP's other sexual abuse and sexual harassment victims.

338. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Lees severe emotional distress.

WHEREFORE, Plaintiff, RACHEL LEES, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXVII
WILLFUL & WANTON –AS TO PLAINTIFF RACHEL LEES**

339. Plaintiff, RACHEL LEES, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

340. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Lees, in one or more of the following ways:

- a. Defendant Bill Gothard committed sexual harassment against Ms. Lees, on numerous occasions between 1992 and 1993. His harassment continued – when he visited New Zealand – until 1995;
- b. When IBLP became aware of Bill Gothard’s sexual harassment of Ms. Lees and other IBLP sexual abuse and harassment victims, as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- c. Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Lees and other IBLP sexual abuse and harassment victims; and
- d. By these actions, IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York, each, individually), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Lees, and the other IBLP sexual abuse victims.

341. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Lees, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, and other relevant child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

342. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Rachel Lees, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RACHEL LEES, demands judgment against Defendant Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXVIII
CIVIL CONSPIRACY –AS TO PLAINTIFF RACHEL LEES**

343. Plaintiff, RACHEL LEES, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

344. Defendant IBLP, by and through its agents and employees, the Control Group (including its current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Rachel Lees, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Lees.

345. This conduct was tortious in nature.

346. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

347. Defendant IBLP, by and through its agents and employees, the Control Group (including the then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress,

and/or willful and wanton conduct against Plaintiff, Rachel Lees, and the other IBLP sexual abuse and sexual harassment victims.

348. These overt acts were done pursuant to the Defendants' common scheme.

349. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Rachel Lees, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RACHEL LEES, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXIX
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JANE DOE III**

350. Plaintiff, JANE DOE III, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

351. Plaintiff, JANE DOE III, was an IBLP ATI program participant from 2003 to 2012.

352. From 2006 to 2011, Bill Gothard pursued JANE DOE III. He first approached her in 2006, during a health conference. After inviting her and her mother to sit at his table during dinner, he asked her to quit home school and to join their missions team, Great Expeditions, as soon as she turned 14. However, a medical condition prevented JANE DOE III from joining Great Expeditions at that time. Gothard continued to pursue JANE DOE III to come to headquarters every year thereafter, during the annual home school

conferences, until she finally consented at age 18. Gothard frequently used the stress in JANE DOE III's home as a reason that she should come to headquarters.

353. In 2011, at the age of 18, Bill Gothard aggressively pursued JANE DOE III at a conference in Indianapolis. At 11:00 PM one night, he called JANE DOE III's father to ask permission for her "to come to headquarters for 3-4 weeks" to "learn how to respect him."

354. Gothard did not want JANE DOE III to work. He just wanted her to come counsel with him personally to learn how to deal with the stress of her strained relationship with her father.

355. When JANE DOE III and her mother agreed to go to headquarters for two weeks, Gothard wanted JANE DOE III to immediately drive with him in his van to headquarters. JANE DOE III's mother was not invited. Despite the fact that JANE DOE III was scheduled to attend a music conference in Indianapolis that week, Gothard protested and said that she did not need to attend the conference. Despite Gothard's insistence and various other maneuvers, JANE DOE III's mother made arrangements to take JANE DOE III to headquarters one week later.

356. When JANE DOE III arrived at headquarters, Gothard announced: "the day I have been waiting for for six years - you are finally here."

357. Gothard then informed JANE DOE III, that her "[f]ather has lost his authority over [her], because of his behavior. We are your family now." He made an analogy to Jesus on the cross telling John to care for Mary, his mother.

358. Over the next several days, it was clear that Gothard had no intention of counseling JANE DOE III. Rather, he worked to convince her not to go back home. He attempted to

have her turn against her mother and to stay at headquarters with him. At one point, Gothard had her go with him to the copy machine, so he could speak with her privately. He asked: "Are you sure that you really want your mom here?" "Do you love your mom?" "Are you sure that she is not abusive like your dad?"

