

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

GRETCHEN WILKINSON, <i>et. al.</i>)	
)	
Plaintiffs,)	
)	Case No. 2015 L 980
v.)	
)	Hon. Judge Kenneth L. Popejoy
INSTITUTE IN BASIC LIFE PRINCIPLES, INC.)	
and WILLIAM W. GOTHARD, JR.,)	Courtroom 2020
)	
Defendants.)	

**AMENDED AFFIDAVIT OF WILLIAM W. GOTHARD, JR. FILED IN SUPPORT
OF MOTION TO DISQUALIFY DAVID GIBBS, III AND GIBBS LAW FIRM**

I, William W. Gothard, having been duly sworn, declare and state as follows under penalty of perjury:

1. This Affidavit is made upon my personal knowledge, and if I were sworn as a witness at trial in this matter, I would testify competently to the facts contained herein.

Preliminary and Background Information

2. Essential background to this affidavit is that during my years in high school and college, I adopted personal disciplines that would allow me to help other young people to be successful in their lives. The most important discipline was meditating on Scripture day and night. God promises that if we do this, we will be successful in whatever we do. (Psalm 1:1-3; Joshua 1:8).

3. When I was thirty years old, the college from which I graduated, asked me to design and teach a course, which they entitled, "Basic Youth Conflicts." In a few years, coliseums and arenas throughout America were packed out with youth and adults from all walks of life to hear thirty hours of instruction. They came only because of the enthusiastic word-of-mouth recommendations of seminar alumni. There was no media advertising. As of today, almost three million people have attended this seminar. (See Exhibit 1).

4. In order to help parents instill the Biblical principles taught in the Basic seminar to their sons and daughters, I established a home education program called Advanced Training Institute. Over 100,000 young people have made use of this training. I have also had the opportunity to interact with and to train tens of thousands of these young people.

5. The gratefulness of these parents and young people for the training they received continues to abound. However, a small percentage of people who went through my training program have, over time, developed a negative and biased perception and animus to the Biblical standards and training we attempted to instill within them, which, at the time, their parents had encouraged them to follow. Many of these people have had difficult and troubled lives and perceive themselves to be victims in many ways. As a result of their animosity, some of them established an anonymous website or blog, which has the stated purpose of destroying me, my message, and the Institute's programs, including the home education program. This website is known as "Recovering Grace." "Recovering Grace," which is a website and blog which was launched in July, 2011, with the website URL address, <http://www.recoveringgrace.org>. According to the moderator, "Recovering Grace is a Christian organization dedicated to helping those affected by the teachings of Bill Gothard, the Institute in Basic Life Principles, ("IBLP"), and the Advanced Training Institute, ("ATI")." A copy of the first page of that website is attached as Exhibit 2. Within the blog, former ATI students and others who were affiliated with the Institute are encouraged to blog their own message railing against my teachings and the Institute, wherein I am called "legalistic" and "the ATA cult" allegedly "contrary to Biblical principles." Eventually, entries began to show up regarding allegations of improper associations and alleged touchings. Those allegations blossomed into full-fledged assertions of sexual misconduct and individuals posted therein were, at some point, encouraged to sue the Institute. The Recovering Grace "mission" states that it is an online organization devoted to helping people whose lives have

been impacted by the teachings of Bill Gothard, the Institute, and the Advanced Training Institute. It is primarily focused upon people who were raised as children in the Advanced Training Institute, and attended my seminars. It states that those individuals are divergent in nature, but “we survived ATI.” The mission statement goes on to state that some survived spiritual abuse at home or training, but explicitly provides “many of those involved with our site, survive physical and/or sexual abuse that causes nightmares and trauma, even today.” Therefore, the obvious mission of Recovering Grace is to attack myself, the Institute, and ATI on all accounts. It essentially solicits people to blog negative comments and invites them to set forth a story of alleged abuse, even suggesting that such purported abuse causes nightmares and trauma. Submissions by individuals to that blog are reviewed, edited, revised, enhanced and embellished by one or more professional writers, and then purportedly subject to the original author’s permission, those re-written and embellished versions are published in the Recovering Grace website, and those publications remain in the public domain to the present day. A copy of the Recovering Grace Mission Statement is attached as Exhibit 3. In April, 2012, Recovering Grace dedicated most of its articles for the month on “sexual harassment experienced in the employment of Bill Gothard.” A copy of that statement is attached as Exhibit 4. The first article was from a pseudonym “Lizzie” who talked about being touched on the hands, back, waist, and playing “footsie.” At the conclusion of her statement, the moderator states “if this sexual abuse series brings up any emotions that you would like to process with a professional counselor, please email us at support@recoveringgrace.org.” The editor’s note also provides a definition of sexual harassment as “the persistent unwelcome directing of sexual remarks and looks, unnecessary physical contact at a person, [sic], usually a woman, especially in the workplace.”

6. This website did not have too much traction until one anonymous girl claimed that my attention to her twenty-four years ago was “sexual harassment.” Her story motivated a second

former student to make a similar claim anonymously. I had an opportunity to talk to this girl and her mother. I pointed out major factors in her story which would have given it an entirely different perspective. The mother and daughter agreed with me, and demanded that their story be removed from the website. The mother stated, "We never considered that you were sexually harassing." Our correspondence in 2012 is attached as Exhibit 5. I explained this to GIBBS, however he has chosen to include her as a "Jane Doe" in his lawsuit.

7. On February 3, 2014, Recovering Grace posted "The Gothard Files: A case for disqualification." A copy thereof is attached as Exhibit 6 and it is from all of this information that David Gibbs, III (GIBBS) likely learned the identity of potential Plaintiffs in this litigation. His early communications with me failed to even disclose the fact that he was interested in filing a lawsuit on behalf of any of these women. I was led to believe that he had other motives, motives that would assist me in returning to my mission at the Institute. As set forth below, we had multiple communications, and I conveyed much information to him. Even when I learned that he represented some of these women, GIBBS led me to believe that he and I were working as a team. For most of my communications with GIBBS, it was my understanding that he would enhance and revise the complaint drafted by my attorney, Kevin Moore, on my behalf and others. I had no idea that he was going to bring a lawsuit for money against either the Institute or me until much later.

8. In March 2014, I realized that I had neglected the day and night meditation, which had brought about the successes of earlier years. Therefore, I stepped away on a temporary basis from my responsibilities at the Institute in order to concentrate on this discipline, and also to do whatever I could to bring about reconciliation with those who claimed they had been offended.

9. As a direct result of re-establishing day and night meditation, I have experienced unimagined success in my life. God has enabled me to write and publish six new books, which

are having a profound impact on all who read them or hear them explained. Hundreds of fathers who have been in the home education program exclaim that this information would have given them a whole new approach to training their sons and daughters and they wish that they would have had it years ago.

10. Based on the many appeals from seminar alumni who need this material now, and in order to honor the intent of donors to the Institute ministry, I asked the Board to reinstate me in the Institute.

11. A controlling group on the Board denied this request. They gave as a primary reason the fear of being sued by former ATI student. When GIBBS heard about the Board's response, he offered to help convince them to reinstate me. It was on this basis that he took many actions, which I assumed were in my interest and desire to return as the President, Founder and Board Trustee of the Institute. As set forth more fully herein, it was also my understanding that Mr. Gibbs and I were working together to effectively overcome attacks that were made against me, my ministry, as well as the Institute's teachings, philosophies and training practices. Our goal also included stopping the Board from taking drastic actions in the sale of Institute assets and relocation to a remote Texas town.

12. My first reason to trust GIBBS was that he was the attorney for John Stancil, Ph.D. In 2012, I invited Dr. Stancil to become a member of the Institute's Board of Directors. As a Board Member, he was involved in an arbitration hearing on a real estate matter and GIBBS accompanied him as a friend, counselor, and observer. John Stancil spoke highly of GIBBS. Because John Stancil was a close friend, ally and associate of mine, even after other members of the Board refused to consider reinstating me to the Institute, John Stancil requested that Mr. Gibbs assist me in my endeavor to return to the Institute, overcome the false allegations that were made

against me within the Recovering Grace website and preserve the status quo of the Institute's mission and assets.

13. My second reason for trusting GIBBS was that I am a long-standing friend of his father, David Gibbs, Jr. His father is the president of a law firm and a nationally known speaker. I have had him speak at several home school conferences. When there was a need for allegations to be investigated, I asked him and his law firm to carry this out, which they did.

14. When David Gibbs, Jr. and his law firm assisted the Institute with an investigation into the allegations made within Recovering Grace, he made reasonable and good faith efforts to communicate directly with those who posted allegations of misconduct within that website. It was reported to me that the purported victims, which included at least some of the individuals named within the pending lawsuit, refused to communicate with David Gibbs, Jr. or respond to his requests for a meeting. In his lawsuit, GIBBS now reveals animosity toward his father. He repeatedly refers to his father's investigation as a "sham." This obviously implies that his father was covering up the truth, which he certainly was not doing. When speaking with GIBBS in 2015, we discussed his father but I had no knowledge that GIBBS would attack him in a lawsuit or that they were at odds.

15. Because of the close relationship I had with David Gibbs, Jr., his initial work on behalf of myself and the Institute in discerning the validity, or lack thereof, of allegations made within Recovering Grace, was deemed to be on a voluntary basis. However over time, it became apparent that David Gibbs Jr. and his law firm were expending extensive and substantial number of hours in this endeavor. As a result, it was determined that David Gibbs, Jr. and his law firm were certainly entitled to compensation for all of the hundreds of hours they put into the investigation, and as a result thereof, an agreement was reached between the Institute and David Gibbs, Jr. for compensation for services rendered. Therefore, although David Gibbs, Jr. often

provided free and voluntary work for Christian Ministries, the Institute could not take advantage of those services to the extent they were provided and compensating David Gibbs Jr. for his work was deemed reasonable and necessary.

16. Attorney GIBBS is the President and General Counsel of the National Center for Life and Liberty. (See Exhibit 7). He also speaks regularly on the Moody Radio Network. David Gibbs, Jr., father of GIBBS, was a close friend and confidant, as of May, 2015, I had no reason to believe that his son GIBBS would ever take a position contrary to the interest of the Institute or myself. I knew GIBBS for many years prior to May, 2015. We always had a positive relationship and he was always very encouraging to me and my ministry. Until he filed suit against me, individually, I would not have believed that GIBBS would have betrayed my confidence.

17. Like his father, GIBBS also is involved in Christian Ministries and has provided voluntary and free legal services to Christian ministries in need. In fact, he discussed that with me extensively at our first meeting. The Christian organization that GIBBS is involved in takes in donations and can effectively pay a lawyer like GIBBS for services rendered to Christian Ministries. (See Exhibit 7). I have recently learned that the organization GIBBS is involved in is in a form of competition with his own father, David Gibbs, Jr., and his Christian organization. Although they both have the stated purpose of assisting Christian ministries, they both vie for the same type of donor dollars and volunteer service members. It is unfortunate that GIBBS uses this lawsuit to compete with his own father, calling his father's investigation a "sham." Unfortunately I did not know this in my discussions with GIBBS.

18. Although GIBBS never asked me directly for a retainer, I was not surprised by this, as this was exactly the same type of relationship I had with his father. It was my understanding that GIBBS was acting on my behalf on a voluntary basis in conjunction with his own Christian ministry, but to the extent that work on my behalf became substantial, he certainly would be

entitled to compensation. I assumed that if we were successful in reinstating me to the Board, that eventually GIBBS could be compensated. GIBBS and I discussed this issue. I stated that, "You are doing a lot of work for me, don't you need to be paid for all this." His response was, "No, I am doing this as a favor." I replied, "That's very generous of you, David." That was like a conversation I once had with his father.

19. In April, 2015, I engaged the service of attorney Kevin Moore to represent me as well as John Stancil, Anthony Burrus, Ralph Hudgens, Roger Blair, and Robert Norvell to bring an action against the Institute Board members. We were requesting that attorney Moore investigate and draft a complaint for a proposed preliminary and permanent injunction and other relief. Attorney Moore represented me and I communicated with him regularly during the months of April and May, 2015. I held off with filing the complaint through Kevin Moore since I was working with GIBBS on the same issues. Beginning again in September, 2015, and continuing into the month of November, 2015, I worked with Kevin Moore on a revised complaint, to be filed on my behalf and on behalf of my not-for-profit corporation, Life Purpose Power Teams, Inc. Additionally, Anthony Burrus, Ralph Hudgens, Robert Novell and Roger Blair were additional proposed plaintiffs in a potential suit against the Institute of Basic Life Principles, Inc. and its Board. On or about October 19, 2015, attorney Kevin Moore provided me with his proposed final version of a verified complaint. A copy thereof is attached as Exhibit 8. GIBBS first received an initial draft complaint prepared by Kevin Moore on May 30, 2015, (see Exhibit 11, attached), and, on information and belief, he communicated with attorney Kevin Moore on at least two occasions. It is my understanding that on each of those occasions, GIBBS was communicating to attorney Moore that we should join forces and be allies in an action against the Institute's Board members. Based upon my conversations with GIBBS, he was aware that Kevin Moore represented me. To my knowledge,

at no time did Kevin Moore ever provide GIBBS with permission to directly communicate with me regarding these matters. However, I did not know the rules of attorney conduct or think that GIBBS needed the permission of Kevin Moore.

20. As set forth more fully below, between mid-May 2014, and the end of December, 2014, I had approximately 40 conversations with GIBBS. On many of those occasions, I would speak with John Stancil and indicate to him that I would like to talk to GIBBS. John Stancil would then send a text message to GIBBS, who at some point thereafter would telephone me and we would have a conversation about what was transpiring and what my goals and intent was. A constant theme of our communications was my intent and desire to communicate directly with the women who had posted statements about me on Recovering Grace. I repeatedly apprised GIBBS and emphasized the importance of the scriptural mandate to meet privately and seek reconciliation on an individual basis. By using the term reconciliation, I always meant that in a personal and private meeting, we could find the truth and make peace, even if I was falsely accused of events or occurrences which had no or little basis in reality. GIBBS always responded by confirming that he was working with me on that goal and objective. He repeatedly advised me that he had tried to talk to or was going to talk to the women who made accusations against me and that he was still waiting for call backs.

My communications with David Gibbs, III¹

21. On May 15, 2015, I sent an email communication entitled, "Potential Legal Action!!" to my friends and supporters Dr. John Stancil, Ralph Hudgens, Dr. Anthony Burrus. A copy of that correspondence is attached at page 2 of Exhibit 9. The email I sent to Dr. John Stancil went through his nephew and Administrative Associate, Jared Stancil. Jared Stancil, in turn, forwarded my May 15, 2015, email to GIBBS approximately half an hour later. That

¹ All dates set forth herein are to the best of my knowledge, information and belief but it is possible that they are not exact.

evening, GIBBS responded to Jared Stancil in the communication attached as Exhibit 9, who in turn forwarded the communication of GIBBS to me on Saturday, May 16, 2015. Upon reading the communication from GIBBS, it appeared to me that he was going to assist me in my desire to return to my position as Director and President of IBLP, even calling himself "a possible witness." From what I read there, he was of the opinion that as the Founder, I had authority to appoint and remove Board members and authority to reinstate myself to the Board. According to GIBBS, as the founder of an ecclesiastical organization, I had rights for the remainder of my life. I also agreed with GIBBS that IBLP should not sell any property or move to Texas. Upon reading all this, I was encouraged that an attorney with the prominence of GIBBS would be interested in assisting me in my endeavor to return to my mission at IBLP.

22. On or about Friday, May 15, 2015, I had a telephone conversation with GIBBS. I explained to him my desire to be reinstated to the Institute and to continue with my commitment of ongoing training to Institute alumni. He and I discussed several ways that could be accomplished legally, including making claims of financial mismanagement, violating the Institute's Founders Authority, and other arguments that were similar to his email communication.

23. On or about Monday, May 18, 2015, I had another telephone conversation with GIBBS. He provided me with further counsel and recommendations and said that "we need to sue the Board." He ended with, "Let's meet." I agreed.

24. On Tuesday, May 19, 2015, GIBBS and his Associate, Christine Field, came to my house. Dr. Roger Blair was present at my home when they arrived. There, we met and discussed a potential lawsuit against the Institute. He was recommending actions such as conspiracy to defraud, private use of assets, breach of contract with donors, violations of fiduciary responsibility, and other potential claims. It was my understanding that he was going to use those claims as leverage to get me back on the Institute's Board and return to my role as President and

Leader of the Institute. GIBBS, Dr. Blair, and I then went to lunch at Boston Market in Westmont, Illinois. To the best of my recollection, Christine Field had somewhere else to go and did not join us, as I do not recall her saying anything. At Boston Market, we further discussed plans on how he could help me return as the Leader at the Institute. At the dinner meeting of May 19, 2015, at Boston Market, I recall that both Roger Blair and GIBBS ordered meatloaf and I ordered sweet potatoes with a vegetable, which I often mix together with gravy. A copy of the receipt from that evening is attached as Exhibit 10. We talked at length about the allegations that were posted on Recovering Grace. We talked specifically about some of the posts from women who are now plaintiffs and what I could recall about those individuals and about what information I had as to why those statements were false and wrong. That included the names of some family members and witnesses that knew the truth. In addition to discussing those allegations, we discussed at length my desire to return to the Institute's Board. We discussed the people who supported me in that endeavor, which included Board members John Stancil and Anthony Burrus. We also discussed at some length, the other Board members, where they came from, how they got on the Board, and what I thought they were thinking. We also discussed at length what the current Board members were planning to do with the assets of the Institute. We discussed their desire to sell property in Oak Brook and Nashville, Tennessee, as well as their desire to move the Institute to Texas. I knew the Board Members that supported that agenda, and those that did not, and I told GIBBS that. GIBBS talked openly about his own ministry as a lawyer and discussed at some length how other founders of multi-national ministries had been attacked, naming, in particular, Bob Jones of the Bob Jones University of South Carolina, as well as James Dobson from the Focus on the Family Ministry. It appeared to me that GIBBS was experienced in dealing with issues that I was confronted with and that he would be the best choice to assist me in achieving my objective of resolving issues with the promoters behind the Recovering Grace website, as well as

the purported victims they solicited. GIBBS advised me not to be discouraged and that he knew how to work through those problems. I had no reason not to believe him, just the opposite. He confirmed his belief that I was wronged and that like other ministry leaders, there are always people out there who want to destroy what I had developed and they would go to great lengths to do that. We also discussed, at length, how we could convince the members of the Board, that it was in the Institute's best interest to return me to my position and resolve the controversy created by those who were attacking myself and the Institute. At no time at that meeting or at any of the subsequent conversations I had with GIBBS, did he ever state or suggest that he would ever use this information against me. It was not until later that I knew that GIBBS was representing any of the women named in the pending suit, or any of the other people who posted negative entries within Recovering Grace. Before we left, I told GIBBS how excited and joyful I was that he was taking up my side. I told him that I was rejoicing that he came to me and was willing to help me. I truly meant that as I thought we were working as a team, and continued to think that way from many months.

25. On or about May 25, 2015, I had a telephone conversation with GIBBS and Dr. John Stancil. To the best of my recollection, we discussed what could be used in drafting a complaint to help get me back on the Institute Board. We spoke by phone again on May 29, 2015 about the donors that would support us and we talked about sending them a letter.

26. On or about May 30, 2015, I corresponded by email to GIBBS and John Stancil. In that correspondence, I thanked GIBBS for calling the prior evening and stated that I was pleased to hear his perspective on the matter of appealing to the Board. I referred to a letter that would accompany an appeal to the donors. I included a draft of such a letter suggesting that GIBBS was free to change it as he wanted. I specifically then stated "I am also sending you a copy of the lawsuit that it [sic] was drawn up by the other lawyer. The only part that may apply to the donors

if this matter gets that far, would be Count III, Breach of Fiduciary Duty.” A copy of that correspondence, with all appended exhibits, is attached as Exhibit 11. In that email, I attached a copy of the first draft complaint that was prepared by Kevin Moore. GIBBS later told me that he “could do much better than that.” I followed up later that night with a follow up message. See Exhibit 11A, attached. I was encouraged because I believed GIBBS was more than capable of preparing a very well written and sophisticated complaint, which would induce the Board to return me to my position at the Institute. I wanted to keep working with him and hoped to hear from him soon. I began thinking that John Stancil’s opinion that GIBBS was the best lawyer to help me was right.

27. On or about Wednesday, June 3, 2015, I had another telephone conversation with GIBBS regarding the need to put pressure on the Board to follow the Institute’s Articles of Incorporation and Bylaws.

28. On or about June 3, 2015, GIBBS corresponded to the Institute’s Board Members and provided me with a copy. In that correspondence, GIBBS represented that he had been contacted by a number of “major donors to the Institute” and in addition thereto a number of ladies who considered themselves to be victims of IBLP, as well as representatives of the Recovering Grace website and other online media. He states that the collective concerns of those divergent individuals focus on the administrative and financial decisions being made by the Board. As a result, he was seeking “pre-suit mediation.” In regards to myself on page 2, he states that the Board handled the organization’s public image regarding incidents in a poor manner and criticized the independent Baptist organization with a “suspect reputation” (apparently including his own father, David Gibbs, Jr.). His major concern was the “mass liquidation of the assets” of the IBLP without a plan for use of these funds. He made various demands upon the Board and then requested that they execute a “mediation agreement.” He threatened that if he does not get what

he requests by Friday, June 12, 2015, to file an emergency motion to preserve the status quo.

A copy of the GIBBS correspondence is attached as Exhibit 12. Although I did not agree with everything GIBBS said in that letter, I also wanted to preserve the status quo and wanted Christian mediation.

29. On June 8, 2015, GIBBS sent a letter to the Institute's Board, and I received a copy. There, he points out that Mr. Barth does not represent any of the Board Members individually, or myself, but that he represents the Institute corporately as general counsel. Although he says that he does not represent me, he then states that I personally contacted him and committed to attend the mediation. He states that I agree with many of his concerns expressed in my letter to the IBLP Board, the June 3, 2015, letter attached as Exhibit 12. He states, "Dr. Gothard, the Founder of IBLP, believes that you men are looting and mismanaging the organization in a manner that violates the law. His testimony alone will most likely allow this litigation to move to a jury for adjudication. I would encourage you men to seriously consider the risk that you are taking by ignoring the donors, the victims, the Founder, and the IRS on these fiduciary decisions that you are making on behalf of the 501(c)(3) non-profit organization." My read of this letter was that although he confirmed that he was not representing me (which was a surprise), he was attempting to resolve all issues with the women who had raised concerns in the Recovering Grace website, as well as preventing the Board from engaging in activity detrimental to the Institute's mission and ideals. A copy of the June 8, 2015, letter is attached as Exhibit 13.

30. On or about June 11, 2015, I had a telephone conversation with GIBBS about a court case that I was aware of against a non-profit for financial mismanagement and how that case could be applied with the Board Members of the Institute.

31. On or about Monday, June 15, 2015, I spoke with GIBBS who wanted to know how the Board was responding to his last letter. We discussed how we could ask a court to put a

restraining order on the Board Members to prevent them from selling local properties. We discussed what those properties were and their potential sale. We discussed the 120-acre Oak Brook headquarters of the Institute and the Institute's Nashville training center.

32. On or about Friday, June 19, 2015, I received a telephone call from Dr. John Stancil. As indicated above, I knew that Dr. John Stancil was on close terms with GIBBS. Dr. Stancil advised me that GIBBS was writing another letter to the Board. I knew that John Stancil was on close terms with GIBBS and believed the three of us were all working together as a team.

33. On or about Wednesday, June 24, 2015, GIBBS suggested for the first time that he could bring in women to sue the Institute for claims of misconduct. I disagreed that this would be a proper approach. He asked me questions about the women and I provided information and facts about them. I am sure we discussed Gretchen Wilkinson or her mother.

34. On or about Monday, July 6, 2015, GIBBS called me and said he wanted to talk about some women who posted allegations on the Recovering Grace website. Although I cannot specifically recall which ones or how many women we discussed on this particular date, during the spring and summer of 2015, I know that I discussed many of the women who are now named as Plaintiffs in the pending litigation with GIBBS. I recall specifically that we had multiple conversations about Gretchen Wilkinson. We discussed at length how I had communicated with Gretchen's mother and how Gretchen's own mother would refute allegations made by Gretchen Wilkinson. We also discussed who the manager was on the property at that time, and also other witnesses who were there with Gretchen, and that they could refute her allegations.

35. We discussed an individual who I believe is now named in the lawsuit as one of the Jane Does. I told him many details about this person, including how I communicated with her family and investigated allegations that she was subjected to abuse. I also told GIBBS about how

a Board member had written to her and other facts that refuted false allegations she made.

36. I spoke with GIBBS at length about Rachel Lees. I told him about when she was at the headquarters and all of the training that she received, how she was able to successfully become a teacher of students with English as a second language. I discussed with GIBBS my conversations with Rachel Lees and her husband. We discussed my September 23, 2014, communication with Rachel and the content of letters she sent to me in 1993, which affirmed her friendship and appreciation of me. (See attached Exhibits 14 and 15). Rachel sent me these letters, (Exhibit 15), two or three years after she was last at the Institute, with no reference of any alleged harassment.

37. I also specifically recall discussing someone who posted on Recovering Grace under a pseudo-name, who I now believe is one of the Jane Does in this litigation. I discussed my attempts to communicate with her and her mother directly. (See attached Exhibit 5). I told GIBBS that in 2012, this person and her mother asked the moderators of Recovering Grace to remove her posting from that website.

38. Although I recall discussing with GIBBS at some length other postings within the Recovering Grace website, I cannot recall the specifics at this time. However, I sent other emails and documents beginning in May 2015, and for months thereafter. See, Exhibits 24-30 attached hereto:

- Exhibit 24 – my email to GIBBS dated May 27, 2015, where I communicate with him regarding the Bates family with the Duggars and Steven Paine, institute Board member. I believe I also forwarded to GIBBS the Curriculum Vitae of St. Steven Paine;
- Exhibit 25 – my email to GIBBS dated June 8, 2015, enclosing Exhibit 25A, which was a proposed letter to the Board;

- Exhibit 26 – my email to GIBBS, which was sent on May 30, 2015, along with an attachment (see Exhibit 11B);
- Exhibit 27 – my email to GIBBS dated July 13, 2015, regarding the interest of the “donors” to go forward. My reference to the “other approach” was in regards to the suggestion by GIBBS to bring an action against the Institute, (but never me), on behalf of the women who had posted on Recovering Grace;
- Exhibit 28 – I received an email back in December, 2014, from a very important donor and forwarded that to GIBBS on July 16, 2015. The donor’s proposed letter to the members of the Institute’s Board is also attached as Exhibit 28 A;
- Exhibit 29 – I sent an email to GIBBS on September 14, 2015, entitled “Case documents!” In that email communication, I referenced our “recent talk,” stating that this was the week that action needed to be taken because of the Board’s plan to relocate to Big Sandy, Texas. I enclosed a number of documents, which are attached to Exhibit 29, including an “appeal to the judge,” the “authority structure of the Institute in Basic Life Principles,” “legal action – against an out of control faction on the IBLP Board of Directors that has seized control, and is knowingly and willfully dissolving the corporation,” a letter dated September 2, 2015, from Ralph Hudgens, also an email I received on September 5, 2015, from an important and concerned donor, including a proposed letter to Dr. Paine and members of the IBLP Board, which was dated September 4, 2015, a statement regarding resignation that was posted on the IBLP website, and a May 17, 2014, summary of “Steps toward reconciliation and restoration,” along with my report pertaining thereto of September 9, 2015, outlining my accomplishments pertaining thereto;
- Exhibit 30 – my correspondence to GIBBS, with a copy to John Stancil, which I

sent after I reviewed the first complaint GIBBS filed in this action.

