

STATE OF ILLINOIS)
)SS
COUNTY OF DUPAGE)

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

GRETCHEN WILKINSON,)	
JANE DOE,)	
MELODY FEDORIW,)	
CHARIS BARKER,)	
RACHEL FROST,)	
RACHEL LEES,)	
JANE DOE III,)	
JAMIE DEERING,)	
RUTH COPLEY BURGER,)	
JOY SIMMONS,)	
JANE DOE IV,)	
CARMEN OKHMATOVSKI,)	
JENNIFER SPURLOCK,)	
MEGAN LIND,)	
JANE DOE V,)	
DANIEL DORSETT,)	
JANE DOE VI, and)	
JOHN DOE I,)	
)	
Plaintiffs,)	CASE NO. 15 L 000980
)	
v.)	Hon. Judge Popejoy
)	
INSTITUTE IN BASIC LIFE PRINCIPLES, INC., and)	JURY DEMANDED
WILLIAM W. GOTHARD, JR.,)	BY PLAINTIFFS
)	
Defendants.)	

SECOND AMENDED COMPLAINT AT LAW

NOW COME the Plaintiffs, GRETCHEN WILKINSON, JANE DOE, MELODY FEDORIW, CHARIS BARKER, RACHEL FROST, RACHEL LEES, JANE DOE III, JAMIE DEERING, RUTH COPLEY BURGER, JOY SIMMONS, JANE DOE IV, CARMEN OKHMATOVSKI, JENNIFER SPURLOCK, MEGAN LIND, JANE DOE V,

DANIEL DORSETT, JANE DOE VI, and JOHN DOE I, by and through their attorneys, GIBBS LAW FIRM, P.A. and JONATHAN P. REMIJAS, and complain of the Defendants, INSTITUTE IN BASIC LIFE PRINCIPLES, INC. ("IBLP") and WILLIAM W. GOTHARD, JR. ("Bill Gothard"), as follows:

NATURE OF THE ACTION

1. This action is brought to seek redress and damages for personal injuries based on the intentional, reckless, negligent, and willful and wanton acts and omissions of the Defendants with regard to sexual abuse and sexual harassment, and similar allegations of malfeasance suffered by the Plaintiffs: Gretchen Wilkinson, JANE DOE, Melody Fedoriw, Charis Barker, Rachel Frost, Rachel Lees, JANE DOE III, Jamie Deering, Ruth Copley Burger, Joy Simmons, JANE DOE IV, Carmen Okhmatovski, Jennifer Spurlock, Megan Lind, JANE DOE V, Daniel Dorsett, JANE DOE VI, and JOHN DOE I.

VENUE AND JURISDICTION

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

THE PARTIES

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

4. Plaintiff JANE DOE was a participant in IBLP seminars, a volunteer for IBLP, and later was an ATI program participant. JANE DOE is currently a resident of the state of

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

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

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

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

8. Plaintiff RACHEL LEES was a participant in IBLP's ATI program for more than ten (10) years. From 1992 to 1993, she was Bill Gothard's personal secretary at IBLP headquarters. She was twenty years old at the time she went to headquarters. After returning to New Zealand for immigration reasons, she continued to work for IBLP for several years. Rachel Lees is a citizen of New Zealand.

9. Plaintiff JANE DOE III was an IBLP ATI program participant from 2003 to 2012. She went to IBLP headquarters in 2011, specifically for the purpose of being personally counseled by Bill Gothard. JANE DOE III is currently a resident of the state of Missouri. Plaintiff JANE DOE III seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

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

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

12. JOY SIMMONS' family joined the IBLP ATI program when she was nine (9) years old in 1985. She was a participant at an IBLP Counseling Seminar in 1993. From 1994 through 1996 she was a volunteer at the Indianapolis Training Center. Beginning in December of 1996 until 1997, Ms. Simmons was a participant and then an employee at the Indianapolis Training Center. Beginning in 2000, she worked at IBLP headquarters in Hinsdale, Illinois in the capacity of a volunteer and employee. She was later transferred to Oklahoma, where she worked for no money until 2003. Ms. Simmons was transferred again to Big Sandy, Texas, where she continued to work as a volunteer until June 2005. She is currently a resident of the state of Georgia.

13. JANE DOE IV began attending IBLP conferences every year beginning in 2001. Her family began using IBLP homeschooling materials during her senior year of high school in approximately 2001. JANE DOE IV was first a volunteer for two (2) years, and then an IBLP employee for one (1) year at IBLP headquarters in Hinsdale, Illinois from 2006 through 2009. She is a resident of the state of North Carolina. Plaintiff JANE DOE IV seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

14. CARMEN OKHMATOVSKI began attending IBLP seminars in approximately 1990, at the age of eleven (11). She continued attending seminars until the age of seventeen (17) in 1996. Later in 1996, Ms. Okmatovski was hired for a staff position at IBLP headquarters in Hinsdale, Illinois and she remained in that position until August of 1997. Ms. Okhmatovski is a permanent resident of Narol, Manitoba.

15. JENNIFER SPURLOCK originally attended an IBLP Girls' Conference at the age of fifteen (15) in 1993. Immediately after the conference Ms. Spurlock became a participant in IBLP programs at the Indianapolis Training Center and was later transferred to IBLP headquarters in Hinsdale, Illinois. She remained at the IBLP facility at Hinsdale until she left IBLP at the age of seventeen (17) in 1995. Mrs. Spurlock is a resident of Florida.

16. MEGAN LIND's family was involved with IBLP since 1971. They began paying yearly dues to IBLP in 1985, when she was five (5) years old. For all of the years of Ms. Lind's schooling, from five (5) to eighteen (18) years of age, she was educated using IBLP materials. Ms. Lind was forced to attend IBLP conferences starting at the age of ten (10), in 1990. Ms. Lind was a participant or volunteer in IBLP activities and programs from 1990 through 2000. She is a resident of California.

17. JANE DOE V's family entered the IBLP ATI program beginning in approximately 1989, when she was in 3rd grade. Beginning in 1992, JANE DOE V and her family began attending IBLP conferences. JANE DOE V was present at the Indianapolis, Indiana and Hinsdale, Illinois facilities from 1995 through 1997, as a participant and volunteer. During this time period she was a minor. JANE DOE V is a resident of Wisconsin. Plaintiff JANE DOE V seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

18. DANIEL DORSETT was schooled with IBLP materials for seven years from 1989 through 1996. In the fall of 1993, Mr. Dorsett attended the IBLP conference at the University of Tennessee. He went directly from the conference to the Indianapolis Training Center to volunteer there. At the end of 1993, Mr. Dorsett went to work as an employee in the lawn maintenance department at IBLP headquarters in Hinsdale, Illinois. He continued in the lawn maintenance department until the end of 1995. In early 1994, Mr. Dorsett began driving for Bill Gothard until he left for the IBLP ALERT program in January of 1996. Shortly after arriving at the ALERT program, Mr. Dorsett returned to IBLP headquarters as an employee until he left IBLP in June of 1996.

19. JANE DOE VI was employed at the IBLP headquarters in Hinsdale, Illinois from 1991 through 1998. She was employed as Bill Gothard's assistant from 1992 until 1997 at IBLP headquarters. JANE DOE VI is currently a resident of South Carolina. Plaintiff JANE DOE VI seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

20. JOHN DOE I first had contact with IBLP's Indianapolis Training Center ("ITC") in 1993. From 1993 until 1994 JOHN DOE I worked at the ITC. JOHN DOE I then went on a missions trip and worked at the Children's Institute for IBLP in 1995 and 1996. JOHN DOE I returned to the ITC in 1996 as an employee and remained there until 1997. JOHN DOE I is a resident of Indiana. Plaintiff JOHN DOE I seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2-401(e).

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

22. Defendant WILLIAM W. GOTHARD, JR., is the founder and former president of the Institute in Basic Life Principles (“IBLP”) until his resignation in 2014. He was a member of IBLP’s Board of Directors at the time of his resignation in 2014. Bill Gothard is a resident of the state of Illinois.

Throughout its history and all relevant time frames asserted by the Plaintiffs, the IBLP has been maintained, managed, and controlled by a core group of male executives, management employees, and male directors to its Board of Directors that have been employed and/or appointed due to their adherence and loyalty to the teachings and policies of Bill Gothard, including, but not limited to, all past Board of Directors and the current Board of Directors, namely TIMOTHY LEVENDUSKY (a resident of the state of Illinois), GIL BATES (a resident of Tennessee), CHARLES STEPHEN PAINE, JR., (aka Stephen Paine) (a resident of the state of Oklahoma), and DAVID YORK (a resident of the state of Wisconsin). The aforementioned male executive management employees and board of directors were all agents of the Defendant IBLP and were charged with the responsibility of knowing and/or being aware of the inner workings of the Defendant IBLP and being blindly loyal to Defendant Bill Gothard at all times that are relevant hereto and placed the welfare and reputation of the IBLP and Bill Gothard above and beyond the welfare, rights, and dignity of the eighteen (18) Plaintiffs named herein, amongst the numerous young males and females that attended the IBLP and/or were employees thereof. Hereinafter, these male executive management employees and board of directors shall be referred to herein as the past and present “Control Group of the IBLP” or “Control Group”. This past and present

Control Group¹ are the agents and employees of IBLP that should have protected the Plaintiffs and others who are similarly situated. From at least 1991, until the date of this filing, the Control Group of the IBLP have failed in their obligation to protect the young people who were present on the IBLP property as participants, interns, volunteers, counselees, or employees (through the IBLP's various agents and employees) and that failure has caused harm to the eighteen (18) Plaintiffs named herein, amongst others, for reasons set forth in more detail below.

GOTHARD, IBLP, AND ITS DIRECTORS

23. Gothard received a B.A. in Biblical Studies in 1957 and an M.A. in Christian education in 1961 from Wheaton College and an unaccredited Doctor of Philosophy in Biblical Studies from the correspondence division of the Louisiana Baptist University in 2004.

24. Gothard has never married nor fathered or parented children of his own.

25. Gothard started an organization in 1961 called Campus Teams, which in 1974, changed its name to Institute in Basic Youth Conflicts. Later, in 1989, the organization's name changed again to Institute in Basic Life Principles (IBLP), of which Gothard was the President and a member of the board until his most recent resignation in 2014. In 1984, he founded the Advanced Training Institute (ATI), a homeschooling program with a curriculum that is based on the Sermon on the Mount and does not follow any state or national educational standards for its scope and sequence.

26. Gothard's primary teaching, his "Basic Seminar," focuses on what he refers to as seven "Basic Life Principles." He claims that these principles are universal and that people will suffer

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

consequences for violating them. Gothard named his Seven Principles: Design, Authority, Responsibility, Suffering, Ownership, Freedom, and Success.

27. The Design principle states that people should understand their specific purpose for which God created them. The Authority principle states that inward peace results when people respect and honor the authorities (parents, government, etc.) that God has put into their lives. It is based on the idea that God gives direction, protection, and provision through human authorities. The Responsibility principle states that a clear conscience results when people realize that they are responsible to God for every thought, word, action, and motive. A part of this principle is asking forgiveness from whomever has been offended so that no one can point a finger at you and say, “You’ve offended me and never asked for my forgiveness.” The Suffering principle states that people should allow the hurts from offenders to reveal “blind spots” in their own lives. The Ownership principle states that people are stewards, not owners, of their possessions. Gothard teaches that anger results from not yielding personal rights to God. The Freedom principle states that desiring to do what is right creates moral purity and results in true freedom. The Success principle states that when people learn to think God’s thoughts, by meditating on and memorizing Scripture, they make wise decisions and fulfill their life purposes.

28. In addition to the Basic Seminar, Gothard also offered an Advanced Seminar and an Anger Resolution Seminar. He also has a “Daily Success” series where he expounds on the “Commands of Christ” found in the Gospels. Additionally, Gothard provides “Total Health” training to address sickness offering “Basic Care Bulletins” and “Stress Resolution Seminars.”

29. Gothard teaches that dating is morally dangerous and that courtship is a better alternative. Gothard encourages parents to be involved in their children’s courtship. The father, especially,

should be involved in his daughter's relationship. He should, at the very least, have the right to say "no" when a man asks to marry his daughter.

30. Gothard also advocates extremely conservative dress for females. Gothard teaches that women working outside the home are putting themselves under another man's authority and conflict may arise.

31. Gothard's teachings disallow rock music, including Christian rock, and Gothard warned his followers that some toys such as Cabbage Patch dolls may cause destructive behavior in children.

32. All four IBLP Board Members, currently remaining, were handpicked by Gothard for their loyalty to him and his teachings. Gothard does not believe they are capable of operating the organization without him.

33. IBLP Board Members, Stephen Paine and Gil Bates, are related to one another by marriage.

34. IBLP Board Member Tim Levendusky is a full-time paid employee of IBLP.

35. IBLP Board Member David York was placed on the board for his loyalty to Gothard and quiverfull teaching, including having his wife undergo reversal surgery to have more children according to IBLP's website.

36. The requirements to become an IBLP Board member are being male, as women are not considered worthy to serve, and demonstrating total submission and loyalty to Gothard and his teachings.

37. IBLP Board Member Stephen Paine helped author books sold by IBLP nationwide giving medical direction and advice.

38. IBLP Board Member Gil Bates models his family after Jim Bob and Michelle Duggar's family with his 19 children and desire to expose his large family on their own reality television

show. Bates received thousands of dollars in compensation from IBLP according to IBLP's most recent 2014 IRS 990 tax filing.

39. The independence and impartiality of the current board does not appear to meet IRS guidelines as the majority of the board has personal relationships by blood or marriage, financial conflicts of interest, and private inurement concerns. Additionally, Gothard, the one who selected and appointed them, deems them incapable of running the organization without him.

40. IBLP, under the leadership of the current board, spent \$4.65 million more than income in 2014, as reported in their most recent IRS tax filing. The organization appears to be in a dramatic financial crisis due to declining donations, decreased sales, and high expenses.

41. Gothard and the IBLP Control Group have a decades long history of sexual misconduct within the organization. Gothard's own brother, who worked for IBLP, was dismissed after it was discovered that he was having sex with many students. The plan of action to discredit victims and cover abuse is well refined by Gothard and the IBLP Control Group.

42. Defendant Gothard coordinates a fairly new website that operates under www.discoveringgrace.com. This website is used to attack victims and is a play on words because www.recoveringgrace.com is the established website where victims share about their IBLP and Gothard abuse experiences. This Gothard website is part of the ongoing re-victimization of the victims. Gothard has a loyal follower, Alfred Corduan, manage and control the site. Mr. Corduan is a volunteer for Gothard as he lists his employment with Northrop Grumman on his family website at www.corduan.com.

43. According to www.discoveringgrace.com, "Bill was never asked to resign by the Board. He was not encouraged to resign. In fact, the Board pleaded with him not to resign. The Board wished instead to assume responsibility for the resolution of this matter and asked him to step aside

until they could complete that task. Bill felt he was best prepared to resolve the problems by personally contacting each offended individual. There was strong disagreement and rather than limit his response, Bill resigned, as he understood it, temporarily. The Board saw Bill as a public relations liability and knew they could not control him.”