359. JANE DOE III advised Gothard that her mother was her best friend and that she was not leaving her.

360. At one point, Bill Gothard's sister, Laura, advised Gothard: "If you want [JANE DOE III], you have to take her mother also." Gothard then asked JANE DOE III's mother: "Have you ever considered divorce or separation?" Gothard then suggested that JANE DOE III's mother not return home. Rather, he offered to put her to work in the kitchens and to give JANE DOE III and her mother a permanent place to live at headquarters.

361. Gothard would hold JANE DOE III's hand, touch her hair, caress her, wink at her, whisper in her ear, kick her feet under the table, place his shoes on top of hers when sitting on the couch, and be very flirtatious with her. Frequently, he would press his thigh against hers while sitting together, place his arm along the top / back of the sofa or her chair. He would compliment her hair, smile and laugh several times per day. He directed her never to cut her hair. He would say to her: "[JANE DOE III] come over here." "You belong here. Perfect Angel. Beautiful. Amazing." He said to her: "I love you, you know that, right?" "Maybe your dad doesn't love you, but I do." "God has put a special love in my heart to you." "You are my energy giver." "I love being around you." She felt that other people knew that she was one of "Gothard's pets." This made her uncomfortable and she would shake her head and with a stern look would frown and correct Gothard and tell him:

“No, I’m not perfect.” Despite JANE DOE III’s clear disapproval, the unwelcomed compliments kept coming. Gothard would also expose himself to JANE DOE III by sitting with his legs wide open, which would make her feel very uncomfortable.

362. Although JANE DOE III did not need any clothes, Gothard made his credit card available to JANE DOE III to have her buy new clothes. JANE DOE III asked his female assistant what was wrong with her clothes. The assistant advised JANE DOE III that Gothard was unhappy that all of her dresses were ankle length, and she said that her skirts had to be calf length rather than ankle length.

363. JANE DOE III was on antibiotics for a medical condition, but Gothard told her that he wanted her to stop taking her medication. Instead, he bought some non-prescription health treatments that she did not want. Because of her medical condition, JANE DOE III was on a special diet. Gothard attempted to bribe her into staying at headquarters by telling her she could eat anything that she wanted while she was at headquarters.

364. After ten days, JANE DOE III and her mother decided to leave. After Gothard tried another failed attempt to convince JANE DOE III’s mother to separate from / divorce her husband, Gothard attempted to have JANE DOE III stay by trying to get her to say that her mother was abusing her. Gothard asked: “How old are you again?” When JANE DOE III said: “18,” Gothard replied: “Well, if you were 17 we wouldn’t even be having this conversation, because I would call up DFS immediately and tell them you are being abused and have you taken away from home. After all, emotional stress is just as bad as physical abuse.”

365. When they decided to leave, Gothard called at midnight to ask JANE DOE III and her mother to come by his office to say “goodbye.” At one point, while they were saying goodbye, Gothard held her hand like a boyfriend saying goodbye.

366. After this ten day barrage of sexual harassment, JANE DOE III wrote comments on the Recovering Grace website in 2012 indicating that she had also been sexually harassed by Gothard. In January of 2012, Gothard attempted to convince JANE DOE III to come to work for him in a medical program teaching about the “7 stresses.”

367. Bill Gothard saw the posts and called her to tell her: “You are a liar. You are worse than a liar” He also alleged that JANE DOE III “was trying to viciously destroy his life’s work and his entire organization.” JANE DOE III suffered severe emotional distress as a result of Bill Gothard’s verbal assault.

368. Both JANE DOE III and her mother had posted comments to the Recovering Grace website. Due to Gothard’s verbal assault, JANE DOE III attempted to have the posts taken down. When they were not immediately taken down, Gothard contacted JANE DOE III again by telephone and verbally assaulted her again. After being relentlessly assaulted by telephone for three weeks, JANE DOE III had the posts removed from the Recovering Grace website.

369. In 2014, JANE DOE III called IBLP headquarters in an attempt to contact the IBLP Board of Directors regarding Gothard’s sexual harassment of her. Headquarters put her in contact with Bill Gothard’s sister, who refused to place her in contact with any of IBLP’s Directors.

370. JANE DOE III was ultimately able to speak with Chris Hogan, Director of ATI. She told Chris Hogan her whole story. He took down her information and advised that CLA would contact her.