39. He also stated he needed to know the names of donors and that the donors could be used as part of the complaint against the Board. I also advised GIBBS that I was uncomfortable about him bringing up the names of women in conjunction with a possible lawsuit against the Board. I told him that to the extent any such women made any such allegations against me, I wanted to consult with them directly and follow the scripture at Matthew 18, so that we could have a direct reconciliation. GIBBS told me that he would try to arrange it. I thought we were both working together for such a resolution.

40. On or about Friday, July 10, 2015, I had a telephone call with Dr. John Stancil about what GIBBS was planning. According to Dr. Stancil, GIBBS was going to use the donors in his complaint against the Institute's Board Members.

41. On or about Saturday, July 11, 2015, GIBBS needed email addresses of donors and they were sent to him by someone helping me at the time.

42. On or about Monday, July 13, 2015, GIBBS and I discussed his conversation with a major Institute donor, who provided suggestions as to how to proceed. GIBBS advised that he was going to proceed with a restraining order against the members of the Board. I offered to send any complaint he drew up to all of the donors.

43. On or about Tuesday, July 14, 2015, GIBBS advised me that it was going to be difficult to obtain an injunction to stop the sale of the Nashville property. We talked about the fact that he received a letter from a major donor.

44. On or about Wednesday, July 15, 2015, GIBBS left me a message saying that he had an idea and that he would later call to talk to me about it.

45. On or about Wednesday, July 29, 2015, I was apprised by Dr. John Stancil that GIBBS told him that he was contemplating going forward with a complaint with the women who

had posted complaints on the Recovering Grace website, but not the donors. Stancil advised me that GIBBS felt that was the best way to get the attention of the Board, but that it would be used for the purpose of getting my reinstatement.

46. I also had numerous discussions and conversations with GIBBS about the Board members themselves, as individuals. I can recall that we discussed the current Institute's president, Tim Levendusky, who took over my Board position when I temporarily took a leave of absence from the Board. We discussed his background and experience and his prior involvement with the Institute. We also discussed John Stancil, who GIBBS knew very well and that John Stancil was fully behind my reinstatement to the Board. We also discussed Board member, Anthony Burrus, and how Anthony Burrus was my supporter and also agreed with John Stancil that I should be reinstated to the Board. We had extensive discussions regarding Board member, Charles Steven Paine, M.D. I described to GIBBS at some length how Dr. Paine first came to the Institute with a troubled marriage and family. We discussed how and why Dr. Paine allowed his medical license to lapse while he was at the Institute, and we discussed his children and Dr. Paine's ultimate redemption with his family, children, and his return to the practice of medicine. We also discussed Dr. Paine's daughter-in-law, who was a troubled youth at the Institute and her redemption and subsequent marriage to Dr. Paine's son. We also discussed, generally, the other Board members and how they became involved with the Institute and what their background and experience was.

47. On August 3, 2015, I received a copy of a letter written by GIBBS to the Board. In that correspondence, GIBBS now states that he represents certain female victims of IBLP and its Board. He does not include my name in that correspondence and I am not identified as a target. A copy thereof is attached as Exhibit 16.

48. On Monday, August 10, 2015, GIBBS called me to find out what I knew about what had occurred at a recent Institute Board meeting. He inquired about whether or not my

reinstatement was being discussed or decided at that meeting. I advised him that to my knowledge, my reinstatement was not discussed at the meeting.

49. On Tuesday, August 18, 2015, GIBBS reported to me that he was “appalled” at the attitude of the Board members. GIBBS advised me that the only way to get the Board’s attention and the force them to the table, was to bring allegations against the Institute from the women who had posted information of harassment on the Recovering Grace website. I fervently disagreed with that approach. He also reported to me that he would not be able to restrain the Board Members from selling Institute real estate.

50. On or about Monday, September 7, 2015, GIBBS called me to discuss his father’s meeting with me. However, no such meeting with David Gibbs, Jr. ever took place. GIBBS did say that he would try to arrange a meeting between me and one of the women who had posted a comment on Recovering Grace so that we could reconcile, as I had previously requested pursuant to scripture.

51. On or about Wednesday, September 9, 2015, GIBBS sent me a copy of a complaint that he was seeking to file. I was not named in the lawsuit and it was my understanding that he was threatening to bring the lawsuit for the purpose of getting both of us to sit down with the members of the Board and to resolve differences. GIBBS agreed with me that the Board had usurped its authority and GIBBS apprised me that he was going to call the Institute’s General Counsel, Robert Barth, and issue him a warning.

52. On or about Friday, September 18, 2015, GIBBS and I discussed the Board’s decision to move the Institute’s headquarters to a remote location in Texas.

53. On or about October 13, 2015, someone I know sent GIBBS the legal description of the Institute’s Nashville property, at his request. We also discussed Gretchen Wilkinson’s possible claim against the Institute. I apprised GIBBS that she was lying and implored him to

contact her mother who would affirm that her daughter had lied. We again discussed with GIBBS the identity of other witnesses who had reported to me that Gretchen was lying.

54. On or about October 16, 2015, GIBBS had his associate email a draft complaint to members of the Institute.

55. On or about October 18, 2015, GIBBS apprised me that he was going to file suit against the Institute and that he would communicate further with Kevin Moore on that issue. He requested that I provide him with a copy of the Hinsdale Police FOIA letter pertaining to one of the alleged female actions. We discussed that situation and I asked him to not file suit on behalf of the women, but rather, on behalf of the donors instead. I then asked someone to provide GIBBS with a copy of the Hinsdale Police FOIA response via email, which is attached as Exhibit 17.

56. On or about October 19, 2015, I received a revised draft complaint prepared by my attorney, Kevin Moore.

57. On or about Wednesday, October 21, 2015, I learned that GIBBS filed a lawsuit, but that I was not named in the lawsuit. Subsequently, GIBBS pointed out to me that I was not named as a Defendant and he told me that his only intent was to bring the Board "to the table."

58. On October 24, 2015, GIBBS allowed his interview by "Spiritual Sounding Board" to be published. A copy of that interview is attached as Exhibit 18. The first question posed in the interview was "Are there plans to name Bill Gothard, himself, in a lawsuit at some point?" His response speaks for itself, but he confirms that I was not legally connected with the organization, stating "It is the Board's decision if they bring him back into the organization." He stated that adding "Gothard to the lawsuit would make it more complicated" and that "litigation goes against an organization with a goal of compensating victims" not against an individual, such as Gothard.

59. On the night before Thanksgiving, November 25, 2015, at about 9:15 p.m., I

received an email communication from David Gibbs, III. (Exhibit 19). Attached to that email was a draft of an Affidavit for me to sign. (Exhibit 19A). This affidavit came out of the blue and I had no prior conversation with GIBBS about signing such an affidavit. It seemed urgent, so I called GIBBS. During our conversation, I told him that I would not sign it, as it contained inaccuracies. I asked him why he wanted an affidavit and he led me to believe that it was to be used to “put pressure on the Board to reinstate me.” Additionally, he led me to believe that he needed the affidavit to set up a private meeting with the women who had made allegations against me, such as those named within his lawsuit against the Institute and the Board members. For reasons unknown to me, GIBBS said that he had to have the affidavit “that night.” I told him that it was crucial to me that the only purpose of the affidavit had to be so as to assist me in having a meeting with these women pursuant to Matthew 18:15-17, and that to the extent that we could not resolve any issues or claims that existed between those women and the IBLP Board, they should be submitted to binding Christian mediation and resolution. He agreed with that purpose. He said he would include that statement within a revised version. He also agreed that he would take out paragraphs 4, 6, 7, 15, 18, 19, 20 and 28 of the first version he sent me. He then sent me a second version around 10:30 p.m. that night, which deleted paragraphs and included paragraph 24. It was my understanding and belief that we were then going to try to establish meetings with these women as well as the IBLP Board to resolve issues pursuant to scripture, and to the extent unresolved, we would submit ourselves to binding Christian mediation resolution. A copy of his email is attached as Exhibit 20. For reasons unknown to me, the top half of the attached affidavit was left blank. Later, GIBBS used that Affidavit as exhibit A to his Complaint and inserted the caption of this cause, which also named me as a Defendant, even though I was not a named Defendant in November, 2015. A copy of that blank and caption-less affidavit, which was attached to Mr. Gibbs’s email is attached here as Exhibit 21. When I stated that the written copy should be

moved up to the top of the first page, he said “I need to have some legal things put above it.” At no time did I ever see my affidavit with a court caption on it at all, and certainly not a court caption that had my name listed as a Defendant. I was shocked when I saw the affidavit with a court caption as Exhibit A to the Amended Complaint.

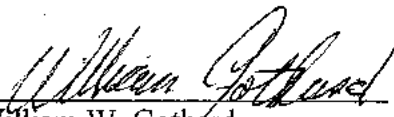
60. On or about Tuesday, December 1, 2015, I had a discussion with GIBBS and asked him what his objectives really were. He then spoke for the first time about getting money for his clients and getting his legal fees paid. I was dismayed to hear him say that.

61. On December 14, 2015, I sent an email to GIBBS informing him of my concerns with the lawsuit he filed against the Institute. A copy of that email is attached as Exhibit 22, (bottom). GIBBS did not respond. On hearing no response, on December 20, 2015, I sent a follow up email to GIBBS letting him know that I was waiting on his response and that I did not want him to use the affidavit in the lawsuit against the Institute. A copy of that email is attached as Exhibit 22, (top).

62. On December 31, 2015, I mailed GIBBS a certified letter informing him that he did not have my permission to use the signed affidavit in the litigation. A copy of that letter is attached as Exhibit 23. In that letter, I stated, in part, that “the mother of your ‘star witness’ assured me that her daughter lied about me. Several others will testify to this fact. I informed you about this in the past.” I conclude, “also I want nothing to do with your amended lawsuit. Therefore, I hereby withdraw my permission for you to use my affidavit.”

63. On January 6, 2016, GIBBS filed his Amended Complaint, including additional Plaintiffs and also naming me as a Defendant. He used that affidavit I signed the night before Thanksgiving as Exhibit A to his Amended Complaint. I was shocked. Between May, 2015 and December, 2015 I provided GIBBS with extensive information directly related to the claims he filed and defenses thereto.

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


William W. Gothard



Cobo Hall in Detroit was one of sixteen coliseums across America that were filled each year.

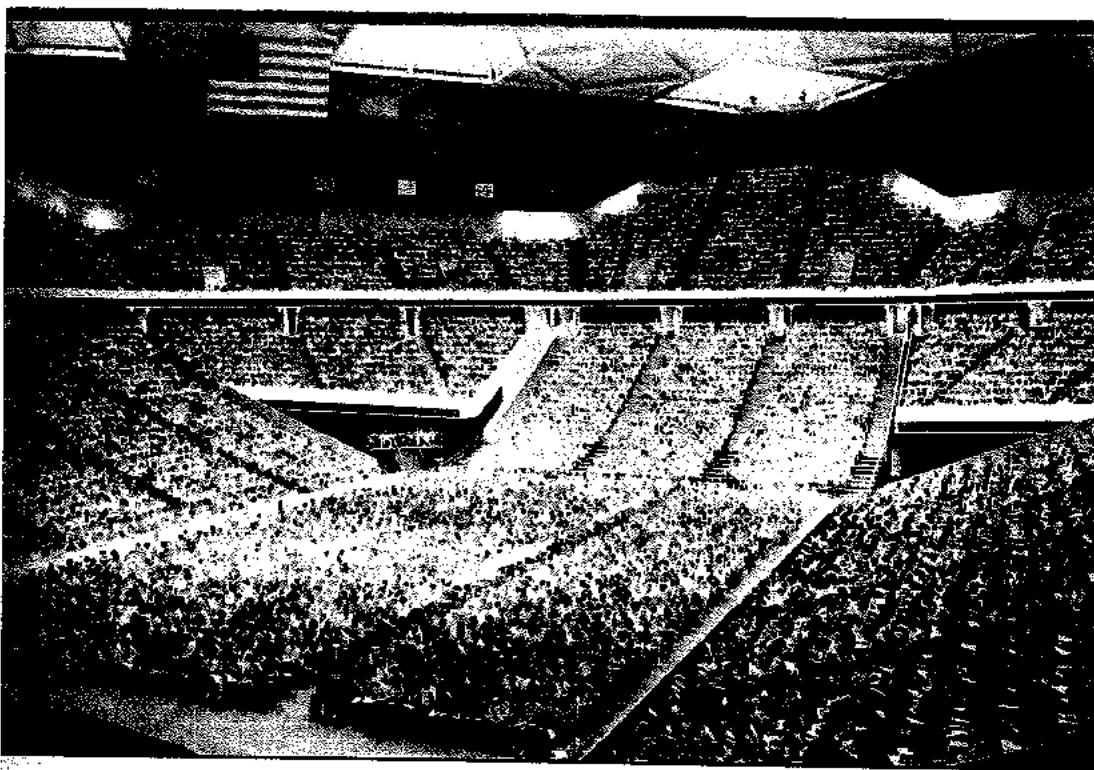


The Seminar in California filled the Long Beach Arena, with an overflow of five thousand.

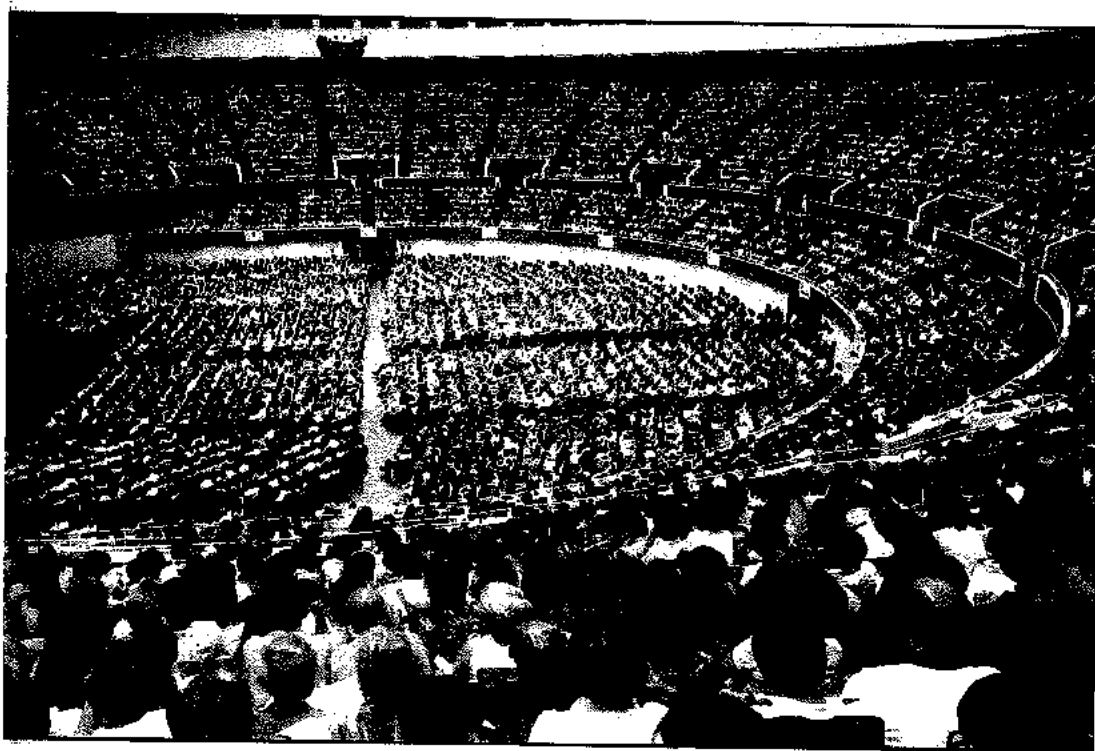
EXHIBIT

tabbies

10



Year after year, "The Omni" in Atlanta, Georgia, was packed with youth and adults.



In Dallas, Texas, this arena was filled, with an overflow crowd of ten thousand people.

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recovering grace

a Gothard generation shines light on the teachings of IBLP and ATI

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Our Beliefs

13 January 2012, 20:34

Moderator

17

Recovering Grace is a Christian organization dedicated to helping those affected by the teachings of Bill Gothard, the Institute in Basic Life Principles (IBLP), and the Advanced Training Institute (ATI). As the foundational statement of our faith, we adhere to both the Apostles and Nicene creeds.

We are evangelical in doctrine and practice, and thus we hold to the following:

- We believe that the Bible is the inspired, infallible, authoritative Word of God.
- We believe that there is one eternal God existing as Father, Son, and Holy Spirit.
- We believe that Jesus Christ was conceived of the Holy Spirit and born of the virgin Mary. He took upon Himself human nature, and through His death on the cross made provision for the redemption of men from sin. He was raised from the dead with a glorified body, he ascended into heaven, and is now exalted at the right hand of God. He will return in power and glory to judge the world and to complete His redemptive mission.
- We believe that the regenerating work of the Holy Spirit is absolutely essential for Salvation.
- We believe that Christians are able to live God-honoring lives only through the power of the Holy Spirit.
- We believe that both the saved and the lost will one day be raised from the dead; the saved to life eternal and the lost to eternal punishment.
- We believe in the spiritual unity of all believers in our Lord Jesus Christ.

Although these are the officially held doctrines of our ministry, the reality is that former ATI students fall along a wide spectrum of theological, spiritual, and behavioral worldviews. Recovering Grace publishes articles written by former ATI students across this spectrum. While we may not endorse every author's personal beliefs or lifestyle, we believe that each one has a valid story to share of their experience within Gothard's programs and the results of his teachings.



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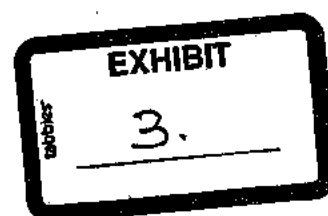
Our Mission

Recovering Grace is an online organization devoted to helping people whose lives have been impacted by the teachings of Bill Gothard, the Institute in Basic Life Principles (IBLP), and the Advanced Training Institute (ATI). Recovering Grace provides a unique perspective in that it was founded and is operated by adults (and their spouses) who were raised as children in Bill Gothard's Advanced Training Institute. We all have attended Bill Gothard's seminars, and most of us served within the IBLP organization in some form or fashion. Among the members of our team are pastors, lawyers, teachers, accountants, businessmen, and stay-at-home moms. We have all taken different journeys, but we all have one thing in common: We survived ATI. *(For more about who and what Bill Gothard, IBLP, and ATI is, visit our FAQ section).*

Some of us had pretty great parents who, by the mercy of God, were able to bring balance to Bill Gothard's legalism. To this group, survival means that they graduated high school and moved on. However, many of those involved with our site survived physical and/or sexual abuse that causes nightmares and trauma even today. Some survived spiritual abuse at home or training centers that has left them with years of untangling who God is, whether faith is worth having, and whether church and religion are anything more than a cosmic joke. Others have survived emotional abuse, being told that they weren't good enough, weren't pretty enough, didn't look right, or whatever. To these people, survival means a lot more. It means there is a lot of hurt, guilt, and pain that is dealt with every day.

Together, we have decided it is time to speak out. Others have done so before in books, magazine articles, and websites. Still, they couldn't speak from the perspective we can. They wrote about Bill Gothard's ministry from the outside. We write about it from the inside. They observed our legalism and tried to warn our families. We lived in legalism and wish we'd listened sooner.

We have identified 3 groups of people as our target audience:





The Entrapped—those who are still fully involved with IBLP and ATI. We seek to warn, plead, and persuade them to leave behind the shackles of legalism and walk in the joy that comes in seeking a vibrant relationship with the living Christ.

The Seeking—parents who are asking questions and students who are trying to determine what they believe about critical issues. Our goal is to provide sound teaching, especially in the areas emphasized by Bill Gothard. We want to help safely guide these people from bondage to freedom without the fear and anguish that tend to accompany such a journey.

The Recovering—those who have left ATI or IBLP and are still working through spiritual, emotional, and theological issues related to their involvement. We desire to help those in this group “reprogram” according to the truths found in God’s word. Many of us are still healing, and we want to go through this journey together.

So, wherever you find yourself, we hope this project and our website is a blessing to your life. It is indeed a labor of love, bathed in prayer and dedicated to the glory of God.

All articles on this site reflect the views of the author(s) and do not necessarily reflect the views of other Recovering Grace contributors or the leadership of the site. Students who have survived Gothardism tend to end up at a wide variety of places on the spiritual and theological spectrum, thus the diversity of opinions expressed on this website reflects that. For our official statement of beliefs, [click here](#).

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Exploited Innocence: Sexual Harassment at HQ

20 April 2012, 06:00

Moderator



Editor's Note: While most of our articles this month have focused on sexual abuse, this article focuses specifically on sexual harassment experienced while in the employment of Bill Gothard. The dictionary defines sexual harassment as, *"The persistent unwelcome directing of sexual remarks and looks, and unnecessary physical contact at a person, usually a woman, especially in the workplace."* This is Part One of a two-part article documenting sexual harassment within the Institute. Follow-up articles with similar testimonies include: **Another Witness; Third Witness; and A Call to Repentance.**



I was an ATI (Advanced Training Institute) student in Advanced EXCEL at the Dallas Training Center and was headed to college in the fall. Gothard called me down to his office to ask about my plans for the future and asked me to defer college enrollment to come write a series of courses in my intended area of college study for the new Telos program at the Institute in Basic Life Principles (IBLP). I believed myself unqualified to take on a project of that scholarship and magnitude, but Gothard was insistent that I was chosen by this material, and to do so specifically at IBLP Headquarters in Oak Brook, IL. Meanwhile, Gothard wanted me to attend a Character First conference with him in Oklahoma that weekend. Later I would understand that these invitations were based on my physical appearance, not my research and writing skills.

That weekend at the Oklahoma City Training Center, I got an introduction to Gothard's conduct with young female apprenticeship students who caught his eye. Gothard and the center director showed me to my room that first night, and after some small talk the center director waited awkwardly for Gothard to leave the room with him. Instead of departing, Gothard walked me to the far side of the bedroom. The director shuffled his feet by the door and

appeared to be making every decorous effort to indicate it was time to leave. The center director eventually departed, visibly uncomfortable with the situation, and left me alone with Gothard. I tried to simply smile and nod as Gothard took my hand in front of the window and talked about the wonderful opportunities ahead for me. I was alarmed, but had no idea how to object without causing a scene. He pressured me for a firm verbal commitment to come to Headquarters, and I replied that it was not a decision I could make lightly or alone. After several minutes he gave my hand a final squeeze and departed with a grin and a wink. I was 17 years old.

I should have known then that I needed to leave the situation, but by the end of the weekend I had convinced myself that this was a man of God, that I was overreacting, that holding my hand was a fatherly gesture, and that Gothard hadn't winked at a teenager in her bedroom but rather had something in his eye. I don't remember whether I even told my parents about this part of the weekend, I self-censored so effectively.

After I went home Gothard called my family's house regularly until it was determined that I would go to Headquarters, and meanwhile I was invited to travel with him and other members of staff from Oak Brook to a conference in San Jose, CA. Without having yet been assigned a specific job for San Jose, I flew into Chicago, and the group picked me up at O'Hare on their way out of town. Gothard, four male assistants, one other female assistant and I drove to the West Coast ATI conference over several days, and I entered the queasy world of Gothard's young female traveling companions.

Gothard touched the other girl and me regularly and with increasing frequency. At first he merely offered a hand to help us in or out of the van, and laid his other hand on our backs as we entered or exited. Then he would hold open a door and touch each of our backs as we walked through; this seemed fine the first time, but I wasn't sure why it was necessary to touch both of our backs with full open hand every single time we walked through a door of any kind. If there was bench seating, his thigh was closely pressed against mine or the other girl's. He would take and hold my or her hand as we walked to and from buildings. Without asking or announcing, he stroked my hair. If he was sitting opposite me in the van I would often look up to find him gazing at me, and then he would nudge my foot with his. I would smile nervously, pull my foot back, and look back down at my papers. If he was seated next to me in the van he would rest his hand on my forearm or reach over to hold my hand. I learned to hold my papers in whichever hand was closest to him.

He took his shoes off and suggested that the group in the back of the van do the same. I thought he was just being casual until he started playing "footsy" with me in front of the others. Thereafter I kept my shoes on with toes curled to secure them and unsuccessfully tried to angle my legs away from him, but the man has a talent for cornering a girl's foot in a small space. I could not figure out how to avoid it without making a scene. I struggled to reconcile the cognitive dissonance between assisting the head of a ministry and trying to gracefully fend off a persistent volley of (usually successful) attempts at physical contact.

On the third day of the trip I called my parents from a pay phone at a Cracker Barrel. I left a message about how Gothard kept touching me and trying to engage me in long, intimate gazes, and how I didn't know what to do about it. By the time I called my parents from San Jose on the fifth day they were frantic, but Gothard had repeatedly admonished me that I should give them a good report "even if I was tired." Since each of the individual incidents that so troubled me seemed minor, I told my parents I'd just been tired when I left the message and must have misunderstood the situations. I assumed I was just a sheltered girl entering a more sophisticated world.

In San Jose, at first I had no task aside from waiting for Gothard to summon me and the others in our party to his room at midday, although I was eventually able to get an assignment working at the book tables in the evenings. I never had a problem with Gothard touching me on the conference floor, when we encountered ATI families at the

hotel, or when someone produced a camera. He confined his touch and gaze to times when we were with the core traveling group in the van or in his suite.

On the trip back to Oak Brook we stopped at a restaurant with a gift shop, and Gothard put his arm around my waist, waved his arm, and said he'd buy me anything in there I wanted. I thanked him, declined, and excused myself. I feared that a gift would indebted me in a way that I could not articulate, but that I knew I did not want. I rejoined the group when I was able to make myself laugh and smile again, as Gothard had rebuked me earlier for not appearing cheerful enough.

After I returned home that summer Gothard continued to call, and I convinced myself that I'd just been overly tired and emotional on the trip. He again convinced my family that God was calling me to complete this project for Telos, and that the project was very important to him personally because of some of his father's dying instructions.

Once I was at Headquarters it became immediately clear that no one in the Telos program was interested in or had even been informed of this project. I threw myself into reviewing and organizing the raw research I'd assembled and began to write what I was supposedly there to write. Gothard would summon me at various times of day and late into the night to help him with correspondence, but my duties in his office usually included being patted on the arm or hair. I tried to keep a desk between him and myself, but that strategy was only intermittently effective. I submitted the first part of the course I was creating for review by the relevant supervisor, and to the best of my knowledge it was never even read. The project had been killed behind the scenes before I'd submitted any material at all, and Gothard had approved this cancellation *months* before without telling me. Too slowly I realized that I had not been invited to Headquarters as a course writer, but as a decorative object. I had the kind of tailored suits and long curly hair that Bill Gothard liked. He continued to take me to meetings and invite me to his office at night, and I tried to find any viable excuse to avoid being alone with him. Simply refusing the head of the ministry was not an option in this very hierarchical environment, and at the time I was not aware of any other young members of staff who had successfully done so.