44. After his resignation, Gothard made it his mission to contact all of his victims and talk to them through any means possible. As part of his apology and reconciliation efforts, Gothard emailed victims, telephoned victims, and reached out to the law firm representing the victims to attempt to schedule meetings with the victims and their spouses. Gothard continued these attempts to schedule meetings with the victims and their attorneys until he hired his most recent lawyer, Mr. Gaffney, in January, and even after that continued to telephone attorneys for the Plaintiffs in this litigation.

45. Gothard believes that if he can personally talk and meet with the Plaintiffs and “their husbands” that this lawsuit can be ended. Gothard continues to try and orchestrate meetings with the current Board of IBLP, the victims and their families, and the lawyers for the victims. Gothard’s loyal follower explains on the www.discoveringgrace.com website: “His door, phone, and email have been wide open for two years now, he pleading for the offended to make contact.”

46. During all relevant times, all Plaintiffs participated in activities that were sponsored by the organization and its corporate Control Group.

47. The Control Group of IBLP owed fiduciary relationships to all Plaintiffs.

48. These fiduciary duties were further developed as a result of the counseling relationship that the Control Group developed with Plaintiffs. Gothard and other members of the Control Group exploited these counseling relationships by using it as an aid in the abuse of Plaintiffs.

49. IBLP and its Control Group are primarily responsible for the harm that occurred to plaintiffs while they were participants in IBLP Ministries activities and for the ongoing campaign to re-victimize these plaintiffs in the media and religious world.

50. There is no question that Gothard and the IBLP Control Group were acting within the course and scope of the employment relationship. Gothard and IBLP Control Group's conduct was so perverse that often the abuse would simultaneously occur while Gothard or others were conducting business for IBLP. There was absolutely no space in time between the sexual and physical abuse and the work that Gothard and the Control Group performed for IBLP. There was absolutely "no daylight" – no break, no matter how short, between Gothard and the Control Group's work activities for IBLP and the abuse of the Plaintiffs.

51. One who retains the services of another has a duty to investigate the background of that individual for fitness for the position, to remain knowledgeable of that fitness, and is liable if another person is injured in some manner related to his employment because of a lack of fitness.

52. IBLP and its directors abandoned their legal responsibility to remain knowledgeable of the fitness of Gothard and other Control Group employees. Rather, they left Gothard and others free to sexually, physically, emotionally, spiritually, and psychologically abuse many of IBLP's participants, employees, or independent contractors in Illinois and literally around the world.

53. IBLP operates as a 501(c)(3) organization to propagate Gothard's views and teachings on marriage, women, children, medicine, and ways to take back and fix the nation.

54. Gothard and his followers espouse avoiding interaction with authorities. There is a pervasive sense within Gothard's tight circle of people that they are engaged in a cosmic war and that they avoid contact with the government and other outside groups that might hold them accountable or ask questions. Gothard helped foster an unregulated community that operated as a "total institution" where Plaintiffs would have limited access to outside support as they came to see their situations as abusive.

55. Don Venoit, a conservative evangelical who founded Midwest Christian Outreach, a ministry devoted to countering the influence of "new religious movements," has long been a critic of Gothard and documented his efforts to confront him in a 2003 book, "A Matter of Basic Principles" that was praised by scholars at evangelical colleges, including Westminster Theological Seminary, Wheaton College, and Dallas Theological Seminary, and received a favorable review in Christianity Today. Venoit states that Gothard's "view of authority is the core of where things go wrong." Gothard teaches, in the first hour of the first night of his "basic" seminar that "authority is like an umbrella of protection." If you get out of that protection, "you are in rebellion, which is like witchcraft," and "all evil will befall you," said Venoit. "It's a culture of fear, is what it is," he added.

56. Gothard and his IBLP Control Group operated a system of absolute authoritarianism – designed to protect "leaders" and silence "rebellion". Gothard was allowed to operate the organization using his "special insights" and idiosyncratic whims.

57. Gothard would select girls based on how they looked and tell them that it was God's will for them to come work for him. He would call their parents and tell them that he knew they were special.

58. At IBLP's Training Center, it was common for people to joke about Gothard's "harem." People noticed that there was a certain physical "type" of woman that he preferred to keep close

and to have them work in his presence. These attractive young women were promised by Gothard that they would be at the center of the next big thing he was planning.

59. Gothard and the IBLP Control Group maintained a system of double standards. Followers were not allowed to go out with other staff in mixed-company groups. Males were not allowed to have a conversation in the lobby with female staff members. And yet Gothard, a single man, had long “counseling sessions” alone with the same young women others were forbidden from meeting. Gothard and his IBLP Control Group were the leaders and chose not to follow their own rules.

60. Gothard and the IBLP Control group would use the children at IBLP as large labor camps to do work for the organization. They were required to dress in matching uniforms, including red scarfs, causing some to see a comparison with the youth of Nazi Germany.

61. Gothard stressed that he was leading a special chosen group. Gothard was the ultimate authority.

62. Gothard and the IBLP Control Group forbid the questioning of authority.

63. Gothard and the IBLP Control Group used fear to control people. They stressed the fear of liberals, fear of all other religions, and fear of the world.

64. Gothard and the IBLP Control Group trained the staff to counsel sexual abuse victims by questioning them about their role in causing the abuse. He taught the staff to ask whether the abused wore immodest dress to cause the abuse or whether indecent exposure caused the abuse. He also would blame abuse victims by asking if they were out of the protection of their parents or with evil friends. Additionally, he would explain that God can compensate physical sexual abuse with spiritual power to the victim. He would instruct his followers to ask: “No physical (sexual) abuse or mighty in Spirit (with God) -- what would you choose?”

65. Gothard and the IBLP Control Group created an organization that operated as a “total institution.” The total institution concept is used to describe an environment where a person is exclusively surrounded by a large number of similarly situated people. In other words, people within a total institution work together, spend leisure and recreational time together, and even dwell together. Religious total institutions also worship together. Thus, a person within a total institution is cut off from the normal world entirely. As a closed and tightly knit unit of people, total institutions lead an enclosed and uniquely administered round of life that is peculiar to its own characteristics and beliefs.

66. Total institutions control the flow and content of information and the patterns of reward and punishment and in doing so create social conditions that erase or minimize the previous or non-institutional identity of the individuals inside of them, rendering them more dependent upon the institution, more compliant and less capable of independent thought or action or participation in the outside world. In this case the total institution creates both a steady supply of submissive victims and a larger community that functions to keep those victims blamed, shamed, silent and compliant. Potential victims have a heightened susceptibility to harm because of the conditions of total control and the dependency that these conditions create. The sexual intrusions create intolerable conflict with their community and within themselves and they have nowhere to turn for clarity or help because they are inside the institution (as are their family and friends) and any effort to speak the truth risks losing the very structure they are now so dependent upon. These people’s most cherished values were systematically used against them.

67. In this lawsuit, Gothard has constantly attempted to manipulate and control the lawyers for the Plaintiffs. On December 31, 2015, he sent a letter threatening “greater

damage to your clients and to the cause of Christ if you expand and refine your lawsuit.” He also seemed to threaten death to the lawyers by stating “Jesus affirmed the death penalty for doing this when he stated, “He that curseth father or mother, let him die the death.” He additionally explained that the “emotional damages of your clients” were caused by “whispering” and “tale-bearing” against him. He further stated that “Christianity is under attack in the world” and that he wants “nothing to do with your amended lawsuit.”

68. Gothard and the IBLP Control Group held a high position of trust in the Plaintiffs lives, personal family circles, social circles, and religious circles. Gothard carefully, intentionally, and effectively closed off all access to outside intervention and support necessary for the victims to challenge him.

69. As described herein, Gothard and the IBLP Control Group sexually, physically, emotionally, spiritually, and/or psychologically abused the Plaintiffs—against their wishes and over their objections. This perverse and offensive conduct repeatedly took place over the course of several decades.

70. Gothard publicly admitted some of his offensive behavior on a blog that he controlled in 2014. Gothard prefaced his statement with the following: “I have withheld this statement in order to honor the request of the Board of Directors to wait until an initial review has taken place. As the review continues, I now want to make this statement.” The statement then read as follows: “God has brought me to a place of greater brokenness than at any other time in my life. It is a grief to realize how my pride and insensitivity have affected so many people. I have asked the Lord to reveal the underlying causes and He is doing this. For many years I have been building the Institute but losing my first love for the Lord. God warns ‘I know thy works, and thy labour . . . Nevertheless I have somewhat

against thee, because thou hast left thy first love. Remember therefore from whence thou art fallen, and repent. . .’ (Revelation 2:2, 4, 5). I was finding value and affirmation from the accomplishments of the ministry and those involved in it instead of filling this void in my life with God and His love. I have repented in deep sorrow. However, over the years many people have been offended in different ways because of my lack of genuine love. I put the Institute and its goals ahead of people and their needs. Standards became more important than relationships. People who didn’t “measure up” were cut off and those who were not seen as adding value to the ministry were treated as though they were expendable. The more I have listened to people describe their experiences the more grieved and sorrowful I have become. My wrong focus produced a further consequence. Families were made to feel that they must “measure up.” This resulted in some parents putting undue pressure on their sons and daughters in order for the family to be accepted. When there was a lack of love or consistency, sons and daughters saw this as hypocrisy and rejected it. Also, many felt that the expectations were so high that they could never measure up to them. This resulted in a feeling of deep defeat. This emphasis on outward appearance was also manifested by bringing selected young people to serve at the Headquarters and causing others to feel rejected and offended by my favoritism. My actions of holding of hands, hugs, and touching of feet or hair with young ladies crossed the boundaries of discretion and were wrong. They demonstrated a double-standard and violated a trust. Because of the claims about me I do want to state that I have never kissed a girl nor have I touched a girl immorally or with sexual intent. I have failed to live out some of the very things that I have taught. I am committed to learning from my failures by God’s grace and mercy, and do what I can to help bring about Biblical reconciliation as Jesus commands: ‘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' (Matthew 5:23-24). More than anything I want to make right what I have done wrong and deepen my relationship with the Lord. I trust in God's undeserved mercy and pray that those whom I have offended would find grace to forgive me. I know that I do not deserve this. I would certainly appreciate your prayers during this time that God would bring healing to those who have been so deeply affected by my actions. I am grateful for the opportunities I have had thus far to be reconciled with individuals and it is my goal to contact as many others as I can, fully hear them, and do whatever I can to bring about Biblical reconciliation. My greatest offense has been against God. I have earnestly sought His mercy and forgiveness and have asked Him to allow me to experience more of Him and the power of His resurrection. Sincerely, Bill Gothard"

71. Gothard and the IBLP Control Group were the dominant authority figures in the Plaintiffs' lives. Gothard made himself into their spiritual father. He was their authority figure with regard to where they lived, where they worked, where and how they worshiped, their education (or lack thereof), their interpersonal relationships, their time and schedule, and even acted as their counselor. In other words, Gothard was the spiritual leader, the boss, the landlord, and the controller of all aspects of their lives—obedience to Gothard and his IBLP Control Group was as obedience to God in this total institution.

72. Gothard is the self-promoted leader of what is commonly known as the "patriarchal" or "quiverfull" movement. Gothard traveled extensively as a presenter attempting to advance his teachings.

73. Gothard and IBLP's patriarchal movement teaches that men are, and should be, in the absolute control of women. Patriarchy considers women to primarily exist for the purposes of producing children, caring for the men, and rearing the children. Females in the patriarchal movement are discouraged from attaining higher education of any kind and are told that their sole purpose is to marry a man within the movement to meet the purposes described above. In other words, women within this movement are perceived to exist only for the end goals communicated by the male leaders that perceive themselves as the "patriarchs" of this world.

74. Families within patriarchal and quiverfull communities place extreme importance on maintaining their daughters' sexual and emotional purity. Sex before marriage is held to be sin, and sex before marriage also damages a daughter's marriage prospects. Most couples in Christian patriarchy and quiverfull circles do not kiss before marriage and some do not even hold hands or embrace. Furthermore, this virginity is more than just physical; it is emotional as well. Girls are urged not to give away pieces of their hearts by becoming emotionally entangled with boys their age. Every teenage crush becomes suspect and dangerous. Dating is discouraged, as it is considered to be practice for divorce. Instead, females within these environments find husbands through parent-guided courtships, trusting their father's guidance and obeying his leadership. Marriage is seen as a transfer of authority from the daughter's father to her husband.

75. While many of the Plaintiffs would have felt compelled to submit to Gothard, the purity culture, would have meant at the same time their submission made them "damaged goods" in their own eyes, the eyes of their families, and their community—raising the cost for them to come forward to call him to account.

76. Gothard and IBLP asserted that God is male, and explicitly not female; that the human male is the “image and glory of God in terms of authority, while the woman is the glory of man.” That is, men are in the image of God in terms of authority over their households; women are created in God’s image in a decidedly different way, sometimes called “reflected glory.”

77. Gothard argues that while men are to exercise dominion, women are to assist their husbands’ dominion by serving in the home. According to Gothard, women in the “exceptional state” of being unmarried may have “more flexibility,” but it is not the “ordinary and fitting role of women to work alongside men as their functional equals in public spheres of dominion.”

78. Under patriarchy, the framework in Scripture is extended—out of context—to women in general. Every woman has a male authority, and that male authority looks to Christ as his authority. A woman is to obey her male authority, whether it is her father, husband, brother, or son, and he in turn is to obey Christ. By obeying her male authority, a woman is obeying God. This is seen as the natural and God-given order.

79. Gothard and IBLP are major advocates of Patriarchy. This ideology includes the belief that there are God ordained distinct gender roles and that man was created first and woman’s creation was secondary. It holds that patriarchy is the divine family order ordained by God. The husband and father is the head of the household, family leader, provider, and protector; the wife and mother, created to be a helper to her husband, is a bearer of children and a “keeper at home,” remaining in her God-ordained and proper sphere of dominion for a wife, the home. The children are to remain obedient to their parents, even as adults. Children are to marry through a process of courtship guided at

every step by their father, and unmarried adult daughters are to remain under their fathers' authority and in their fathers' homes. This patriarchal family order is held to be divine and God ordained. Stepping outside of it is held to be rejecting God's will and listening to the lies of "the world."

80. As an example of Gothard's level of control, one of Gothard's protégé's, Douglas Phillips stated: "Daughters aren't to be independent. They're not to act outside the scope of their father. As long as they're under the authority of their fathers, fathers have the ability to nullify or not the oaths and the vows. Daughters can't just go out independently and say, 'I'm going to marry whoever I want.' No. The father has the ability to say, 'No, I'm sorry, that has to be approved by me.'"

81. In the book, *Quiverfull: Inside the Christian Patriarchy Movement*, it is written that women in Gothard's patriarchy are expected to ask their husbands about every detail of household management, are discouraged from speaking in the company of men, and are typically considered at fault for marital difficulties, all of which are thought to stem from their lack of submission.

82. Voddie Baucham, a leader in the patriarchal and quiverfull movement, explains the patriarchal men's desire to be revered by younger women: "A lot of men are leaving their wives for younger women because they yearn for attention from younger women. And God gave them a daughter who can give them that." The attitudes that produce these ideas are what leads to physical, mental, verbal, spiritual, and sexual abuse of both women and daughters within the patriarchal movement.

83. Dr. Julie Ingersoll (Associate Professor of Religious Studies at the University of North Florida) described the role of women in patriarchy in a 2003 article on Religion

Dispatches: “In biblical patriarchy, the refrain of ‘women and children first’ hides an agenda whereby the women are ‘first’ only insofar as they keep their place which is subordinate to men . . . tragically, a biblical woman is also ‘first’ to take the blame for marital problems, ‘first’ to be excommunicated as part of church discipline, ‘first’ to serve her father and then her husband in his vision for dominion.”