371. When JANE DOE III did not hear from CLA, she called CLA herself. She left a telephone message explaining who she was and that Chris Hogan was supposed to have told them about her, and that she would like to share her story with them. JANE DOE III never received a return call from CLA.

372. As a result of their knowledge of JANE DOE III's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP intentionally disclosed false information from the sham investigation regarding the sexual harassment of JANE DOE III and other IBLP victims in 2014.

373. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to JANE DOE III and the other IBLP victims.

374. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and harassment and from the psychological and emotional harm that results from sexual abuse and harassment. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

375. Through their actions, Defendants Bill Gothard and IBLP breached their duty to JANE DOE III by failing to protect her from further and continuing psychological and emotional harm.

376. The conduct of the sham investigation and the dissemination of information from the sham investigation about JANE DOE III's sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused JANE DOE III additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual harassment and verbal abuse of JANE DOE III. IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of information from the sham investigation regarding JANE DOE III's sexual harassment by Bill Gothard. (See Exhibit A at ¶ 9.)

377. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendants set forth in this Amended Complaint, Plaintiff, JANE DOE III, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

378. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois

Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;

- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, JANE DOE III, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXX
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE III**

379. Plaintiff, JANE DOE III, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

380. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding JANE DOE III's and IBLP's other sexual abuse victims was extreme and outrageous.

381. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

382. Defendant IBLP, through its Directors and President, Bill Gothard, all knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and harassment. In some cases, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to JANE DOE III and to IBLP's other sexual abuse victims.

383. The conduct of Defendants Bill Gothard and IBLP actually caused JANE DOE III severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE III, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XXXI
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE III

384. Plaintiff, JANE DOE III, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

385. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Jane Doe III, in one or more of the following ways.

- a. Defendant Bill Gothard committed sexual harassment against JANE DOE III on numerous occasions, including, but not limited to, a ten day period in 2011;
- b. In or around 2012, Defendant Bill Gothard verbally assaulted JANE DOE III over a period of three weeks in a successful attempt to have her remove her truthful posts from the Recovering Grace website in an effort to protect his organization, IBLP;

- c. When IBLP became aware of Bill Gothard's sexual harassment of JANE DOE III and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse and harassment for the benefit of IBLP;
- d. Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE III and other IBLP sexual abuse and harassment victims; and
- e. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE III, and the other IBLP sexual abuse and harassment victims.

386. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE III, in one or more of the following ways.

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and

- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

387. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, JANE DOE III, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE III, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXII
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE III**

388. Plaintiff, JANE DOE III, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

389. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE III, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE III.

390. This conduct was tortious in nature.

391. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

392. Defendant IBLP, by and through its agents and employees, its Control Group (including its then current Board of Directors, as listed in Paragraph 15), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JANE DOE III, and the other IBLP sexual abuse victims.

393. These overt acts were done pursuant to the Defendants' common scheme.

394. As a proximate result of the aforesaid civil conspiracy by and between the various members of the then current Board of Director (as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE III, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JANE DOE III, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXIII
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JAMIE DEERING**

395. Plaintiff, JAMIE DEERING, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

396. Jamie Deering was a participant in the IBLP ATI program beginning in 1992 at the age of 13. In January of 1993, Ms. Deering went to the Indianapolis Training Center.

397. In 1994, at the age of 14, she was invited by Bill Gothard to come to IBLP headquarters.

398. While at the Training Center, Ms. Deering met Bill Gothard. When he saw her, Gothard made a straight line over to greet her.

399. Upon meeting Jamie Deering, Bill Gothard immediately asked her to follow him to his office. When she entered Gothard's office, Ms. Deering met Rachel Lees, Gothard's secretary and a co-plaintiff in this lawsuit.

400. On a multitude of occasions and at locations around the world, Ms. Deering was sexually abused by IBLP President, Bill Gothard.

401. Gothard always kept Ms. Deering close. He spent time with her. When everyone had to be in bed, he would "hang out."

402. Gothard would always find a place where they could be alone.

403. During these times, he would engage in long talks with Ms. Deering about her life and her problems, and he would "counsel" her. He frequently talked with her about impurity and discouraged her from having contact with male peers.