What I did not know was that in the Summer and Fall of 1997, after the San Jose conference and around the time I arrived at Headquarters, the father of one of the young men on the San Jose trip had approached the IBLP Board with a spectrum of concerns about Gothard's conduct, particularly his penchant for taking young girls on road trips and conducting himself in a questionable manner with them while on those trips. I do not know what Gothard's verbal or written response was to the Board when presented with these concerns, but I know firsthand that his conduct with me and other young women did not alter in the months after the Board asked him to change his behavior. The other girls and I were all between 15 and 24 years of age.

I stayed and worked at Headquarters because it was too late for me to start college that year, and because I wanted to make a success of my first job. I stopped explaining away Gothard's creepy and invasive behavior with young women, although I believed myself powerless to do anything about it. I repeatedly saw him initiate long hand-holding sessions with various young women on staff wherein he would rub and massage their hands as he gazed into their eyes. I heard him praise two of my housemates effusively for their "discipline of figure" after one of them lost weight during a serious illness and the other started exhibiting all symptoms of full-on anorexia nervosa, while other girls were "reassigned" from Headquarters for becoming too heavy. I tentatively discussed Gothard's hyper-tactile behavior with girls who were or had been in my place. I saw girls rotate on and off of Gothard's roster of favored companions and stopped trying to convince myself that every brush of his hand against a thigh must be a unique accident. There were always between two and six girls on this rotation, and I couldn't figure out how to get off of it.

My solution to this was to become somewhat surly. This was, of course, not a *great* plan, but it did lessen the number of invitations to Gothard's office, and I went on fewer trips. Gothard assigned me to rewrite a footnote about divorce for an upcoming edition of the Zodiastes study Bible, and I declined on the grounds that I did not have adequate linguistic expertise. Gothard assigned me to answer a couple of letters with advice that I could not endorse, and I let the letters die in a drawer instead. I tried to find a space between being a favorite and being seen as obstinate, which is a much smaller space than one might expect. Nevertheless, I was still on the escort rotation, seemingly because I still fit Gothard's favored physical profile.

The way out was photo day. I was ill the day staff pictures were taken, and my photo was of a pale, sweaty girl with sunken eyes and a chapped smile squinting through glasses. These were to be the photos Gothard viewed and prayed over each morning, and I was never called to his office again.

A well-timed virus had accomplished what all my passive aggression could not, and I was finally off Gothard's list of favorite objects.

Click here for Part 2 of this article: "*Sexual Harassment: Aren't you making too big an issue of this?*"

See how the experiences Ruth, Annette, Charlotte, Rachel, Meg, Lizzie, and Grace had with Bill Gothard fit together chronologically here, and behaviorally here.

Lizzie's parents first attended the Basic Youth Conflicts Seminars in the 1970s, and her family was enrolled in the ATI program for most of the 1990s. Between 1994 and 1998 she spent several months at the Indianapolis and Dallas Training Centers, worked at IBLP seminars in five states, and served at the Moscow Training Center. She worked at IBLP Headquarters in Oak Brook, IL, 1997-98. Lizzie graduated from Moody Bible Institute and did graduate work at Wheaton College.

If this sexual abuse series brings up any emotions that you would like to process with a professional counselor, please e-mail us at: support@recoveringgrace.org. We would be happy to recommend some professional counselors who are associated with the Recovering Grace ministry and who are familiar with the fundamentalist background of ATI and IBLP.

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Featured Article When the Umbrella Breaks: Sexual Abuse in ATI

Advanced Training Institute

ATI

Basic Seminar

Bible

Bill Gothard

college

MGA

From: Liz [REDACTED]comcast.net]
Sent: Monday, May 07, 2012 10:55 PM
To: Bill Gothard
Subject: Recovering Grace Retraction

Dear Mr. Gothard,

We are sending you our request to pull Emily's post on Recovering Grace. I have copied and pasted it below. I hope we covered everything you requested. If there is anything else you think we can do to remedy the situation, please let us know. If they refuse to pull the post, I will make another post myself stating the concerns we talked about.

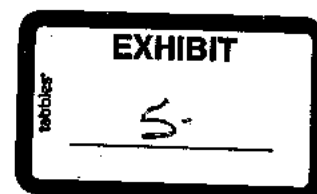
Just so you know, my husband has asked us to forego attending the conference this year because of medical finances. I didn't want you to think we were not coming over this situation. He actually mentioned this to me over a week ago.

We were so excited to see that Jim Schettler is speaking. We heard the Ahithophel message he preached last August in Indianapolis at the Majesty Music Conference at Burge Terrace Baptist Church, right before we came up to Chicago. I guess we will just have to get the DVDs when they come out later this year.

I am very sorry for all the stir as a result of the posts and think a good lesson has been learned about internet communication. I would appreciate your prayers on behalf of Emily and her health since these kinds of incidents can give her trouble in the days following an emotional upheaval. She is taking extra probiotics tonight!

Thank you for your call today. My husband read the posts when he got home and we spent some time talking about further ways to get help to restore our family.

[REDACTED] & [REDACTED]



Dear Moderators:

This is [REDACTED] and [REDACTED] who posted on the Sexual Harassment at HQ article. Mr. Gothard has been in contact with us concerning the posts we made. He pointed out that we did not give a complete picture of our visit there last summer, and we agreed that some information was not included. Everything we posted was as it happened, but for sake of length in the post, we didn't give the total picture of how the ministry was trying to help us. This has been a point of offense to Mr. Gothard, and we feel like we should comply with his request to delete the posts since they are seeming to cause a great amount of damage in a way that we did not originally intend. Therefore, we are asking that [REDACTED]'s original post be deleted. Mr. Gothard and we are requesting that the moderators state that "this post was deleted due to incomplete information".

The information [REDACTED] did not include in her post concerned the fact that Mr. Gothard did indeed contact my husband twice—once to ask permission for [REDACTED] to come to HQ, and again while we were there. My husband actually initiated the second contact requesting that we return home, but during that call Mr. Gothard did discuss the family issues which were the reason for our seeking his help. While we were there, Mr. Gothard also did contact two physicians concerning Emily's health issues. We talked with someone from Vonner Health Services on speaker phone in Mr. Gothard's office, so I am guessing this was one of the doctors he referred to. At that time, Mr. Gothard ordered and the ministry paid for \$1,000.00 worth of supplements which he gave to us free of cost in an effort to help [REDACTED]'s health condition. I could not pay for this and kindly refused the offer, but he asked that we go ahead and take the products and give them a try.

In retrospect, the sexual harassment article probably was not the appropriate place for our concerns to be aired as (I stated in my post) this was not the impetus for our posts. In particular, we feel that the summary article's statement on sexual harassment about [REDACTED] being "inappropriately touched" was misleading. [REDACTED] was uncomfortable with some

gestures, but neither of us felt that these would be considered sexual harassment. We feel like Recovering Grace overstepped its bounds by making the statement in the summary article without asking our permission to do so. ✱

Thank you for your attention to this matter. We would appreciate a prompt resolution and ask that a response be made in a timely manner.

Sincerely,

and

From: MGA [mailto:mga@iblp.org]
Sent: Monday, May 21, 2012 11:56 AM
To: [REDACTED]
Subject: Letter

Dear [REDACTED] and [REDACTED],

Thank you so much for calling back Saturday and discussing the best response to your post. I am very grateful that we can identify the real problem of putting everything under a false and malicious heading. This is certainly a false judgment because it is totally opposite of my true motivation to work with young people over all of these years.

Thank you also for going over the letter that I was going to send to the website. After further discussion with leadership here, we feel it would be better not to send this letter but to have you take whatever you want and send your own letter with the insistence that they remove the post because they are using it to support their false claims. I certainly appreciate your kind and gracious response to this very serious situation.

If you have any further questions, I would be very happy to hear from you.

Through Christ our Lord,

Bill Gothard

Here is the content of the letter:

Dear [REDACTED],

I want to thank you and your mother for the discussions that we have had regarding your post. I appreciate your affirming that many important factors were missing from it and also that it was placed in a context that is not at all what you intended.

During the conference last August, we talked on three occasions. Each time you told me about the continuing conflict that you were having with your father and about your suffering from Crohn's disease. I knew that Crohn's disease is largely caused by stress. Therefore, my number one objective was to assist you in clearing up your Crohn's disease by helping you get away from your stressful environment and also helping you be reconciled with your father.

During the conference, I called your father and discussed the possibility of you coming to the Headquarters. When you and your mother visited the Headquarters, I made a further phone call to your father. He explained that from his perspective you and your mother were teamed up against him. Therefore, he was not able to receive the respect that he wanted. I discussed this with you and also listened to your side of the problem. This only confirmed to me the need for you to get away from the stress at home.

When I realized that you were intent on returning home, I called a doctor and health professional to see what counsel they could give to help you. They affirmed the need to be removed from stress and also recommended some supplements that might help your Crohn's disease. I ordered these products for you and gladly paid the cost which was over \$1,000.

None of these factors were mentioned in your post. You also mentioned that I would look at you during conferences but did not explain that you always liked to sit in the front row. You reported that I invited you to my "office" but did not describe the "office" which was a room off the lobby with floor-to-ceiling glass panels so that anyone walking by could look in.

When we talked at the Headquarters your mother was almost always with you and she affirms that she never felt like I had wrong motives.

I did ask you to forgive me for making you feel uncomfortable and I am grateful for your forgiveness. I will continue to pray for your relationship with your father and your total health.

Sincerely,

Bill Gothard

MGA

From: [REDACTED]@comcast.net]
Sent: Monday, June 04, 2012 4:37 PM
To: MGA
Subject: RE: Letter/RG Post

Dear Mr. Gothard,

Recovering Grace finally deleted our posts and removed our names from other posters' replies to us this past Friday. Sadly, they would not comply with my request to delete the replies to our posts that are now no longer there. They asked me to encourage you to try to make amends with the other posters, even if it has to be through the website. It is probably the only way it will all get deleted.

[REDACTED] has been having some unusual sensations over the past week and is wondering if God is not doing a healing work in her body. Please pray that whatever is happening is truly healing and not another manifestation of illness. Thank you for your continued concern for us. We are praying for you, too. Feel free to call us if you feel the need to do so.

[REDACTED] & [REDACTED]

From: MGA [mailto:mga@iblp.org]
Sent: Monday, June 04, 2012 4:05 PM
To: [REDACTED]
Subject: RE: Letter/RG Post

Dear [REDACTED] and [REDACTED],

Thank you so much for your efforts to bring closure to this matter. I am praying for your health and God's blessing upon your family.

Through Christ our Lord,

Bill Gothard

From: [REDACTED]@comcast.net]
Sent: Monday, May 28, 2012 8:48 PM
To: MGA
Subject: RE: Letter/RG Post

Dear Mr. Gothard,

Below is a copy of an e-mail message I just sent (Mon. 8:35 pm CT) to the Recovering Grace moderator who goes by "David", with whom we have been in contact about rectifying the situation caused by our posts to their website. I have asked for immediate removal (meaning tonight) of all posts and replies to and from us. Please feel free to contact me again if you feel like we need to talk further. Praying for you and the conference this week.

Liz [REDACTED]
[REDACTED]-home
[REDACTED]-cell

Dear "David",

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recovering grace

a Gothard generation shines light on the teachings of IBLP and ATI

[TWITTER](#)[HOME](#)[ABOUT US](#)[THE GOTHARD FILES](#)[BEST OF RG](#)[ARTICLES](#)[RESOURCE](#)

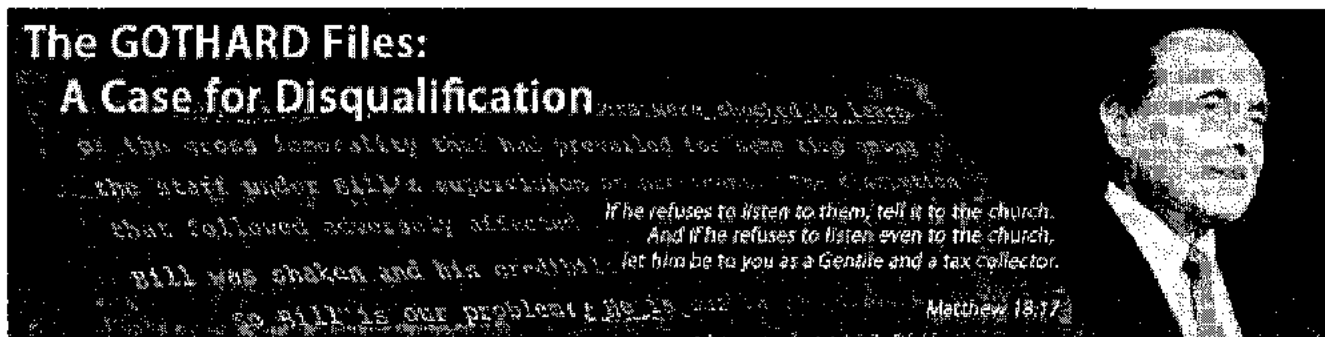
You are here: [Home](#) [Gothard Files](#) [The GOTHARD Files: A Case for Disqualification](#)

The GOTHARD Files: A Case for Disqualification

3 February 2014, 06:00

Moderator

247



Dear Recovering Grace Reader,

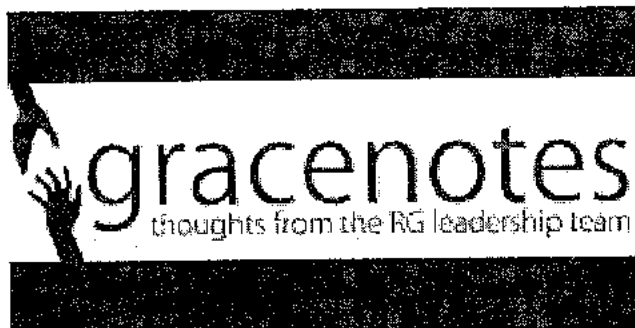
Today we would like to prayerfully share with you some important information about what is going to be happening on our website over the next few months.

When we launched our website in July of 2011, we did so with the express mission of helping people whose lives have been impacted by the teachings of Bill Gothard through the Institute in Basic Life Principles (IBLP) seminars and the Advanced Training Institute (ATI) homeschool program. We have attempted to fulfill that mission through regularly posted articles primarily written by former students of ATI—articles that have covered a wide variety of issues such as theological discussions of IBLP teachings, personal stories of discovering grace, and bringing to light some of the darker aspects of working at an IBLP Training Center. What we truthfully did not realize at the time of our launch was the strong undercurrent of depravity displayed for decades at the highest levels of IBLP leadership. Our thought at the time was that the most viscerally damaging effects of Gothardism were spiritual, and that Bill Gothard's worst flaws were theological and hermeneutical. As such, most of our attention for the first year of our website was focused on these areas.

EXHIBIT

6.

In early 2012, this all changed for us when a young lady shared with us her experiences working for Bill Gothard at Headquarters. While it has long been widely known by anyone who worked there that Bill had his favorites, this young lady opened our eyes to what being a "favorite" meant: unwanted and unwarranted emotional and physical attention from a man in a position of authority to young women who could not refuse it. In other words, it was textbook sexual harassment.



So, on April 20, 2012, we published Lizzie's story. And as soon as we did, we discovered that we had opened Pandora's box. The emails and comments poured in like a flood, and we knew that we had stumbled across something bigger than we could have ever anticipated. A few weeks later, we published Annette's story; a year later, Grace's. Over the past two weeks, Meg has shared with us her very painful personal journey. And, later this week, we will share yet another account.

Since the time that Lizzie's story was published, we have identified by name **at least 34 different women** who have experienced the same harassment, and we have sufficient evidence to believe that there are dozens more. We have had men and women who served in IBLP leadership confirm that the allegations are true, although they felt (and often were) powerless to do anything at the time. In fact, we have learned that the IBLP Board of Directors has on more than one occasion addressed this behavior with Bill Gothard, but to no lasting avail.

Once we had enough verifiable and/or witnessed accounts to be certain without a shadow of doubt that the allegations of ongoing sexual harassment were true (we have lawyers on our team reviewing the data), we issued a public Call to Repentance to Bill Gothard on June 6, 2013. In this article we identified the pattern of behavior and issued a call for him

...to cease denial and suppression of the truth, and to publicly repent and turn from this behavior which is unbecoming to a minister of Jesus Christ...to be willing to humble himself in this matter, and make a public confession and apology to the countless women whose lives he has affected.

Two weeks later, we received a brief email from Bill Gothard requesting a meeting with us for the purposes of "reconciliation." What followed was a 12-day-long exchange of emails in which we would ask specific questions of him in an attempt to discern whether this was a sincere effort towards repentance. Each response we received from him was vague and non-specific, and at no time did he admit to or indicate that he took responsibility for any of the inappropriate behavior, only that he desired that the "painful memories" of those involved in the IBLP ministry could be "resolved." Our last official communication with him took place on July 1, 2013, when we stated our belief that

the first step towards reconciliation with those you have offended must be sincere repentance. While we respect that you feel sorrow over others' painful memories, we do not believe that sorrow alone is sufficient to mitigate others' pain. As Paul states in 2 Corinthians 7:10, a godly sorrow leads to true repentance. Until we see some evidence of this repentance and a desire to turn from your sin, our organization will be unable to assist you in reconciling with those you have sinned against. Reconciliation apart from repentance by the offender is, quite simply,

***from all ministry and leadership positions, publicly repent of the above sins,
and exhibit fruit in keeping with repentance (Matt. 3:8).***

After two and a half years of publications, we hope and trust that our readership has grown to understand that this statement and this series of posts is not one born of vindictiveness, spitefulness, or gratuitousness. Our hope is that this undertaking will provide healing for the many victims and repentance to Bill's heart. Each member of our team has donated countless hours to this project at great emotional, mental, and physical cost, and each of us has, in many ways, left our current lives to revisit a time in our lives that we could just as easily forget. But for the sake of our younger brothers and sisters in Christ who are still in danger, we refuse to look the other way and allow the abuse to continue.

Amidst all of this, it is our ultimate calling before God that drives us now as it has since our first day in July 2011: a calling to act justly, to love mercy, and to walk humbly with our God (Micah 6:8). It is our deepest prayer that God would use the efforts of Recovering Grace to demonstrate publicly what justice, mercy, and humility look like when exemplified in the church of Jesus Christ. We would ask for your prayers and support as we embark upon this endeavor.

The Recovering Grace Team

All articles on this site reflect the views of the author(s) and do not necessarily reflect the views of other Recovering Grace contributors or the leadership of the site. Students who have survived Gothardism tend to end up at a wide variety of places on the spiritual and theological spectrum, thus the diversity of opinions expressed on this website reflects that. For our official statement of beliefs, [click here](#).

Gothard Files gracenotes

abuse Advanced Training Institute ATI Bill Gothard disqualification

Gothard Files IBLP Institute in Basic Life Principles justice Matthew 18 mercy

Micah 6:8 Recovering Grace repentance sexual abuse Sexual harassment

spiritual abuse Training Center victims

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About the author

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Gothard Files gracenotes

abuse	Advanced Training Institute	ATI	Bill Gothard	disqualification	
Gothard Files	IBLP	Institute in Basic Life Principles	justice	Matthew 18	mercy
Micah 6:8	Recovering Grace	repentance	sexual abuse	Sexual harassment	
spiritual abuse	Training Center	victims			

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About the author

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REQUEST AN IDOL SPEAKER

About National Center for Life and Liberty

This is an exciting, but perilous, time for religious liberty in America. As Christians, we must act now to protect our constitutional freedom to be able to practice and pass the Biblical faith and values that we hold dear to the next generation. The Lord has led me to launch a new ministry—the National Center for Life and Liberty—to fulfill a pressing need at this critical time in our nation's history.

This nonprofit legal ministry—NCLL—will serve to protect and defend the Bible-based values upon which our nation was founded. NCLL will endeavor to protect and defend these important foundational areas that support our freedoms: Life Values, Constitutional Values, Church Liberty, Christian Education, and Homeschool Education.

America's Founding Fathers gave their lives and fortunes to protect the life and liberty rights of American citizens—but this fight does not only happen in one generation. We must accept the challenge to pass these God-given rights on to our children and grandchildren.

My generation must act now! The need is great. The time is short.

President of NCLL - David Gibbs III



Attorney David C. Gibbs III is the President and General Counsel of the National Center for Life and Liberty, a ministry organization that defends life and liberty freedoms nationwide. Mr. Gibbs speaks regularly to audiences in churches and conferences while also litigating cases as a trial attorney. He hosts the weekly radio program Law Talk Live on the Moody Radio Network and has authored five books including *Fighting for Dear Life* and *Understanding the Constitution*.

Attorney Gibbs graduated from Duke Law School and manages the Gibbs Law Firm with offices in Dallas, Texas; St. Petersburg, Florida; and Washington, D.C. He is admitted to practice before the United States Supreme Court and numerous federal circuit and district courts nationwide. He has also been admitted to the State Bars of Florida, Minnesota, Colorado, North Dakota, Ohio, Texas, Tennessee, Michigan, and the District of Columbia.

Attorney Gibbs was the lead attorney in the Terri Schiavo case representing the parents as they fought to save the life of their daughter. This case went before the United States Supreme Court twice in ten days. Mr. Gibbs is a frequent spokesperson on radio and television having appeared on many major news and talk programs.

Attorney Gibbs believes: "If it's wrong, fight it. If it's right, fight for it." His life verse is Matthew 25:40, where Jesus said, "Inasmuch as ye have done it unto one of the least of these, my brethren, ye have done it unto me."

CONTACT US

PO Box 270548
Flower Mound, TX 75037-0548

Phone: 888.233.NCLL (6255)

Fax: 727.398.3507

Email: info@NCLL.org

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Life Defense
Christian Education
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International Liberty



**STATE OF ILLINOIS UNITED STATES OF AMERICA COUNTY OF DUPAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT**

LIFE PURPOSE POWER TEAMS, INC.,)
an Illinois not-for-profit corporation,)
WILLIAM GOTHARD, ANTHONY BURRUS,)
RALPH HUDGENS, ROBERT NOVELL, and)
ROGER BLAIR, D.D.S.,)

plaintiffs,)

v.)

INSTITUTE IN BASIC LIFE PRINCIPLES, INC.,)
an Illinois not-for-profit corporation,)
JOHN STANCIL, Ph.D., GIL BATES,)
TIM LEVENDUSKY, STEPHAN PAINE, M.D.,)
DAVID YORK, and ROBERT BARTH,)

defendants.)

No.
Judge
Calendar

VERIFIED COMPLAINT

NOW COME LIFE PURPOSE POWER TEAMS, INC., an Illinois not-for-profit corporation, WILLIAM GOTHARD, individually, ANTHONY BURRUS, as a Board member of IBLP and individually, RALPH HUDGENS, individually, ROBERT NOVELL, individually, and ROGER BLAIR, D.D.S., individually, for their complaint against the INSTITUTE IN BASIC LIFE PRINCIPLES, INC., an Illinois not-for-profit corporation ("IBLP"), JOHN STANCIL, Ph.D., as a Board member at IBLP and individually, GIL BATES, as a Board member at IBLP and individually, TIM LEVENDUSKY, as a Board member at IBLP and individually, STEPHAN PAINE, M.D., as a Board member at IBLP and individually, DAVID YORK, as a Board member at IBLP and individually, and ROBERT BARTH, individually, state:



1. The parties.

A. The plaintiffs.

1. LIFE PURPOSE POWER TEAMS, INC., is an Illinois not-for-profit corporation dedicated to providing instruction and training on how to find success and fulfillment through principles found in Scripture to individuals, families, churches, schools, communities and businesses ("LIFE PURPOSE POWER TEAMS"). Its principal place of business is located at 1027 Arlington Avenue, LaGrange, Illinois.

2. WILLIAM GOTHARD is an individual who resides at 1027 Arlington Avenue, LaGrange, Illinois ("GOTHARD"). GOTHARD has devoted his life to providing advice, counsel, instruction and training on how to find success by following God's principles found in Scripture. In 1961, GOTHARD founded Campus Teams, an organization which came about from GOTHARD's work with troubled youths. The name of the organization was changed to Institute in Basic Youth Conflicts in 1974, and in 1989, the name was changed to the current INSTITUTE IN BASIC LIFE PRINCIPLES, of which GOTHARD is the founder and of which he was a Board Member from inception until March, 2014. GOTHARD now runs LIFE PURPOSE POWER TEAMS.

3. ANTHONY BURRUS is an individual who resides at 213 Carver Street, Waco, Texas. He currently is a Member of the Board of Directors of the IBLP, and has been a Member since December 8, 2012 ("BURRUS"). He was appointed by GOTHARD.

4. RALPH HUDGENS is an individual who resides at 6509 Highway 106 South, Hull, Georgia. He is a former Member of the Board of Directors of the IBLP, having been appointed by GOTHARD, and is an alumnus of the IBLP ("HUDGENS").

5. ROBERT NOVELL is an individual who resides at 12739 Pecan Tree Court, Willis, Texas. He has been a significant donor to IBLP, and is an alumnus of the IBLP ("NOVELL").

6. ROGER BLAIR, D.D.S., is an individual who resides at 4529 Cross Street, Downers Grove, Illinois. He is a former participant in the IBLP home education program, and is an alumnus of the IBLP ("BLAIR").

B. The defendants.

7. The INSTITUTE IN BASIC LIFE PRINCIPLES, INC., is an Illinois not-for-profit corporation whose purpose is to provide instruction and training to individuals, families, churches, schools, communities and businesses on how to find success by following God's principles found in Scripture ("IBLP"). This has always been done primarily, if not exclusively, through seminars devised by GOTHARD and publications authored by GOTHARD. It is neither a congregational nor hierarchal church, and is not bound by or subject to the doctrine or rules of any church. Its principal place of business is located at 707 West Ogden Avenue, Hinsdale, Illinois, and it is a 501(c)(3) corporation.

8. JOHN STANCIL is an individual who resides at 1800 Nicklaus Drive, Springfield, Tennessee. He currently is a Member of the Board of Directors of the IBLP, and has been a Member since December 8, 2011 ("STANCIL"). He was appointed by GOTHARD.

9. GIL BATES is an individual who resides at 259 Echo Valley Road, Lake City, Tennessee. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("BATES"). He was appointed by GOTHARD.

10. STEPHAN PAINE, M.D., is an individual who resides at 8706 W. Eseco Road, Agra, Oklahoma. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("PAINE"). He was appointed by GOTHARD.

11. DAVID YORK is an individual who resides at 11330 W. Whitaker Avenue, Greenfield, Wisconsin. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("YORK"). He was appointed by GOTHARD.

12. TIM LEVENDUSKY is an individual who resides at the corporate headquarters of IBLP at 707 West Ogden Avenue, Hinsdale, Illinois. He currently is a Member of the Board of Directors of IBLP, and has been a Member since April, 2014 ("LEVENDUSKY"). He was appointed by BATES, PAINE and YORK.

13. ROBERT BARTH is an individual and a licensed attorney who resides at 1211 Birchwood Road, Oak Brook, Illinois. He has been and is the general counsel for IBLP.

2. Jurisdiction and venue.

14. Jurisdiction is proper in Illinois because the commission of the tortious acts set out in this Complaint occurred in Illinois. See 735 ILCS 5/2-209(a)(1).

15. Venue is properly set in DuPage County because it is the county in which the transaction or some part thereof occurred out of which this cause of action arises. Too, IBLP and LEVENDUSKY are residents of DuPage County. See 735 ILCS 5/2-101.