84. Females within the movement are manipulated by the male leaders. The males control and manipulate them into believing that the world revolves around the male “patriarchs.” Women, as scapegoats, are blamed for the inappropriate conduct of the men, thus preserving the men’s self-perceived collective self-image and concomitantly lowering the women’s self-esteem, so that women will fall into deeper submission under the men’s patriarchal authority. Women within this movement are instructed to do anything to please the male leaders.

85. Gothard and the IBLP Control Group would not permit boys and girls to talk to each other, demanded a strict dress code, taught that girls should never run, and demanded that girls style their hair wavy—not straight or curly—because “wavy hair is attractive and becoming—it causes you to focus on the woman’s face instead of her body.” Gothard’s approved wavy hairstyle is meant to attract men to a woman’s bright eyes, which will attract them to God, instead of her body.

86. Gothard and the IBLP Control Group required girls to remain under their father’s authority, even in adulthood, and discouraged girls from attending college. Gothard and the IBLP Control Group warned parents and discouraged college because parents should not expose their children to “alternative philosophies.”

87. Gothard, who has never married, teaches on sexual relations. For example, he explained that sex should not occur during the menstrual cycle or for seven days after. He encouraged married people to not have sex approximately half of the month because he taught in the “Benefits of Abstinence” that this schedule builds self-control. He further states, “When sex drives are misused, they become self-consuming and can never be satisfied. Burned-out lusts call for new forms of perversion, which become even greater tyrants of unfulfillment.”

88. Gothard, who does not have a medical degree or medical license anywhere in the world, attempts to instruct entire nations on medical issues. Gothard told the media that a delegation of Peruvian elected officials and other leaders were impressed with his ability to heal stress and cancer. “God has directed us to a new approach to health,” Gothard stated, “which is taking care of stress first.” Now the Peruvians, he said, want to be a “model world nation.” That, he added, “to me is like the example of what we’ve been working for all these years.”

89. Ronald B. Allen, now a Senior Professor of Bible Exposition at Dallas Theological Seminary, criticized Gothard’s “chain-of-command” tenets of patriarchy in an essay: “Paramount among these is the terrible picture of the chain of command in the family with the husband as the hammer, the wife as the chisel and the children as the gems in the rough... The ghastly picture is that he beats on her and she chips on them. If ever there were a reason for a women’s movement in the evangelical church—this is it. This illustration is simply not reflective of biblical theology; it is a parody of patriarchalism.” Allen called Gothard’s teaching “the basest form of male chauvinism I have ever heard in a Christian context... His view is basically anti-woman.”

90. As a result of the manipulation of this movement, the Plaintiffs' thinking was altered. As described herein, Gothard and the IBLP Control Group—standing in a position of influence and prominence within patriarchy—methodically groomed victims so that they would eventually participate in inappropriate activities. Due to the years of continued conditioning and indoctrination by Gothard and the patriarchal leaders of the IBLP Control Group, the victims were incapable of giving consent to Gothard's or the IBLP Control Group's sexual advances.

91. Gothard promised his victims that they were special to him and that God would use them in special ways for being loyal and submissive to him and his IBLP Control Group.

92. Many Gothard and IBLP Control Group conferences would last for days or weeks at a time. With the children deprived of sleep, receiving minimal food, and having way too much propaganda pushed on them with no time to think, Gothard and the IBLP Control Group were able to control these children and young people.

93. Gothard would spend money on his victims.

94. Gothard would give gifts to his victims.

95. Gothard would give special privileges to his victims.

96. Gothard would take his victims on special trips.

97. Gothard elevated his victims to a highly favored and protected status within the IBLP community.

98. Gothard demonstrated a calculated, planned, and methodical grooming process that went on for decades with thousands of children at his disposal for personal gratification.

99. The victims were powerless and did not want to disappoint Gothard and those he installed as the IBLP Control Group as he controlled every facet of their lives and serving him was tantamount to obeying God for these victims.

100. Dr. Leslie Lebowitz, PhD, is a clinical psychologist in private practice in Newton Center, Massachusetts. She consults extensively in forensic contexts and provides training in the area of trauma in both community and military settings. Dr. Lebowitz developed the psychological portion of the curriculum for training Air Force Sexual Assault Response Coordinators. Her research focuses on the psychological meaning of trauma and the implications for treatment, examining the aftermath of sexual violence, and her more recent work addresses traumatic loss and moral injury. Based upon her evaluation of the Second Amended Complaint and other preliminary materials that are available, Dr. Lebowitz thinks that:

- a. Gothard and/or the IBLP Control Group would identify potential victims (generally perceived to be vulnerable).
- b. Gothard and/or the IBLP Control Group held a position of authority over the victims.
- c. Gothard and/or the IBLP Control Group would do kind things for the victims in their positions of authority to build trust and to groom them.
- d. Gothard and/or the IBLP Control Group would isolate the victims.
- e. Gothard and/or the IBLP Control Group would psychologically and/or sexually, physically, emotionally, spiritually abuse the victims.
- f. Gothard and/or the IBLP Control Group used their positions of authority to abuse victims in ways that alienated them from their heartfelt values and commitments creating pain, confusion, and trauma with the potential to last a lifetime.
- g. Gothard and/or the IBLP Control Group used their positions of authority to blame the victims, denigrate, slander and harass victims and cover up the abuse that occurred. This is a highly damaging extension and expansion of the

original abuse and is, therefore, extremely likely to be psychologically, emotionally, and spiritually traumatic.

- h. There seems to be a considerable effort to get the victims to acquiesce to their exploitation, to agree that their victimization is in their best interest and to foster a sense of collusion and an identification with the perpetrator and against themselves.
- i. In this case the total institution creates both a steady supply of submissive victims and a larger community that functions to keep those victims blamed, shamed, silent and compliant. Potential victims have a heightened susceptibility to harm because of the conditions of total control and the dependency that these conditions create. The sexual intrusions create intolerable conflict with their community and within themselves and they have nowhere to turn for clarity or help because they are inside the institution (as are their family and friends) and any effort to speak the truth risks losing the very structure they are now so dependent upon.

FACTS COMMON TO ALL ALLEGATIONS

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

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

103. On information and belief, at the times relevant to their claims, Defendant IBLP's agents, employees and/or directors were aware or should have been aware of serious allegations of sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to certain IBLP participants, interns, volunteers and/or employees, including but

not limited to the Plaintiffs, initiated by IBLP's agents/employees, but neither the Defendant IBLP nor its agents, employees, or directors reported these serious, potentially criminal allegations to law enforcement authorities, the Illinois Department of Children & Family Services, or other relevant state child welfare agencies, in accord with their duties and their statutory responsibilities.

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

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

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

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

108. CLA is a fundamental Independent Baptist organization that operates predominately as a King James Bible preaching ministry for its seventy-one year old President. CLA's President is a personal friend of Bill Gothard and IBLP, who speaks

regularly at IBLP events. On information and belief, CLA had no staff or employees with qualifications to conduct an appropriate investigation and CLA has a national reputation of covering up immoral actions by ministry leadership.

109. CLA was hired and the fee was paid for the purpose of producing an internal investigation that was preordained and nothing more than a cover-up of the allegations of sexual abuse, sexual harassment, inappropriate/unauthorized touching, and stalking that had occurred at the Defendant IBLP.

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

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

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

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

113. As a result of the internal investigation commissioned and paid for by the Defendant IBLP, Defendant IBLP, by its management and its Board of Directors (aka the current Control Group), concluded, without further independent inquiry and investigation into claims of sexual abuse, sexual harassment, and inappropriate touching occurring to minors and adults, that no criminal or reportable conduct had occurred, and further announced on November 17, 2014 that:

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

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

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

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

117. Despite the IBLP's denials, even Defendant Bill Gothard himself acknowledges at least some degree of wrongdoing by stating: "I have encouraged the Board of IBLP to meet with legal counsel for the Plaintiffs and to meet with these ladies and their lawyers.

It is sad to me that these ladies are not being listened to by the Board of IBLP.” (See Exhibit A at ¶ 18.) “I assume that the IBLP Board thought that the Plaintiffs and their counsel were bluffing and that they would not sue. Obviously, that is not the case.” (See Exhibit A at ¶ 21.) “The IBLP Board has responded to this lawsuit unwisely and not even contacted me for information or assistance. The Board is handling the case unwisely as I have the information they need. This is a shameful waste of donors money.” (See Exhibit A at ¶ 23.)

118. Additionally, Bill Gothard has attempted to apologize for actions that he is willing to admit and deems inappropriate, in person and in writing, to the Plaintiffs and other victims. (See “Exhibit B.”) This “A Further Confession And Request” was written by Bill Gothard with the assistance of Dr. Garland “Doty” Murphy. Gothard approved the final version of this statement (Exhibit B) and authorized Dr. Murphy to publish it. On June 27, 2014, Dr. Murphy forwarded the statement to Recovering Grace by email for publication. Gothard also agreed to have the statement published on a website himself. Recovering Grace waited for Gothard to publish the statement. Because Gothard reneged on his agreement to publish the statement, Recovering Grace did not publish the statement on its website. Ultimately, Recovering Grace forwarded Dr. Murphy’s email containing the statement (Exhibit B) to the Plaintiffs’ Counsel.

119. Despite its public statement, cited above, Defendant IBLP removed its former President (Gothard), and in its current status, Defendant IBLP is no longer fulfilling its purpose as an organization and under the principles for which it purportedly exists. Rather, Defendant IBLP continues to exist by liquidating assets, which total over One Hundred

Million Dollars and which were accumulated over decades. (See Exhibit A at ¶ 4, 16, & 17.)

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

121. The Plaintiffs, due to various mental, psychological and psychiatric conditions resulting from the sexual abuse, sexual harassment, and multiple/constant episodes of inappropriate/unauthorized touching which amounted to grooming, and pre-abuse and post-abuse stalking by Defendant Bill Gothard, did not discover and/or were compelled to conceal the wrongdoing alleged herein until after 2014.

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

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

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

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

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

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

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

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

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

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

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

132. As a result of their knowledge of Ms. Wilkinson's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended

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

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

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

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

136. The conduct of the sham investigation and the dissemination of false information about Ms. Wilkinson's sexual abuse by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP caused Ms. Wilkinson additional severe emotional distress, beyond that which was originally caused by Bill Gothard's childhood sexual abuse of Ms. Wilkinson. The IBLP, by its Control Group, including the Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of

false information regarding Ms. Wilkinson's childhood sexual abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

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

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

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

- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

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

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

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

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

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

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

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

COUNT III
WILLFUL & WANTON –AS TO PLAINTIFF GRETCHEN WILKINSON

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

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

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

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

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

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

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

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

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

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

149. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Gretchen Wilkinson, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Wilkinson.

150. This conduct was tortious in nature.

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

152. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an

unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Gretchen Wilkinson, and the other IBLP sexual abuse victims.

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

154. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Gretchen Wilkinson, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

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

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

158. JANE DOE was a minor until 1988.

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

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

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

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

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

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

165. When she was approximately 15 years old, JANE DOE became aware of Bill Gothard's teaching that adopted children should be "given back" to their biological parents or to the state. Bill Gothard taught that due to the "curse of the sins of the forefathers" adopted children were doomed to repeat the evils of their biological parents. Bill Gothard

also taught that adoptive children tainted a family's biological children. – Thus the reason they should be given back.

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

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

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

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

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

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

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

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

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

175. As a result of their knowledge of JANE DOE's allegations and those of others like her, the Control Group (including the current Board of Directors, as listed in Paragraph 23 of this Second Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding JANE DOE's abuse and the abuse of other IBLP victims in 2014.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT VII
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE

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

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

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

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

- a. Failed to report the allegations of prior sexual abuse, sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein, to law enforcement authorities or to child welfare agencies;
- b. Failed to conduct a reasonable investigation into the allegations of prior physical, psychological, and sexual abuse, of its program participants, and sexual harassment, and inappropriate/unauthorized touching of its participants, interns, and employees, as alleged herein;

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

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

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

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

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

194. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of

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

195. This conduct was tortious in nature.

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

197. Defendant IBLP, through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of failure to report allegations of physical, psychological, and sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JANE DOE, and the other IBLP sexual abuse victims.

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

199. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

201. Plaintiff, Melody Fedoriw, was an IBLP program participant, volunteer, and employee between 2011 and 2012. She first attended the IBLP Journey to the Heart program in 2011. She started working at headquarters in March 2012. Ms. Fedoriw returned home for a three (3) week period during June of 2012, but then returned to IBLP headquarters until she finally left in October of 2012.

202. During the period from March 2012 to October 2012, Ms. Fedoriw was a minor; she was fifteen (23) years old.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

217. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Ms. Fedoriw by failing to protect her from further and continuing psychological and emotional harm. Furthermore, the unwanted and unauthorized sexually charged touchings by Defendant Bill Gothard, as an employee and agent of IBLP, constituted an assault and sexual abuse upon Ms. Fedoriw.

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

219. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendants set forth in this Second Amended Complaint, Plaintiff, Melody Fedoriw, has

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

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

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

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

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

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

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

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

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

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

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

COUNT XI
WILLFUL & WANTON –AS TO PLAINTIFF MELODY FEDORIW

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

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

- a. Defendant Bill Gothard sexually abused Ms. Fedoriw on numerous occasions in 2012, a criminal offense;
- b. Defendant IBLP failed to report the sexual abuse of Ms. Fedoriw in violation of 325 ILCS 5/4, a criminal offense;
- c. When IBLP, through its Control Group, became aware of Bill Gothard's sexual abuse of Ms. Fedoriw and other IBLP sexual abuse victims as a result of their disclosure via the Recovering Grace website and through other means, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Fedoriw and other IBLP sexual abuse victims;
- e. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Melody Fedoriw, and the other IBLP sexual abuse victims.

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

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

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

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

COUNT XII
CIVIL CONSPIRACY –AS TO PLAINTIFF MELODY FEDORIW

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

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

232. This conduct was tortious in nature.

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

234. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction

of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Melody Fedoriw, and the other IBLP sexual abuse victims.

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

236. As a proximate result of the aforesaid civil conspiracy by and between various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Melody Fedoriw, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

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

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

240. When Ms. Barker and her sister approached Bill Gothard, he invited them to his office, where he told Ms. Barker how he had noticed her attentiveness and her smile. He

wanted to know if she would be willing to work for him at his headquarters in Oak Brook, Illinois.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

259. As a result of their knowledge of Ms. Barker’s allegations and those of others like her, the Control Group, including the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Bill Gothard, and IBLP, through its Control Group, intentionally published a statement in 2014 containing false information from the sham investigation regarding the sexual harassment allegations of Ms. Barker and other IBLP victims.

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

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

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

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

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

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

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

- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP, through its Control Group, conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

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

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

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

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

269. Defendant IBLP, through its Control Group and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, the allegations included childhood sexual abuse.

Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Barker and to IBLP's other sexual abuse victims.