404. Gothard went so far as to make sure Ms. Deering's bedroom was directly across from his office window, so he would know when she could come to his office, after everyone else had left.

405. When Gothard isolated Ms. Deering and they were alone, he massaged her hand with his thumb, stroked her back, and held hands with her. He would also play "footsie" with her. He frequently took her to the back door and hugged her.

406. Ms. Deering has not fully recovered her memory of an incident that happened during an IBLP trip to Russia in 1993. Although she does not have a complete memory of what occurred, “something very bad happened” in the middle of the night. As a result of whatever it was, Ms. Deering wound up sleeping on the sofa, where Mr. and Mrs. Mattix were staying. Shortly thereafter, Gothard was gone and was no longer on the trip.

407. As part of his sexual abuse of Ms. Deering, Gothard would tell her where to sit. Gothard would then sit across from her, with his legs spread wide apart. Gothard would frequently have an erection and he wanted Ms. Deering to know it.

408. On airplanes Gothard would have Ms. Deering sit next to him, and – under a blanket – he would touch her thighs and her hand. Ms. Deering was very uncomfortable with this and was afraid people would know what was occurring.

409. When Ms. Deering would call her parents, Gothard would have her call from his office, where he would be listening. He would tell Ms. Deering that her parents did not need to know about everything that happened at headquarters. She assumed that he was referring to Gothard’s sexual abuse of her.

410. After her first year at IBLP headquarters, Ms. Deering’s father lost his job. After that, Gothard paid for all of Ms. Deering’s expenses. He would hand her fifty dollars (\$50.00) or one hundred dollars (\$100.00) at a time. He would also pay for Ms. Deering to have special hair treatments, because her hair would not hold a curl. Gothard often said that women should have long, flowing curls of hair.

411. On one occasion, Gothard took Ms. Deering into his home and showed her his bedroom. This made Ms. Deering very uncomfortable. While there, he stroked her back and her hair – in his bedroom.

412. On one occasion, Gothard required Ms. Deering to touch his groin area on top of his clothing.

413. At this time, Ms. Deering has many memory gaps regarding what occurred during the time period when Bill Gothard sexually abused her.

414. As a result of the special treatment and physical attention that she received from Gothard, Ms. Deering was referred to as Gothard's "pet," his "type," his "favorite", or a "Gothard girl." The sexual harassment and special attention were no secret. Gothard's conduct was common knowledge to the IBLP staff.

415. Ms. Deering was at IBLP headquarters at approximately the same time as Rachel Frost and Rachel Lees, other victims of Gothard's. Ms. Frost's and Ms. Lees' experiences are very similar to Ms. Deering's.

416. On one occasion, while at home, Ms. Deering's father abused her. He pushed her down the stairs. Ms. Deering called Rachel Frost at IBLP to ask Gothard for help. Bill Gothard refused to help her.

417. As a result of their knowledge of Ms. Deering's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Deering and other IBLP victims in 2014.

418. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual

abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to Ms. Deering and the other IBLP victims.

419. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse, sexual harassment, and from the psychological and emotional harm that results from sexual abuse and harassment. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

420. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Deering by failing to protect her from further and continuing psychological and emotional harm.

421. The conduct of the sham investigation and the dissemination of false information about Ms. Deering's sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Deering additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual abuse of Ms. Deering. The IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Deering's sexual abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

422. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff, Jamie Deering, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

423. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, JAMIE DEERING, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXIV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JAMIE DEERING**

424. Plaintiff, JAMIE DEERING, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

425. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Deering and IBLP's other sexual abuse and sexual harassment victims was extreme and outrageous.

426. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

427. Defendant IBLP, through its Directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, including Jamie Deering's, the allegations included sexual abuse of minors. Despite this knowledge, each and every individual director and Bill Gothard authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Deering and to IBLP's other sexual abuse and sexual harassment victims.

428. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Deering severe emotional distress.

