

**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, and  
JANE DOE VI, et al.,**

Plaintiffs,

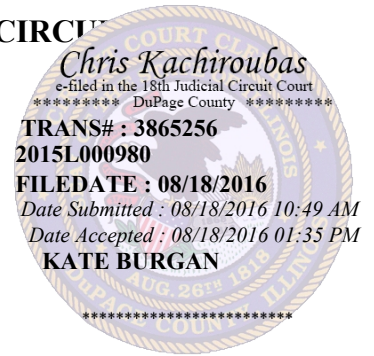
v.

**INSTITUTE IN BASIC LIFE PRINCIPLES,  
WILLIAM W. GOTHARD, JR., KENNETH  
COPLEY and MATT HEARD,**

Defendants.

No. 15 L 000980

Hon. Judge Popejoy



**THIRD 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, and JANE DOE VI, by and through their attorneys, MEYERS & FLOWERS, LLC, and complain of the Defendants, INSTITUTE IN BASIC LIFE PRINCIPLES, INC. ("IBLP"), WILLIAM W. GOTHARD, JR. ("Bill Gothard"), KENNETH COPLEY and MATT HEARD 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 physical abuse, 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, and JANE DOE VI.

### **VENUE AND JURISDICTION**

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

### **THE PARTIES**

3. At all relevant times, Defendant, INSTITUTE IN BASIC LIFE PRINCIPLES, INC. ("IBLP"), was and is a not-for-profit Illinois corporation, with its principal place of business and headquarters in DuPage County, Illinois.

4. Defendant WILLIAM W. GOTHARD, JR., is the founder and former president of IBLP until his resignation in 2014, at which time he was a member of IBLP's Board of Directors. He also founded ADVANCED TRAINING INSTITUTE INTERNATIONAL, INC. ("ATII"). WILLIAM W. GOTHARD, JR. is a resident of the state of Illinois.

5. Defendant KENNETH COPLEY was at all relevant times an employee and/or agent of IBLP, ATII and/or other subsidiaries of these corporations serving as a senior staff member and biblical teacher.

6. Defendant MATT HEARD was at all relevant times and employee and/or agent of IBLP at the Indianapolis Training Center, ATII and/or other subsidiaries of these corporations serving as an IBLP staff member.

7. At all relevant times, ADVANCED TRAINING INSTITUTE INTERNATIONAL, INC. ("ATII"), was and is a not-for-profit Illinois corporation, with its principal place of business and headquarters in Big Sandy, Texas. ATII is a home education program that provides curriculum

and training for parents who home school their children. The ATII program was developed and founded by IBLP and William W. Gothard, Jr.

8. Between 1991 and 1993, Plaintiff GRETCHEN WILKINSON was a participant in IBLP programs and was later an employee of IBLP. At all relevant times hereto, GRETCHEN WILKINSON was a minor. She is currently a resident of the state of Virginia.

9. Between 1982 and 1989, 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 5/2-40l(e).

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

11. Plaintiff CHARIS BARKER was homeschooled in the ATII program beginning around 1986 and was an intern and employee of IBLP from 1999 to 2000. Ms. Barker is currently a resident of the state of Georgia.

12. 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.

13. 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, she continued to work for IBLP for several years. Ms. Lees is a citizen of New Zealand.

14. 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 S/2-401(e).

15. Plaintiff JAMIE DEERING was a participant in the IBLP ATI program beginning in 1992. In 1994, she was invited by Bill Gothard to come to IBLP headquarters. Ms. Deering's involvement with IBLP continued until 1999. Ms. 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. Ms. Burger is currently a resident of the state of Colorado.

12. Plaintiff JOY SIMMONS' family joined the IBLP ATI program in 1985. She was a participant at an IBLP Counseling Seminar in 1993. From 1994 through 1996 she was a “Leader in Training” 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 participant and employee. She was later transferred to Oklahoma, where she worked until 2003. Ms. Simmons was transferred again to Big Sandy, Texas, where she continued to work as a participant until June 2005. She is currently a resident of the state of Georgia.

13. Plaintiff JANE DOE IV began attending IBLP conferences every year beginning in 2001. Between 2006 and 2009, Plaintiff JANE DOE IV was a volunteer and later an IBLP employee at the IBLP headquarters in Hinsdale, Illinois. JANE DOE IV 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. Plaintiff CARMEN OKHMATOVSKI attended IBLP seminars from 1990 until 1996. In 1996, Ms. Okhmatovski was hired for a staff position at IBLP headquarters in Hinsdale, Illinois and she remained in that position until 1997. Ms. Okhmatovski is a resident of Narol, Manitoba.