3. Facts common to all Counts.

16. IBLP was founded by GOTHARD for the purpose of providing a forum for GOTHARD to provide seminars and disseminate books and other materials containing the basic life principles GOTHARD learned from his work with youth and Scripture. People who attend

the seminars and purchase the published materials maintain that GOTHARD's teachings have had a substantial impact on their lives, repairing broken homes, lives and marriages, and leading them to realize their full, prosperous potential. More than 2.5 million people in the United States have attended GOTHARD's thirty-hour seminars; they are known as alumni. Up to the time he left IBLP, GOTHARD stayed in touch with and made himself available to alumni to provide further advice and counsel on a regular basis. IBLP also provides curriculum and resources for home schooling programs, and it provides counseling and guidance to other groups, including prisoners.

17. Payment of the entrance fee at a seminar guarantees the attendee admission to an unlimited number of subsequent seminars of the attendee's choosing, free of charge. Most alumni attend multiple seminars to obtain on-going guidance from GOTHARD.

18. IBLP is funded by the income realized from the seminars and sale of the published materials, and, in large part, from donations from the alumni.

19. Over the years, prominent alumni have donated significant amounts of real estate or money to support GOTHARD in the work he was doing through IBLP. Many of the donations were made to GOTHARD personally, but GOTHARD promptly transferred them to IBLP. As a result, IBLP owns various properties on which there are training centers and other facilities:

- a. approximately 120 acres for corporate headquarters and production facilities in Hinsdale and Oak Brook, Illinois;
- b. approximately 3,000 acres known as the Northwoods Conference Center in Watersmeet, Michigan;
- c. approximately 2,200 acres known as the Big Sandy Campus, in Big Sandy, Texas;
- d. approximately 20 acres known as the Little Rock Training Center, in Little Rock, Arkansas;

- e. approximately 40 acres known as the Nashville Training Center, in Madison, Tennessee;
- f. approximately 700 acres known as the Eagle Springs Training Center, in Skiatook, Oklahoma; and
- g. approximately 120 acres known as the south Campus, in Indianapolis, Indiana.

20. The alumni made these donations with the expressed intent that the donations be used to fund the work of IBLP, and in particular to allow GOTHARD to continue to conduct seminars, write books and stay in regular contact with the alumni for advice and counsel. IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH knew this to be the intent of the donors.

21. Sometime in 2013, someone posted on a website allegations that GOTHARD had improper contact with a woman. The name and picture accompanying the post were, and still are, unfamiliar to GOTHARD. A short time later a second woman posted another story of improper contact, but the woman who posted the story immediately insisted that it be removed from the website because her story had been framed by the operators of the website in a false context, and it was removed. Thereafter other anonymous postings of a similar nature were made on this website. The stated "mission" of the website is to discredit GOTHARD and his ministry.

22. In February, 2014, GOTHARD expressed his intent to accept an offer by the operators of the website to put GOTHARD in contact with the people who posted the allegations on the website, many of whom were anonymous, to allow them to discuss the allegations. But PAINE, YORK and BATES, in their capacity as Board members, and BARTH refused to allow GOTHARD to have any contact with those operators, terming them enemies of the IBLP. GOTHARD offered his leave of absence to the Board of IBLP in order to contact his accusers free from any association with IBLP, but PAINE, YORK, BATES and BARTH declined to accept his leave offer of leave of absence, stating that they first wanted to have a thorough

investigation of the allegations conducted by independent counsel and, upon information and belief, as Board members of IBLP wanted to maintain the authority to direct and restrict GOTHARD's conduct. They directed GOTHARD not to have any contact with the staff of IBLP, or any of its current participants or alumni, or with anyone associated with the website.

23. GOTHARD considered PAINE, YORK, BATES, LEVENDUSKY and BARTH's direction that he have no contact with anyone involved in IBLP to be contrary to the purpose of IBLP and contrary to the interests and intent of the alumni in making their donations, and considered the restrictions to be designed to isolate and neutralize him. On March 5, 2014, GOTHARD again offered his leave of absence, and this time PAINE, YORK, BATES and BARTH, accepted it on a temporary basis, with the agreed upon understanding that GOTHARD would return to his position with IBLP after a short while.

24. To sustain GOTHARD during his leave, BARTH offered to provide GOTHARD an office, the help of a staff member, and his salary and benefits, all of which was to continue until such time further Board action reinstated him to IBLP.

25. Contrary to the promises and assurances made by PAINE, YORK, BATES and BARTH, PAINE, YORK, BATES, LEVENDUSKY and BARTH denied and continue to deny GOTHARD access to IBLP facilities and staff, seminar participants and alumni. GOTHARD was never provided an office or his salary and benefits,

26. On May 2, 2014, YORK had a telephone conversation with GOTHARD in which YORK told GOTHARD that he and his ministry should be forever separated from the ministry, that while neither YORK nor any other Member of the Board believed GOTHARD was guilty of any of the allegations made on the website, PAINE, YORK, BATES, LEVENDUSKY

and BARTH nonetheless wanted GOTHARD permanently cut off from IBLP for some unstated reason. YORK told GOTHARD that his seminar material and publication would no longer be used at IBLP, and that GOTHARD would never have any contact with any IBLP's participants, alumni or staff.

27. Shortly before this telephone call, the outside attorney retained by IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH concluded the independent investigation of the allegations against GOTHARD. The independent investigator, an attorney (with his staff), concluded that the allegations were unfounded and reported this to IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH. No further investigative action was taken by IBLP, PAINE, YORK, BATES LEVENDUSKY or BARTH, all of whom have since acknowledged that the report did not support the allegations against GOTHARD. They did not disclose to GOTHARD the result of the investigation until after they informed him he would not be allowed to return.

28. On September 13, 2014, PAINE, BATES and LEVENDUSKY again told GOTHARD, in the presence of BURRUS, that GOTHARD would never be allowed to return to IBLP, but did not state why.

29. Thereafter, thousands of the current participants and alumni of IBLP made it known through letters and telephone calls that they do not support PAINE's, YORK's, BATES's, LEVENDUSKY's and BARTH's decision to banish GOTHARD, and many have expressly written that the donations made to IBLP were to further GOTHARD's work and should be redirected to GOTHARD, and were not to be used or administered by PAINE, YORK, BATES or LEVENDUSKY.

30. At or about the same time, PAINE, YORK, BATES and LEVENDUSKY voted to liquidate certain IBLP property in order to fund \$3 million in payments to certain staff members of IBLP, including BARTH, in shares of \$250,000.00 each. However, upon information and belief, this plan was held in abeyance to avoid criticism of donors and alumni already concerned with the actions of PAINE, YORK, BATES and LEVENDUSKY.

31. On April 20, 2015, PAINE, YORK, BATES, LEVENDUSKY and BARTH announced that IBLP was closing its headquarters in Oak Brook, Illinois, and that IBLP would sell all of its property other than that located in Big Sandy, Texas. It also announced that IBLP would move its headquarters to the Big Sandy Campus, a remote location over two hours driving time from the nearest airport, and would discontinue IBLP's ministry.

32. At about the same time, PAINE, YORK, BATES, LEVENDUSKY and BARTH announced country-wide lay-offs of all IBLP staff and employees not needed for the limited operations to be conducted in Big Sandy, Texas.

33. Upon information and belief, PAINE, YORK, BATES, LEVENDUSKY and BARTH intend to liquidate all the property of IBLP in order to eventually convert the proceeds from the sales to their own use, and to the use of others who will help them facilitate the conversion. They had earlier amended the by-laws of IBLP to allow for Board action upon a majority of the Board, and not by unanimous consent as it had been before, and when PAINE, YORK and BATES appointed LEVENDUSKY to the Board, they secured the majority needed to carry out the plan. PAINE, YORK, BATES, LEVENDUSKY and BARTH know that the properties are necessary and continue to be necessary to conduct the stated purpose of IBLP. PAINE, YORK, BATES, LEVENDUSKY and BARTH intend to convert all IBLP's real

property holdings to cash at a time they have expressly stated they are going to discontinue the ministry of IBLP in its many forms. In 2014, PAINE, YORK, BATES and LEVENDUSKY voted to sell property in Dallas, Texas, in order to raise cash for \$250,000 payments to certain and staff, including BARTH, the first time that would have ever been done, and just a short time after they were able to arrange for the removal of GOTHARD from the Board and ESTABLISH their own majority on the Board.

**COUNT I
FRAUD**

IBLP, STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH

LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS,
NOVELL, and BLAIR restate Paragraphs 1 through 33 in this Complaint as Paragraphs 1 through 33 of this Count I as though fully set out herein.

34. To make a claim for common law fraud, a plaintiff must establish 1) a false statement or omission of material fact, 2) knowledge or belief of the falsity by the party making it, 3) intention to induce the other party to act, 4) action by the other party resulting in reliance on the truth of the statements, and 5) damage to the other party resulting from such reliance.

35. IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH falsely assured GOTHARD that his voluntary leave would be temporary, that he would be able to return to IBLP after contacting his accusers and his exoneration by the independent investigation, and that they would operate IBLP according to its long-standing purpose in his absence. To induce GOTHARD to accept these assurances they promised him an office, staff help, his salary and benefits until he was restored at IBLP.

36. At the time they made these assurances, IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH knew them to be false as these individual defendants, who now constituted a majority on the Board of IBLP, saw an opportunity to get control of the assets of IBLP, once GOTHARD was out of the way, and to liquidate all of IBLP's real property in order to convert those assets to their own use.

37. IBLP, PAINE, YORK, BATES, LEVENDUSKY and BARTH intended GOTHARD to rely on their false statements in order to remove GOTHARD from IBLP and gain control of its assets.

38. As a result of those false statements, GOTHARD resigned his position as Chairman of the Board of IBLP.

39. LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR were harmed in relying on PAINE's, YORK's, BATES's and LEVENDUSKY's false statements because LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR are being denied GOTHARD'S life's work and ministry and the stated purpose of IBLP has been or will be abandoned.

WHEREFORE, LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR respectfully request this court to enjoin PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) using the name Institute in Basic Life Principles, 3) operating IBLP contrary to its stated purpose, 4) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of

IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

COUNT II
CIVIL CONSPIRACY
IBLP, STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH

LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS,
NOVELL, and BLAIR restate Paragraphs 1 through 44 of Count I as Paragraphs 1 through 44 in this Count II, as though fully set out herein.

45. To plead a cause of action based on a civil conspiracy, a plaintiff must allege that 1) an agreement between two or more persons 2) to participate in an unlawful act, or a lawful act in an unlawful manner, 3) an injury caused by an unlawful overt act performed by one of the parties; and 4) the overt act was done pursuant to and in furtherance of the common scheme.

46. PAINE, YORK, and BATES were each appointed to the Board of IBLP on December 8, 2012. In 2013, allegations were made against GOTHARD which PAINE, YORK, and BATES saw as an opportunity to remove GOTHARD from IBLP and its assets, and they agreed to use those allegations to unlawfully induce GOTHARD to take a leave from IBLP in order to get control of those assets.

47. PAINE, YORK, and BATES appointed LEVENDUSKY a member of the Board in April, 2014, and thereafter LEVENDUSKY joined with PAINE, YORK, and BATES to unlawfully keep GOTHARD from IBLP.

48. PAINE, YORK, BATES, LEVENDUSKY and BARTH thereafter made numerous false promises and representations to GOTHARD, all of which were meant to take advantage of GOTHARD's belief in reconciliation and return.

49. LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR was harmed by the agreement and the false statements made by PAINE, YORK, BATES, LEVENDUSKY and BARTH statements because IBLP is being gutted, GOTHARD is being denied the forum to pursue his ministry and the other plaintiffs are being denied the stated purpose of IBLP.

50. PAINE's, YORK's, BATES's and LEVENDUSKY's false statements were made in furtherance of their common scheme.

WHEREFORE, LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR respectfully request this court to enjoin STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) continuing as Board Members of IBLP and enjoin them from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) operating IBLP contrary to its by-laws, 3) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

COUNT III
BREACH OF FIDUCIARY DUTY
STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH

LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR restate Paragraphs 1 through 50 of Count II as Paragraphs 1 through 50 in this Count III, as though fully set out herein.

51. A fiduciary relationship exists when a special confidence is reposed in one who, by reason of such confidence, must act in good faith and with due regard to the interests of the person reposing such confidence.

52. Special confidence has been reposed in STANCIL, PAINE, YORK, BATES, and LEVENDUSKY as Board members, and in BARTH as general counsel, to use the property of IBLP as intended by IBLP and the alumni who donated the property and money to acquire the property.

53. STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH have breached that duty by abandoning the purpose of IBLP and making it impossible for GOTHARD to engage in his work by denying them their property rights and converting that property to their own use.

54. LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR have been damaged by the breach of fiduciary duty by STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH, and STANCIL, PAINE, YORK, BATES, LEVENDUSKY and BARTH should be enjoined from disposing of the property in the manner they intend.

WHEREFORE, LIFE PURPOSE POWER TEAMS, GOTHARD, BURRUS, HUDGENS, NOVELL, and BLAIR respectfully request this court to enjoin PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) continuing as Board Members of IBLP and enjoin them from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) operating IBLP contrary to its by-laws, 3) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with

IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

LIFE PURPOSE POWER TEAMS,
GOTHARD, BURRUS, HUDGENS,
NOVELL, and BLAIR

By: _____
One of their attorneys

Kevin J. Moore
LAW OFFICE OF KEVIN J. MOORE, P.C.
4365 Lawn Avenue, Suite 7
Western Springs, Il 60558
(708) 246-1595
DuPage Attorney No: 218047

Bill Gothard

From: Jared Stancil <jared@anchortransportation.com>
Sent: Saturday, May 16, 2015 7:54 AM
To: bill@billgothard.com
Subject: Fwd: Re: Potential Legal Action!!

See Below.

Jared Stancil
Anchor Transportation
615-533-0857 Cell

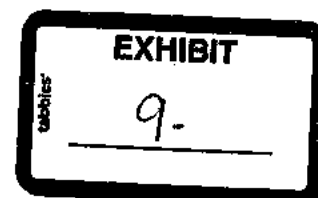
----- Forwarded message -----

From: David Gibbs III <dgibbs@gibbsfirm.com>
Date: May 15, 2015 6:42 PM
Subject: Re: Potential Legal Action!!
To: Jared Stancil <jared@anchortransportation.com>
Cc:

Jared,

Please forward these bullet points to Dr. Gothard from Dr. Stancil. Please remove my name from the documents or I will no longer be able to be called as a possible witness.

1. No new organization. Work to save and control IBLP.
2. Assert fraud and breach of contract claims. Dr. Gothard is entitled to back pay and ministry support for life as founder of IBLP.
3. Make the financial insinuations stronger against the board members who are financially exploiting their board seats for personal gain.
4. IBLP is an ecclesiastical organization under the authority of its founder for his entire life. As the founder, he has authority to appoint and remove board members. He has the authority to reinstate himself to the board. This is Scripturally an authority that he has over IBLP, an ecclesiastical organization that he founded, for the remainder of his life.
5. Dr. Gothard appointed the current board members with the condition that they would fully rely on his direction and counsel. They were never appointed to be independent as he does not believe they are competent to serve without his oversight.
6. The board is making disastrous decisions in breach of their fiduciary obligations. For example, publicizing and relying on the CLA report when CLA never spoke to any of the alleged victims and Dr. Gibbs, Jr. is traveling around preaching for their conferences. CLA specializes in board cover-ups not investigations. CLA was incompetent to conduct what the board asked them to do. CLA did not have appropriate independence. For example, selling properties and moving to Texas.
7. He needs to assert a claim for a full accounting of all funds and assets in the organization.
8. He needs to ask the court to freeze all assets beyond normal operations until the board is appropriately recognized by the court as valid.



9. Dr. Gothard needs to ask that no board meetings take place any longer without him present and voting as the ministry founder. He is asserting his founder's authority to save the organization from some board members who desire to privately inure and loot the organization for their own benefit.

From: Jared Stancil <jared@anchortransportation.com>

Date: Friday, May 15, 2015 at 1:34 PM

To: David Gibbs III <dgibbs@gibbsfirm.com>

Subject: FW: Potential Legal Action!!

From: Bill Gothard [mailto:bill@billgothard.com]

Sent: Friday, May 15, 2015 11:57 AM

To: Dr. John Stancil; Ralph Hudgens; Dr. Anthony Burrus

Subject: Potential Legal Action!!

Dear Men;

The attached document is what the attorney suggested as an initial approach to the opposing board members. I would appreciate your comments and counsel. I praise God for your faithful pray and support during these critical days of history. Every day is a new display of God's blessing on this new ministry.

Through Christ our Lord,

Bill

Boston Market #0166

101 W. Ogden Avenue
Westmont, IL
60559.
(630)964-1600

WE CATER!

2015-05-19

5:56 PM

0166 2 91 2067

Cashier: Christopher T

*** Order was Modified ***
*** After Total ***

Thank you for using
your Boston Market Card.

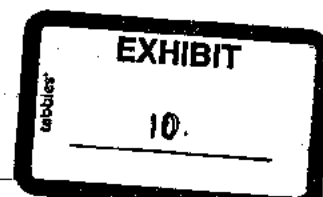
LARGE Meatloaf	10.99
Corn	6.69
Sweet Potatoes	
White Item Sampler	6.29
Corn	
Sweet Potatoes	
Sweet Potatoes	
Regular Meatloaf	7.89
Creamed Spinach	
Green Beans	
2 Fountain Beverage	3.98
Eat In	24.97
Senior Discount	-1.88
8.75% Tax	2.18
Amount Due	\$27.15
Gift Card	\$27.15
Change	\$.00

REDEMPTION

CARD A/C NUMBER: *****4149	
OPENING BALANCE:	100.00
TRANSACTION AMOUNT:	27.15
CURRENT BALANCE:	72.85

Check your balance online at
<http://www.bostonmarket.com/card>

NOT SCOUTED



Bill Gothard

From: Bill Gothard <bill@billgothard.com>
Sent: Saturday, May 30, 2015 1:17 PM
To: dgibbs@ncll.org
Cc: sales@anchortours.com
Subject: Letter to the Board
Attachments: Letter to donors.pdf; Complaint.pdf; proposed letter from DG III.pdf; Urgent appeal 25-5-15.pdf

Dear David,

Thank you for calling last evening. I was very pleased to hear your perspective on this whole matter of appealing to the board. I know that God will honor you for your generous Spirit.

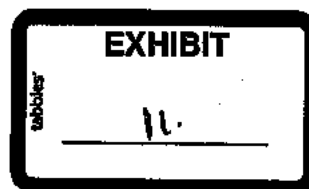
We talked about a letter that would accompany the appeal of the donors. I have written what I believe would be the essential points of such a letter. You are free to change it any way you want. Your letter and the appeal along with Tim Levendusky's e-mail (with my comments) to me (attached) hopefully be sufficient. In addition to the board members, it would be good to send a copy to Harvey Neu. He is the very influential person in Pastor York's church. His e-mail address is: harv@neushardware.com.

I am also sending you a copy of the lawsuit that it was drawn up by the other lawyer. The only part that may apply to the donors if this matter gets that far would be count III on breach of fiduciary duty.

You mentioned you might call today. And I will be very happy to hear from you.

Through Christ our Lord,

Bill



From: bill@billgothard.com

To: dgibbs@ncil.org

Subject: Addition to letter

Date: Sat, 30 May 2015 20:59:13 -0500

Dear David,

A few minutes ago I was talking with Dr. Stancil. After reading my proposed letter to him, he felt that it needed a final statement. He dictated the one that is on the attached letter. This lets them know that they must move quickly. I am still open to a call from you at any time.

Through Christ our Lord,

Bill.



Dear Members of the Board.

I have been approached by a group of very alarmed donors to the Institute in Basic Life Principles.

These donors have stated their concerns in the attached appeal.

As a practicing trial attorney and as a fellow believer, I want to assure you that you do not want this matter to proceed to a court.

I would strongly advise you to immediately reinstate Bill Gothard as a member of the board and refute the false allegations that have been brought against him.

Within the next two weeks legal action will begin unless you contact me with your plan of action.

Sincerely,

David Gibbs III



Note:

On Sunday May 24th I called Dr Paine and explained that I want to pursue reconciliation by asking the ATI families that would be gathered at the regional conference in Nashville if they would forgive me for not being the leader that I should have been to them. He said that he would pass this request to Tim Levendusky who is the president of the Institute and also a member of the board. Two days later Tim sent the following email to me.

This confirms the depths of the problem

"Dear Mr. Gothard,

I understand that you have plans to come to the Nashville Family Conference and that you wish to speak to or meet with the people attending this week.

I am writing on behalf of the IBLP Board and the whole IBLP ministry to tell you that we care about you, but we cannot allow you to come to the Nashville Family Conference, to be on the property of the Training Center or the Goodpasture School auditorium, or to disrupt the meetings in any way by your presence or interaction with IBLP staff, ATI families, or others present for this conference week. The Board has made it clear in the past (see below) and there has been no change regarding our current policy of not permitting you on any IBLP property.

For these and other important reasons, I am asking that you not put us in the position of having to ask you to leave the properties related to the conference this week. If you choose to disregard this admonition, we are prepared to utilize all appropriate means to have you removed from the property.

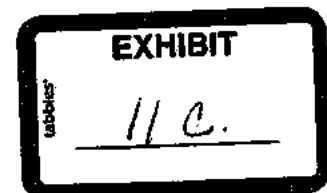
Please heed this warning and avoid any unnecessary courses of action by your coming to the Family Conference. If you are planning to come to Nashville, it will be best if you not even come near the conference grounds.

I will call John Stancil so that he is sure that you get this message being sent to you by email before the opening sessions start this evening. I am attaching your resignation letter so that John and others on the Board can see it first-hand as well.

John, you are welcome to call me if you see this email, to let me know you got it, and that you passed the message on to Mr. Gothard.

Sincerely in Christ,

Tim"



Dear Members of the Board.

I have been approached by a group of very alarmed donors to the Institute in Basic Life Principles.

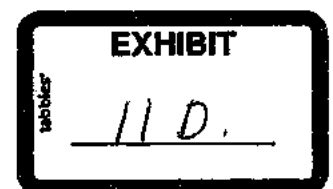
These donors have stated their concerns in the attached appeal.

As a practicing trial attorney and as a fellow believer, I want to assure you that you do not want this matter to proceed to a court.

I would strongly advise you to immediately reinstate Bill Gothard as a member of the board and refute the false allegations that have been brought against him.

Sincerely,

David Gibbs III



LIFE PURPOSE POWER TEAMS, INC.,)
an Illinois not-for-profit corporation,)
WILLIAM GOTHARD, Ph.D., individually,)
JOHN STANCIL, Ph.D., individually,)
ANTHONY BURRUS, individually, RALPH)
HUDGENS, individually, and)
ROGER BLAIR, D.D.S., individually.)

V.

INSTITUTE IN BASIC LIFE PRINCIPLES, INC.,)
an Illinois not-for-profit corporation, GIL BATES,)
individually, TIM LEVENDUSKY, individually,)
STEPHAN PAINE, M.D., individually,)
DAVID YORK, individually,)
and ROBERT BARTH, individually,)

NOW COME LIFE PURPOSE POWER TEAMS, INC., an Illinois not-for-profit corporation, WILLIAM GOTHARD, Ph.D., individually, JOHN STANCIL, Ph.D., individually, ANTHONY BURRUS, individually, RALPH HUDGENS, individually, and ROGER BLAIR, D.D.S., individually, for their complaint against the INSTITUTE IN BASIC LIFE PRINCIPLES, INC., an Illinois not-for-profit corporation, GIL BATES, individually, TIM LEVENDUSKY, individually, STEPHAN PAINE, M.D., individually, and DAVID YORK, individually, state;

EXHIBIT
11 E.

corporation dedicated to providing instruction and training on how to find success by principles found in Scripture to individuals, families, churches, schools, communities and businesses ("LIFE PURPOSE POWER TEAMS"). Its principal place of business located at 1027 Arlington Avenue, LaGrange, Illinois.

2. WILLIAM GOTHARD is an individual who resides at 1027 Arlington Avenue, LaGrange, Illinois ("GOTHARD"). GOTHARD has devoted his life providing advice, counsel, instruction and training on how to find success by following God's principles found in Scripture. In 1961, GOTHARD founded Campus Teams, an organization which came about due to GOTHARD's work with troubled youth and through which he conducted seminars on the application of Scripture to everyday life, and he wrote and disseminated books and other materials on the applications of Scripture, among other things. The name of the organization was changed to Institute in Basic Youth Conflicts in 1974, and in 1989, the name was changed to the current IBLP. GOTHARD now runs LIFE PURPOSE POWER TEAMS, INC.

3. JOHN STANCIL is an individual who resides at 1800 Nicklaus Drive, Springfield, Tennessee. He currently is a Member of the Board of Directors of the IBLP, and has been a Member since December 8, 2012 ("STANCIL"). He was appointed by GOTHARD.

4. ANTHONY BURRUS is an individual who resides at 213 Carver Street, Waco, Texas. He currently is a Member of the Board of Directors of the IBLP, and has been a Member since December 8, 2012 ("BURRUS"). He was appointed by GOTHARD.

5. RALPH HUDGENS is an individual who resides at 6509 Highway 106 South, Hull, Georgia. He is a former Member of the Board of Directors of the IBLP, having been appointed by GOTHARD, and is an alumnus of the IBLP ("HUDGENS").

6. ROGER BLAIR, D.D.S., is an individual who resides at 4529 Cross Street, Downers Grove, Illinois. He is a former Member of the Board of Directors of the IBLP, having been appointed by GOTHARD, and is an alumnus of the IBLP ("BLAIR").

7. The INSTITUTE IN BASIC LIFE PRINCIPLES, INC., is an Illinois not-for-profit corporation whose by-laws prescribe that it is to provide instruction and training on how to find success by following God's principles found in Scripture to individuals, families, churches, schools, communities and businesses, exclusively through seminars devised by GOTHARD and publications authored by GOTHARD ("IBLP"). (A true and accurate copy of the by-laws are attached hereto and incorporated herein as Exhibit 1.) It is neither a congregational nor hierarchal church, and is not bound by or subject to the doctrine or rules of any church. Its principal place of business is located at 707 West Ogden Avenue, Hinsdale, Illinois, and it is a 501(c)(3) corporation.

8. GIL BATES is an individual who resides at 259 Echo Valley Road, Lake City, Tennessee. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("BATES"). He was appointed by GOTHARD.

9. STEPHAN PAINE, M.D., is an individual who resides at 8706 W. Eseco Road, Agra, Oklahoma. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("PAINE"). He was appointed by GOTHARD.

10. DAVID YORK is an individual who resides at 11330 W. Whitaker Avenue, Greenfield, Wisconsin. He currently is a Member of the Board of Directors of IBLP, and has been a Member since December 8, 2012 ("YORK"). He was appointed by GOTHARD.

11. TIM LEVENDUSKY is an individual who resides at the corporate headquarters of IBLP at 707 West Ogden Avenue, Hinsdale, Illinois. He currently is a Member of the Board of Directors of IBLP, and has been a Member since April, 2014 ("LEVENDUSKY"). He was appointed by GOTHARD.

12. ROBERT BARTH is an individual and a licensed attorney who resides at _____, Illinois. He is the general counsel for IBLP.

2. Jurisdiction and venue.

13. Jurisdiction is proper in Illinois because the commission of the tortious acts set out in this Complaint occurred in Illinois. See 735 ILCS 5/2-209(a)(1).

14. Venue is properly set in DuPage County because it is the county in which the transaction or some part thereof occurred out of which this cause of action arises. Too, IBLP and LEVENDUSKY are residents of DuPage County. See ILCS 5/2-101.