WHEREFORE, Plaintiff, JAMIE DEERING, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XXXV
WILLFUL & WANTON –AS TO PLAINTIFF JAMIE DEERING

429. Plaintiff, JAMIE DEERING, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

430. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Jamie Deering, in one or more of the following ways:

- a. Defendant Bill Gothard committed sexual abuse against Ms. Deering on numerous occasions in violation of 735 ILCS 5/13-202.2, a criminal offense;
- b. Defendant IBLP failed to report the sexual harassment of Ms. Deering in violation of 325 ILCS 5/4;
- c. When IBLP became aware of Bill Gothard's sexual abuse of Ms. Deering and other IBLP sexual abuse victims, as a result of their disclosures via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Deering and other IBLP sexual abuse and harassment victims; and
- e. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Jamie Deering, and the other IBLP sexual abuse and harassment victims.

431. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Jamie Deering, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;

- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

432. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Jamie Deering, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JAMIE DEERING, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXVI
CIVIL CONSPIRACY –AS TO PLAINTIFF JAMIE DEERING**

433. Plaintiff, JAMIE DEERING, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

434. Defendant IBLP, by and through its agents and employees, including its then current Board of Directors (listed in Paragraph 15, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent

infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Jamie Deering, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Deering.

435. This conduct was tortious in nature.

436. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

437. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, listed in Paragraph 15, above), and Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Jamie Deering, and the other IBLP sexual abuse and sexual harassment victims.

438. These overt acts were done pursuant to the Defendants' common scheme.

439. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Jamie Deering, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, JAMIE DEERING, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXVII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF RUTH COPLEY BURGER**

440. Plaintiff, RUTH COPLEY BURGER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

441. Plaintiff, Ruth Copley Burger, is the adopted daughter of Kenneth Copley, a former IBLP Biblical Counselor. Between 1994 and 1995, Ms. Burger resided at the Indianapolis Training Center and participated in IBLP activities.

442. Kenneth Copley's duties included counseling juvenile delinquents, who were court ordered to the Training Center, as well as counseling other teens and young adults who were employed by or participated in Training Center programs.

443. Copley had a history of sexual misconduct. He was forced out of his first ministry in Minnesota, as a result of sexual misconduct. He left IBLP in 1995 due to sexual misconduct involving other IBLP staff in the age range of 14 to 20 years old.

444. Immediately after the first IBLP Children's Institute in 1994, in which Ms. Burger participated, Kenneth Copley began sexually abusing her.

445. On the Sunday, immediately after the closing of the Children's Institute, Copley began fondling Ms. Burger's buttocks. On the date described, Ruth Copley Burger was between the ages of 11 and 12 years old.

446. The sexual molestation progressed. There was an instance where Copley had Ms. Burger put on a dress that her mother wouldn't allow her to wear. He then laid on her bed

and started groping her through her clothing. Ms. Burger's adoptive mother walked in and wanted to know what was going on. Copley stated that he was "checking her for modesty."

447. On hundreds of occasions, Copley would come to Ms. Burger's room and grind and rub his penis – "dry humping" - against her, through her clothes.

448. On one occasion, Copley asked her: "Do you know what sex is?" When Ms. Burger said "no," he explained in detail, particularly with respect to the female anatomy.

449. As part of his abuse process, Copley would have Ms. Burger go down the hall to another room at the Training Center, where he would sexually abuse her. Because he was a staff member, he had keys to all of the rooms. He had full use of IBLP's facility for purposes of sexually abusing Ms. Burger.

450. On one occasion, when Ms. Burger's older sister had gone to Dallas, Copley told Ms. Burger "I want to see you totally naked." She cried – "No." Copley had Ms. Burger pull her nightgown up, while he pulled her panties down and looked at her vaginal region.

451. Although Copley never digitally penetrated her, he stroked her pubic mound. This occurred hundreds of times, while Ms. Burger was at the Training Center.

452. As time went on, Copley's sexual abuse became more explicit. For example, he would undress Ms. Burger in bed. Copley also psychologically abused Ms. Burger through extreme isolation.