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

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

COUNT XV
WILLFUL & WANTON – AS TO PLAINTIFF CHARIS BARKER

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

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

- a. Defendant Bill Gothard committed sexual harassment against Ms. Barker for the entire eighteen (18) month period that she was at IBLP headquarters, from 1999 to 2000;
- b. When IBLP became aware, through its Control Group, of Bill Gothard's sexual harassment of Ms. Barker and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- c. Defendant IBLP by the Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of

information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Barker and other IBLP sexual harassment, and abuse victims; and

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

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

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

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

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

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

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

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

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

277. This conduct was tortious in nature.

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

279. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and

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

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

281. As a proximate result of the aforesaid civil conspiracy by the various members of the Control Group (as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Charis Barker, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

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

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

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

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

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

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

289. Almost immediately, Gothard asked her: "Have you ever considered coming to headquarters?" Ms. Frost advised him that she was only fifteen (15) years old and was too young to work at IBLP. Gothard responded by directing her to write a letter about herself and what she had learned that week at the conference. He further directed her to give it to him before she left that day. Ms. Frost immediately wrote the letter.

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

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

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

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

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

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

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

297. This same activity occurred several more times in the following days. He would put his foot against Ms. Frost's foot and nudge her slowly, or he would try to cross ankles with

hers. On one occasion, she felt his socked foot against her leg and he started to explore up the back of her calf.

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

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

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

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

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

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

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

305. Her work in the Basic CARE Department caused Ms. Frost to spend time in the copy room, which placed her within eyesight of Gothard, when he was at his desk. When she was in the copy room, Gothard would sometimes come in and close the door (or sometimes

leave it open) and stroke Ms. Frost's back or arm, while she was using the copy machine. At times, he would give her a side hug, or hold her hand, or lean into her, all while praising her and telling Ms. Frost that she was "such an encouragement to [him]," that she was an "energy giver," or a "great example to the other girls."

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

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

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

309. As a result of the special treatment and physical attention that she received from Gothard, Ms. Frost was referred to as Gothard's "pet," his "type," his "favorite", or a

“Gothard girl.” The sexual harassment, and special attention were no secret. Gothard’s conduct was common knowledge to the IBLP staff.

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

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

312. In 1992, when an opportunity became available to work for a prominent ATI family as a nanny, Ms. Frost accepted the opportunity. Gothard, although approving of Ms. Frost’s decision, advised Ms. Frost that he fully expected her to return after her one-year commitment.

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

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

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

316. As a result of their knowledge of Ms. Frost’s allegations and those of others like her, the Control Group, including the current (not former directors or directors from another time period) Board of Directors (namely those listed in Paragraph 23 of this Second Amended Complaint), Bill Gothard and IBLP undertook the sham CLA investigation in

2014. After receiving the results of their sham investigation, Bill Gothard and IBLP, through its Control Group, intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Frost and other IBLP victims in 2014.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT XIX
WILLFUL & WANTON –AS TO PLAINTIFF RACHEL FROST

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

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

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

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

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

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

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

COUNT XX
CIVIL CONSPIRACY –AS TO PLAINTIFF RACHEL FROST

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

333. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board Members, listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Rachel Frost, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Frost.

334. This conduct was tortious in nature.

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

336. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent

infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Rachel Frost, and the other IBLP sexual abuse and sexual harassment victims.

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

338. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including members of the then current Board of Directors, as listed in Paragraph 23, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Rachel Frost, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

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

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

342. Ms. Lees' first personal contact with Gothard occurred in 1992, at a seminar in Auckland, New Zealand. She was nineteen or twenty years old at the time. He

immediately asked her to come visit IBLP headquarters. Once Ms. Lees arrived at headquarters, Gothard asked her to work directly for him.

343. Shortly after Ms. Lees arrived at headquarters, Gothard had her come to his office. He wanted to make sure that she had everything she needed, and asked whether there was anything that he could get for her. Ms. Lees responded: "I am running out of money. I need a few winter things." Gothard leaned down and opened a desk draw and pulled out cash. He handed her the bills and said: "Here go take this and go and get whatever you need." He advised her that if she needed more, she should just come back and ask.

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

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

346. One day, Ms. Lees was approached by another IBLP employee who had been at headquarters longer. The other employee asked whether Ms. Lees had been a secretary before. Ms. Lees said "no," this was her first job as a secretary. This conversation caused her to wonder why Gothard would have chosen her as his secretary. She asked Gothard.

His response was that if he had wanted other girls at headquarters to be his secretary, he would have asked them. He said that he needed someone “special” to be his secretary.

347. Approximately six to eight weeks after Ms. Lees began working for Gothard, she noticed that he found reasons to touch her. The touching consisted of sitting so close to her that they were touching. He would sit close, so that his arm or hand would brush against hers. It progressed from there to other physical contact, which made Ms. Lees uncomfortable. The other physical contact included lingering hugs and holding hands. Gothard also began to find reasons to be alone with Ms. Lees.

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

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

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

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

352. On a long drive to Detroit, Ms. Lees felt Gothard put his hands on hers. Later, she felt his foot brush up against her leg. When she first felt his foot run up the back of her leg, she was startled. He locked his leg under hers, and she felt his foot rubbing against

hers. He was playing “footsie” with her. But Ms. Lees describes Gothard’s actions as more intimate than that. His foot stroked the back of her leg, played with her toes, and explored her leg all the way up her calf muscle and back down over and over again, while he was gripping her hand in between them. When Ms. Lees lifted her hand to intentionally break his hold, Gothard pulled her hand over his thigh. When she resisted, he held her hand tight and rested it on his thigh, covering her hand with his. He patted her hand, massaged it, rubbed her fingers with his thumb, running his thumb slowly up and down between her fingers, over and over. Gothard would frequently hold hands with Ms. Lees during travel.

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

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

355. When Ms. Lees learned the fact that Gothard had actually sought the IBLP Board’s permission to marry her, she was so shocked and suffered such emotional distress that she

sought professional counseling. She realized that Gothard was a predator who had been grooming her.

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

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

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

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

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

361. Ms. Lees published an account of her sexual harassment by Gothard on the Recovering Grace website using the pseudonym "Meg." Meg was Gothard's nickname for

Ms. Lees. It stood for “My/Major Energy Giver.” Due to this publication, Ms. Lees sexual harassment was brought to the attention of the IBLP’s Control Group, including its current Board of Directors.

362. As a result of their knowledge of Ms. Lees’ allegations and those of others like her, the Control Group, including the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 23 of this Second Amended Complaint, above), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP, through its Control Group, intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Lees and other IBLP victims in 2014.

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

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

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

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

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

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

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

- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies, the Illinois Department of Children & Family Services, and other relevant state child welfare agencies;
- e. IBLP, through its Control Group, conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

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

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

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

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

372. Defendant IBLP, through its Control Group, including its Directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse and sexual harassment. In some cases, the allegations included sexual abuse of minors. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public

dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to these Directors that this conduct would result in severe emotional distress to Ms. Lees and to IBLP's other sexual abuse and sexual harassment victims.

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

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

COUNT XXIII
WILLFUL & WANTON –AS TO PLAINTIFF RACHEL LEES

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

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

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

York, each, individually), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Rachel Lees, and the other IBLP sexual abuse victims.

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

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

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

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

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

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

379. Defendant IBLP, by and through its agents and employees, including the Control Group (including its current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Rachel Lees, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Lees.

380. This conduct was tortious in nature.

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

382. Defendant IBLP, by and through its agents and employees, the Control Group (including the then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent

infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Rachel Lees, and the other IBLP sexual abuse and sexual harassment victims.

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

384. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Rachel Lees, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

**COUNT XXV
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE III**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

397. Gothard recommend that JANE DOE III take a vow to devote herself to the ministry by remaining single for a certain number of years. JANE DOE III believes the purpose of this vow was to maintain Gothard’s access to her.

398. Gothard had JANE DOE III write out the expectations that she had for proper treatment by her father and then he had her kneel and pray that God would take away her expectations of appropriate treatment.

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

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

401. After ten days, JANE DOE III and her mother decided to leave. After Gothard tried another failed attempt to convince JANE DOE III’s mother to separate from / divorce her husband. Gothard then implied that he would exaggerate the abuse to DFS. Gothard asked:

“How old are you again?” When JANE DOE III said: “18,” Gothard replied: “Well, if you were 17 we wouldn’t even be having this conversation, because I would call up DFS immediately and tell them you are being abused and have you taken away from home. After all, emotional stress is just as bad as physical abuse.”

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

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

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

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

406. In 2014, JANE DOE III called IBLP headquarters in an attempt to contact the IBLP Board of Directors regarding Gothard’s sexual harassment of her. Headquarters put her in

contact with Bill Gothard's sister, who refused to place her in contact with any of IBLP's Directors.

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

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

409. As a result of their knowledge of JANE DOE III's allegations and those of others like her, the Control Group, including the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 23 of this Second Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP, through the Control Group, intentionally disclosed false information from the sham investigation regarding the sexual harassment of JANE DOE III and other IBLP victims in 2014.

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

411. Religious organizations and organizations that provide programs for minors have a duty under Illinois law to protect their participants from sexual abuse and harassment and

from the psychological and emotional harm that results from sexual abuse and harassment. (See *Wisniewski v. Diocese of Belleville*, 943 N.E.2d 43 (Ill. App. 2011); *King v. Woodmen of World Ins. Co.*, 541 N.E. 2d 735 (Ill. App. 1989); etc.)

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

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

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

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

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;

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

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

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

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

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

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

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

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

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

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

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

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

- a. Defendant Bill Gothard committed sexual harassment against JANE DOE III on numerous occasions, including, but not limited to, a ten day period in 2011;

- b. In or around 2012, Defendant Bill Gothard verbally assaulted JANE DOE III over a period of three weeks in a successful attempt to have her remove her truthful posts from the Recovering Grace website in an effort to protect his organization, IBLP;
- c. When IBLP , through its Control Group, became aware of Bill Gothard's sexual harassment of JANE DOE III and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Defendant intentionally undertook a sham investigation in 2014 to cover up the abuse and harassment for the benefit of IBLP;
- d. Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE III and other IBLP sexual abuse and harassment victims; and
- e. By these actions, Defendant IBLP, by its Control Group (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE III, and the other IBLP sexual abuse and harassment victims.

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

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

thereafter adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter further sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs; and

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

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

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

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

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

426. Defendant IBLP, by and through its agents and employees, including the Control Group (which includes its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE III, or knew that

there was a high probability that their conduct would cause severe emotional distress to JANE DOE III.

427. This conduct was tortious in nature.

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

429. Defendant IBLP, by and through its agents and employees, its Control Group (including its then current Board of Directors, as listed in Paragraph 23), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to disclose information regarding these matters to the public knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JANE DOE III, and the other IBLP sexual abuse victims.

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

431. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group, including the then current Board of Director (as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE III, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

COUNT XXIX
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JAMIE DEERING

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

447. After her first year at IBLP headquarters, Ms. Deering's father lost his job. After that, Gothard paid for all of Ms. Deering's expenses. He would hand her fifty dollars

(\$50.00) or one hundred dollars (\$100.00) at a time. He would also pay for Ms. Deering to have special hair treatments, because her hair would not hold a curl. Gothard often said that women should have long, flowing curls of hair.

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

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

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

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

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

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

454. As a result of their knowledge of Ms. Deering's allegations and those of others like her, Control Group, including the current (not former directors or directors from another time period) IBLP Board of Directors (namely those listed in Paragraph 23 of this Second

Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP, through its Control Group, intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Deering and other IBLP victims in 2014.

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

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

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

458. The conduct of the sham investigation and the dissemination of false information about Ms. Deering's sexual harassment by Bill Gothard in 2014 by Defendants Bill Gothard and IBLP, through its Control Group, caused Ms. Deering additional severe emotional distress, beyond that which was originally caused by Bill Gothard's sexual abuse of Ms. Deering. The IBLP, by its Control Group, including its Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and

the public disclosure of false information regarding Ms. Deering's sexual abuse by Bill Gothard. (See Exhibit A at ¶ 9.)

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

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

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

- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

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

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

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

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

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

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

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

COUNT XXXI
WILLFUL & WANTON –AS TO PLAINTIFF JAMIE DEERING

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

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

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

Plaintiff, Jamie Deering, and the other IBLP sexual abuse and harassment victims.

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

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

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

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

COUNT XXXII
CIVIL CONSPIRACY –AS TO PLAINTIFF JAMIE DEERING

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

471. Defendant IBLP, by and through its agents and employees, including its Control Group, which includes its then current Board of Directors (listed in Paragraph 23, above) and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Jamie Deering, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Deering.

472. This conduct was tortious in nature.

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

474. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, listed in Paragraph 23, above), and Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or

sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Jamie Deering, and the other IBLP sexual abuse and sexual harassment victims.

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

476. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Jamie Deering, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

COUNT XXXIII
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
RUTH COPLEY BURGER

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

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

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

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

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

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

483. The sexual molestation progressed. There was an instance where Copley had Ms. Burger put on a dress that her mother wouldn't allow her to wear. He then laid on her bed and started groping her through her clothing. Ms. Burger's adoptive mother walked in and wanted to know what was going on. Copley stated that he was "checking her for modesty."

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

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

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

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

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

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

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

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

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

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

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

495. As a result of their knowledge of Ms. Burger's allegations and those of others like her, the Control Group, including the current (not former directors or director from another time period) IBLP Board of Directors (namely those listed in Paragraph 23 of this Second Amended Complaint), Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of Ms. Burger and other IBLP victims in 2014.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- a. Defendant IBLP allowed its "Biblical Counselor," Kenneth Copley, to use its facilities for the purpose of performing childhood sexual abuse on Ms. Burger and allowed Kenneth Copley to commit sexual abuse while he was working as a "Biblical Counselor" for IBLP. Mr. Copley was working in his capacity as a "Biblical Counselor" for IBLP at the time he was abusing Ms. Copley from 1994 to 1995. This childhood sexual abuse was a criminal offense;

- b. Despite Copley's known sexual history, and IBLP's history of issues with childhood sexual abuse and harassment, IBLP did not properly supervise Copley and did not have proper policies and procedures in place to supervise its counselors and other employees and to keep its participants, interns, volunteers and employees safe. As a result, Copley also engaged in sexual misconduct with young staff members, which may have constituted a criminal offense;
- c. Defendant IBLP failed to report the childhood sexual abuse of Ms. Copley or any of the sexual abuse committed by Copley during his employment with IBLP, which may have constituted a criminal offense;
- d. When IBLP, through its Control Group, became aware of Ms. Burger's posts to Recovering Grace and through other means regarding Copley's childhood sexual abuse of Ms. Burger and other IBLP sexual abuse, the Defendants intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- e. Defendant IBLP, by its Control Group (then consisting of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Burger and other IBLP sexual abuse victims; and
- f. By these actions, Defendant IBLP, by its Control Group (then consisting of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard, showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Ruth Copley Burger, and the other IBLP sexual abuse victims.

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

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

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

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

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

COUNT XXVI
CIVIL CONSPIRACY –AS TO PLAINTIFF RUTH COPLEY BURGER

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

512. Defendant IBLP, by and through its agents and employees, and the Control Group (including its then current Board of Directors, listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agree to accomplish an

unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Ruth Copley Burger, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Burger.

513. This conduct was tortious in nature.

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

515. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Ruth Copley Burger, and the other IBLP sexual abuse victims.