3. Facts common to all Counts.

15. IBLP was founded by GOTHARD for the sole purpose of allowing GOTHARD to provide seminars and to disseminate books and other materials containing the basic life principles GOTHARD believes was revealed to him through Scripture. People who attend the seminars and purchase the published materials maintain that GOTHARD's teachings have had a substantial impact on their lives, repairing broken home, lives and marriages, and leading them to realize their full, prosperous potential. More than 2.5 million people in the United States have attended GOTHARD's thirty-hour seminars; they are known as alumni. Up to the time he left IBLP, GOTHARD stayed in touch with and made himself available to all alumni to provide further advice and counsel on a regular basis.

16. The work of IBLP is primarily to provide GOTHARD's seminars, publications counsel and guidance to the 2.5 million alumni and the thousands of current attendees, which constitutes around ninety percent of the IBLP's work and consumes a like percentage off its operational expenses. IBLP also provides curriculum and resources for home schooling, and it provides counseling and guidance to prisoners, which together constitute and consume the remaining ten percent of the work and operational expenses.

17. IBLP is funded by the income realized from the seminars and sale of the published materials, and, in large part, from donations from the alumni.

18. Over the years, prominent alumni have donated significant amounts of real estate or money to support GOTHARD in the work he was doing through IBLP. Many of the donations were made to GOTHARD personally, but GOTHARD promptly transferred them to IBLP. As a result, IBLP owns various properties on which there are training centers and other facilities: approximately 120 acres for corporate headquarters and production facilities in Hinsdale and Oak Brook, Illinois; approximately 2000 acres, known as the Northwoods Conference Center in Watersmeet, Michigan; approximately 2,200 acres, known as the Big Sandy Campus, in Big Sandy, Texas; approximately 20 acres, known as the Little Rock Training Center, in Little Rock, Arkansas; approximately 40 acres, known as the Nashville Training Center, in Madison, Tennessee; approximately 700 acres, known as the Eagle Springs Training Center, in Skiatook, Oklahoma; and approximately 20 acres, known as the south Campus, in Indianapolis, Indiana. All of these properties are used and intended by the donors to be used solely to support GOTHARD's life work, and the existence of these properties is generally known at IBLP, and in particular to PAINE, YORK, BATES, LEVENDUSKY and BARTH.

19. The alumni made these donations with the expressed intent that the donations be used to fund the work of IBLP, and in particular to allow GOTHARD to continue to conduct seminars, write books and stay in regular contact with the alumni for advice and counsel.

20. Sometime in 2013, someone posted a story on a website, which is typically critical of anything to do with IBLP, claiming GOTHARD had improper contact with the person who posted. The name and picture accompanying the post were, and still are, unfamiliar to GOTHARD. A short time later a second person posted another story of improper contact, but the woman who posted the story immediately insisted that it be removed from the website, and it was. But by then other anonymous postings of a similar nature were made on this website.

21. At the same time, GOTHARD realized there was resentment against him by certain staff members due to the work demands he put on them, and the hours they were caused to devote to IBLP.

22. In February, 2014, GOTHARD wanted to accept an offer by the operators of the website to contact the people who posted the allegations on the website and ask they had made untrue allegations, and in that way reconcile with them (GOTHARD assumed they were alumni), but PAINE, YORK, BATES, LEVENDUSKY and BARTH refused to allow GOTHARD to have any contact with those operators, terming them enemies of the IBLP. GOTHARD offered his resignation to the Board of IBLP, but PAINE, YORK, BATES, LEVENDUSKY and BARTH declined to accept his resignation, stating that they wanted to conduct a thorough investigation of the allegations posted on the website. They directed GOTHARD not to have any contact with any staff of IBLP, or any of its current participants or alumni.

23. GOTHARD considered PAINE, YORK, BATES, LEVENDUSKY and BARTH's direction that he have no contact with anyone involved in IBLP to be contrary to the nature of his work at IBLP and contrary to the interests and intent of the alumni in making their donations. Relying on Scripture – Mathew 5:23-24, which holds that at the time a person brings his gift to the altar, which to GOTHARD was his work, he should reflect not on whether he has grounds for complaint against others but whether others have grounds for complaint against him, and, if so, he must seek reconciliation before he returns to the altar¹ – GOTHARD knew the restrictions placed on him by PAINE, YORK, BATES, LEVENDUSKY and BARTH made reconciliation impossible. GOTHARD knew the restriction were designed to isolate and neutralize him. On March 5, 2014, GOTHARD again offered his resignation, as Scripture required him to do. PAINE, YORK, BATES, LEVENDUSKY and BARTH, accepted it. STANCIL and BURRUS objected to the resignation, as it had not been shown GOTHARD had acted inappropriately and they knew how integral GOTHARD was to IBLP.

24. At the time he offered his resignation, it was GOTHARD's expressed the intent to return to IBLP once reconciliation was made, and it was on this basis PAINE, YORK, BATES, LEVENDUSKY and BARTH accepted his resignation. PAINE, YORK, BATES, LEVENDUSKY and BARTH acknowledged GOTHARD would return to IBLP once GOTHARD's reconciliation with staff, participants and alumni was complete. To sustain GOTHARD during his leave, and to make sure he was out of the way. PAINE, YORK, BATES,

¹ Matthew 5: 23-24: "Therefore if thou bring thy gift to the altar, and there rememberest that thy brother hath ought against thee; Leave there thy gift before the altar, and go thy way; first be reconciled to thy brother, and then come and offer thy gift."

LEVENDUSKY and BARTH offered to provide GOTHARD an office, the help of two staff members, and his salary and benefits, all of which was to continue until such time further Board action reinstated him to IBLP.

25. Once GOTHARD formally resigned, PAINE, YORK, BATES, LEVENDUSKY and BARTH denied GOTHARD any access to IBLP facilities and staff, and denied him a copy of a list of participants and alumni, making any reconciliation with them impossible. GOTHARD was never provided an office, access to any staff members, or his salary and benefits,

26. On May 2, 2014, YORK had a telephone conversation with GOTHARD in which YORK told GOTHARD that GOTHARD that he was “disqualified” from the ministry and should be forever totally separated from the ministry, that while neither YORK nor any other Member of the Board believed GOTHARD was a sexual predator or harasser, the Board nonetheless believed GOTHARD should be publically rebuked for some unstated reason, that his seminar material and publication should no longer be used at IBLP, and that GOTHARD should never have any contact with any IBLP’s participants, alumni or staff.

27. On June 17, 2014, to address growing concern, consternation and uncertainty among the alumni and participants, PAINE, YORK, BATES, LEVENDUSKY and BARTH caused to be posted on IBLP website the following:

In response to allegations against Bill Gothard, the Board sought the facts through a confidential and thorough review process conducted by outside legal counsel. Many people were interviewed, including former Board members, current and past staff members, current and past administrators, parents, and family members.

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. . . . At this time the Board unanimously agrees that Mr. Gothard is not permitted to serve in any counseling, leadership, or Board role within the IBLP ministry. . . . We want to encourage reconciliation within families and are very supportive of efforts toward reconciliation with Mr. Gothard or with IBLP. . . . *The Board does not believe that Mr. Gothard's shortcomings discredit the truths of God's Word that were taught through him.* . . . We are seeking and praying for a new permanent president for the IBLP ministries. Please pray with us to this end. See www.iblp.org, Statement of Board of Directors, June 17, 2014; emphasis added.

28. On September 13, 2014, PAINE, BATES and LEVENDUSKY told GOTHARD, in the presence of BURRUS, that GOTHARD would never be allowed to return to IBLP.

29. Thereafter, thousands of the current participants and alumni of IBLP made it known through letters and telephone calls that they do not support PAINE, YORK, BATES, LEVENDUSKY and BARTH's decision to banish GOTHARD, and many have expressly written that the donations made to IBLP were to further GOTHARD's work and should be redirected to GOTHARD, and were not to be used or administered by PAINE, YORK, BATES or LEVENDUSKY.

30. On _____, PAINE, YORK, BATES and LEVENDUSKY voted to liquidate certain IBLP property in order to fund \$3 million in payments to staff of IBLP, and shortly thereafter a hotel in Dallas was sold to fund this. STANCIL and BURRUS objected to the proposal, which had never been done before.

31. At around the same time, PAINE, YORK, BATES, LEVENDUSKY and BARTH authorized Ken Krause, a staff employee, to make all IBLP facilities “self-sufficient,” even though IBLP was not paying real estate taxes on most of the property and the properties had historically been used to fund and sustain IBLP and its work. What was meant by making the properties “self-sufficient” was never defined, and in any event Krause focused entirely on liquidating all the properties without regard to their best use, which was PAINE, YORK, BATES, LEVENDUSKY and BARTH’s real purpose. For example, IBLP was offered a lease on property in Nashville, Tennessee, that exceeded the current lease and would have realized considerable income for IBLP which, over the years of the lease, would have exceed today’s market value for the property, but Krause rejected the lease proposal and put the property on the market.

32. On April 20, 2015, PAINE, YORK, BATES, LEVENDUSKY and BARTH announced that IBLP was closing its headquarters in Oak Brook, Illinois, and was moving its headquarters to the Big Sandy Campus, in Big Sandy, Texas, where approximately 300 of the 2,000 participants in the home schooling project were located. At the same time, it announced IBLP would no longer provide seminars or use the publications of GOTHARD, and would no longer engage in the prison ministry.

33. Over the years, IBLP has averaged \$1.5 to \$2 million in alumni donations, including approximately \$1.5 million in 2013. In 2014, only \$100,000 was donated to IBLP.

34. Upon information and belief, PAINE, YORK, BATES, LEVENDUSKY and BARTH intend to liquidate all the property of IBLP in order to convert the proceeds from the sale to their own use, and for the use of others who will help them facilitate the conversion.

COUNT I
FRAUD
PAINE, YORK, BATES, LEVENDUSKY and BARTH

STANCIL, BURRUS, HUDGENS, BLAIR, GOTHARD and LIFE PURPOSE
POWER TEAMS restate Paragraphs 1 through 34 in this Complaint as Paragraphs 1 through 34 of this Count I as though fully set out herein.

35. To make a claim for common law fraud, a plaintiff must establish 1) a false statement or omission of material fact, 2) knowledge or belief of the falsity by the party making it, 3) intention to induce the other party to act, 4) action by the other party resulting in reliance on the truth of the statements, and 5) damage to the other party resulting from such reliance.

36. PAINE, YORK, BATES, LEVENDUSKY and BARTH falsely assured GOTHARD that he would be able to return to IBLP once his reconciliation was complete, and they promised to operate IBLP according to its by-laws in his absence. They assured him his resignation was only temporary, and to induce GOTHARD to accept these assurances they promised him an office, staff help, his salary and benefits until he was restored at IBLP.

37. At the time they made these assurances, PAINE, YORK, BATES, LEVENDUSKY and BARTH knew them to be false as they saw an opportunity to get control of the assets of IBLP, once GOTHARD was out of the way, and PAINE, YORK, BATES, LEVENDUSKY and BARTH intended to convert those assets to their own use.

38. PAINE, YORK, BATES, LEVENDUSKY and BARTH intended GOTHARD to rely on their false statements in order to remove GOTHARD from IBLP and gain control of its assets.

39. As a result of those false statements, GOTHARD resigned his position as Chairman of the Board of IBLP.

40. GOTHARD was harmed in relying on PAINE's, YORK's, BATES's and LEVENDUSKY's false statements because now he is being denied his life's work and ministry.

41. STANCIL, BURRUS, HUDGENS and BLAIR have been harmed by PAINE's, YORK's, BATES's and LEVENDUSKY's false statements because they are denied access to and the benefit of GOTHARD's teachings and the presence in their lives, in which IBLP plays an integral part.

42. To obtain a preliminary injunction or temporary restraining order, a plaintiff must show 1) a clearly ascertainable right in need of protection, 2) that he will suffer irreparable harm without protection of that right, 3) that there is no adequate remedy at law, and 4) that there is a substantial likelihood of success on the merits of the underlying action. The plaintiff is not required to set out a case which would entitle it to relief on the merits. Rather, it need only show that it raises a "fair question" about the existence of its right and then the court should preserve the *status quo* until the case can be decided on its merits.

43. STANCIL, BURRUS, HUDGENS and BLAIR have benefitted and would continue to benefit if IBLP was operated according to its by-laws, and they therefore have ascertainable rights to have IBLP operated in the manner prescribed by the by-laws.

44. STANCIL, BURRUS, HUDGENS and BLAIR maintain IBLP and the teachings of GOTHARD have changed their lives and will continue to change their lives, and they will be irreparably harmed if IBLP is not operated in the manner prescribed in the by-laws.

45. There is no adequate remedy at law for STANCIL, BURRUS, HUDGENS

and BLAIR, as the benefit provided them by IBLP and the teachings of GOTHARD are unique and irreplaceable.

46. There is a substantial likelihood STANCIL, BURRUS, HUDGENS and BLAIR will succeed on the merits, as the INSTITUTE OF BASIC LIFE PRINCIPLES is admittedly not operated according to the by-laws, as established by the April 20, 2015 annual meeting in which PAINE, YORK, BATES, LEVENDUSKY and BARTH openly stated it would not be, and all other statements and misrepresentations made by PAINE, YORK, BATES, LEVENDUSKY and BARTH were either made in writing or in front of witnesses.

WHEREFORE, GOTHARD, STANCIL, BURRUS, HUDGENS, BLAIR and LIFE PURPOSE POWER TEAMS respectfully request this court to enjoin PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) continuing as Board Members of IBLP and enjoin them from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) operating IBLP contrary to its by-laws, 3) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

COUNT II
CIVIL CONSPIRACY
PAINE, YORK, BATES, LEVENDUSKY and BARTH

STANCIL, BURRUS, HUDGENS, BLAIR, GOTHARD and LIFE PURPOSE POWER TEAMS restate Paragraphs 1 through 46 of Count I as Paragraphs 1 through 46 in this Count II, as though fully set out herein.

47. To plead a cause of action based on a civil conspiracy, a plaintiff must allege that 1) an agreement between two or more persons 2) to participate in an unlawful act, or a lawful act in an unlawful manner, 3) an injury caused by an unlawful overt act performed by one of the parties; and 4) the overt act was done pursuant to and in furtherance of the common scheme.

48. PAINE, YORK, and BATES were each appointed to the Board of IBLP on December 8, 2012. In 2013, allegations were made against GOTHARD which PAINE, YORK, and BATES saw as an opportunity to remove GOTHARD from IBLP and its assets, and they agreed to use those allegations to unlawfully induce GOTHARD to resign from IBLP in order to get control of those assets.

49. LEVENDUSKY was appointed a Board Member in April, 2014, and joined with PAINE, YORK, and BATES to unlawfully remove GOTHARD from IBLP.

50. PAINE, YORK, BATES, LEVENDUSKY and BARTH thereafter made numerous false promises and representations to GOTHARD, all of which were meant to take advantage of GOTHARD's belief in reconciliation and return.

51. GOTHARD was harmed by the agreement and the false statements made by PAINE, YORK, BATES, LEVENDUSKY and BARTH statements because now he is being denied his life's work.

52. STANCIL, BURRUS, HUDGENS and BLAIR have been harmed by PAINE's, YORK's, BATES's and LEVENDUSKY's false statements because they are denied access to and the benefit of GOTHARD's teachings and the presence in their lives of IBLP.

53. PAINE's, YORK's, BATES's and LEVENDUSKY's false statements were made in furtherance of their common scheme.

WHEREFORE, GOTHARD, STANCIL, BURRUS, HUDGENS, BLAIR and LIFE PURPOSE POWER TEAMS respectfully request this court to enjoin PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) continuing as Board Members of IBLP and enjoin them from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) operating IBLP contrary to its by-laws, 3) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

COUNT III
BREACH OF FIDUCIARY DUTY
PAINE, YORK, BATES, LEVENDUSKY and BARTH

STANCIL, BURRUS, HUDGENS, BLAIR, GOTHARD and LIFE PURPOSE POWER TEAMS restate Paragraphs 1 through 53 of Count II as Paragraphs 1 through 53 in this Count III, as though fully set out herein.

54. A fiduciary relationship exists when a special confidence is reposed in one who, by reason of such confidence, must act in good faith and with due regard to the interests of the person reposing such confidence.

55. Special confidence has been reposed in PAINE, YORK, BATES, and LEVENDUSKY as Directors, and in BARTH as general counsel, to use the property of IBLP as intended by IBLP and the alumni who donated the property and money to acquire the property.

56. PAINE, YORK, BATES, LEVENDUSKY and BARTH have breached that duty by abandoning the purpose of IBLP and making it impossible for GOTHARD to engage in his work by denying them their property rights and converting that property to their own use.

57. The IBLP and GOTHARD have been damaged by the breach of fiduciary duty by PAINE, YORK, BATES, LEVENDUSKY and BARTH, and PAINE, YORK, BATES, LEVENDUSKY and BARTH should be enjoined from disposing of the property in the manner they intend.

WHEREFORE, GOTHARD, STANCIL, BURRUS, HUDGENS, BLAIR and LIFE PURPOSE POWER TEAMS respectfully request this court to enjoin PAINE, YORK, BATES, LEVENDUSKY and BARTH from 1) continuing as Board Members of IBLP and enjoin them from prohibiting or in any way hindering GOTHARD's reinstatement as a Board Member, 2) operating IBLP contrary to its by-laws, 3) selling or disposing of IBLP's assets, 4) converting IBLP's assets to their own use, 5) denying GOTHARD access to and contact with IBLP's participants, alumni and staff, or, alternatively, 6) transferring the assets of IBLP to LIFE PURPOSE POWER TEAMS, INC., so that the ministry of IBLP may continue under that entity.

LIFE PURPOSE POWER TEAMS, INC.,
WILLIAM GOTHARD, Ph.D., JOHN
STANCIL, Ph.D., and ANTHONY BURRUS

By: _____
One of their attorneys

Kevin J. Moore
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(708) 246-1595
DuPage Attorney No: 218047

AN URGENT APPEAL

From:

DONORS TO THE INSTITUTE
SEMINAR ALUMNI
ATI FAMILIES
PAST BOARD MEMBERS
PASTORS AND CHRISTIAN LEADERS
PAST STAFF MEMBERS

To:

MEMBERS OF THE INSTITUTE BOARD:



AN APPEAL . . .

1. THAT YOU HONOR THE PURPOSE OF INCORPORATION

As a teenager Bill Gothard dedicated his life to serving young people and their families. He initiated many programs for them including youth meetings, radio broadcasts, high school Bible clubs, working with church youth groups and Chicago street gangs. In 1961 he incorporated his work under a 501 C-3 not for profit organization. (The name he chose reflected the work he was doing at that time: "Campus Teams Inc.")

When the Basic Seminars began to expand throughout America, the corporate name was changed in 1964 to "Basic Youth Conflicts Inc." Then in 1989 the name was again changed to include the many programs that resulted from Basic Seminars. It became the "Institute in Basic Life Principles Inc."

It is obvious that the sole purpose of incorporation was to facilitate and give support to the expanding life message and ministry of Bill Gothard. Bill Gothard is the Institute and the Institute is Bill Gothard. They cannot be separated.

2. THAT YOU ALLOW BILL GOTHARD TO FULFILL HIS COMMITMENT TO SEMINAR ALUMNI

When we registered for a Basic Seminar we were promised that the money we paid was more than just an enrollment fee. It entitled us to many more benefits that would be given to us by Bill Gothard.

For many years seminar alumni were allowed to attend future Basic Seminars without charge and they received ongoing training and resources that would help them apply what they learned in the Basic Seminar.

Bill Gothard has been faithful to provide these benefits. However, with the moral collapse of our culture and the unprecedented corrupting influences of social media, we need the deeper instruction that Bill Gothard can now give to us. Those who have received this material state that it is the most helpful information they have ever read and that every seminar alumni should receive it.

With all the investments that Bill Gothard has made in our lives and families, we feel like a "large family," and indeed, we are all members of the family of God.

3. THAT YOU FULFILL YOUR PROMISE TO BILL GOTHARD

The purpose for which Bill Gothard stepped away from his leadership position was clearly stated in the Scripture he was obeying:

"If you bring your gift to the altar, and there remember that your brethren hath ought against you; leave there thy gift by the altar and go your way; first be reconciled to your brother, and then come and offer your gift (Matthew 5:23-24)."

When Bill Gothard offered his resignation it was based on the Scripture. This resignation was rejected by the board. However you publically stated, On March 5, 2014 Mr. Gothard again submitted his resignation, indicating that he wanted to follow Matthew 5:23-24. The board of directors accepted Mr. Gothard's resignation. This was posted on your website, April 18th, 2014.

Then, during a board meeting on May 17th, 2014 Bill Gothard was given a sheet of paper with the title "For: Bill Gothard, Steps Toward Reconciliation and Restoration". Six items were listed on that sheet. All six items have been fulfilled as far as Bill is able to carry them out.

4. THAT YOU CARRY OUT YOUR SPIRITUAL RESPONSIBILITY

You were selected to be on the board of directors by Bill Gothard because he believed that you were spiritually mature and capable of godly leadership. God's Word has a requirement for you to fulfill, even if the false accusations against Bill Gothard were true.

"Brethren, if a man be overtaken in a fault, ye which are spiritual restore such a one in the spirit of meekness; considering thyself, lest thou also be tempted. Bear ye one another's burdens, and so fulfil the law of Christ (Galatians 6:1-2).

What positive steps has the board taken to restore Bill Gothard? Instead of restoration the board has simply cut him off. In one case his efforts at reconciliation have actually been blocked by a board member. This response only confirms that certain members of the board are not qualified to be on the board.

In the Corinthian Church a man had actually committed an immoral act of "fornication as is not so much as named among the gentiles" (I Corinthians 5:1). Paul ordered that he be put out of the church. However, a year later Paul gave clear instruction that he should be restored to the church.

"Sufficient to such a man is this punishment, which was inflicted of many. So that contrariwise ye ought rather to forgive him, and comfort him, ... Wherefore I beseech you that ye would confirm your love toward him... I lest Satan should get an advantage of us: for we are not ignorant of his devices (II Corinthians 2:6-8, 11).

5. THAT YOU RENOUNCE FALSE ACCUSATIONS

There is no way to separate the name of Bill Gothard from the name of the Institute which he developed. They are synonymous. Nor is there any way to separate Bill Gothard's name from the body of Christ. When one member suffers, all the members suffer with it (I Corinthians 12:26).

Each one of you has affirmed to Bill Gothard that God has used him to greatly benefit your life and family. Each one of you has stated that he is not guilty of the serious allegations that have been made against him in the media.

Therefore, you have a responsibility to publicly refute these false allegations. By being silent for over one year, you are only adding credibility to those who openly state that their goal is to destroy Bill Gothard and his ministry.

It is apparent to many that you are operating out of a spirit of fear. We are in war and God does not want fearful people to be soldiers; much less leaders in the battle (see Deuteronomy 20:8).

6. THAT YOU STOP VIOLATING YOUR FIDUCIARY DUTY

The primary responsibility of a board of directors is to watch over the financial matters of the organization. This means that the funds must be used as the donors intended for them to be used. It also means that the ministry funds must not be dissipated or unwisely depleted.

Both of these financial duties are being violated by the present direction that the board is taking. The money and properties that donors have given for the furtherance of Bill Gothard's ministry are not being used for their intended purpose. Because of board decisions, hundreds of thousands of dollars are not being given to the ministry. Instead, donors are giving money directly to Bill Gothard so that he can carry on his ministry to them.

The board members who are responsible for these losses will be personally liable for them. The longer you delay in restoring Bill Gothard, the greater personal liability you will have.

When a major donor of property made a written request to the board that one of the facilities be donated be given to Bill Gothard for his on-going ministry, the board refused to honor his request. This is a very serious spiritual and legal matter.

7. THAT YOU RESTORE A VITAL BY-LAW

When the Institute was incorporated in 1961, the original board of directors realized the vital importance of having board decisions made by unanimous vote.

They pointed out that the majority is usually wrong - especially in spiritual matters. God often speaks through the one or two who cannot go along with the majority. This was the case with the twelve spies in the days of Moses, and the Sanhedrin in the days of Jesus, and in many other instances.

Therefore, the board established a policy of unanimous decisions. It has been followed for over fifty years. As soon as Bill Gothard resigned, this by-law was rejected and replaced with a majority vote requirement.

The results have been predictable: divisions on the board and unwise and destructive decisions.

In recent years successful programs such as the Journey To The Heart and the prison ministry have been based on one accord power. The power of one accord is clearly taught and demonstrated in the Bible. It was when the 120 disciples were in one accord that the power of God's Spirit came upon them. The same was true of the power of the first century Church. The prayer of Jesus in John 17 was for one accord unity.

How can a divided board carry out a spiritual ministry without one accord power?

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DR. BILL GOTHARD, Founder of IBLP

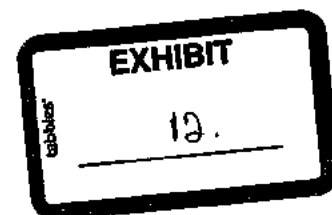
bill@billgothard.com

Gentlemen in Leadership at IBLP:

My law firm has been contacted by a number of major donors to the Institute in Basic Life Principles, a number of ladies who consider themselves to be victims of IBLP, and representatives of the Recovering Grace website and other on-line media. The collective concerns of these divergent individuals focus on the administrative and financial decisions being made by the IBLP Board at this time. This letter is written as a formal request to engage the board in the process of a confidential pre-suit mediation.

As non-profit directors and men of God, you owe the following standards of care to the non-profit and its constituents:

1. Duty of care,
2. Duty of loyalty,
3. Duty to account,
4. Duty of confidentiality,
5. Duty of full disclosure,
6. Duty to act fairly, and
7. Duty of good faith and fair dealing.



The people contacting my office believe that the following breaches have occurred and must be immediately rectified:

- self-dealing (i.e., through conflict of interest or reaping of extra profits);
- usurpation of business or corporate opportunity;
- misappropriation of funds or property;
- neglect, imprudence, or want of skill (e.g., failure to administer trust property as prudent administrators, and improper reliance on professionals);
- failure to act in another's best interest;
- misrepresentation/omission as to a statement of fact (e.g., financial condition/statement of affairs);
- inducement;
- breach of an assumed duty (e.g., to provide accurate information);
- misuse of confidential information/breach of confidentiality;
- misuse of superior knowledge;
- failure to disclose;
- aiding and abetting or acting in concert with another;
- rendering inappropriate advice (e.g., bad business or investment advice).

Non-profit directors are burdened with fiduciary obligations pursuant to the very nature of the trust relationship. Trustees will be held liable for negligence in dealing with trust property as well as conflicts of interest. For example, trustees lacking in investment experience must seek out expert advice, but they must nevertheless exercise independent judgment. In addition, trustees who have engaged in self-dealing will be held accountable for such acts. The "prudent person" standard is the traditional measure of trustee conduct in breach of fiduciary duty cases. The fact that all of you were appointed by Dr. Gothard to serve under his direction and control seems to indicate that your independence, your experience, and your judgment were never truly evaluated to determine whether you should be serving as fiduciaries of a public charity organization with over \$200 million in assets.

The poor manner in which the board handled the organization's public image regarding the incidents that involved Dr. Gothard, the fact that the board brought in an Independent Baptist organization with a suspect reputation to report on the matters involving Dr. Gothard, the fact that the board never released the report that supposedly cleared Dr. Gothard of criminal wrong-doing, and IBLP's uncertain future ministry plans (if any) all seem to indicate that the concerns of those contacting my office are legitimate.