453. As a result of the PTSD that resulted from Copley's childhood sexual abuse of Ms. Burger, she became suicidal on multiple occasions and was hospitalized twice at Community North Hospital in Indiana.

454. Ms. Burger was later hospitalized again in Cedar Springs, Colorado, in November of 2006. Once again, she was suicidal due to the PTSD that resulted from Copley's sexual abuse.

455. As part of her recovery process, Ms. Burger confronted Copley and asked him why he abused her. He said it was because she "molested [his] other children." Copley was referring to an incident that had occurred when Ms. Burger was a young child, was not properly supervised, and had innocently explored one of the other children in the Copley home. To manipulate Ms. Burger into not taking any legal action against him, Copley asked her: "Do you want the kids to grow up without a dad and want me to go to jail?" Copley also told Ms. Burger: "It is your problem now. It is not like I penetrated you with my finger or penetrated you."

456. Ms. Burger went through extensive counseling in the process of attempting to recover from the childhood sexual abuse that she suffered at Copley's hands.

457. In that recovery process, Ms. Burger anonymously posted the story of her sexual abuse at the Indianapolis Training Center online in 2010 or 2011. With treatment, as Ms. Burger's condition improved, she was able to post a more graphic version of the facts of her sexual abuse in 2012. Ms. Burger's abuse was brought to the attention of IBLP's current Board of Directors, as a result of these posts.

458. As a result of their knowledge of Ms. Burger's allegations and those of others like her, the current (not former directors or director from another time period) IBLP Board of Directors (namely those listed in Paragraph 15 of this Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP intentionally published a

statement containing false information regarding the sexual abuse allegations of Ms. Burger and other IBLP victims in 2014.

459. Defendants Bill Gothard and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the sexual abuse, psychological abuse, sexual harassment, and unauthorized touching would cause severe emotional distress to Ms. Burger and the other IBLP victims.

460. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and from the psychological and emotional harm that results from sexual abuse. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

461. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Burger by failing to protect her from further and continuing psychological and emotional harm.

462. The conduct of the sham investigation and the dissemination of false information about Ms. Burger's sexual abuse by Kenneth Copley in 2014 by Defendants Bill Gothard and IBLP caused Ms. Burger additional severe emotional distress, beyond that which was originally caused by Kenneth Copley's childhood sexual abuse of Ms. Burger. IBLP, by its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding Ms. Burger's childhood sexual abuse by Kenneth Copley. (See Exhibit A at ¶ 9.)

463. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Amended Complaint, Plaintiff Ruth Copley Burger has suffered

and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, including severe emotional distress.

464. In addition, Defendant IBLP, by its agents and/or employees, was negligent in one or more of the following acts or omissions:

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Despite Defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other appropriate state child welfare agencies, and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant child welfare agencies;
- e. IBLP conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

WHEREFORE, Plaintiff, RUTH COPLEY BURGER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XXXVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
RUTH COPLEY BURGER**

465. Plaintiff, RUTH COPLEY BURGER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

466. The conduct of the Control Group, Bill Gothard, and IBLP in conducting the sham investigation and making false public statements regarding Ms. Burger and IBLP's other sexual abuse victims was extreme and outrageous.

467. The Control Group, Bill Gothard, and IBLP either intended to inflict severe emotional distress or knew that there was a high probability that the conduct would cause severe emotional distress.

468. Defendant IBLP, through its Directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse. In some cases, as in Ms. Burger's case, the allegations included childhood sexual abuse. Despite this knowledge, each and every individual Director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Burger and to IBLP's other sexual abuse victims.

469. The conduct of Defendants Bill Gothard and IBLP actually caused Ms. Burger severe emotional distress.

WHEREFORE, Plaintiff, RUTH COPLEY BURGER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

COUNT XXXIX
WILLFUL & WANTON –AS TO PLAINTIFF RUTH COPLEY BURGER

470. Plaintiff, RUTH COPLEY BURGER, realleges herein by reference each and every other allegation set forth in this Complaint at Law.