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

517. As a proximate result of the aforesaid civil conspiracy by and between the various members of the then current Board of Directors (as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Ruth Copley

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

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

**COUNT XXXVII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JOY SIMMONS**

518. Plaintiff, JOY SIMMONS, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

519. Plaintiff, Joy Simmons' family joined the IBLP ATI program when she was nine (9) years old in 1985.

520. Ms. Simmons was a participant at an IBLP Counseling Seminar in 1993.

521. From 1993 through 1996 Ms. Simmons was a volunteer for various months at the Indianapolis Training Center ("ITC").

522. Beginning in December of 1996 until 1997, Ms. Simmons was a participant and then an employee at the Indianapolis Training Center.

523. Initially, Ms. Simmons was sent to ITC as what IBLP termed "an encouragement case," which is IBLP's term for a "juvenile delinquent." However, after several months at ITC, IBLP came to understand that Ms. Simmons' difficulties had to do with her parents' behavior, not hers.

524. At that point, Ms. Simmons was made a member of the paid staff at ITC.

525. In April of 1998 Ms. Simmons' family joined Pastor David York's church. Pastor York is a current member of the IBLP Board of Directors. At the time Ms. Simmons was a

member of his church, Pastor David York subscribes to IBLP's patriarchy / quiverfull teachings.

526. On her twenty-fourth birthday in 1999, Ms. Simmons was sexually assaulted by a member of Pastor York's IBLP church.

527. When Ms. Simmons' parents and Pastor York learned of the sexual assault, they determined that she was partly to blame for the assault and determined that the appropriate course of action would be to send Ms. Simmons to Bill Gothard for counseling at IBLP headquarters.

528. Beginning in 2000, Ms. Simmons worked at IBLP headquarters in Hinsdale, Illinois in the capacity of a volunteer and employee.

529. Ms. Simmons often worked over one hundred (100) hours per week during conferences. From 2001 through 2002, Ms. Simmons regularly worked that many hours per week, as a result of the two job responsibilities she was assigned. However, she was only paid minimum wage for forty (40) hours per week for one job.

530. IBLP did not have electronic time card machines or computers to keep track of work hours. Instead, employees were given cards and told to hand write their work hours each day. They were told that the ministry just didn't have the funds to pay overtime, and not to report overtime worked, because IBLP could get into trouble for not paying it. Bill Gothard told Ms. Simmons that her overtime was given a service to God.

531. While Ms. Simmons was at IBLP, she would regularly meet with Gothard for counseling in his office.

532. When Gothard met with Ms. Simmons for counseling, he would meet with her alone and sit with her on the sofa in his office. The purpose of the counseling was to deal with the issues related to and caused by her sexual assault.

533. During the sexual assault counseling, Gothard would sexually harass Ms. Simmons. He would sit very close to her on the couch – hip to hip. He would also play “footsie” with her.

534. During counseling, Gothard would also press Ms. Simmons for unnecessary details of her sexual assault, and hold her hands and touch her inappropriately.

535. When Gothard would counsel Ms. Simmons, he would use the bathroom adjacent to his office and urinate with the door partly open. He would come out while he was still zipping his pants. Gothard would only behave this way when he was alone with Ms. Simmons. This caused Ms. Simmons psychological and emotional distress.

536. Ms. Simmons had very limited sexual knowledge at the time of the sexual assault and at the time she was being counseled by Gothard. As such, she really did not understand the sexual nature of what had been done to her, or that she could report it to the police.

537. Neither Pastor York (a current IBLP Board member) nor Gothard ever informed Ms. Simmons that what had been done to her was a crime and that she had the right to report it to the police.

538. In addition to the fact that Gothard was alone with Ms. Simmons in counseling, Gothard would keep Ms. Simmons so late at his office, sometimes until 1:00 a.m., that he would tell her he had to drive her home for her safety.

539. Ms. Simmons left IBLP from May 4, 2001 until Gothard requested that she return in October, 2001. She was sent home by IBLP ATI Director Jim Voeller, when she caught

Voeller and his secretary locked in an office alone together. Voeller told Ms. Simmons that she needed to need to “work on [her] poor relationship with [her] parents.”

540. In August of 2002, Ms. Simmons advised Gothard that her fiancé’ had been using an IBLP credit card for personal financial gain without repaying IBLP. Because she was not permitted to have a fiancé, Gothard blamed Ms. Simmons for the theft, and had her sent off to IBLP’s Oklahoma facility as an “encouragement case” to be “reprogrammed.”

541. Before leaving for Oklahoma, Ms. Simmons was required to make a false confession that Bill Gothard wrote out for her on a 3 X 5 card. The false confession was delivered to over two hundred (200) staff people.

542. When Ms. Simmons was transferred against her will to Oklahoma, she worked there for no money until 2003.

543. Six and one half months after Ms. Simmons was sent to the Oklahoma “Log Cabin Program,” Gothard visited Oklahoma City for a conference. Ms. Simmons met Gothard at the Oklahoma City Training Center. He told her that some of the truth had been discovered about the improper credit card use that her ex-fiance’ had committed at headquarters. Despite the fact that Gothard had transferred her to the Log Cabin Program based on false allegations regarding this credit card issue (and her alleged “problem with guys” – because she had a fiancé’) and required her to make a false confession about this allegation, Gothard made no apology for being wrong, nor did he apologize for his wrongful embarrassment of Ms. Simmons.

544. Ms. Simmons was transferred again to Big Sandy, Texas, where she continued to work as a full-time volunteer, to help her sister, an IBLP employee who had been injured during an IBLP training incident.

545. While she was there, Ms. Simmons, who was now married to another IBLP volunteer, asked leadership to put her on lighter duty, because she had two miscarriages in one year.

546. IBLP's leadership responded by telling Ms. Simmons that she and her husband didn't need to focus on having children right now, but rather, needed to focus on IBLP's ministry.

547. Ms. Simmons left IBLP in June of 2005.

548. Ms. Simmons published a detailed article about the abuse she suffered at the hands of Bill Gothard and IBLP on the Recovering Grace website under her real name, "Joy."

549. As a result of their knowledge of Ms. Simmons' allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of Ms. Simmons and other IBLP victims in 2014.

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

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

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

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

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

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

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

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

employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities or the Illinois Department of Children & Family Services and said wrongful conduct was allowed to continue;

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

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

**COUNT XXXVIII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JOY SIMMONS**

556. Plaintiff, JOY SIMMONS, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

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

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

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

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

COUNT XXXIX
WILLFUL & WANTON –AS TO PLAINTIFF JOY SIMMONS

561. Plaintiff, JOY SIMMONS, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

- a. Defendant Bill Gothard committed sexual harassment against Ms. Simmons on numerous occasions between 2000 and 2002;

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

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

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

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

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

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

**COUNT XL
CIVIL CONSPIRACY –AS TO PLAINTIFF JOY SIMMONS**

565. Plaintiff, JOY SIMMONS, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

566. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Joy Simmons, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Simmons.

567. This conduct was tortious in nature.

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

569. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Joy Simmons, and the other IBLP sexual abuse victims.

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

571. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Joy Simmons, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

COUNT XLI
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JANE DOE IV

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

573. Plaintiff, JANE DOE IV, was present at IBLP from 2006 – 2009. At first as a volunteer and then as an employee.

574. Of all of the Plaintiffs in the instant lawsuit, JANE DOE IV is the only Plaintiff who was interviewed by CLA as part of IBLP's sham investigation.

575. JANE DOE IV came to IBLP for counseling that was necessary as a result of being raped at the age of eleven (11) years old.

576. As a result of the rape, JANE DOE IV was suffering serious P.T.S.D., dissociation, and amnesia.

577. Although he possesses no formal counseling training, Bill Gothard advised JANE DOE IV: "I'm so glad your parents never allowed you to seek professional help because now you and I can work through it together so we can be bonded together. I believe God allowed the abuse to bond you and I together for ministry. My name is Bill, meaning brave protector. I now have a great desire to protect you. As you and I work through this together, we will be bonded and we can serve the Lord together better in our ministry."

578. At a later time, when JANE DOE IV went to Gothard to seek his permission to seek the help of a professional counselor Gothard said: "No, a professional counselor would ruin you and all your potential to serve the Lord. Look, professional counselors do not know how to work with abused girls, only I do." Gothard continued: "You are just a young girl laden with fears that is why you have pain in your heart."

579. Despite claiming to be the only one who knows how to work with abused girls. Gothard treated the decision of whether or not to report JANE DOE IV's rape at the age of eleven (11) years old very lightly. Gothard flipped a coin, and on that basis, he decided not to report the First Degree Rape of an eleven (11) year old child.

580. In addition to harming JANE DOE IV through his counseling, Gothard also sexually harassed JANE DOE IV during the counseling sessions when she was supposed to be receiving counseling for the trauma that she suffered as a result of the First Degree Rape.

581. During counseling Gothard was "very touchy" with JANE DOE IV. He engaged in activities that included attempting "to play footsie," giving her full frontal hugs, and telling her that she was gaining weight.

582. When JANE DOE IV resisted Gothard's advances, he would shy away and tell her that she was "a young girl laden with fears."

583. In addition to Gothard's decision to conceal the First Degree Rape of an eleven (11) year old child and attempting to sexually harass JANE DOE IV during counseling, Gothard also took advantage of JANE DOE IV physically and financially.

584. As a result of his grossly incompetent counseling, his refusal to allow JANE DOE IV to obtain competent counseling, and sexual harassment that Gothard engaged in while counseling JANE DOE IV, Gothard caused JANE DOE IV significant psychological harm.

585. Gothard required JANE DOE IV to operate an IBLP program for young girls without sufficient funding. This left the young girls in the program without sufficient funds to meet their needs and forced JANE DOE IV to use the small amount of money that she had available to attempt to provide for the needs of these young ladies.

586. The schedule Gothard required of JANE DOE IV forced her to work fifty (50) to seventy (70) hours per week. These long hours without access to sufficient food caused JANE DOE IV significant health problems.

587. Gothard also required JANE DOE IV to use her personal vehicle, without reimbursement, to provide transportation for IBLP program participants.

588. The IBLP, likely thinking that JANE DOE IV would be a positive witness, arranged for her to take part in a farce interview with David Gibbs, Jr. for IBLP's sham investigation.

589. It is JANE DOE IV's belief that Jennifer Cooper and Janie Moore were also interviewed for IBLP's sham investigation. It is believed these ladies were selected to be interviewed, because IBLP thought they would give answers that would be helpful to IBLP and Bill Gothard.

590. David Gibbs, Jr. conducted the interview by telephone and he allowed IBLP Attorney Robert J. Barth to be present on the call during the interview.

591. During the interview David Gibbs, Jr. advised JANE DOE IV that he did not want to hear about anything other than illegal activity by Bill Gothard. He was not interested in activity that was only morally wrong. He only wanted to hear about illegal activity.

592. When JANE DOE IV was told that David Gibbs, Jr. did not want to hear about anything that wasn't illegal, JANE DOE IV began listing conduct by Bill Gothard and IBLP that she believed was illegal.

593. As JANE DOE IV stated each point, Robert Barth interrupted and changed JANE DOE IV's answers.

594. Based on JANE DOE IV's observations, the investigation that David Gibbs, Jr. conducted on behalf of IBLP was, in fact, a sham.

595. JANE DOE IV wrote a detailed letter, approximately eight (8) pages in length, to the IBLP Board of Directors in 2014. In the letter, JANE DOE IV described in detail Gothard's misconduct, his abusive counseling relationship with her, the reason she required counseling, and the physical and financial stress that Gothard placed on her.

596. In that letter, JANE DOE IV also detailed the physical harm that her body suffered and the counseling and treatment that was necessary, as a direct result of the harm that Gothard caused. Gothard caused this harm in his official capacity as an employee of IBLP.

597. The IBLP Board of Directors was fully informed, beyond the information contained in this Second Amended Complaint, of the details of the harm that Gothard did to JANE DOE IV. Additionally, JANE DOE IV offered to answer any questions and to provide any additional details or documentation that the Board desired.

598. In a February 17, 2015 letter, the IBLP Board offered to pay JANE DOE IV for the automotive expenses that Gothard required JANE DOE IV to incur, but for which he refused to reimburse her. IBLP refused to compensate JANE DOE IV for any of the harm that was committed by their Founder, former Board Member, and former President, Bill Gothard or that was caused by IBLP, as an organization.

599. In its February 17, 2015 letter, IBLP did not deny any of JANE DOE IV's allegations, but rather stated: "These are the types of things about which we encourage you to speak directly with Mr. Gothard. For reconciliation to occur he needs to hear and to understand how he made you feel and why you responded as you did. This would seem to be important for your well-being and it would also help Mr. Gothard realize any mistakes he may have made in his interactions with you and your family."

600. Ultimately, IBLP paid JANE DOE IV \$1,500.00 for automotive expenses.

601. It is JANE DOE IV's belief that the \$1,500 payment was intended as "hush money" to make her go away.

602. JANE DOE IV wrote the IBLP Board of Directors regarding the matters described herein and received a letter in response dated February 17, 2015, that confirmed the Board's awareness of JANE DOE IV's allegations. Due to her letter, JANE DOE IV's abuse was brought to the attention of the IBLP's Control Group, including the current Board of Directors.

603. As a result of their knowledge of JANE DOE IV's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the abuse allegations of JANE DOE IV and other IBLP victims in 2014.

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

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

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

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

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

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

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

Illinois Department of Children & Family Services and said wrongful conduct was allowed to continue;

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

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

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

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

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

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

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

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

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

COUNT XLIII
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE IV

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

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

- a. Defendant Bill Gothard sexually harassed JANE DOE IV on numerous occasions between 2006 and 2009 in the course of rape counseling that was necessary due to a rape at eleven (11) years of age.
- b. When the IBLP became aware of Bill Gothard's sexual harassment of JANE DOE IV and other IBLP sexual abuse victims, as a result of JANE DOE IV's letter and through disclosures via the Recovering Grace website, and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;

- c. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE IV and other IBLP sexual abuse victims; and
- d. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, JANE DOE IV, and the other IBLP sexual abuse victims.

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

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

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

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

**COUNT XLIV
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE IV**

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

620. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE IV, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE IV.

621. This conduct was tortious in nature.

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

623. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and

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

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

625. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE IV, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

COUNT XLV
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF CARMEN OKHMATOVSKI

626. Plaintiff, CARMEN OKHMATOVSKI, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

627. Plaintiff, Carmen Okhmatovski, began attending IBLP seminars since approximately 1990 at the age of eleven (11). She continued attending seminars until the age of seventeen (17), in 1996.

628. Ms. Okhmatovski wanted to become a physicians assistant and had started college in 1996. Based on IBLP teachings, her parents decided she should leave college. Later that year she attended the IBLP Girls' Counseling Seminar.

629. During the Girls' Counseling Seminar, she approached Bill Gothard. Gothard asked her to stay after to meet him alone.

630. During this weeklong seminar, Gothard would ask Ms. Okhmatovski to come to his office everyday, after the seminar was over for the day.

631. During these meetings Gothard would tell Ms. Okhmatovski that God had brought them together and that they were to work together to build the ministry.

632. After the first day that Gothard met Ms. Okhmatovski, he began calling her parents to ask them to allow her to come to work at headquarters.

633. Within a week of meeting Ms. Okhmatovski, Gothard asked her if she was a virgin.

634. At the time Gothard wanted Ms. Okhmatovski to come to headquarters, she was scheduled to have surgery for severed ankle tendons. Gothard advised her parents not to worry about the surgery. He knew a doctor who would inject sugar water to cure Ms. Okhmatovski's tendon issue. Gothard never provided her with the name of this doctor when she arrived at headquarters.