Based on the information being leaked out, the people contacting my office are alarmed about the mass liquidation of the assets of the IBLP without a plan for use of these funds beyond the alleged career enhancement and potential private inurement of the board members. Clearly, the loyalties of the board are in question. There is a huge concern that the board is advancing their own agendas and providing for their own financial security, rather than acting as non-profit fiduciaries.

These actions are highly troubling in and of themselves but they also demonstrate a gross disregard for the donors' intentions as well as the needs of any potential victims of this ministry. The lack of provision for these potential liabilities may submit board members to personal liability for dissipation of assets should these claims be brought against the organization. It is shocking that this board has chosen to offer

no financial help to the victims of whom it has become aware. Penn State University has set a far higher standard of excellence for assisting victims than IBLP has, at this time.

Further concerns have arisen with the recent public disclosure of the scandals within the Duggar family. Given your close corporate relationship with this family, the Duggars were the public face of the IBLP. To that end, there must be transparency about the terms of that relationship, as it has a bearing on the financial health of the nonprofit. Additionally, when was the organization aware of the child molestation, the cover-up, and why would the Duggars' videos still be shown at your Nashville conference, if the organization were wanting to send a clear message to the nation about child abuse and covering-up scandals?

In preparation for mediation and as the law requires you to disclose many of these items upon request, please furnish my office with the following documents:

- The articles of incorporation and any amendments;
- The nonprofit corporation's bylaws and any older versions used in the three most recent years;
- Minutes from the board of directors meetings for the three most recent years;
- Records of all actions taken by the directors without a meeting for the three most recent years;
- A list of the full names and last known addresses of all past and present directors;
- A list of the full names and last known addresses of all past and present officers;
- Financial records, including federal, state, and local tax returns and reports, for the three most recent years;
- Annual or biennial reports or statements of information filed with the state for the three most recent years;
- Any other documents filed with the state;
- Copies of any existing or former child abuse policies and conduct standards of the IBLP;
- Copies of any workplace harassment policies and conduct standards of the IBLP; and
- Copies of any conflict of interest policies for the Board of Directors.

We would ask that the Board agree that no assets will be sold or dissipated during this time and that would allow this matter to be handled outside the supervision of a court. We are willing to organize a confidential mediation at the IBLP Headquarters or other location of your choosing. If individual civil or criminal counsel for the individual board members involved wish to be part of this mediation in order to limit their respective client's liability, we would welcome their participation in this mediation process as well. If any board member resigns prior to the mediation, they do not need to participate in the mediation.

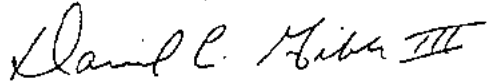
I am requesting that DR. PAINE and ROBERT BARTH coordinate with TIM LEVENDUSKY to execute a mediation agreement that my office will draft. My office will schedule a time and place for mediation that will work for all of the parties to be scheduled within the next forty-five (45) days.

If we do not hear from these men or their attorneys with a response to these requests by the close of business on Friday, June 12, 2015, we have been asked to file emergency motions with the court to preserve the status quo. I would certainly encourage dialogue before an expensive court-ordered is potentially installed and the Illinois Courts dictate the future direction of IBLP.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Sincerely,

Gibbs Law Firm, P.A.



David C. Gibbs III

Admitted in Florida, North Dakota, Minnesota, Colorado, Texas, Ohio, Tennessee, Michigan, and the District of Columbia

GIBBS LAW FIRM

ATTORNEYS AND COUNSELORS AT LAW

(727) 362-3700

(727) 398-3907

www.gibbsfirm.com

2648 FM 407, Suite #240
Bartonville, TX 76226

June 8, 2015

INSTITUTE IN BASIC LIFE PRINCIPLES, INC., an Illinois not-for-profit corporation

DR. STEPHEN PAINE, M.D., Chairman
wholehealthministries@gmail.com

DR. JOHN STANCIL, Ph.D., Board Member
magicmanslily@yahoo.com

ANTHONY BURRUS, Board Member
Email unknown. Please forward to him.

GIL BATES, Board member
batesbits@gmail.com

TIM LEVENDUSKY, President
tlevendusky@iblp.org

PASTOR DAVID YORK, Board Member
davidcyork@sbcglobal.net

ROBERT BARTH, General Counsel for IBLP
rjbarth@iblp.org

DR. BILL GOTHARD, Founder of IBLP
bill@billgothard.com

Dear Mr. Barth and Members of the IBLP Board,

I am writing in response to Mr. Barth's letter of June 5, 2015. I am aware that Mr. Barth has been Dr. Gothard's attorney and an IBLP employee for decades as Dr. Gothard hired him and he was his trusted confidante and legal counsel, working diligently at his side. I appreciate the fact that he informed me that he is not representing Dr. Gothard any longer or the board members in their individual capacities, but that he does continue to represent IBLP corporately as general counsel. Although I want to make it clear that I do not represent Dr. Gothard, he has personally contacted my office and committed to attend the mediation and interestingly, as the founder of the organization and the one who personally hired Mr. Barth and installed each board member, he agrees with many of the concerns expressed in my letter to the IBLP Board. The founder of the organization has stated that he will testify that it is his opinion that you men are violating the trust of the donors. Dr. Gothard's willingness to publicly support the position of the donors and victims is something that you men need to seriously consider. I would think that if Dr. Gothard is concerned about your fiduciary actions that there are also men on the Board

EXHIBIT

13.

Gibbs Law Firm, P.A. with offices also in Washington, D.C. and Florida

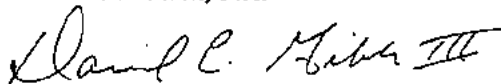
appointed by Dr. Gothard who share these concerns. A pre-suit mediation appears to be the best forum to deal with these issues to preserve the reputation of the public charity you men are entrusted to oversee.

While there is no conflict of interest, I would like to make it abundantly clear to the entire Board that Gibbs Law Firm has never represented IBLP. I attended a mediation on behalf of Anchor Bible Concepts in Chicago years ago in an unpaid pro bono capacity at the invitation of Dr. Stancil. Mr. Barth was there as Dr. Gothard's personal attorney and on behalf of IBLP.

I think Mr. Barth's letter is attempting to distract attention from the core question that I asked. Is the board of IBLP willing to conduct a pre-suit mediation? If not, my clients (who do not wish to be identified at this time for fear of being victimized again by the IBLP through defamation and harassment) will decide how to proceed. I assure you that if each board member is sued personally for breach of their fiduciary duties at IBLP, there will be video-taped depositions of each board member and their personal benefit and potential conflicts of interest will be examined in detail. Dr. Gothard, the founder of IBLP, believes that you men are looting and mismanaging the organization in a manner that violates the law. His testimony alone will most likely allow this litigation to move to a jury for adjudication. I would encourage you men to seriously consider the risk that you are taking by ignoring the donors, the victims, the founder, and the IRS on these fiduciary decisions that you are making on behalf of a 501(c)(3) non-profit organization.

Sincerely,

Gibbs Law Firm, P.A.



David C. Gibbs III

Admitted in Florida, North Dakota, Minnesota, Colorado, Texas, Ohio, Tennessee, Michigan, and the District of Columbia

cc. Dr. Gothard

September 23th, 2014

Dear Rachel,

Because I am, and will always be your friend; and because we are both members of the body of Christ, I want to do all that I can to restore our friendship, and fulfill the goals that we had when you and your family were part of my life and ministry.

When I was thirty years old, an event took place in my life that I will never forget. I was reading through the book of Isaiah, when suddenly the Spirit of God illuminated the eyes of my understanding to the words of Isaiah 59:19 "When the enemy shall come in like a flood, the Spirit of the Lord shall lift up a standard against him."

I sensed the Lord assuring me that during my lifetime I would experience this verse, and that I should prepare for it by training believers in the ways of God. In the days that followed God gave me the contents of the Basic Seminar, and a few months later I was teaching this seminar at Wheaton College.

Then, in 1990 a special delegation of Christian leaders from New Zealand came to the Headquarters with a personal invitation from your Prime Minister. He requested that we bring our ministry to your Nation and help celebrate "the Year of New Zealand."

As we knelt in prayer for God's leading, the Lord brought to my mind a verse of Scripture: "So shall they fear the name of the Lord from the west, and his glory from the rising of the sun." When we finished praying, I told the man about the Scriptures that God had given to me. They were excited about this and told me that New Zealand is the first Nation upon which the sun rises in the morning.

I eagerly looked up the verse in order to see it in its context. I was stunned when I saw that it preceded the scripture that God had given to me when I was thirty! "So shall they fear the name of the LORD from the west, and his glory from the rising of the sun. When the enemy shall come in like a flood, the Spirit of the LORD shall lift up a standard against him." (Isaiah 59:19)

These events gave me a deep commitment to see God do a great work in New Zealand. As you know, God marvelously blessed the launching of the Basic Seminar in your Nation. When we arrived an official from the U.S. Embassy was shocked to learn that 3000 were registered for the seminar in Auckland, another 2500 in Christ Church, plus 1500 in Wellington.

I was informed that New Zealanders often arrived late for events, so I should not expect the seminar to begin at the appointed time of 7 pm. However, the entire audience of 3000 were there at 6:45! So for the first time in our history, we began the seminar



September 23th, 2014

fifteen minutes early! The response to the truths in God's Word was thrilling. I can still picture the waves of agreement that swept through the audience during the sessions, and the overwhelming responses for each commitment. Also during the week hundreds filled out sheets asking for more information about our homeschool program.

During our time in New Zealand, I realized that in order to experience lasting results, we needed dedicated and trained New Zealanders to carry on the work. When I met you and your family, I saw the potential that you all had for such a ministry. It was such an encouragement that your dad became the director, and your family worked with all the homeschool families.

My intentions in bringing you and your sister to the Headquarters in 1991 was to give you the best possible training, and then send you back to New Zealand so that we could continue the ministry of reaching your Nation for the Lord. I had no other intentions!

When you began meeting with me in my office for training and answering letters, my sister, Laura, was in the adjoining office and was able to hear our conversations. She clearly recalls how morning after morning I needed to reassure you that you were important, and that you had value. She was surprised at how much time this required. However, I was glad to do it because I saw the many excellent qualities that you had, and I looked forward to the ministry that you would carry out in New Zealand.

The friendship that we had is confirmed by many documents. First is the daily record that I asked you to write out while you were here. You did an outstanding job of capturing the marvelous things that God was doing, I still have that book and I would like to send you a copy of what you wrote. Then, there are the letters that you sent to me after you returned to New Zealand. These are treasures and I thank God for them. I also treasure the time that I flew out to New Zealand for your wedding. And the phone conversations which we have had over the years.

A friendship that is based on Godly intentions will always be able to withstand the attacks that come against it. I can honestly say before the Lord that my desire was to build a strong friendship with you and your family that would last for the rest of our lives.

If anyone would have told me that the words and actions that I used to encourage and affirm you, would one day be interpreted as "harassment" and "grooming," I would have recoiled in horror, and instantly stopped any actions or words that could be misunderstood. I would appeal to you, to rethink your time at Oak Brook based on the following letters that you wrote to me after you returned to New Zealand:

September 23rd, 2014

Rachel, we accomplished many important things for God's kingdom. The book that we worked on is still being used. The visit to Taiwan and the meeting with its President is still producing results with teams of students teaching in Taiwan public schools. The missionary accounts that you wrote for the New Zealand home schooling families provided a valuable basis for the spiritual foundations of your history.

Scripture warns that a "whisperer can separate chief friends." (Prov 16:28) And that "The words of a talebearer are as wounds, and they go down into the innermost parts of the belly." (Prov 18:8).

Those who have talked to you have totally misunderstood my motives and goals in working with young people. However God has used this time to bring me back to my life calling, which is to meditate on His word day and night, and to exhort as many others as I can to do the same.

I will continue to pray for you and your family. I am also praying that I would be able to explain to you over the phone why I would like to send you a copy of the Journal that you wrote.

Through Christ our Lord.

A handwritten signature in black ink, appearing to be 'B. ...' with a stylized flourish.

June 20th 1993

Dear Mr. Gothard

I so wanted to be able to give you a gift and wish you a Happy "Spiritual" Father's Day, but I could not find anything appropriate or that would express enough the deep gratefulness I have to you for your counsel on so many occasions, and for your friendship which means more to me than I can say.

I can't wish you a Happy Father's Day, but you are a very caring, trustworthy, loyal, patient, forgiving wonderful friend to me, so I'm going to make up my own day, and wish you a very happy "Friends" Day.

I've never had a friendship before where I've experienced the true 'oneness' of spirit that I have with you. This is one of God's greatest gifts to me.

Thank you tremendously for the privilege of knowing you.

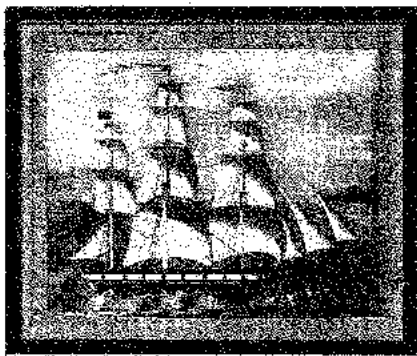
I love and respect you very much.

Rachel

"... There is a friend that
sticketh closer than a brother."

Prov. 18: 24

November 6, 1994



Dear Mr. Gothard,

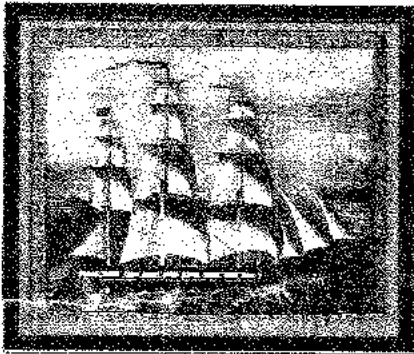
You really do spoil me!

It was such a lovely surprise to find your fax waiting for me when I got to the office, and was such an encouragement, and then the extra double blessing of talking with you on the phone. I couldn't have had a better birthday present than hearing all that good news! What an exciting day you had, and you made it exciting for me too, and then to receive the gifts the very next day just overwhelmed me. Thank you for being so thoughtful. I have the clock in a prominent place in my room - on Chicago time, so that when I pray for you and the ministry over there, I can make a guess at what you'll be doing! And a real reward!

And, do you know what, I was laughing at myself, because it showed me how homesick I am, but I kept picking up the box that the clock came in and smelling it, because it smells just like, and reminds me of the staff center, and your office and mine and Mrs. Heinigers!

Your thoughtfulness and sensitivity really blessed me last week and really made my birthday and my whole week! It wouldn't have been half as good

September 23th, 2014

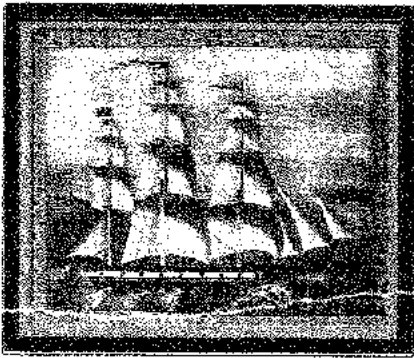


2.
without hearing from you, and
I wish there was a way that
I could bless you as much as
you blessed and encouraged me!
Did you have a nice birthday
on the 2nd? I prayed that
you would.

None is looking forward to your coming, to New
Zealand more than me. ^(Are you still planning to come?) I can hardly believe it
yet, and it won't seem real until I see you walk
off that airplane. I still have to wait 4 months
or so yet, and then after you leave I'll have 7
more months to wait until I come back to Oak Brook.
Looking at it that way doesn't sound quite as long
as it seems - but still dreadful for a homesick!

We've picked out a hotel for you to stay in already.
It's quite close to where we live, and looks out
over a lake, so it will be nice and restful for you,
and we're not going to work you as hard as
those Taiwan people! Will you be able to bring
some writing or correspondence with you? I'm
just itching to do some.

The Lord gave me a special encouragement last
week too. It was a verse that goes along with
my life-verse, Psalm 119:112. I have inclined my heart to



3.
perform the stories always.
even unto "the end" and when
I came across this other verse
that seemed to jump off the page!
Psalm 65 "For thou, O God
hast heard my vows (my life-work
and commitment to the dead and to
the community) thou hast given me

the heritage of those that fear Thy Name," and I began to
think of all the Godly people who have influenced me
and say life from when I was a little girl - you being
chief of all, Mr. Gotthard.

Remember when you told me I was like Elisha?
I remembered that when I read that verse (Elisha is one
of my names, isn't it? What an incredible heritage Elisha
left for Elisha, and what a wonderful heritage you're
giving me! I've learnt so much from you already! And
think of all the other things I've still got to learn in the
years ahead! And I can't wait to come back so I
can follow you around again and be a learner (and
learn) and an Elisha (but being loyal and loving) and
a Ruth (by being loyal and being in the same country)
and Ethel and all E.C.

Thank you, Mr. Gotthard for your generosity to me,
and for the blessing and encouragement that you are to
me all the time, and for the spiritual heritage you're
giving me. I miss you and I can't wait for you to
come to New Zealand. I'm praying every day for you.
Love always, Rachel

GIBBS LAW FIRM

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2648 FM 407, Suite #240
Bartonville, TX 76226

August 3, 2015

INSTITUTE IN BASIC LIFE PRINCIPLES, INC., an Illinois not-for-profit corporation

DR. STEPHEN PAINE, M.D., Chairman
wholehealthministries@gmail.com

DR. JOHN STANCIL, Ph.D., Board Member
magicmanslily@yahoo.com

ANTHONY BURRUS, Board Member
NEED EMAIL ADDRESS

GIL BATES, Board member
batesbits@gmail.com

TIM LEVENDUSKY, President
tlevendusky@iblp.org

PASTOR DAVID YORK, Board Member
davidcyork@sbcglobal.net

ROBERT BARTH, General Counsel for IBLP
rbarth@iblp.org

DR. BILL GOTHARD, Founder of IBLP
bill@billgothard.com

Gentlemen in Leadership at IBLP:

This letter is in response to your letters dated June 5, 2015 & June 8, 2015, which requested information regarding the names of those whom this firm represents. At this time the Gibbs Law Firm, P.A. represents the following victims of IBLP and its Board: [REDACTED] Charis Barker, Rachel Frost, Rachel Lees, [REDACTED] and Gretchen Wilkinson. Given the large number of IBLP victims, the ranks of those whom this law firm represents will likely grow, once it becomes public knowledge that this firm is pursuing these claims. Also, some donors are praying about joining with our current clients in this matter. Additionally, Attorney John Underwood, Recovering Grace, is consulting with us on this case.

It has come to our attention that none of our clients were interviewed in the process of the alleged investigation that was conducted by Attorneys David Gibbs, Jr. and Seth Kraus of the Christian Law Association, an investigation for which the Board paid a large sum of money. A number of our clients had actually contacted the IBLP

EXHIBIT

16-

Gibbs Law Firm, P.A. with offices also in Washington, D.C. and Florida

to make the Board aware of their abuse. Despite the fact that the IBLP Board knew that these victims existed, it pursued a cover-up rather than a legitimate investigation to correct the wrongs that had been committed in the name of your organization.

On behalf of these victims, we would like to schedule a meeting in the first week of September with the IBLP Board to begin pre-suit negotiations to compensate them for their injuries.

In addition, it has come to our attention that the IBLP has contracted to sell its property in Tennessee. The information that we have received indicates that the Tennessee property is being sold for significantly less than its value. On behalf of our clients, we would request a copy of any appraisals or other evaluations that have been performed on that property and would ask that any proceeds from the proposed sale be held in escrow until our clients' claims have been resolved. There is concern that the IBLP Board is dissipating assets in an inappropriate manner, similar to what Doug Phillips and the Vision Forum Ministries Board did once a victim came forward.

Also, none of the information that was previously requested by our June 3, 2015 letter has been provided to date. The requested information included the following:

- The articles of incorporation and any amendments;
- The nonprofit corporation's bylaws and any older versions used in the three most recent years;
- Minutes from the Board of Directors meetings for the three most recent years;
- Records of all actions taken by the directors without a meeting for the three most recent years;
- A list of the full names and last known addresses of all past and present directors;
- A list of the full names and last known addresses of all past and present officers;
- Financial records, including federal, state, and local tax returns and reports, for the three most recent years;
- Annual or biennial reports or statements of information filed with the state for the three most recent years;
- Any other documents filed with the state;
- Copies of any existing or former child abuse policies and conduct standards of the IBLP
- Copies of any workplace harassment policies and conduct standards of the IBLP
- Copies of any conflict of interest policies for the Board of Directors

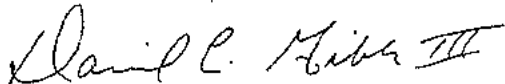
Please respond with this information.

We request that you respond with proposed dates for the initial pre-suit mediation. If the Board prefers arbitration, we are open to that possibility. Otherwise, public litigation will be the only option open to these ladies.

Sincerely,

David C. Gibbs III

Gibbs Law Firm, P.A.



Admitted in Florida, North Dakota, Minnesota, Colorado, Texas, Ohio, Tennessee, Michigan, and the District of Columbia

cc: Attorney John Underwood



**VILLAGE
OF HINSDALE** FOUNDED IN 1873
19 EAST CHICAGO AVENUE
HINSDALE, ILLINOIS 60521-3489 • (630) 789-7000
Village Website: <http://www.villageofhinsdale.org>

POLICE DEPARTMENT 789-7070
FIRE DEPARTMENT 789-7060
121 SYMONDS DRIVE

VILLAGE PRESIDENT
Tom Cauley

TRUSTEES
J. Kimberley Angelo
Christopher J. Elder
William N. Haarlow
Gerard J. Hughes
Laura LaPlaca
Bob Saigh

February 18, 2015

Mr. Alfred Corduan
2305 Sienna Drive
Joliet, IL 60431

Re: FOIA Request #2014-10-20

Dear Mr. Corduan:

I am writing in response to your Freedom of Information request received October 24, 2014 (copy attached), wherein you request information about the alleged 1992 molestation of Gretchen Swearingen by Reverend Bill Gothard on the campus of the Institute of Basic Life Principles located at 707 W. Ogden Avenue, Hinsdale.

The Police Department has conducted a search of their records and has found no report(s) responsive to this request.

Thank you,

Christine M. Bruton
Village Clerk



**VILLAGE OF HINSDALE
FREEDOM OF INFORMATION
REQUEST PRODUCTION OF RECORDS**

To: Christine Bruton, Village Clerk
Village of Hinsdale, 19 East Chicago Avenue, Hinsdale, Illinois 60521-3431
Phone: (630) 789-7011 FAX (630) 789-7015 email: cbruton@villageofhinsdale.org

Date: 10/14/2014 I hereby request to ☐ inspect ☐ by* the following records:

(Please describe requested records as specifically as possible, attaching additional page if necessary.)

It is reported in <http://literatecomments.com/2014/03/02/conservative-leader-bill-gothard-on-leave-following-abuse-allegations/> that Gretchen Swearingen was molested as a 16 year old in 1992 by the Reverend Bill Gothard on campus of Institute for Basic Life Principles 707 W. Ogden Ave., Hinsdale, IL 60521-3069. She is said to have "reported her story to the Hinsdale (Ill.) Police Department a week ago. A police spokesman said no investigation has been opened at this time." I would like to know if that "report" was compiled in an official "police report" and, if so, would like to obtain a copy. A week before March 2, 2014 would be around February 17-24. She may also go by the married last name of Wilkinson. Thank you

Is this request for a commercial purpose? Yes ☐ No ☒

Are you requesting a waiver or reduction of copying fees? Yes ☐ No ☒ If you answered yes, what is the purpose of this request?

Requester's Contact Information

Printed Name: Alfred Corduan Signature: 

Address: (City, State, Zip) 2305 Sienna Drive, Joliet, IL 60431

Phone Number: (847) 354-6304 E-mail Address: ACorduan@gmail.com

FAX #: _____

2014 FOIA # <u>10-20</u>	OFFICE USE ONLY DATE REC'D: <u>10/24/14</u>	RESPONSE DUE DATE: _____
FORWARD REQUEST TO: <u>Bloom</u>		
REQUEST FOR WAIVER (IF REQUESTED): APPROVED OR DENIED (CIRCLE ONE) FEE PAID: _____		
NOTES: _____		

* Note: There is no copying fee for the first 50 black and white standard-sized copies. The fee for additional copies is 15¢ per page. Actual cost will be charged for copies of documents not of standard size, and for the recording medium (e.g., compact disk, tape, DVD), when applicable. The Village shall charge \$1 for certifying a record.

Memorandum

To: Christine Bruton – Executive Secretary
From: Deputy Chief Kevin Simpson
Date: February 17, 2015
Re: Freedom of Information Act (FOIA) request



The attached request (or portion there of) was denied or unable to be provided because of the following reason(s):

 X

No incidents of record were located as requested by the FOIA.

The information requested has been denied because of a pending investigation/trial and as result, a subpoena would be required to obtain the requested record in its entirety.

The information requested has been denied because it is beyond the legal scope of a FOI request.

Other: Disclosure of the specified records would constitute a violation of existing statutes (Title 18, Part 1, Chapter 123-2721) prohibiting the release and use of personal information from State Motor Vehicle Records.

Spiritual Sounding Board

Finding resolve amidst the dissonance of "churchianity"

OCT 24 2015



Attorney David Gibbs III Discusses the IBLP Lawsuit and Answers Important Questions

Institute in Basic Life Principles (IBLP), Bill Gothard, lawsuit, David Gibbs III

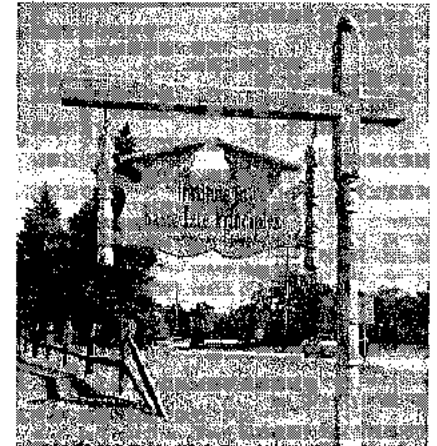
Many are probably aware of the recent news that five very brave women have come forward and have filed a lawsuit against Bill Gothard's former ministry, Institute in Basic Life Principles, Inc. (IBLP), and six men who serve as Directors of IBLP: John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Charles Stephen Paine, Jr., and David York.

The five women, Gretchen Wilkinson, Jane Doe, Charis Barker, Rachel Frost, and Rachel Lees, are seeking:

"redress and damages for personal injuries based on the negligent and willful and wanton acts and omissions of Defendants with regard to sexual abuse and sexual harassment and similar allegations of malfeasance suffered by the Plaintiffs."

The complaint's allegations:

- o All Plaintiffs either participated in IBLP programs, were interns, or employed by IBLP.
- o "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 hand of the IBLP, by and through its agents and employees, and suffered as a result thereof."
- o Employees and directors of IBLP were aware of the sexual abuse/harassment allegations, and failed to notify authorities.
- o There was an internal "investigation" done by staff/employees who were not qualified to do such an investigation.
- o Apparently, no victims were interviewed in the internal investigation. The investigation was labeled as a sham cover-up (to the tune of \$50,000).
- o Investigation summary reported that "no criminal activity has been discovered. ... 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."
- o IBLP plans to sell off and relocate their headquarters to Texas, "in an attempt to flee the jurisdiction (State of Illinois) where this wrongful conduct occurred."
- o Each woman seeks \$50,000 in damages.