471. Defendants Bill Gothard and IBLP demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Ruth Copley Burger, in one or more of the following ways:

- a. Defendant IBLP allowed its “Biblical Counselor,” Kenneth Copley, to use its facilities for the purpose of performing childhood sexual abuse on Ms. Burger and allowed Kenneth Copley to commit sexual abuse while he was working as a “Biblical Counselor” for IBLP. Mr. Copley was working in his capacity as a “Biblical Counselor” for IBLP at the time he was abusing Ms. Copley from 1994 to 1995. This childhood sexual abuse was a criminal offense;
- b. Despite Copley’s known sexual history, and IBLP’s history of issues with childhood sexual abuse and harassment, IBLP did not properly supervise Copley and did not have proper policies and procedures in place to supervise its counselors and other employees and to keep its participants, interns, volunteers and employees safe. As a result, Copley also engaged in sexual misconduct with young staff members, which may have constituted a criminal offense;
- c. Defendant IBLP failed to report the childhood sexual abuse of Ms. Copley or any of the sexual abuse committed by Copley during his employment with IBLP, which may have constituted a criminal offense;
- d. When IBLP became aware of Ms. Burger’s posts to Recovering Grace and through other means regarding Copley’s childhood sexual abuse of Ms. Burger and other IBLP sexual abuse, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- e. Defendant IBLP, by its Control Group (then consisting of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Burger and other IBLP sexual abuse victims; and
- f. By these actions, Defendant IBLP, by its Control Group (then consisting of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to

and/or conscious disregard for a substantial risk of harm to Plaintiff, Ruth Copley Burger, and the other IBLP sexual abuse victims.

472. Defendant IBLP also demonstrated an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Ruth Copley Burger, in one or more of the following ways:

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;
- c. Concealed the allegations of prior wrongful conduct, as alleged herein, from official scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- d. After becoming aware of the allegations of prior wrongful conduct, as alleged herein, including inappropriate conduct by its President, Bill Gothard, failed to thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and
- e. Defendant IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein, including turning a blind eye to the inappropriate conduct of its President, Bill Gothard.

473. As a proximate result of one or more of the aforesaid willful and wanton acts and/or omissions of Defendants Bill Gothard and IBLP set forth in this Amended Complaint, Plaintiff, Ruth Copley Burger, has suffered and will in the future continue to suffer injuries of a personal, emotional, and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RUTH COPLEY BURGER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

**COUNT XL
CIVIL CONSPIRACY –AS TO PLAINTIFF RUTH COPLEY BURGER**

474. Plaintiff, RUTH COPLEY BURGER, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

475. Defendant IBLP, by and through its agents and employees, and the Control Group (including its then current Board of Directors, listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Ruth Copley Burger, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Burger.

476. This conduct was tortious in nature.

477. Defendant IBLP, as an organization, approved the sham investigation and the public disclosure of false information from the investigation. (See Exhibit A at ¶ 9.)

478. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information

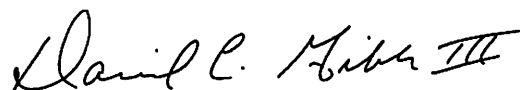
regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Ruth Copley Burger, and the other IBLP sexual abuse victims.

479. These overt acts were done pursuant to the Defendants' common scheme.

480. As a proximate result of the aforesaid civil conspiracy by and between the various members of the then current Board of Directors (as listed in Paragraph 15, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Ruth Copley Burger, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

WHEREFORE, Plaintiff, RUTH COPLEY BURGER, demands judgment against Defendants Bill Gothard and IBLP in a sum in excess of \$50,000.00, plus the costs of this suit.

Respectfully submitted,



Counsel for Plaintiffs

GIBBS LAW FIRM, P.A.