635. Originally Gothard advised Ms. Okhmatovski that she would work in the ATI Department, but she was actually assigned to the Kitchen staff. Gothard assigned her to the kitchen staff, because the kitchen was located below his office. This made it easier for Ms. Okhmatovski to come to his office, when Gothard called her.

636. From the beginning, Bill Gothard's conduct toward Ms. Okhmatovski was inappropriate. During a conversation before she was hired, Gothard asked about her

interests. She stated that she liked to bake “specialty breads.” As a result of this comment, Gothard falsely advised the IBLP staff that he had hired a chef whose specialty was bread.

637. Ms. Okhmatovski became an employee of IBLP in 1996 at the Hinsdale, Illinois facility, when she was eighteen (18) years of age.

638. When Ms. Okhmatovski arrived at headquarters, Gothard encouraged her to spend time in his office, to come to his office before hours, after hours, and during the day.

639. Early on, Ms. Okhmatovski noticed that Gothard would take her hands and he would hold them much longer than is normal. He would stare into her eyes to the point that it was unnerving and uncomfortable.

640. In his office, Gothard would regularly hold Ms. Okhmatovski’s hands, caress her hands, ask intrusive questions, sit uncomfortably close, place his hand on her thigh, lay his head on her shoulder, and sit across from Ms. Okhmatovski with an obvious erection while he kept his legs spread.

641. Gothard would also advise Ms. Okhmatovski not to tell her parents what was occurring at headquarters.

642. When Ms. Okhmatovski rode with Gothard in staff vehicles he would play “footsie” with her. If she would move her feet, Gothard would pursue her feet and continue playing “footise” with her feet in their new position.

643. On one occasion, when Gothard was alone with Ms. Okhmatovski in his office, he suggested that she should have two small moles removed from her face. She refused.

644. While Ms. Okhmatovski was associated with IBLP, she also participated in IBLP activities that included the 1996 trip to Russia.

645. During the 1996 trip to Russia, Gothard had Ms. Okhmatovski sit next to him on the plane and he placed a blanket from their laps up to their shoulders. He then put his hands on Ms. Okhmatovski's leg. She blocked his hand from moving any further, so he held her hand. He then put his head on her shoulder and fell asleep.

646. Gothard would refer to Ms. Okhmatovski as his "energy giver." As part of his grooming/isolating process, Gothard would advise her not to have friends, but to keep other girls as her "disciples."

647. When Ms. Okhmatovski noticed Gothard's pattern of behavior, she informed her mother, who was alarmed and told her to protect herself. Her mother advised her not to go to Gothard's office alone again and to not to give him any more opportunities to touch her inappropriately.

648. When Ms. Okhmatovski resisted his touches and refused to engage in the intimacy that Gothard desired, Gothard had a clear look of disappointment and reproach.

649. In August of 1997, Ms. Okhmatovski went home for a visit. Her parents were concerned about the changes in her personality and were not pleased. Ms. Okhmatovski parents decided to remove her from IBLP.

650. Gothard was very upset with Ms. Okhmatovski's parents and told them that no one had ever removed their child from IBLP before.

651. After Ms. Okhmatovski left, Gothard falsely advised the IBLP staff that she had been sent away for having an inappropriate relationship with a man.

652. While Ms. Okhmatovski was at headquarters, it was well known that an IBLP staff member by the name of Matthew Heard, who was approximately 23 or 24 years old, raped a fourteen (14) year old female IBLP program participant at the IBLP conference in

Knoxville, Tennessee. That rape victim is now a plaintiff in the instant lawsuit. Ms. Okhmatovski was that Plaintiff's roommate.

653. Bill Gothard called the rape victim at her IBLP home, where Ms. Okhmatovski also resided. Gothard berated the rape victim for three (3) hours, because she had been raped by Matthew Heard.

654. IBLP staff member Matthew Heard's unlawful sexual assault of his teenaged victim in Tennessee would constitute either rape or a form of sexual assault under Tennessee law, and is a criminal offense.

655. IBLP, through its employees: Gothard, Perkins, Barth, and many others, was aware of this rape and its failure to report this childhood sexual abuse, as required by 325 ILCS 5/4, is also a criminal offense.

656. Ms. Okhmatovski wrote the IBLP Board of Directors on March 7, 2014 advising the Board of many of the details included in this complaint. Due to this email, Ms. Okhmatovski's harassment was brought to the attention of the IBLP's Control Group, including the current Board of Directors.

657. As a result of their knowledge of Ms. Okhmatovski's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual harassment allegations of Ms. Okhmatovski and other IBLP victims in 2014.

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

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

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

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

662. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendant set forth in this Second Amended Complaint, Plaintiff, Carmen Okhmatovski,

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

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

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

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

COUNT XLVI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
CARMEN OKHMATOVSKI

664. Plaintiff, CARMEN OKHMATOVSKI, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

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

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

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

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

COUNT XLVII
WILLFUL & WANTON –AS TO PLAINTIFF CARMEN OKHMATOVSKI

669. Plaintiff, CARMEN OKHMATOVSKI, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

- a. Defendant Bill Gothard committed sexual harassment against Ms. Okhmatovski on numerous occasions between 1996 and 1997;
- b. Defendant IBLP failed to report the childhood sexual abuse of Carmen Okhmatovski's roommate in violation of 325 ILCS 5/4, a criminal offense;
- c. When the IBLP became aware of Bill Gothard's sexual harassment of Ms. Okhmatovski and other IBLP sexual abuse victims, as a result of their disclosure via emails, letters, the Recovering Grace website, and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Okhmatovski and other IBLP sexual abuse victims; and
- e. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Carmen Okhmatovski, and the other IBLP sexual abuse victims.

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

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

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

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

**COUNT XLVIII
CIVIL CONSPIRACY –AS TO PLAINTIFF CARMEN OKHMATOVSKI**

673. Plaintiff, CARMEN OKHMATOVSKI, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

674. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Carmen Okhmatovski, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Okhmatovski.

675. This conduct was tortious in nature.

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

677. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Carmen Okhmatovski, and the other IBLP sexual abuse victims.

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

679. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Carmen Okhmatovski, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

**COUNT XLIX
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JENNIFER SPURLOCK**

680. Plaintiff, JENNIFER SPURLOCK, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

681. Plaintiff, Jennifer Spurlock, originally attended an IBLP Girls' Conference at the age of fifteen (15) in 1993.

682. When Gothard saw Ms. Spurlock stand and give her testimony at the Indianapolis Training Center ("ITC"), Gothard asked her to come to his office alone a few days later.

683. Immediately after that conference Bill Gothard contacted Ms. Spurlock's family and convinced them that she needed to be a "leader in training" at the IBLP program at the ITC. Ms. Spurlock was later transferred to IBLP headquarters in Hinsdale, Illinois.

684. It was determined that she needed to be a "leader in training," due to problems at home. Her parents considered her "strong willed." In reality Gothard used Ms. Spurlock's parent's emotional problems to convince them that she needed to be in the ITC program.

685. Ms. Spurlock was initially placed in a room with a girl she did not know. She had to share a queen-sized bed with this girl. When she approached Gothard about this, he advised her that she was “special,” and decided she should have her own room. Gothard used this situation to completely isolate Ms. Spurlock, to place her in an isolated room at the end of a hallway with no roommate – to keep her isolated from everything and everyone at the Center. Gothard controlled all aspects of what she did and to whom she talked and had access. He told her he was the only one who she could trust, the only one who was there to protect her, and the only one who loved her.

686. After she arrived at the ITC, Ms. Spurlock received no education or classes of any type.

687. When Ms. Spurlock asked Gothard about education classes, she was told that what she was learning now was all that mattered. That included how to find a husband and how to please him – “life skills.” Gothard also told her she was too beautiful to pursue education. The IBLP staff person in charge would say to her: “Why do you need an education?” She was told not to ask about education classes again. At this point in time, Ms. Spurlock had only completed eighth grade and had not yet started high school.

688. When Ms. Spurlock would go to Gothard’s office, he would tell her how beautiful she was and sit closely with her on the couch. While she was in his office, Gothard would hug her, rub her thighs, hold her hands, and touch her hair.

689. Gothard would advise Ms. Spurlock that she was not to speak with anyone about her relationship with him and that she would be treated differently.

690. Gothard would come to the ITC once or twice a month. While he was there, he would meet with her alone.

691. The ITC leadership told Ms. Spurlock that the only reason they did not “kick her out” of the program was because “Mr. Gothard loves you.” Gothard would come in and manipulate Ms. Spurlock by advising her to “stay strong.”

692. When Ms. Spurlock was sixteen (16) years old, a juvenile delinquent by the name “Jarvis,” was admitted to the IBLP juvenile delinquent program. The Juvenile graphically described the sexual acts he was determined to commit against Ms. Spurlock the moment he had her alone.

693. Jarvis was seventeen (17) or eighteen (18) and was about three times her size.

694. Ms. Spurlock went to the IBLP staff multiple times to express her terrifying fear that he was going to commit these acts on her. Jarvis would regularly grab and touch Ms. Spurlock inappropriately – grabbing her by her waist and grabbing her buttocks.

695. IBLP staff repeatedly told Ms. Spurlock that it was her fault because of what she was wearing and the way she was behaving. That she was bringing this on herself. As a punishment for complaining about Jarvis’ threats, Ms. Spurlock was placed on the “outreach team,” where she was required to clean streets.

696. One day, when Ms. Spurlock had just turned sixteen (16), she was walking down the stairs while Jarvis was walking up the stairs – in an area where there were no cameras. Jarvis began attempting to rape Ms. Spurlock. He attempted to commit the acts he previously described, and that she had previously warned IBLP staff he was going to commit.

697. Ms. Spurlock was able to fight him off, but wasn’t permitted to contact the police. She was told by IBLP staff that she was the reason Jarvis had done what he had done. Further, if she were permitted to contact the police (She was not permitted to use the phone

at IBLP.), this would discredit Gothard's juvenile delinquent program with the court system.

The IBLP staff did nothing to stop Jarvis or to protect her.

698. Ms. Spurlock was not permitted to speak about this incident with anyone.

699. When Gothard learned that she was attacked, he drove to the ITC within twenty-four (24) hours.

700. Gothard removed Ms. Spurlock from the ITC and drove her, in the middle of the night, to IBLP headquarters in Hinsdale, Illinois. They arrived the next morning.

701. During the drive, Gothard rubbed her thigh and played "footsie" with her the whole way back to headquarters. He advised her that he was her "protector."

702. When they arrived at headquarters, Gothard had her placed in the nicest house, "where all of the pretty girls stayed." She was placed in a single bed in the attic temporarily, until another place was located for her.

703. Within two or three days of arriving, Ms. Spurlock was again placed in seclusion by placing her in her own two bedroom, two bathroom apartment.

704. From the time she arrived, Gothard wanted her to come sit in his office every day. He told her that he wanted her company. He told her that he would find work for her. He would say: "I want you with me."

705. Gothard told her that he wanted her to dress prettier. He would take out cash and give her money. He told her "I want you to be the prettiest one here."

706. Gothard never allowed Ms. Spurlock to be with other people. He kept her isolated and secluded.

707. After a few days, Ms. Spurlock was assigned a position. She was just supposed to sit outside Gothard's door as his companion and helper. He wanted his guests to see her personality and her beautiful face. She was there to make Gothard happy.

708. Initially, Ms. Spurlock was told to come to Gothard for any money she needed, which he would provide to her in cash. After approximately one month of being at headquarters, Ms. Spurlock was officially put on staff as a "secretary." She would sit and do nothing – other than answer phones occasionally. The hourly wage she was paid was well below minimum wage.

709. Ms. Spurlock accompanied Gothard on every trip and every meal. That was her stated purpose – to sit next to Gothard and to go on trips with him. She was his "slave girl" at his "beck and call" at all times.

710. During trips that were through the night, Gothard would constantly touch her. He would touch the sides of her breasts, her feet, her face, and her thighs. He would tell her how beautiful she was.

711. Gothard would regularly give Ms. Spurlock long hugs, smell her hair, and rub her face. When Gothard would hug her, he would physically force his chest against Ms. Spurlock's breasts to the point that it was painful. While Gothard would hug her, he would rub back and forth – laterally – and make disgusting noises from his mouth, while he was rubbing back and forth. Gothard would do this after hours at 2 or 3 in the morning, after everyone was gone. Then Gothard would drive her home. Every time Gothard was alone with her, he would do this.

712. When Gothard would rub Ms. Spurlock's upper thigh, he would rub near her vaginal area. He bought her a particular dress that was slit in the front that he would frequently

instruct her to wear on trips, when she would be sitting next to him. He did this so he could rub the bare skin of her thighs. She was always instructed where to sit in the IBLP van or his personal car, so Gothard could have his desired access to her.

713. Gothard was disappointed that she liked soccer and horses. He wanted her to be submissive.

714. Ms. Spurlock's family had very limited access to her. When her parents asked Gothard when she should come home, Gothard responded "absolutely not." He advised her family that he was on the brink of breaking her into submission. He said: If you take her now, there is no hope for her.

715. When Ms. Spurlock attended the Excel program in Dallas, she was finally able to communicate with other people. After this event, she made up her mind that she was going to leave IBLP.

716. Shortly before the age of eighteen (18), Ms. Spurlock left IBLP.

717. When she advised Gothard she was leaving, he was emotional and said: "I did so much for you." "What have I done?"

718. Once she left IBLP, she was blacklisted. IBLP staff and participants were prohibited from talking to her.

719. As a result of their knowledge of the allegations of victims like Ms. Spurlock, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP

intentionally published a statement containing false information regarding the sexual harassment allegations of Ms. Spurlock and other IBLP victims in 2014.

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

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

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

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

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

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

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

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

COUNT L
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JENNIFER SPURLOCK

726. Plaintiff, JENNIFER SPURLOCK, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

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

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

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

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

COUNT LI
WILLFUL & WANTON –AS TO PLAINTIFF JENNIFER SPURLOCK

731. Plaintiff, JENNIFER SPURLOCK, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

- a. Defendant Bill Gothard committed childhood sexual abuse against Ms. Spurlock on numerous occasions between 1993 and 1996 in violation of 735 ILCS 5/13-202.2, a criminal offense;
- b. Defendant IBLP failed to report the childhood sexual abuse of Jennifer Spurlock in violation of 325 ILCS 5/4, a criminal offense;
- c. When the IBLP became aware of Bill Gothard's childhood sexual abuse of Ms. Spurlock and other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Spurlock and other IBLP sexual abuse victims; and
- e. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Jennifer Spurlock, and the other IBLP sexual abuse victims.

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

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

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

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

COUNT LII
CIVIL CONSPIRACY –AS TO PLAINTIFF JENNIFER SPURLOCK

735. Plaintiff, JENNIFER SPURLOCK, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

736. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Jennifer Spurlock, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Spurlock.

737. This conduct was tortious in nature.

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

739. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and

wanton conduct against Plaintiff, Jennifer Spurlock, and the other IBLP sexual abuse victims.