There are quite a few articles covering the lawsuit, which was filed October 20, 2015:

- o Negligence Lawsuit Filed Against IBLP (<http://www.recoveringgrace.org/2015/10/negligence-lawsuit-filed-against-iblp/>) – Recovering Grace. In addition to the linked article, this blog site specifically addresses the abuses by Bill Gothard and the teachings of IBLP. If you are new to the Gothard/IBLP story, this is the place to go.
- o Five women sue Bill Gothard's ministry that has ties to the Duggars (<https://www.washingtonpost.com/news/acts-of-faith/wp/2015/10/22/five-women-sue-bill-gothards-ministry-that-has-ties-to-the-duggars/>). The Washington Post
- o Lawsuit alleges sexual misconduct at Oak Brook-based Christian ministry (<http://www.chicagotribune.com/suburbs/oak-brook/news/ct-dupage-ministry-lawsuit-met-20151022-story.html>). Chicago Tribune
- o Five Women Sue Duggar-Connected Ministry for Sex Abuse Cover-Up (http://www.slate.com/blogs/xx_factor/2015/10/23/fundamentalist_duggar_connected_ministry_is_sued_for_sex_abuse_cover_up.html).

Slate

- [Stunning lawsuit alleges sex scandal at Christian ministry \(http://www.wnd.com/2015/10/stunning-lawsuit-alleges-sex-scandal-at-christian-ministry/#GCYjO3DYiODfigyU99\)](http://www.wnd.com/2015/10/stunning-lawsuit-alleges-sex-scandal-at-christian-ministry/#GCYjO3DYiODfigyU99), World Net Daily
- [Christian ministry with links to the Duggars sued over sexual abuse and cover up \(http://www.christiantoday.com/article/christian-ministry-with-links-to-the-duggars-sued-over-sexual-abuse-and-cover-up/68507.htm\)](http://www.christiantoday.com/article/christian-ministry-with-links-to-the-duggars-sued-over-sexual-abuse-and-cover-up/68507.htm), Christianity Today
- [DUGGAR CHRISTIAN ORGANIZATION SUED FOR SEXUAL ABUSE, HARASSMENT \(http://radaronline.com/exclusives/2015/10/another-duggar-sex-scandal-christian-organization-institute-basic-life-principles-sued-sexual-abuse-harassment/\)](http://radaronline.com/exclusives/2015/10/another-duggar-sex-scandal-christian-organization-institute-basic-life-principles-sued-sexual-abuse-harassment/), Radar Online
- [Five Women Sue Fundamentalist Ministry With Duggar Family Ties \(http://www.etonline.com/news/174567-five-women-sue-fundamentalist-ministry-with-duggar-family-ties/\)](http://www.etonline.com/news/174567-five-women-sue-fundamentalist-ministry-with-duggar-family-ties/), ET Online
- [Victims Allege Christian Ministry Hid Sexual Abuse in Multimillion-Dollar Lawsuit \(http://www.charismanews.com/us/52811-victims-allege-christian-ministry-hid-sexual-abuse-in-multimillion-dollar-lawsuit\)](http://www.charismanews.com/us/52811-victims-allege-christian-ministry-hid-sexual-abuse-in-multimillion-dollar-lawsuit), Charisma News

The attorney representing the five women is David Gibbs III. Mr. Gibbs and I have had occasion to talk by phone when the Lourdes Torres vs. Doug Phillips case was breaking, and so I asked if he'd be willing to talk again, and he kindly agreed. The articles I have read above seem to present an accurate summary of what Mr. Gibbs relayed to me regarding the lawsuit. But I have seen other questions in the comments of the articles, and have had my own questions to ask, so I was able to address these with Mr. Gibbs.



<https://spiritualsoundingboard.files.wordpress.com/2015/10/iblp2.jpg>

Interview with Attorney David Gibbs III

Are there plans to name Bill Gothard himself in a lawsuit at some point?

Mr. Gibbs responded, "Bill is not legally connected with the organization [IBLP]. It is the Board's decision" if they were to bring him back into the organization. Gibbs noted that adding Gothard to the lawsuit would make it more complicated for various reasons, one reason in particular, that some "clients were less comfortable about suing him directly" because of the abuses. He also described that, typically, "litigation goes against an organization with the goal of compensating victims," not against an individual, such as Gothard.

This makes a lot of sense. I am on the board of a local nonprofit, and as a board member, it is my responsibility (along with the other board members) to make sure the Artistic Director is doing what he's supposed to be doing. The Board of IBLP was supposed to make sure Bill Gothard was behaving appropriately. If they had any indication that something was amiss, they had/have a responsibility to act on it immediately. According to the lawsuit, the IBLP was negligent in how they handled these allegations by failure to report to authorities, not removing Gothard immediately from his position, failure to seek sex abuse experts to conduct a thorough unbiased investigation, etc. By suing the Board, it sends a clear message to IBLP that there was negligence on their part. Bill Gothard is no longer with the ministry, but, moving forward, how will they address these concerns? Will children be put in harm's way? Who will make sure they are protected and safety policies are in place so no child will be harmed, or if something does happen, there are procedures in place to report immediately to civil authorities and minimize further abuse?

Why is this a civil lawsuit instead of a criminal case?

Mr. Gibbs made the important distinction that this is a civil lawsuit, not a criminal case. Anyone can report sex abuse allegations to authorities and they (authorities) may decide to open an inquiry for a criminal case, but that is entirely different than this civil lawsuit. A criminal case is initiated by the government and sentencing can include jail time, etc. A civil case is brought on by parties who ask the court

to make the defendants fulfill their legal responsibilities, compensate for harm done, etc. This [article \(http://litigation.findlaw.com/filing-a-lawsuit/civil-cases-vs-criminal-cases-key-differences.html\)](http://litigation.findlaw.com/filing-a-lawsuit/civil-cases-vs-criminal-cases-key-differences.html) gives further information.

Child Labor Laws

There was discussion about children working for IBLP without appropriate pay and/or possible violation of child labor laws. Gibbs indicated that he and his firm always report any alleged criminal activity to authorities, such as possible violation of child labor laws; but once again, it is within the discretion of the government to pursue these allegations and decide if an inquiry is warranted, which may result in a criminal case. Mr. Gibbs is exploring labor violations, which might be a separate case.

Is there an ongoing search for victims of sexual harassment or sexual assault that fall within the statute of limitations for bringing criminal charges against Bill Gothard?

Mr. Gibbs indicated that his "office remains open for anyone" to report sexual abuse allegations. We discussed the Bill Cosby sex abuse scandal and how publicity helped to encourage more victims to come forward. Mr. Gibbs believes it is likely that we will see the number of plaintiffs increase as the case becomes more public and victims realize that they are part of a larger group and won't have to fight this battle on their own. Based on the number of personal testimonies shared at the Recovery Grace site, I, too, predict the number of plaintiffs to rise.

IBLP Headquarters

We discussed the IBLP property which is currently for sale. There was recent news that IBLP is selling their main headquarters and has plans to relocate to Big Sandy, Texas. Mr. Gibbs indicated the property is worth approximately \$100,000,000. The lawsuit requested that if the property is sold, some sort of trust fund is established until the case is concluded. The monies could later be used to compensate victims if the plaintiffs are successful in the lawsuit.

Survivor Lawsuits in General

Have you served as counsel for other lawsuits by survivors against the perpetrators, or is the IBLP suit the second one for you?

Mr. Gibbs responded that he has handled a number of litigations of injured (all types of injuries). This is not the second case.

Do you think there will be more such lawsuits emerging (e.g., negligence, emotional distress, etc.), given the current overall situation with survivors of abuse?

Yes, if someone is abused, they are entitled to compensation for their abuse. We will see increasingly more of this kind of litigation. With national leaders comes responsibility, and part of that is to protect children, keep them safe, and have zero tolerance for child abuse. They should be safe at church and in their homes.

Allegations of Vulnerable Children Revictimized at IBLP

We discussed a bit of the plight of some of the plaintiffs (in general). It's important to think about these young children and what it was like for them. Some came from abusive homes and were sent to IBLP so they could be "fixed" by Gothard and his teachings. These were kids who were homeschooled and lived sheltered lives. Some of them came from abusive homes and were being sent to IBLP to help their character. They were sent far from home to a strange environment. Their parents trusted IBLP to take care of them. These children likely had no one they knew, which put them in a more vulnerable position.

If they were caught in a sin, there were serious consequences. Some were isolated and/or abused at IBLP. For some, IBLP became their second place of victimization. When they "misbehaved," leaders would call home to the fathers (also perpetrators) and share the "sins," and were sent back home. So some went from one abusive home to experience abuse at IBLP, and then back home in disgrace because they failed at IBLP. Just imagine what would happen to a child who returned to their abusive home from IBLP for discipline reasons! The child was to blame in both places! These children had no safe place for help.

The age range of our victims when abused by IBLP was 14 years to 17 years (and continuing for some as adults). Unreported home abuse ranged from ages 4-17.

For people to cover up, hide it, keep it in the family is victimizing children at unbelievable levels. When you see this pattern of a vulnerable child, they get sent to IBLP to a person with a position of trust, you isolate them, then abuse them, that's horrific. Then when you cover it up – blame them – that's horrific. Many people don't survive [emotionally].

Mr. Gibbs went on to discuss the responsibility of Christian leaders:

I do believe religious leaders/organizations need to realize there is a high standard – and society is holding people more accountable. ... I think you're going to see more cases, but hopefully the national leaders will see there is a higher bar of expectations [for accountability].

Can you give an update on the Lourdes Torres vs. Doug Phillips lawsuit?

The case is currently in discovery and depositions are being taken. The case continues, and mediation will likely occur later in the year. Mr. Gibbs indicated that because this is a high-profile case, extra effort has been made to keep media distractions to a minimum.

I mentioned to David Gibbs that some were concerned about him taking the case based on his background and connections, and asked for comment.

Gibbs identified a possible point of confusion: his name. His father is David Gibbs Jr., and he is David Gibbs III. This often causes misinformation and he's very used to the mix-up. (You can see a chart comparing the two Gibbs' [here](http://spiritualsoundingboard.com/2014/05/26/which-attorney-david-gibbs-leads-the-lawsuit-of-lourdes-torres-manteufel-vs-douglas-phillips-the-father-or-the-son/) (<http://spiritualsoundingboard.com/2014/05/26/which-attorney-david-gibbs-leads-the-lawsuit-of-lourdes-torres-manteufel-vs-douglas-phillips-the-father-or-the-son/>).

Mr. Gibbs then shared in more detail about the process of what happens when he meets a client:

I always sit down with any of my clients and share my heart, explain to them my perspective, my passion, why I'm willing to get involved. The easiest thing would be to do nothing and not engage in this arena. But I wouldn't feel like I was doing the right thing. I view this as an honor and the right thing to do to represent these women who are victimized.

In terms of stepping forward, my actions speak fairly loudly. Are there things years ago I wish I weren't involved in? Yes, but in terms of marching forward, [I have] zero tolerance for child abuse and encourage churches to build awareness, to step forward and do things the right way. The folks that have gotten to know me through litigation seem to have a lot of confidence in the sincerity of these actions. I want to encourage these ladies. I view it as my privilege, along with others.

I asked his views of women, especially with regard to the culture of Patriarchy which depersonalizes women.

I believe women are obviously equal to men, created by God – there is no question in terms of their value. [I believe] they should be educated, and receive every opportunity to achieve their full potential. They need to find their identity in God. Some of the dangerous teachings of the overdomination of males to break the spirit [of women] is not loving. It's wrong and lends itself to abuse.

We have numbers of lady attorneys on staff and they do great work. Every person has to rise and fall on their own merits. Some of what has been taught in Patriarchal cultures puts ladies in positions where they feel horrifically trapped. People who are supposed to protect, turn around and abuse [women]. That's incredibly sad.

Is there anything that hasn't been reported in the media that you would like share?

Many of these women were in abuses at home and escaped to get free. It's heartbreaking.

The vulnerability – once they'd try to pull away, skip one-on-one sessions, counselors were made to telephone their fathers, they were sent back with shame of being sent home where they were abused and having been told by IBLP officials all of the confidential stuff that went on during sessions. Imagine a girl who has never been to school/doctor – that had to be horrifically confusing. All the people you hoped to trust and then find yourself victimized. When you look at culture, many of these ladies felt like they had no place to turn. It's frightening to step on the national stage and bring forward these claims. Family dynamics, personal dynamics, these cases bring up a lot of painful emotions and courage to come forward.

It was brave of [these] ladies to step forward – scary with abusive backgrounds – courage. It's disappointing that IBLP forced them into this. We offered to meet [IBLP Board members] ahead of lawsuit being filed, but they refused. In some measure, they were counting on the victims not being willing to come forward. That was a calculated risk on their part. They are concerned about other women at risk.

Internal Investigation by IBLP

We discussed the internal investigation by IBLP. IBLP paid \$50,000 for an investigation to be done. This investigation was a "sham." The results were never publicly released. I was greatly disturbed to find that the no one asked questions of the victims:

No victims were spoken to in the investigation. It is the lowest level of confidence or credibility if they don't talk to victims.

The lawsuit will access findings of the "investigation." They will have to produce who they talked to, the report, the details, so people can judge from themselves.

There was a calculated effort by the Board to handle it disastrously wrong. Hopefully other churches and organizations will learn from this.

Do you have any thoughts on what it means in the Kingdom for you to participate in the dismantling of a system your father helped create that seems to have shielded these kinds of ministries from scrutiny and accountability?

I am always honored to stand up for what I believe to be right, and I want to do it with a right spirit. That's why we offered IBLP to talk. But when people refuse to do things the right way, you have to evaluate options.

Conclusion

The teachings of Bill Gothard and the abuses that have gone on for years at IBLP have harmed many. What many of us have known for years is finally being exposed publicly, thanks in part to the connection with the Josh Duggar sex scandal. Some have concerns about Mr. Gibbs' involvement in this case. Others want Gothard to be criminally charged and brought to justice. The bottom line is that five brave women have joined together, chosen Mr. Gibbs to represent them, and to call IBLP to account for the way they have mishandled serious abuse cases.

mrskatie

OCTOBER 24, 2015 @ 7:45 PM

You may want to fix the type-o that mentions Bill "Cosby" instead of "Gothard".

Julie Anne

OCTOBER 24, 2015 @ 8:20 PM

You may want to fix the type-o that mentions Bill "Cosby" instead of "Gothard".

Actually, I did mean Bill Cosby. In fact, today I see that 2 more women have come forward with sex abuse allegations against the actor/comedian. The number is now almost up to 60.

I believe that women will join the original five women on the lawsuit as word gets out.

E

OCTOBER 24, 2015 @ 8:08 PM

If "Bill is not legally connected with the organization". I'm the Queen of England because my name is Elizabeth!

I wish these women had access to another lawyer.

Not one related to the lawyer who said NOTHING bad happened at the IBLP!

That is why his motives are being questioned!

Julie Anne

OCTOBER 24, 2015 @ 8:22 PM

E. - I understand why his motives are being questioned and that's why I asked him the specific questions.

These women had access to any lawyer, but they chose Gibbs III. That's not going to stop me from supporting them.

Kathi

OCTOBER 24, 2015 @ 8:09 PM

This should be interesting to watch. I am wondering if Illinois has a statute of limitations for child abuse. For goodness sake, some of these women report that they were teenagers when Gothard made his advances. But, starting with the board is a good move.

Scott

OCTOBER 24, 2015 @ 8:21 PM

Civil lawsuit and Not a criminal lawsuit? There is no such thing as a criminal lawsuit. Criminals cases are simply criminal prosecutions. A citizen can seek an arrest warrant or make a criminal complaint with the US attorney's office, or local prosecutor's office but that's not a lawsuits. A prosecutor would still have to be willing to take the case to court. Gothard's scummery was so long ago that the statute of limitations has long ago expired. Everything he has been accused of is a misdemeanor, so at best he would face a long list of misdemeanors if charged. Very unlikely that sleazy Bill will ever see a court criminal case filed against him. It would be great to see his "ministry" in total ruin before he crooks. That would be justice, everything you worked for your entire life blown to dust and the whole world knows you were just a twisted, legalistic pervert with a fetish for women's feet & hair.

Julie Anne

OCTOBER 24, 2015 @ 8:28 PM

Scott, I'm certainly no legal expert, but I just did a quick Google search and there are indeed criminal lawsuits. Maybe you are familiar with different terminology? I agree with everything else you said, especially the part about seeing his so-called ministry in ruin.

Keith Blankenship

OCTOBER 25, 2015 @ 6:54 AM

"Criminal lawsuit" is not a widely used term. Typically in the USA a civil action seeking monetary damages or other relief, such as injunctive relief is called a "lawsuit". The wrongs addressed are torts, breaches of contract, etc. The burden of proof in these matters is typically a preponderance of the evidence

Criminal prosecutions are instituted by lawyers representing the state, and employed by the state. US Attorneys prosecute on behalf of the United States. The bulk of criminal prosecution is undertaken on the state level by District Attorneys, Commonwealth's Attorneys, Solicitors etc.

In some states anyone can swear out a warrant alleging that a crime was committed, but the final decision as to maintaining a criminal prosecution lies with the attorney for the state, as these are "public wrongs", in old-fashioned language "offenses against the peace and dignity of the state". The burden of proof is beyond a reasonable doubt.

If a person believes a crime has been committed, it should be first reported to the police so that an investigation can be conducted. Then the matter can be reviewed by the prosecutor to determine if enough evidence exists to proceed.

Julie Anne

OCTOBER 25, 2015 @ 8:49 AM

Thanks, Keith.

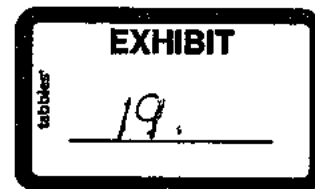
From: dgibbs@gibbsfirm.com

To: bill@billgothard.com

Subject: Draft affidavit for your review

Date: Wed, 25 Nov 2015 21:07:27 +0000

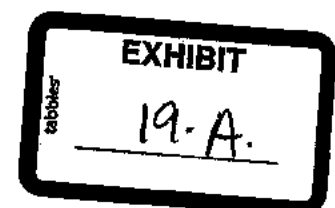
Since you are currently unrepresented, please review this affidavit and call me back with any additional edits.



Affidavit of Dr. William W. Gothard, Jr.

Dr. William W. Gothard, Jr. ("Bill Gothard"), after being sworn on oath, deposes and states as follows:

1. This Affidavit is made upon my personal knowledge, and if I were sworn as a witness at trial in this matter, I would testify to the facts contained herein.
2. I am over the age of 21 (twenty-one) years and I am competent to swear to the facts contained herein.
3. I am the founder of the Institute in Basic Life Principles. {"IBLP"}. I have served as its President and Board Chairman to build it into a large international organization.
4. I have written the materials and taught the programs that constituted the ministry of IBLP and grew it into a ministry empire with real estate holdings in excess of \$200 million and over 2.5 million alumni having attended my seminars.
5. I have reviewed the complaint filed by the plaintiffs in this case, and I know all of the plaintiffs personally as they were all either employees, volunteers, interns, or participants with IBLP.
6. I have attempted to contact all of the plaintiffs in this case and ask for their forgiveness for any inappropriate conduct that I demonstrated toward them. I now realize how I treated them was not right. I showed them the wrong kind of love.
7. God has been dealing with my heart in these areas and showing me things.
8. I personally appointed the Board of Directors. They were selected for their loyalty to me 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 take care of some personal issues. It was my 100% intention to return and the other IBLP Board members fully understood that fact.
11. I would have never temporarily resigned if the IBLP Board was not in unanimous agreement that IBLP could not function without me as its founder and leader.



12. I have submitted to my pastor and he believes it is time for me to be reinstated to the IBLP Board to save the ministry from the destructive and foolish path the current Board members are undertaking.
13. I consider David Gibbs, Jr. to be a personal friend and a follower of IBLP principles since the 1970's.
14. I personally brought David Gibbs, Jr. and his organization CLA to help me and save my ministry at IBLP.
15. David Gibbs, Jr. and CLA were paid \$50,000 to help me save my ministry at IBLP.
16. David Gibbs, Jr. and CLA were supposed to talk with the victims and I now understand that this never happened.
17. I do not have a written copy of the document that David Gibbs, Jr. and CLA generated during their time of helping me save my ministry at IBLP.
18. The Board of IBLP knew David Gibbs, Jr. and CLA would be friendly toward IBLP as he was a paid speaker at IBLP conferences and a strong follower of my teachings. David Gibbs, Jr. and CLA were never considered to be outsiders, independent, or objective. David Gibbs, Jr. was our friend as the IBLP Board recently stated on their website.
19. I understand that David Gibbs, Jr. has essentially retired from the practice of law and that he now travels and preaches to churches who share his Independent Baptist, King-James Bible only philosophy.
20. A few weeks ago, David Gibbs, Jr. and his personal secretary, Steve Kluth, wanted to meet with me in Chicago to help me get back on the IBLP Board and to restore my ministry. He also wanted to warn me that his son was a trial attorney committed to helping abuse victims and would most likely be bringing a lawsuit on their behalf. This meeting did not occur because David Gibbs, Jr. refused to sign a statement that I asked him to sign confirming his intentions of restoring me to the IBLP Board and Presidency.
21. I have asked the Board of IBLP to not liquidate properties.
22. I have asked the Board of IBLP to not flee to the State of Texas.
23. I have encouraged the Board of IBLP to meet with legal counsel for the plaintiffs and to meet with the nine ladies and their lawyers. It is sad to me that these ladies are not being listened to by the Board of IBLP.

24. I received a number of letters over many months from legal counsel for the plaintiffs offering to meet with me and the IBLP Board before the lawsuit was filed.
25. I agreed to participate in this pre-lawsuit meeting. The IBLP Board refused to meet.
26. The IBLP Board thought that the plaintiffs and their counsel were "bluffing" and that "they would not sue." Obviously, that is not the case.
27. The IBLP Board has responded to this lawsuit poorly in my opinion and in violation of Christian dispute resolution principles.
28. I believe that the plaintiffs have valid claims that should be submitted to Christian mediation and resolution.

AFFIANT FURTHER SAYETH NOT.

Dr. William W. Gothard, Jr.
Founder
Institute in Basic Life Principles, Inc.

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

Notary Public

From: dgibbs@gibbsfirm.com

To: bill@billgothard.com

Subject: Final draft

Date: Wed, 25 Nov 2015 22:34:06 +0000

Please sign and notarize tonight, and mail the original back to me at this address. Thank you.

Gibbs Law Firm, P.A.
2648 FM 407, Suite 240
Bartonville TX 76226



Affidavit of William W. Gothard, Jr.

William W. Gothard, Jr. ("Bill Gothard"), after first being sworn on oath, deposes and states as follows:

1. This Affidavit is made upon my personal knowledge, and if I were sworn as a witness at trial in this matter, I would testify to the facts contained herein.
2. I am over the age of 21 (twenty-one) years and I am competent to swear to the facts contained herein.
3. I am the founder of the Institute in Basic Life Principles. ("IBLP"). I have served as its President and Board Chairman to build it into a large international organization.
4. I have written the materials and taught the programs that constitute the ministry of IBLP and by God's blessing watched it grow into a ministry with real estate holdings in excess of \$100 million and over 2.5 million alumni having attended my seminars.
5. I have reviewed the complaint filed by the plaintiffs in this case, and I know all of the identified plaintiffs personally as they were all either employees, volunteers, interns, or participants with IBLP.
6. I have attempted to contact as many plaintiffs as possible in accordance with Matthew 18:15-17.
7. During the past seven months, God has allowed me to publish six new books that contain a powerful new message that I want to get to all of the alumni.



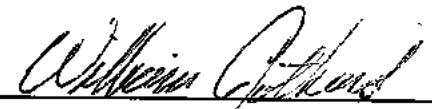
8. I personally appointed the Board of Directors. They were selected for their loyalty to the ministry and my teaching.
9. All actions taken by the IBLP Board were to be unanimous.
10. I temporarily resigned from the Board of IBLP to follow the instruction of Matthew 5:23-24. The Scripture itself affirms 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 15 day of November 2015.


Notary Public

From: bill@billgothard.com
To: dgibbs@gibbsfirm.com
CC: sales@anchortours.com
Subject: RE: Important Message from Bill Gothard
Date: Sun, 20 Dec 2015 16:16:37 -0600

David:

I am still looking forward to your answer to this important letter. It would be very disastrous for you to refile on January 6th and I would not want my affidavit to be used if a refiling is done. Please honor this request. The affidavit specifies that the girls would contact me according to Scripture. This has not yet been done.

Sincerely,

Bill

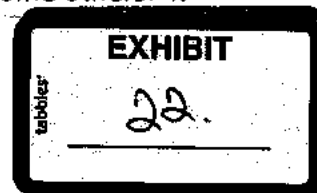
From: Bill Gothard [<mailto:bill@billgothard.com>]
Sent: Monday, December 14, 2015 3:15 PM
To: 'David Gibbs III' <dgibbs@gibbsfirm.com>
Cc: John Stancil <sales@anchortours.com>
Subject: Important Message from Bill Gothard

Dear David,

Thank you for calling yesterday afternoon. I prayed that God would use your message last night to draw many to His way of life.

This letter is written to you as a brother in the Body of Christ, with the confidence that our primary goal is to glorify God, protect His Name, and edify the Body of Christ. I believe this is the purpose of your ministry.

Over the past months, I have met with six lawyers. Each one has emphasized to me that their number one responsibility is to confirm the facts of their case. This requires much diligence, as you know. In your lawsuit against the Institute, the claims of your clients are blatantly false. I have documents, letters, and many witnesses to prove this. I believe that I gave you a few of them and informed you about some others. It seems that you are relying only on their stories.



David, I care about the spiritual life of each one of your clients. They have had extensive training in the Bible. They know what God requires of one who has been offended by another believer.

The First Step: "Go and tell him his fault between thee and him alone" (Matthew 18:15).

The Second Step: "But if he will not hear thee, then take with thee one or two more, that in the mouth of two or three witnesses every word may be established" (v. 16).

The Third Step: "And if he shall neglect to hear them, tell it unto the church" (v. 17).

Telling their offenses to the world FIRST on the Recovering Grace website was a serious violation of this Scripture! Violating Scripture always bring guilt. And unresolved guilt leads to roots of bitterness. We are to watch "diligently lest any [person] fail of the grace of God, lest any root of bitterness springing up trouble you, and thereby many be defiled" (Hebrews 12:15). This defilement would include sons and daughters, grandchildren, friends and many non-Christians.

Your lawsuit is a further violation of Scripture. "Dare any of you, having a matter against another, go to law before the unjust . . . Now, therefore, there is utterly a fault among you, because ye go to law one with

DECEMBER 31, 2015

DOCUMENT IX

DEAR DAVID,

THIS URGENT APPEAL IS BEING WRITTEN TO YOU OUT OF LOVE AND RESPECT FOR YOU AS A FELLOW MEMBER OF THE BODY OF CHRIST.

YOU HAVE AN OPPORTUNITY TO DO GREAT GOOD OR GREAT EVIL. YOU CAN DO GREAT GOOD BY REQUIRING YOUR CLIENTS WHO HAVE "AUGHT AGAINST ME" TO OBEY THE CLEAR COMMANDS OF MATTHEW 18:15-18.

YOU WILL DO GREATER DAMAGE TO YOUR CLIENTS AND TO THE CAUSE OF CHRIST IF YOU EXPAND AND REFILE YOUR LAWSUIT.