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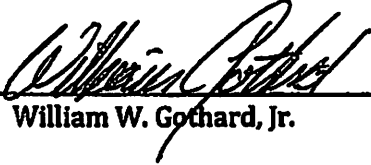
- 8. I personally appointed the Board of Directors. They were selected for their loyalty to the ministry and my teaching.**
- 9. All actions taken by the IBLP Board were to be unanimous.**
- 10. I temporarily resigned from the Board of IBLP to follow the instruction of Matthew 5:23-24. The Scripture itself affirms a return to the ministry once I had fulfilled as far as possible its instruction. The IBLP Board members made public my reasons for resigning that also affirmed my 100% intention to return.**
- 11. I have submitted to the spiritual authority of my pastor and local church, Rev. David Shoaf and the Bolingbrook Baptist Church. Pastor Shoaf agrees that it is time for me to be reinstated to the IBLP Board.**
- 12. I consider David Gibbs, Jr. to be a personal friend and a follower of IBLP principles since the 1970's.**
- 13. I personally brought David Gibbs, Jr. and his organization CLA to help me and provide counsel to the ministry at IBLP.**
- 14. David Gibbs, Jr. and CLA were supposed to talk with the victims and I now understand that this never happened.**
- 15. I do not have a written copy of the document that David Gibbs, Jr. and CLA generated during their time of helping the IBLP ministry.**
- 16. I have asked the Board of IBLP to not liquidate the Oak Brook headquarters or Nashville properties.**
- 17. I have asked the Board of IBLP to not flee to the State of Texas.**
- 18. I have encouraged the Board of IBLP to meet with legal counsel for the plaintiffs and to meet with the ladies and their lawyers. It is sad to me that these ladies are not being listened to by the Board of IBLP.**
- 19. I received a number of letters over many months from legal counsel for the plaintiffs offering to meet with the IBLP Board and me before the lawsuit was filed.**
- 20. I agreed to participate in these requested pre-lawsuit meetings. The IBLP Board refused to do so.**
- 21. I assume that the IBLP Board thought that the plaintiffs and their counsel were bluffing and that they would not sue. Obviously, that is not the case.**

23. The IBLP Board has responded to this lawsuit unwisely and not even contacted me for information or assistance. The Board is handling the case unwisely as I have the information they need. This is a shameful waste of donors money.

24. After following Matthew 18:15-17, any unresolved claims between the plaintiffs, the IBLP Board, and me should be submitted to binding Christian mediation and resolution.

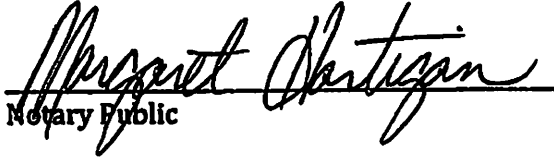
AFFIANT FURTHER SAYETH NOT.





William W. Gothard, Jr.

SUBSCRIBED AND SWORN TO
before me this this 25 day of November 2015.



Notary Public

EXHIBIT B

A FURTHER CONFESSION AND REQUEST

By Bill Gothard

After posting my first statement, I have listened to several reports of individuals I sinned against and have read statements of many whom I wounded. God has begun to reveal to me the gravity of my words and actions.

I have realized how wrong and insensitive I was to only select certain types of young people, especially young women, to serve at Headquarters, often as my personal assistants.

Rather than appreciating people as Jesus did, and bonding their spirits to Him, I evaluated them by my criteria and bonded their spirits to me. I was very wrong in holding hands, giving hugs, and touching their hair or feet. I was also wrong in making statements that caused emotional turmoil and confusion. My guilt is compounded by my hypocrisy of requiring standards for others but not following them myself. All of this can only be described as ungodly and sinful.

I have not only sinned against young ladies, but also against their parents and husbands by breaking a trust to protect them. Through the years, faithful individuals repeatedly warned me about my words and actions. I sinned by not following their counsel.

I have caused great destruction in the lives of many individuals and families. I do not deserve to be forgiven. Therefore, I can only humbly ask that each of you whom I damaged consider granting me the opportunity to confess my sins against you and to ask you to forgive me.

I am very grateful that God has chosen Dr. Doty Murphy to hold me accountable. He has overseen my initial opportunities to request forgiveness. He is willing to facilitate and to moderate interaction with any others who choose to grant such opportunity. He is not a part of the Institute; he has committed to provide a safe and acceptable method, time and place, should you allow me to seek your forgiveness. You may contact him at gdmmd3@gmail.com. I pray sincerely that God will bring healing to each individual that I have so grievously damaged.

Grateful that you would take time to read and consider this request,

Bill Gothard