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

741. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Jennifer Spurlock, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

**COUNT LIII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF MEGAN LIND**

742. Plaintiff, MEGAN LIND, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

743. Plaintiff, Megan Lind's family became dues paying members of IBLP in 1985, when she was five (5) years old. For all of the years of her schooling, from five (5) years old to eighteen years of age, she was educated using IBLP materials.

744. Ms. Lind was forced to attend IBLP conferences starting at the age of ten (10), in 1990.

745. Between 1990 and 1998, Ms. Lind was forced to attend over twenty (20) IBLP conferences by her parents.

746. After one of these conferences, Ms. Lind found herself in Bill Gothard's van. She knows that she was under the age of sixteen (16) years old during this particular trip. She was required to sit next to Gothard, who began touching her leg and holding her hand, as they were traveling.

747. In 1998, at the age of seventeen (17), Ms. Lind was forced into the Indianapolis Training Center ("ITC") by her parents.

748. Shortly after Ms. Lind was forced into the ITC, she turned eighteen (18) years of age and was an adult. Ms. Lind was considered a "leader in training," while she was at the ITC.

749. After arriving at the ITC, Ms. Lind was immediately locked and confined in a room for at least five (5) days. It may have been longer.

750. Ms. Lind recalls that IBLP staff at the ITC included Mr. & Mrs. Gergeni and Mr. & Mrs. McWha.

751. Ms. Lind was told that she was to stay in a specific room and that she was not allowed to leave, even for the purpose of eating. All of her meals were brought to her in her room.

752. Ms. Lind was not allowed to close the bathroom door in the room in which she was locked.

753. Even after she turned eighteen years of age, Ms. Lind was not permitted to leave her room, except when an escort would come and take her to Gothard for a session.

754. During these counseling sessions, Gothard would sexually harass Ms. Lind by sitting very close to her, touching her, hold her hand, rub her legs and he would lean in very close to her.

755. ITC required certain young women, including Ms. Lind, to be up and out of bed before 5:00 a.m. to complete a book/Bible study. These young women were awakened with a phone call or an alarm.

756. Any young women who were not out of bed when required (at least every weekday morning), were subject to discipline.

757. During this period, Ms. Lind was often sleep deprived.

758. Ms. Lind's possessions were locked away and she was only permitted to wear IBLP approved clothing.

759. Ms. Lind's confinement at the ITC by the IBLP staff constitutes "criminal confinement," pursuant to Burns Ind. Code Ann. § 35-42-3-3, a felony.

760. After a period of time, Ms. Lind was removed from confinement at the ITC and was transferred to another training center on "good behavior."

761. At this facility, although she was over eighteen years of age, Ms. Lind was forced to make meals for the training center and was not permitted to leave or do anything other than what she was told. Ms. Lind was well over eighteen (18) years of age at this time.

762. Many IBLP victims published an account of their abuse by Gothard and IBLP on a website called Recovering Grace. Due to this publication, Ms. Lind's abuse was brought to the attention of the IBLP's Control Group, including the current Board of Directors.

763. As a result of their knowledge of Ms. Lind's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP

intentionally published a statement containing false information regarding the sexual harassment and abuse allegations of Ms. Lind and other IBLP victims in 2014.

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

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

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

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

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

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

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, and inappropriate/unauthorized touching occurring to young female interns, employees, and participants in IBLP programs;
- b. Failed to implement proper policies and procedures to prevent IBLP program participants from being criminally confined and psychologically abused and tortured by IBLP staff, against their will;
- c. Despite defendant IBLP's prior knowledge of allegations of sexual abuse and sexual harassment being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the sexual abuse, sexual harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities or the Illinois Department of Children & Family Services and said wrongful conduct was allowed to continue;
- d. Despite decades of ongoing sexual abuse, sexual harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP, through its Control Group, failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- e. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies and the Illinois Department of Children & Family Services;
- f. IBLP, through its Control Group, conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- g. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and

- h. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

**COUNT LIV
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
MEGAN LIND**

770. Plaintiff, MEGAN LIND, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

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

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

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

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

COUNT LV
WILLFUL & WANTON –AS TO PLAINTIFF MEGAN LIND

775. Plaintiff, MEGAN LIND, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

- a. Defendant Bill Gothard committed sexual harassment against Ms. Lind on numerous occasions between 1998 and 2000;
- b. IBLP staff, under Bill Gothard's control and direction regularly and continuously criminally confined Ms. Lind at the ITC in violation of Ind. Code Ann. § 35-42-3-3, a felony criminal offense;
- c. When the IBLP became aware of Bill Gothard's sexual harassment of Ms. Lind and other IBLP sexual abuse victims and of Ms. Lind's criminal confinement, as a result of their disclosure via the Recovering Grace website and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Ms. Lind and other IBLP sexual abuse victims; and
- e. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Megan Lind, and the other IBLP sexual abuse, sexual harassment and physical and psychological abuse victims.

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

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

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

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

COUNT XLVI
CIVIL CONSPIRACY –AS TO PLAINTIFF MEGAN LIND

779. Plaintiff, MEGAN LIND, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

780. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, criminal confinement, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Megan Lind, or knew that there was a high probability that their conduct would cause severe emotional distress to Ms. Lind.

781. This conduct was tortious in nature.

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

783. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction

of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Megan Lind, and the other IBLP sexual abuse victims.

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

785. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Megan Lind, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

787. Plaintiff, JANE DOE V, was a participant in IBLP ATI program beginning in approximately 1989, when she was in 3rd grade.

788. Beginning in 1992, JANE DOE V's family began attending ATI conferences.

789. In 1995, at the age of thirteen (13), JANE DOE V went unaccompanied to the Indianapolis Training Center ("ITC") for a conference.

790. While she was there, she met Bill Gothard.

791. After a brief conversation, Gothard singled her out and told her to come up to his office alone later. This happened about midway through the conference.

792. When JANE DOE V went to Gothard's office, he asked JANE DOE V a number of personal questions about her home life: Are you having problems with your parents? How is your home life? What are your moral struggles? JANE DOE V confided in Gothard that she had kissed a boy in her neighborhood.

793. When JANE DOE V returned home, Gothard called her parents and convinced them to send her to headquarters while she was still thirteen (13) years old. She went to IBLP headquarters as a volunteer.

794. JANE DOE V continued at IBLP headquarters as a volunteer through the summer of 1996 and spent several months in the winter in Mississippi with her leader, Kaysha Coker. They were working with Pat Robinson, who lived in Mississippi and took in problem children for Gothard and IBLP.

795. In the spring of 1997, JANE DOE V returned to headquarters and spent a significant amount of time in Gothard's office in counseling sessions and running errands for Gothard.

796. During these counseling sessions, Gothard would sexually harass JANE DOE V. He would sit very close to her. He would rub her knees, touch her thighs, hold her hands, and stroke her hair.

797. He would also press her for details of very personal questions.

798. Between the spring and July of 1997 she was sent to the ITC, because there was a young man on the lawn crew who took an interest in her. When Gothard became aware of this, he had her moved to ITC. She was assigned as a "leader in training" in Indianapolis.

799. While JANE DOE V was at the Knoxville conference, an IBLP staff member Matthew Heard, who was twenty-two (22) years old, raped her.

800. After the rape Heard pulled out and, before he left, he told JANE DOE V not to tell anyone. JANE DOE V confided what had happened to an IBLP staff member Stephanie Burgess. Ms. Burgess in turn informed her friend Monica Navarro. In turn Ms. Navarro notified Mrs. Gergheni, who shared this information with her husband. Mr. Gergheni in turn notified Mr. McWah who was the director of the leaders in training program.

801. Mr. McWah, director of the leaders in training program, brought JANE DOE V into his office and whipped her with a belt for being raped. He informed her that he would instill the fear of God in her.

802. At that point JANE DOE V was called on the phone by Bill Gothard. Gothard berated her and accused her of causing the rape.

803. Despite the numerous IBLP staff personnel who were aware of the rape, not a single IBLP staff member reported the rape to law enforcement or the appropriate child welfare authorities.

804. After this JANE DOE V was confined to “the prayer room” for weeks on end at the ITC. At times, the ITC staff forgot to feed her and JANE DOE V would go hungry.

805. JANE DOE V’s confinement constituted criminal confinement under Burns Ind. Code Ann. § 35-42-3-3, a felony.

806. After several months, JANE DOE V earned the privilege of going to the park with a group of people to hike and picnic in the park.

807. When she saw an opportunity, JANE DOE V ran from the park and hitchhiked back to headquarters in Hinsdale, Illinois.

808. When JANE DOE V arrived at IBLP headquarters, she was encouraged to contact Mr. Perkins. When she did so, Perkins immediately contacted Gothard, who was very cold to her.

809. Gothard wanted to know all of the details of her rape by Matthew Heard, including whether there was penetration.

810. Gothard then ordered JANE DOE V taken back to the ITC, where she served on staff performing; cleaning, kitchen duty, and generally earning her keep.

811. IBLP had obtained land in Arkansas. JANE DOE V was sent to Arkansas for a week, as part of the staff to get the new program up and running.

812. While she was in Arkansas, JANE DOE V was caught talking with a boy by the IBLP staff.

813. When she returned to the ITC, she was again illegally confined to the “prayer room” for several days to a week.

814. At one point, IBLP staff member McWah came into her room with a baseball bat and threatened to straighten her out if she didn’t straighten herself out.

815. JANE DOE V was able to have some limited telephone conversations with her parents about how she was being mistreated by the ITC staff.

816. At approximately the time of her fifteenth (15th) birthday, JANE DOE V’s parents came to the ITC and took her home.

817. Many IBLP victims published an account of their abuse by Gothard and IBLP on a website titled Recovering Grace. Due to this publication, JANE DOE V’s abuse was brought to the attention of the IBLP’s Control Group, including the current Board of Directors.

818. As a result of their knowledge of JANE DOE V's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of JANE DOE V and other IBLP victims in 2014.

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

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

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

822. The conduct of the sham investigation and the dissemination of false information about JANE DOE V's sexual harassment by Bill Gothard, about her rape by Matthew Heard, and about her criminal confinement by IBLP in 2014 by Defendants Bill Gothard and IBLP caused JANE DOE V additional severe emotional distress, beyond that which was originally

caused by Bill Gothard's sexual harassment, by Matthew Heard's rape, and by IBLP's criminal confinement of JANE DOE V. The IBLP, by its Control Group, including the Board of Directors and President, and thus as an organization, approved the conduct of the sham investigation and the public disclosure of false information regarding JANE DOE V's sexual harassment by Bill Gothard, rape by Matthew Heard, and criminal confinement by IBLP. (See Exhibit A at ¶ 9.)

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

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

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

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

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

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

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

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

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

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

was obvious to the Control Group that this conduct would result in severe emotional distress to JANE DOE V and to IBLP's other sexual abuse victims.

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

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

COUNT XLIX
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE V

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

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

- a. Defendant Bill Gothard committed sexual harassment against JANE DOE V, a minor, during counseling sessions;
- b. Defendant IBLP failed to report JANE DOE V's rape by Matthew Heard in violation of 325 ILCS 5/4, a criminal offense;
- c. IBLP by its ITC criminal confinement JANE DOE V, in violation of Burns Ind. Code Ann. § 35-42-3-3, a felony;
- d. When the IBLP became aware of Bill Gothard's sexual harassment of JANE DOE V, her rape by Matthew Heard, her criminal confinement by IBLP staff and similar conduct toward other IBLP sexual abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- e. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of

false information would result in severe emotional distress for JANE DOE V and other IBLP sexual abuse victims; and

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

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

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

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

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

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

COUNT LX
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE V

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

835. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE V, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE V.

836. This conduct was tortious in nature.

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

838. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an

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

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

840. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE V, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

COUNT LXI
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF DANIEL DORSETT

841. Plaintiff, DANIEL DORSETT, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

842. Plaintiff, Daniel Dorsett, attended the IBLP conference at the University of Tennessee in 1993.

843. By the end of 1993 Daniel Dorsett became an employee at the IBLP headquarters in Hinsdale, Illinois in the lawn maintenance department, where he continued to work until 1996.

844. While working in the lawn maintenance department, he began driving for Bill Gothard in 1994. He continued to be Bill Gothard's primary driver until January of 1996, when he left, briefly, for IBLP's ALERT program.

845. When Mr. Dorsett began driving for Bill Gothard, he was told to disregard any indiscretions that he observed in the vehicle. He was told that if he reported what he saw while he was driving he would go "straight to hell."

846. Although Mr. Dorsett felt that much of what he observed was wrong, because Gothard was his spiritual leader, he was in a moral dilemma. Gothard told Mr. Dorsett that this was his way of ministering to these young ladies. "As my driver, you are expected to be a minister of God, as well."

847. While Mr. Dorsett was driving for Gothard, he observed Bill Gothard sexually harass and/or molest over one hundred fifty (150) young ladies.

848. Gothard would always pick the prettiest girls to travel with him.

849. Gothard inappropriately touched every pretty young lady that he had ride in the IBLP van with him, while Mr. Dorsett was driving.

850. Mr. Dorsett was also invited to Gothard's office after hours. He would regularly see Gothard hugging and groping young women in his office. He would also observe Gothard touching young women on their upper thighs.

851. In January of 1996, Mr. Dorsett went to the IBLP ALERT program.

852. At the program, as a legal adult, Mr. Dorsett was locked in a room by IBLP for admitting what IBLP considered a sinful activity.

853. Locking Mr. Dorsett in a room against his will constitutes unlawful restraint in violation of Illinois Compiled Statutes Annotated 720 ILCS 5/10-3, a felony.

854. Mr. Dorsett had previously observed that IBLP regularly locked “leaders in training” in their rooms, when he was a volunteer at the ITC. He had repaired doors that had been kicked or scratched from the inside at the ITC.

855. During his brief stay at the IBLP ALERT program, Mr. Dorsett was exposed to unbearable torture that included being required to perform a mock rescue in the freezing cold in his underwear with no shirt or shoes on.

856. After being exposed to this brutal treatment and being unlawfully locked in a room for confessing a “sin,” Mr. Dorsett left the ALERT program after only a couple of days and returned to his former work at IBLP headquarters.

857. Mr. Dorsett continued at IBLP for approximately five (5) more months until June of 1996, when his father asked Gothard to fire him for refusing to return to the ALERT program.

858. As a result of his abuse in IBLP’s programs and the psychological trauma caused by Bill Gothard’s conduct and that of IBLP and its staff, Mr. Dorsett now has a diagnosis of post-traumatic stress disorder.

859. IBLP was aware of the abuse of its program participants, including Mr. Dorsett, as a result of publications made by former victims, including those on a website titled Recovering Grace. Due to this publication, Mr. Dorsett’s abuse was brought to the attention of the IBLP’s Control Group, including the current Board of Directors.

860. As a result of their knowledge of Mr. Dorsett’s allegations and those of others like him, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014.

After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the abuse allegations of Mr. Dorsett and other IBLP victims in 2014.

861. Defendants Bill Gothard, and IBLP intended, knew, or should have known that there was a high probability that their conduct of denying the existence of the physical abuse and psychological abuse suffered by Mr. Dorsett and others like him would cause severe emotional distress to Mr. Dorsett and the other IBLP victims.

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

863. Through their actions, Defendants Bill Gothard and IBLP breached their duty to Mr. Dorsett by failing to protect him from further and continuing psychological and emotional harm.