ARE YOU AWARE OF THE SERIOUS CONSEQUENCES OF CURSING YOUR OWN FATHER TO THE WORLD? JESUS AFFIRMED THE DEATH PENALTY FOR DOING THIS WHEN HE STATED, "HE THAT CURSETH FATHER OR MOTHER, LET HIM DIE THE DEATH" (MATTHEW 15:4).

THE WORD "CURSE" IS TO "LIGHTLY ESTEEM". YOU WENT WAY BEYOND THIS IN THE COMMENTS YOU MADE ABOUT YOUR DAD.



DAVID, YOUR WHOLE LAW SUIT IS
BASED ON FALSE ALLEGATIONS. THE MOTHER
OF YOUR "STAR WITNESS" ASSURED ME THAT
HER DAUGHTER LIED ABOUT ME. SEVERAL
OTHERS WILL TESTIFY TO THIS FACT. I
INFORMED YOU ABOUT THIS IN THE PAST.
THEREFORE, YOU ARE BEARING FALSE WITNESSES.

OVER THE PAST 50 YEARS I HAVE
HAD THE OPPORTUNITY AND RESPONSIBILITY TO
WORK WITH TENS OF THOUSANDS OF YOUNG
PEOPLE. I CONSIDERED EVERY ONE OF THEM
AS A FRIEND FOR WHOM I WAS LAYING
DOWN MY LIFE.

SCRIPTURE WARNS THAT A WHISPERER
SEPARATES CHIEF FRIENDS" (PROVERBS 16:28).
AND "THE WORDS OF A TALEBEARER ARE
AS WOUNDS, AND THEY GO DOWN INTO THE
INNERMOST PARTS OF THE BELLY" (PROVERBS 18:8).
THIS HAS CAUSED THE "EMOTIONAL DAMAGES"
OF YOUR CLIENTS. I HAVE LETTERS TO
PROVE THIS, PLUS, THEY HAVE ALSO
REPORTED THAT OTHERS INFLUENCED THEM
TO CHANGE THEIR ATTITUDES TOWARD ME.

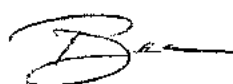
MILLIONS OF SEMINAR ALUMNI HAVE GREATLY BENEFITED BY WHAT THEY LEARNED AND WANT OTHERS TO LEARN THE TRUTHS THAT TRANSFORMED THEIR LIVES.

YOUR ATTACK AGAINST ME IS GIVING THOSE WHO HATE THE LORD AN OPPORTUNITY TO DAMAGE THE WORK OF THE LORD. CHRISTIANITY IS UNDER ATTACK IN THE WORLD, HOW ARE YOU GOING TO ADVANCE THE CAUSE OF CHRIST BY DIRECTLY VIOLATING THE WORD OF GOD?

MY DAILY PRAYER IS THAT GOD WILL GIVE YOU THE WISDOM AND COURAGE TO DO WHAT IS RIGHT. ANY MONEY THAT WOULD BE GIVEN TO YOUR CLIENTS WOULD BE AN ADMISSION OF FALSE ALLEGATIONS THEREFORE YOU AND THEY SHOULD NOT EXPECT TO GET ANYTHING.

ALSO, I WANT NOTHING TO DO WITH YOUR ATTENDED LAW SUIT, THEREFORE, I HEREBY WITHDRAW MY PERMISSION FOR YOU TO USE MY AFFIDAVIT,

LOVE IN CHRIST,





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Bill Clinton
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Bill Clinton
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PM Exp 2-Day Flat Rate Env (Domestic)	1		\$19.99
(ARGYLE, IL 76226)			
(Flat Rate)			
(Signature Waiver)			
(Scheduled Delivery Day)			
(Saturday 01/02/2016 03:00 PM)			
(Money Back Guarantee)			
(USPS Tracking #)			
(EG758929875US)			
PM Exp Insurance (Up to \$100.00 included)	1		\$0.00
Signature Waived	1		\$0.00
Total			\$19.99

Credit Card Remitted
(Card Name: Discover)
(Account #: XXXXXXXXXX7533)
(Approval #: 031358)
(Transaction #: 713)

From: bill@billgothard.com

To: dgibbs@ncll.org

Subject: Info

Date: Wed, 27 May 2015 14:27:55 -0500

Thank you for your phone call last night.

Another Important development is an article that recently came out linking the Bates family with the Duggar family and Steven Paine

<http://defamer.gawker.com/the-bates-family-is-cable-tvs-new-duggars-and-theyre-ju-1706997724>

Bill



From: bill@billgothard.com

To: dgibbs@ncll.org

Subject: Letter to the Board

Date: Mon, 8 Jun 2015 11:56:41 -0500



June 8th, 2015

Dear Members of the Board,

Last Friday and Saturday, June 5 and 6, a government official from another state came to my home for a conference. He has direct access to a multibillion dollar fund which has been established to make his state a model for the Nation. He wanted me to give him some ideas.

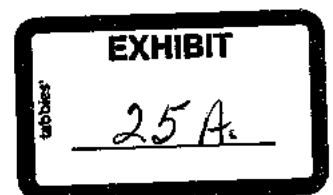
We worked out an eight point plan that has great potential to transform his state. We then began contacting state leaders and explained the plan to them. They were thrilled and want to be a part of it. This is an unprecedented opportunity!

In order for this plan to work, we need the Big Sandy property and the Nashville Property.

At this crisis time in America, I am sure that you would want to see the development of a potential solution.

Through Christ our Lord,

Bill



December 31, 1971

Dear David,

A few minutes ago I was talking with Dr. Stancil. After reading my proposed letter to him, he felt that it needed a final statement. He dictated the one that is on the attached letter. This lets them know that they must move quickly. I am still open to a call from you at any time.

Through Christ our Lord,

Bill.



From: bill@billgothard.com

To: dgibbs@ncfl.org

Subject: Donors Emails

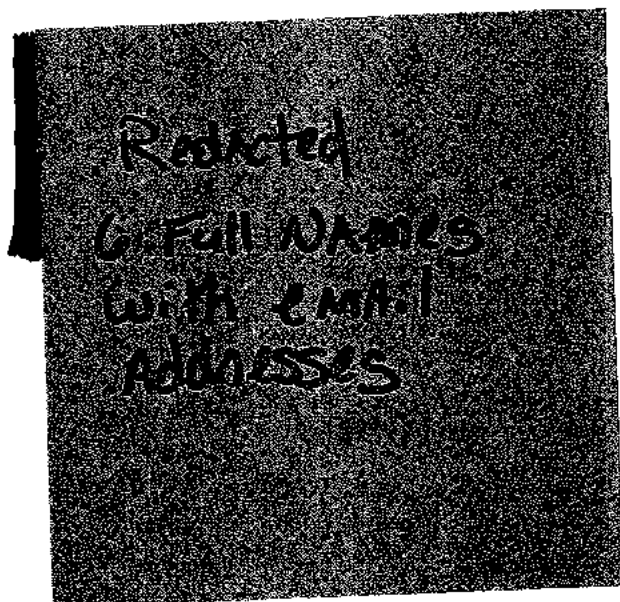
Date: Mon, 13 Jul 2015 18:27:50 -0500

Dear David,

I am looking forward to talking with you as soon as possible. Meanwhile I have contacted all the donors and they are ready and eager to go forward. I believe the other approach will be very damaging for reasons I will explain to you.

Through Christ Our Lord,

Bill



From: bill@billgothard.com
To: dgibbs@ncfl.org
Subject: FW: Document1
Date: Thu, 16 Jul 2015 10:04:17 -0500

From: [REDACTED]
Sent: Wednesday, December 3, 2014 5:08 PM
To: 'bill@billgothard.com'
Subject: Document1

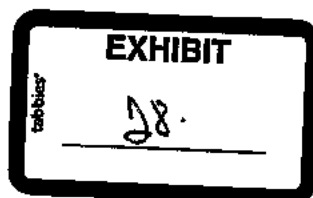
Bill

I have typed the attached letter for you to pass on to the Board of IBLP.

Blessings

[REDACTED]

This email message, including any attachment(s) is for the sole use of the intended recipient(s) and may contain confidential information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please immediately contact the sender by email.



December 3, 2014

Members of the Board of Directors
Of the Institute in Basic Life Principles
Box 1, Oak Brook, IL 60521

Dear Members of the Board,

When our family donated the Nashville Training Center to the Institute in Basic Life Principles it was our hope that the facility would be used to further the ministry and have a positive impact on lives. It is now our understanding that the Institute In Basic Life Principles has no further need for the Training Center, and has therefore put it up for sale.

I am aware that Bill Gothard has started a new ministry, Life Purpose Power Teams inc. with the goal of motivating and equipping fathers, military veterans and others to meditate on Scripture and have a growing prayer life. I would ask that this new ministry be considered as a potential recipient of the property.

If the Board has any questions concerning this request please feel free to contact me.

Blessings

[REDACTED]
[REDACTED]

From: bill@billgothard.com
To: dgibbs@ncll.org
Subject: Case Documents!
Date: Mon, 14 Sep 2015 11:00:23 -0500

Dear David,

I enjoyed our recent talk. This is the week that action must be taken. Key staff are already being re-located to Big Sandy in order to vacant the headquarters property.

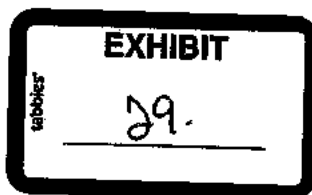
The attached diagram on the three structures of authority may be a critical document to prove to Board and court that they are not following the teaching on authority from even the basic seminar. The Board has repeatedly claimed that they are, however they have usurped the authority of the Church.

Last night I had an excellent talk with my pastor, David Shoal. He reminded me that Dr. Paine had been a member of his church before the family moved to Oklahoma. He was shocked to learn that the chief complaint of the renegade board members was that "I was not repentant enough." He exclaimed that this was not their responsibility and anyone with an accusation, should present it to the pastor and his elders, with Bill present. This has never been done with any accuser, even to the Board. The pastor will be calling Steven Paine today and letting me know the outcome.

Meanwhile, we need to quickly move forward with legal action and the requested injunction. If you have questions or comments, please give me a call.

Though Christ our Lord,

Bill



An Appeal To The Judge

A controlling faction on the Board of Directors of the Institute of Basic Life Principles forced a vote on Tuesday, September 8, 2015 to liquidate critical assets of the ministry and relocate the ministry from its present and historical location in Oakbrook, Illinois to a remote location in Texas.

This very unwise move is essentially dissolving the ministry at a time when it could be greatly expanded. This move is also the purpose for which the past funds were donated. Donors gave millions of dollars for the sole purpose of supporting the ongoing teaching ministry of its founder, Bill Gothard.

For not valid reason, this faction on the Board is refusing to allow Bill Gothard to continue his work, and the ministry is not viable without him. One of the first, negative actions of this faction of the Board was to change the initial and long standing policy of unanimous approval of the entire Board for all critical decisions to a simple majority rule. The longest standing members of the Board vehemently disagree with the current decisions.

On behave of the donors we are appealing to this court to issue an immediate restraining order, so that we can confirm the facts of this case by depositions, and subsequent legal action.

The Authority Structure of the Institute in Basic Life Principles

THE LOCAL CHURCH

Bill Gothard has put himself under the spiritual authority of the Bollingbrook Baptist Church with Pastor David Shoaf.

Bill has faithfully attended this church for the past ten years. During the past 18 months, he has attended every Sunday morning, Sunday evening and Wednesday evening service.

Bill has maintained regular communication with Pastor Shoaf and has been accountable to him in the spiritual matters of his personal life.

If there would be a serious problem in the life of Bill Gothard, Pastor Shoaf and the church leaders would be the ones to deal with it.

Pastor Shoaf is ready and able to meet with anyone who has an allegation with Bill present. To date this has not happened.

THE BOARD OF DIRECTORS

The Board of Directors has been appointed in accordance with the requirements of a 501-C-3 non-profit corporation in the state of Illinois.

The primary responsibility of the board is to protect the assets of the corporation, and to make sure that they are used in accordance to the laws of the state, and in accordance with the directives of the donors. Neither of these responsibilities is being carried out by this Board.

Bill Gothard personally selected each of the present six Board members, and entrusted to them the fiduciary responsibility of overseeing and protecting the assets of the Institute.

Both the U.S. Constitution and the Bible make a clear distinction between the government and the church.

THE EMPLOYER

Since the day that Bill Gothard founded his ministry in 1961, he has been the sole employer of the Institute. He has personally selected and trained all employees. Bill chose each staff member on the basis of his or her commitment to the ongoing life message that God has entrusted to him and their eagerness to see it go forward.

In March of 2014, Bill took what he assumed was a temporary leave of absence from the Board and ministry as urged by the attorney for the Institute in order to be reconciled to various past staff and associates whom he had unintentionally offended.

The Board also affirmed by various documents that when Bill fulfilled his goals as far as he could, he was to be reinstated to his ministry.

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LEGAL ACTION

Against an Out-of-Control Faction

On The IBLP Board of Directors That Has Seized Control,
And is Knowingly And Willfully Dissolving The Corporation.

Dictionary definition of a "faction":

"A group of people operating within, and often in opposition to a larger group to gain its own ends."

Our Appeal before the court:

This action represents millions of youth and adults who have benefitted greatly by the teachings of Dr. Bill Gothard during the past fifty years. These teachings transcend all nationalities, cultures, religions and political systems. They have universal application, and have been welcomed by the leaders of many nations.

Bill Gothard began working with teen-agers in youth groups and with Chicago street gangs during his youth. When he was thirty years old, he developed a thirty-hour seminar which explains the principles that he learned in his youth work.

Wheaton College and Graduate School invited Bill to teach his material as an elective summer school course. They gave it the name "Basic Youth Conflicts". Those who attended that first course were so enthusiastic about what they had learned, that they told all their friends about it.

In a few years tens of thousands of youth and adults were packing out colosseums and arenas throughout America and then in New Zealand, Russia, Taiwan, and many other nations.

Thus far, over 2.7 million have attended the thirty-hour seminar. When repeat-attenders are counted, the total comes to seven million. These alumni continue to be grateful for the principles they have learned and want the teachings to continue. Therefore, they have contributed without solicitation, tens of millions of dollars to Bill Gothard for his ministry.

At the beginning of 2014, Bill Gothard was made aware that during the past fifty years various individuals with whom he had worked or whom he had trained had been offended by his words or actions. Therefore, he purposed to make it a priority to be reconciled with these individuals in accordance with the instructions of Matthew 5:23, 24.

At this time Bill had several meetings with Bob Barth, the attorney for the Institute, along with another senior staff member. They strongly urged him to resign in order to carry out his goal. Based on their counsel Bill offered his resignation to the board of directors. They unanimously rejected it and appealed to Bill to withdraw it. After further urging by his counsel, he submitted what he understood would be a temporary separation from the ministry.

In Bill's absence attorney Bob Barth encouraged the board to change the long-standing policy of unanimous ^{DECISIONS} to a majority rule. Then, he sent many negative e-mails to the board from those who have opposed Bill's ministry. This steady diet of unproven allegations and negative reports poisoned the minds of four of the six board members. They, in turn, have decided for no valid reason that Bill Gothard should not return to his ministry.

This decision is having disastrous results in the financial affairs of the Institute. Donors are alarmed that the funds which they have given over the years are no longer being used by Bill Gothard for his ministry. They have given strong appeals to the board to reinstate Bill Gothard, but these appeals have gone unheard. Therefore, they believe that their only recourse is to appeal to this court.

This matter is extremely urgent because the board has turned over all its properties to a man who has had no experience in managing a large corporation. He has already made devastating financial decisions. He has urged the board to sell the Oak Brook headquarter's property and all the other assets, and move the remains of the ministry down to their training center in Big Sandy, Texas. This facility is two and a half hours from the Dallas airport, and is simply a holding action until all the funds are used up. Just this week the board has voted to put the properties up for sale and make the move.

We are appealing to this court to review the board's violations of their fiduciary responsibility as a 501-C-3 corporation in Illinois and to require the board to immediately fulfil the purposes of the funds which have been given.



COMMISSIONER OF INSURANCE
SAFETY FIRE COMMISSIONER
INDUSTRIAL LOAN COMMISSIONER

RALPH T. HUDGENS

2 MARTIN LUTHER KING, JR. DRIVE
SEVENTH FLOOR, WEST TOWER
ATLANTA, GEORGIA 30334
404-656-9140

September 2, 2015

IBLP Board
PO Box One
Oak Brook, IL 30522-3001

Dear Current Board Members,

As a past member of the Board, I would like to comment on the current situation. Also I am an alumni of several Basic seminars, the Advanced seminar, the Total Health seminar, an ATI father for six years beginning the second year of the program, and a personal friend of Bill Gothard.

I was on the Board with Bill Boyd, Dr. Blackwood, Congressman Johnson, and Dr. Boring. Bill Boyd died, Congressman Johnson resigned for his campaign, and Dr. Blackwood resigned to take care of his aging wife. That left Dr. Boring, Bill Gothard, and me on the board. At my insistence each of you was added because I felt that there would be wisdom in numbers and also the regulations for 501C corporations required more than three board members.

After recounting my past, I want to get to the point of my letter. If there had been no Bill Gothard, there would be no IBLP! There would be no main campus, no ATI, no Nashville training Center,

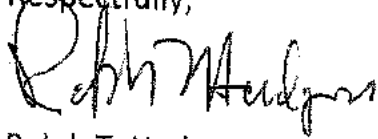
PAID FOR BY FRIENDS OF RALPH HUDGENS

no Big Sandy, No Oklahoma Training Center, or any of the other properties. These were given to Bill, not the board! In my opinion the board and you individually have STOLEN this ministry and it's assets from Bill Gothard. In my opinion, the Board should vote unanimously to reinstate Bill and then if any of you disagree with the reinstatement then they should immediately resign.

A verse from the Bible comes to mind. "Thou art a God ready to pardon, gracious and merciful, slow to anger, and of great kindness" Nehemiah 9:17

I pray that each on you will adopt these qualities.

Respectfully,

A handwritten signature in black ink, appearing to read "Ralph T. Hudgens". The signature is written in a cursive, somewhat stylized script.

Ralph T. Hudgens

September 4, 2015

Dear Dr. Paine and members of the IBLP board,

I have been a long time supporter of IBLP, the ministry that Bill Gothard founded and built over many years. By God's grace and blessing, we have been able to support IBLP in the form of donations totaling over 7 figures. Currently, I am very concerned as not only a donor, but as a ATI dad that the ministry is rapidly declining and diminishing without Bill Gothard's influence and leadership. The board gave Bill some direction as to what they thought needed to be done for him to be restored to the Institute (which he has done, to my knowledge). He has written several books in the interim that would greatly benefit us—especially the men and fathers. These, to my knowledge have not been made available to the IBLP alumni through the Institute or website.

With purposeful, but not necessarily malicious or evil intent, the board is essentially keeping Dr. Gothard from the very ministry that he founded and nurtured. As he completes the tasks that the board directs him to do to be restored to the ministry, the board seems to keep "raising the bar" and/or finding reasons to not restore him to his ministry—to the detriment of IBLP. With the continuing passage of time, the Institute suffers loss, and great potential for the benefit of his leadership, influence and guidance is also being lost. Families are drifting and floundering. Many families who looked to the Institute for inspiration and direction are instead finding that without Bill Gothard it is not the same. Many, including myself, miss the Godly inspiration, motivation, leadership and energy provided by Bill.

I know that given a chance to do things over—Bill would do things differently. I agree with the board that some things should have happened differently. However, in some cases context is deemphasized or purposefully spun to make some situations seem suspect or inappropriate. However, Bill has done his best to rectify those cases with validity as he becomes aware of them. Who among us is blameless or has not had regrets and remorse about past actions, thoughts, or deeds? In this case, I feel Bill has learned his lesson and has even been inspired to focus his ministry in a different direction—to teach men to be the leaders they should be.

Members of the IBLP board—I ask that you please restore Bill to his ministry, allowing him the platform to share once again with IBLP alumni openly and without reservation. Let him share the riches that God has shown him through these difficult times. Let grace and forgiveness prevail. The days are evil and time is so precious. Please take action before even more time is lost, and support Bill. Restore him with your blessings.

I thank the board for the opportunity to address you and would be happy to speak to any of you individually. May God bless us all with the riches of Christ. May we be the evidence of a loving and merciful God to a watching and needy world!

In Christ,

Dr. Gary Chan

Bill Gothard

From: [REDACTED]
Sent: Saturday, September 5, 2015 7:00 AM
To: bill@billgothard.com
Subject: letter to IBLP Board
Attachments: IBLP Board ltr-2015.docx

Hi Bill,

I started this letter at 2:00 a.m. and just finished it. I had an extremely busy work week. Sorry for the delay in sending this to you. May God richly bless you.

Warmly,
[REDACTED]

September 4, 2015

Dear Dr. Paine and members of the IBLP board,

I have been a long time supporter of IBLP, the ministry that Bill Gothard founded and built over many years. By God's grace and blessing, we have been able to support IBLP in the form of donations totaling over 7 figures. Currently, I am very concerned as not only a donor, but as a ATI dad that the ministry is rapidly declining and diminishing without Bill Gothard's influence and leadership. The board gave Bill some direction as to what they thought needed to be done for him to be restored to the Institute (which he has done, to my knowledge). He has written several books in the interim that would greatly benefit us—especially the men and fathers. These, to my knowledge have not been made available to the IBLP alumni through the Institute or website.

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In Christ,

Dr. [REDACTED]

IBLP

ATI

Embassy Institute

More



Statement Regarding Resignation

The stated corporate purpose of the Institute in Basic Life Principles, Inc. is to introduce individuals to God's basic way of life through the Gospel of the Lord Jesus Christ. The Institute remains committed to this purpose and to helping individuals live out their salvation, received by grace through faith, and apply Biblical truths in their daily lives.

A few weeks ago, Bill Gothard respectfully submitted his resignation to the Board of the Institute and the Board unanimously and in unanimity asked him to withdraw it until a review by outside legal counsel was complete and recommendations given. At the Board's encouragement, Mr. Gothard agreed to withdraw his resignation. However, based on assertions brought by various individuals and groups, Mr. Gothard was placed on administrative leave where he was to have no contact with the ministry pending such review.

On March 5, 2014, Mr. Gothard again submitted his resignation indicating that he wanted to follow Matthew 5:23-24 and listen to those who have "ought against" him. In considering what was in the best interests of the Institute, the Board of Directors accepted Mr. Gothard's resignation.

On March 14, 2014, the Board of Directors announced the appointment of Dr. Tim Levendusky as the interim president for the Institute. Meanwhile, the Christ honoring review process shall continue and a future statement will be issued once the review is complete and submitted to the Board of Directors.

Board of Directors
Institute in Basic Life Principles, Inc.

MAY 17, 2014.
EXPLAINED AT BOARD
MEETING

TO: Mr. Bill Gothard

STEPS TOWARD RECONCILIATION AND RESTORATION

- 1. Must be accountable to a local pastor and a member of a local church with regular attendance on a weekly basis.
- 2. Take active steps toward reconciliation with ladies who you have offended, expenses for which the Institute will consider paying if approved by the Institute administration.
- 3. No in-person interaction or counseling with ladies, except for purposes of reconciliation with a third party present.
- 4. Reconcile with individuals who you have offended through broken promises or harsh actions, beginning with Steve Hamm within 30 days.
- 5. May not be on Institute property unless as specified by the Board of Directors.
- 6. Submit to a team of four or five Christian leaders for purposes of restoration, who would include your local pastor and such leaders as Bruce Wilkinson, Gary Smalley, and Dr. Doty Murphy if they are willing.

MY REPORT, SEPTEMBER 9, 2015

- 1. I HAVE MAINTAINED ALMOST PERFECT ATTENDANCE SUNDAY MORNING, SUNDAY EVENING, AND WEDNESDAY EVENING AT THE BOLLINGBROOK INDEPENDENT CHURCH FOR THE PAST FOURTEEN MONTHS. PASTOR DAVID SHOAF AND I TALK REGULARLY AND MEET PERIODICALLY.
- 2. I HAVE MADE EVERY EFFORT POSSIBLE TO DO THIS. ONE OF THEIR LEADERS HAS WRITTEN TO ME STATING THAT IF I WANT TO BE RECONCILED WITH THE GROUP I MUST CHANGE MY MESSAGE AND ADMIT THAT THE A.T.E. PROGRAM WAS WRONG.
- 3. THIS DIRECTIVE HAS BEEN FULLY FOLLOWED.
- 4. I HAVE THE NAMES OF OVER 50 PEOPLE WITH WHOM I HAVE BEEN RECONCILED. STEVE HAMM TOLD ME THAT I AM FULLY FORGIVEN.
- 5. THIS HAS BEEN FULLY FOLLOWED.
- 6. I HAVE A TEAM OF GODLY MEN WITH WHOM I MEET REGULARLY. THESE INCLUDE, PASTOR DAVID SHOAF, DR. DON WOOD, DR. RESS HOUWER, DR. ROGER AND CARL BLAIR, AND I HAVE MET IN TOUCH WITH DR. BRUCE WILKINSON, AND GARY AND NORMA SMALEY.

Bill Gothard

To: David Gibbs III
Cc: Dr. John Stancil; (; sales@anchortours.com;)
Subject: Important Message from Bill Gothard

Dear David,

Thank you for calling yesterday afternoon. I prayed that God would use your message last night to draw many to His way of life.

This letter is written to you as a brother in the Body of Christ, with the confidence that our primary goal is to glorify God, protect His Name, and edify the Body of Christ. I believe this is the purpose of your ministry.

Over the past months, I have met with six lawyers. Each one has emphasized to me that their number one responsibility is to confirm the facts of their case. This requires much diligence, as you know. In your lawsuit against the Institute, the claims of your clients are blatantly false. I have documents, letters, and many witnesses to prove this. I believe that I gave you a few of them and informed you about some others. It seems that you are relying only on their stories.

David, I care about the spiritual life of each one of your clients. They have had extensive training in the Bible. They know what God requires of one who has been offended by another believer.

The First Step: "Go and tell him his fault between thee and him alone" (Matthew 18:15).

The Second Step: "But if he will not hear thee, then take with thee one or two more, that in the mouth of two or three witnesses every word may be established" (v. 16).

The Third Step: "And if he shall neglect to hear them, tell it unto the church" (v. 17).

Telling their offenses to the world FIRST on the Recovering Grace website was a serious violation of this Scripture! Violating Scripture always bring guilt. And unresolved guilt leads to roots of bitterness. We are to watch "diligently lest any [person] fail of the grace of God, lest any root of bitterness springing up trouble you, and thereby many be defiled" (Hebrews 12:15). This defilement would include sons and daughters, grandchildren, friends and many non-Christians.

Your lawsuit is a further violation of Scripture. "Dare any of you, having a matter against another, go to law before the unjust . . . Now, therefore, there is utterly a fault among you, because ye go to law one with another. Why do you not rather take wrong? Why do you not rather suffer yourselves to be defrauded? Nay, ye do wrong and defraud, and that your brethren" (I Corinthians 6: 1, 7-8).

✱ Since you are representing these women, you can require them to follow Scripture by meeting with me and at least one other witness in order that "every word be established." Millions of Seminar alumni are waiting for the truth to be affirmed. If a single dollar is given to "appease the plaintiffs," it will cause deeper guilt in them and will also be interpreted by many to say that I am guilty of their false accusations. I would hope that you would not want this to happen.

I look forward to your response to these important points.

Love in Christ,

Bill