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

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

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

- a. Failed to adequately train and/or supervise its staff, including management/supervisory staff, and/or have appropriate policies and procedures in place, to prevent and/or deter sexual abuse, sexual harassment, inappropriate/unauthorized touching, unlawful restraint or confinement, and physical and psychological abuse occurring to interns, employees, and participants in IBLP programs;
- b. Despite defendant IBLP's prior knowledge of allegations of sexual abuse, sexual harassment, physical abuse, including but not limited to unlawful restraint or confinement, and psychological abuse being committed against its participants, interns, and employees, many of whom were under eighteen (18) years of age at the time of the abuse, harassment, and inappropriate/unauthorized touching, IBLP failed to report these allegations to law enforcement authorities or the Illinois Department of Children & Family Services and said wrongful conduct was allowed to continue;
- c. Despite decades of ongoing abuse, harassment, and inappropriate/unauthorized touching and credible reports thereof, Defendant IBLP, through its Control Group, failed to conduct a reasonable investigation into the allegations, and said wrongful conduct was allowed to continue;
- d. IBLP concealed the allegations of abuse and harassment from scrutiny by law enforcement agencies and the Illinois Department of Children & Family Services;
- e. IBLP, through its Control Group, conducted an unreasonable investigation into the allegations of abuse and harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

**COUNT LXII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
DANIEL DORSETT**

867. Plaintiff, DANIEL DORSETT, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

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

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

871. The conduct of the Defendants Bill Gothard, and IBLP actually caused Mr. Dorsett severe emotional distress.

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

COUNT LXIII
WILLFUL & WANTON –AS TO PLAINTIFF DANIEL DORSETT

872. Plaintiff, DANIEL DORSETT, reincorporates herein by reference each and every other allegation set forth in this Complaint at Law.

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

- a. Defendant Bill Gothard caused Mr. Dorsett extreme psychological distress by his conduct between 1994 and 1996;
- b. IBLP and its staff committed the crime of unlawful restraint against Mr. Dorsett, in violation of Illinois Compiled Statutes Annotated 720 ILCS 5/10-3, a felony;
- c. When the IBLP became aware of Mr. Dorsett's physical and psychological abuse and unlawful restraint and the abuse suffered by other IBLP abuse victims, as a result of their disclosure via the Recovering Grace website and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for Mr. Dorsett and other IBLP abuse victims; and
- e. By these actions Defendant IBLP, by its Control Group (including John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York), along with Defendant Bill Gothard showed an utter indifference to and/or conscious disregard for a substantial risk of harm to Plaintiff, Daniel Dorsett, and the other IBLP abuse victims.

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

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

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

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

COUNT LXIV
CIVIL CONSPIRACY –AS TO PLAINTIFF DANIEL DORSETT

876. Plaintiff, DANIEL DORSETT, realleges and incorporates herein by reference each and every other allegation set forth in this Complaint at Law.

877. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, Daniel Dorsett, or knew that there was a high probability that their conduct would cause severe emotional distress to Mr. Dorsett.

878. This conduct was tortious in nature.

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

880. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of abuse and harassment of its participants, interns, and employees and to publicly disclose information regarding these matters knowing that such conduct would result in the negligent infliction of emotional

distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, Daniel Dorsett, and the other IBLP abuse victims.

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

882. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, Daniel Dorsett, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

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

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

884. Plaintiff, JANE DOE VI, was an employee of IBLP at its Hinsdale, Illinois headquarters from 1991 through 1998.

885. From 1992 until 1997, JANE DOE VI was employed as Bill Gothard's assistant.

886. When JANE DOE VI first went to IBLP headquarters in 1991, she was a minor, sixteen (16) years old. She continued to work for IBLP until she was twenty four (24) years old.

887. On a driving trip to the Indianapolis Training Center from IBLP headquarters in an IBLP van, Bill Gothard was sitting next to JANE DOE VI, while she was taking dictation.

888. While JANE DOE VI was taking dictation, Gothard locked his arm around in hers. He began rubbing her leg and her foot with his foot, and then wrapped his ankle around hers and kept it there the whole trip.

889. After JANE DOE VI was finished taking dictation for Gothard, while his arm and ankle were still locked in hers, his head began leaning against her after he fell asleep. He slept on her shoulder the whole rest of the way to the Indianapolis Training Center.

890. During the time JANE DOE VI worked as Gothard's assistant, Bill Gothard constantly engaged in behavior of this type. He would constantly touch her, including holding her hand.

891. As a result of her concern for the inappropriateness of Gothard's conduct, JANE DOE VI approached the wives of two members of the IBLP board of directors about her concerns.

892. In 1997, shortly after JANE DOE VI approached the board member's wives with her concerns, the IBLP Board implemented a policy that Gothard was not to have female assistants.

893. JANE DOE VI observed that Gothard engaged in similar behavior with a number of other females who worked for IBLP.

894. Bill Gothard's conduct toward JANE DOE VI has caused her severe psychological and emotional distress through the present time.

895. IBLP was aware of the fact that Bill Gothard was sexually harassing or abusing IBLP interns, volunteers and employees, as evidenced by its 1997 policy. Despite this, IBLP failed to enforce that policy to stop Gothard's behavior. The harassment and abuse continued.

896. As a result of JANE DOE VI's efforts to bring Gothard's behavior to the IBLP Board's attention, IBLP, through its Control Group, was well aware of Gothard's sexual harassment of JANE DOE VI and other victims.

897. As a result of their knowledge of JANE DOE VI's allegations and those of others like her, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of JANE DOE VI and other IBLP victims in 2014.

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

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

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

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

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

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

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

- d. IBLP concealed the allegations of sexual abuse and sexual harassment from scrutiny by law enforcement agencies and the Illinois Department of Children & Family Services;
- e. IBLP, through its Control Group, conducted an unreasonable investigation into the allegations of sexual abuse and sexual harassment;
- f. IBLP was otherwise careless or negligent in the supervision of its staff, directors, agents, and employees during the relevant times alleged herein; and
- g. Bill Gothard continued to stalk his sexual abuse and harassment victims after they left headquarters, and was permitted to do so by IBLP.

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

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

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

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

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

907. The Defendant IBLP, through its Control Group, including its directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual harassment and sexual abuse. In some cases, as in JANE DOE VI's case, the allegations included childhood sexual harassment. Despite this knowledge,

each and every individual director authorized a sham investigation of these matters and then authorized the public dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to the Control Group that this conduct would result in severe emotional distress to JANE DOE VI and to IBLP's other sexual harassment and abuse victims.

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

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

COUNT LXVII
WILLFUL & WANTON –AS TO PLAINTIFF JANE DOE VI

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

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

- a. Defendant Bill Gothard committed sexual harassment against JANE DOE VI, both while she was a minor and when she was an adult between 1991 and 1998;
- b. When the IBLP became aware of Bill Gothard's sexual harassment of JANE DOE VI and other IBLP sexual abuse victims, as a result of JANE DOE VI's efforts, as a result of disclosures via the Recovering Grace website, and through other means, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- c. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JANE DOE VI and other IBLP sexual abuse victims; and

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

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

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

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

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

**COUNT LXVIII
CIVIL CONSPIRACY –AS TO PLAINTIFF JANE DOE VI**

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

914. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JANE DOE VI, or knew that there was a high probability that their conduct would cause severe emotional distress to JANE DOE VI.

915. This conduct was tortious in nature.

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

917. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information

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

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

919. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JANE DOE VI, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

**COUNT LXIX
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS –AS TO
PLAINTIFF JOHN DOE I**

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

921. Plaintiff, JOHN DOE I, initially visited the IBLP Indianapolis Training Center ("ITC") in 1993.

922. Later, from 1993 until 1994, JOHN DOE I returned to the ITC and was later employed there.

923. From 1996 until 1997, JOHN DOE I was again employed at the ITC.

924. In 1994, when JOHN DOE I was a minor at age seventeen (17) and while he was a participant in IBLP programs at the ITC, JOHN DOE I was regularly counseled by IBLP counselor Pastor William Tollett ("Tollett").

925. Tollett would regularly counsel JOHN DOE I alone. Over a period of approximately ten (10) personal counseling sessions Tollett gained JOHN DOE I's trust through a grooming process.

926. Tollett would counsel JOHN DOE I about very private matters.

927. During one counseling session, when JOHN DOE I was in a room by himself at the ITC. Tollett came to JOHN DOE I's room. Tollett proceed to massage JOHN DOE I and then molested.

928. JOHN DOE I began to cry when Tollett began molesting him.

929. Tollett asked JOHN DOE I: "Do you want to stop?" JOHN DOE I immediately said "Yes!"

930. Tollett asked JOHN DOE I: "Have you ever had homosexual thoughts before?" JOHN DOE I said: "No, I haven't." Tollett responded: "Well, I have."

931. Tollett continued the conversation by asking: "Do you want me to stop?" JOHN DOE I responded: "Yes, I do!"

932. Finally, Tollet apologized by saying: "Okay, I am really sorry."

933. JOHN DOE I called and notified his father.

934. JOHN DOE I also notified Pastor McWha, the director of the ITC.

935. The following day Tollett resigned.

936. IBLP was made aware of JOHN DOE I's sexual abuse through the notification of the Director of ITC, Pastor McWha.

937. ITC failed to make a mandatory report of the abuse of JOHN DOE I, as required by Burns Ind. Code Ann. § 31-33-22-1, which is a criminal offense.

938. JOHN DOE I notified IBLP through the director of the ITC. Due to this notification, JOHN DOE I's abuse was brought to the attention of the IBLP's Control Group, including the current Board of Directors.

939. As a result of their knowledge of JOHN DOE I's allegations and those of others like him, the current (not former directors or directors from another time period) IBLP Board of Directors, (namely those listed in Paragraph 23 of this Second Amended Complaint), the Control Group, Bill Gothard, and IBLP undertook the sham CLA investigation in 2014. After receiving the results of their sham investigation, Defendants Bill Gothard, and IBLP intentionally published a statement containing false information regarding the sexual abuse allegations of JOHN DOE I and other IBLP victims in 2014.

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

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

942. Through their actions, Defendants Bill Gothard and IBLP breached their duty to JOHN DOE I by failing to protect him from further and continuing psychological and emotional harm.

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

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

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

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

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

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

COUNT LXX
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS –AS TO PLAINTIFF
JOHN DOE I

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

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

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

949. The Defendant IBLP, through its Control Group, including its directors and President, Bill Gothard, knew that they were dealing with an extremely sensitive subject matter: allegations of sexual abuse. In some cases, as in JOHN DOE I's case, the allegations included sexual abuse of a minor. Despite this knowledge, each and every individual director authorized a sham investigation of these matters and then authorized the public

dissemination of information from the sham investigation. (See Exhibit A at ¶ 9.) It was obvious to the Control Group that this conduct would result in severe emotional distress to JOHN DOE I and to IBLP's other sexual abuse victims.

950. The conduct of the Defendants Bill Gothard, and IBLP actually caused JOHN DOE I severe emotional distress.

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

COUNT LXXI
WILLFUL & WANTON –AS TO PLAINTIFF JOHN DOE I

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

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

- a. IBLP employee William Tollett committed sexual abuse against JOHN DOE I in 1994, a criminal offense;
- b. Defendant IBLP failed to report the sexual abuse of JOHN DOE I in violation of Burns Ind. Code Ann. § 31-33-22-1, which is a criminal offense.;
- c. When the IBLP became aware of Bill Gothard's childhood sexual abuse of JOHN DOE I and other IBLP sexual abuse victims, as a result of their JOHN DOE I's notification of the ITC director, the Control Group intentionally undertook a sham investigation in 2014 to cover up the abuse for the benefit of IBLP;
- d. The Defendant IBLP, by its Board of Directors (then composed of John Stancil, Anthony Burrus, Gil Bates, Timothy Levendusky, Stephen Paine, and David York) along with Defendant Bill Gothard, approved the public disclosure of information from the sham investigation knowing that this public disclosure of false information would result in severe emotional distress for JOHN DOE I and other IBLP sexual abuse victims; and

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

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

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

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

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

COUNT LXXII
CIVIL CONSPIRACY –AS TO PLAINTIFF JOHN DOE I

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

956. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, agreed to accomplish an unlawful result through concerted action, specifically that they agreed to engage in actions resulting in negligent infliction of emotional distress, intentional infliction of emotional distress, and/or willful and wanton conduct, by all of which they either intended to inflict severe emotional distress to Plaintiff, JOHN DOE I, or knew that there was a high probability that their conduct would cause severe emotional distress to JOHN DOE I.

957. This conduct was tortious in nature.

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

959. Defendant IBLP, by and through its agents and employees, the Control Group (including its then current Board of Directors, as listed in Paragraph 23, above), and Defendant Bill Gothard, as well as other unknown co-conspirators, accomplished an unlawful result through concerted action, specifically that they agreed to conduct an unreasonable and/or sham investigation regarding allegations of sexual abuse and sexual harassment of its participants, interns, and employees and to publicly disclose information

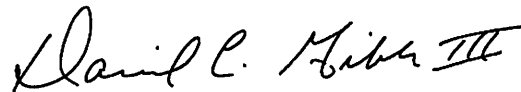
regarding these matters knowing that such conduct would result in the negligent infliction of emotional distress, the intentional infliction of emotional distress, and/or willful and wanton conduct against Plaintiff, JOHN DOE I, and the other IBLP sexual abuse victims.

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

961. As a proximate result of the aforesaid civil conspiracy by and between the various members of the Control Group (including the then current Board of Directors, as listed in Paragraph 23 supra), and Defendant Bill Gothard, as well as other unknown co-conspirators, Plaintiff, JOHN DOE I, has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

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

Respectfully submitted,



Counsel for Plaintiffs

GIBBS LAW FIRM, P.A.
Attorneys for Plaintiff
David C. Gibbs III
2648 FM 407, Suite 240
Bartonville, TX 76226
Telephone: (727) 362-3700
Facsimile: (727) 398-3907
IL ARDC: 6321878

LAW OFFICES OF JONATHAN REMIJAS
Attorneys for Plaintiff
17 N. State Street, Suite 1600
Chicago, IL 60602
Telephone: (312) 726-5250
IL ARDC: 6225911

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CASE NO. 15 L 000980

Hon. Judge Popejoy

JURY DEMANDED BY PLAINTIFFS

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ard, Jr.

. William W. Gothard, Jr. ("Bill Gothard"), after first being sworn on oath, deposes

- 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.**

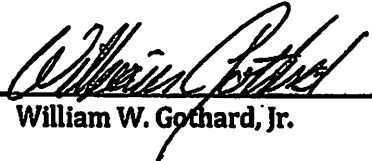
- 8. I personally appointed the Board of Directors. They were selected for their loyalty to the ministry and my teaching.**
- 9. All actions taken by the IBLP Board were to be unanimous.**
- 10. I temporarily resigned from the Board of IBLP to follow the instruction of Matthew 5:23-24. The Scripture 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 this 25 day of November 2015.

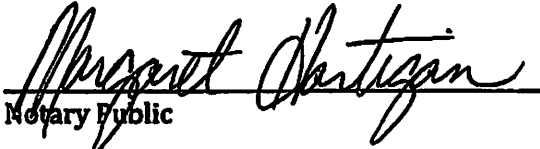

Notary Public

EXHIBIT B

A FURTHER CONFESSION AND REQUEST

By Bill Gothard

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

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

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

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

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

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

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

Bill Gothard