15. Plaintiff JENNIFER SPURLOCK attended an IBLP Girls' Conference in 1993 and immediately thereafter, became a participant in IBLP programs at the Indianapolis Training Center and worked at the IBLP headquarters in Hinsdale, Illinois. She remained at the IBLP facility in Hinsdale until she left IBLP in 1995. Mrs. Spurlock is a resident of the state of Florida.

16. Plaintiff MEGAN LIND's family was involved with IBLP since 1971. Ms. Lind attended IBLP conferences starting in 1990 and was a participant or volunteer in IBLP activities and programs from 1990 through 2000. Ms. Lind is a resident of the state of California.

17. Plaintiff JANE DOE V got involved with the IBLP ATI program beginning in approximately 1989 and started attending IBLP conferences in 1992. JANE DOE V was present at the Indianapolis, Indiana and Hinsdale, Illinois facilities from 1995 through 1997, as a participant and volunteer. JANE DOE V is a resident of the state of Wisconsin. Plaintiff JANE DOE V seeks to proceed anonymously for good cause shown in accord with 735 ILCS 5/2- 401(e).

18. Plaintiff DANIEL DORSETT was schooled with IBLP materials from 1989 through 1996 and attended an IBLP conference at the University of Tennessee in 1993. From 1993 to 1996, Mr. Dorsett volunteered at the Indianapolis Training Center, attended the IBLP ALERT program and worked at the IBLP headquarters in Hinsdale, Illinois. Mr. Dorsett is a resident of the state of Montana.

19. Plaintiff JANE DOE VI was employed at the IBLP headquarters in Hinsdale, Illinois from 1991 through 1998. 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).

### **GOTHARD, IBLP, AND ITS BOARD OF DIRECTORS**

20. IBLP originated in 1961 as an organization founded by Bill Gothard called Campus Teams, changing its name in 1974 to Institute in Basic Youth Conflicts and later changing its name against to Institute in Basic Life Principles in 1989.

21. The mission of IBLP is to give individuals, families, churches, schools, communities, governments, and businesses clear instruction and training on how to find success by following God's principles found in Scripture. IBLP accomplishes its mission primarily through seminars, educational programs, printed literature, and the operation of centers to facilitate training.

22. At all relevant times, IBLP was operated by Bill Gothard and a Board of Directors that was chosen by him.

23. All four IBLP Board Members, currently remaining, were handpicked by Bill Gothard for their loyalty to him and his teachings.

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

25. IBLP Board Member Tim Levendusky is a full-time paid employee of IBLP and resident of the state of Illinois.

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

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

28. 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. Mr. Bates received thousands of dollars in compensation from IBLP according to IBLP's 2014 IRS 990 tax filing.

29. Throughout IBLP's history and at all relevant times to the allegations made herein, IBLP has been maintained, managed and controlled by a core group of male executives, management employees, and male director to its Board of Directors. This core group includes Bill Gothard, Timothy Levendusky, John Stancil, Anthony Burrus, Gil Bates, Charles "Stephen" Paine and David York ("Control Group"). These men were employed by and/or appointed to their respective

positions due to their loyalty to Bill Gothard and his teachings. They were employees, agents and/or servants of IBLP and Bill Gothard and responsible for knowing IBLP inside and out. This core group was also responsible for ensuring IBLP's reputation was maintained and protected at all costs.

30. Bill Gothard, IBLP and the Control Group have a decades long history of sexual misconduct within the organization including allegations of sexual abuse, sexual harassment, inappropriate/unauthorized touching and stalking. Bill Gothard's own brother, who worked for IBLP, was dismissed after it was discovered that he was having sex with many students.

31. Steve Gothard, was at all relevant times the brother of Bill Gothard, an employee and/or agent of IBLP and/or ATII and personally abused IBLP/ATII participants, employees, or independent contractors.

32. In order to discredit IBLP and Bill Gothard's victims and their allegations of longstanding abuse, IBLP, Bill Gothard and the Control Group retained the Christian Law Association ("CLA"), headed by Bill Gothard's personal friend, to investigate the claims of wrongdoing against IBLP.

33. CLA was retained by IBLP and the Control Group in 2014 and paid \$50,000.00 to conduct an investigation, privately report back on its findings, and assist in covering up the wrongdoing.

34. Upon information and belief, CLA failed to contact or interview any of the plaintiffs except for JANE DOE IV.

35. Bill Gothard, IBLP and the Control Group had fiduciary relationships and owed fiduciary duties to all Plaintiffs.

36. These fiduciary duties were further developed as a result of the counseling relationship that Bill Gothard, IBLP and the Control Group developed with Plaintiffs. Bill Gothard, IBLP and the Control Group exploited these counseling relationships by using them as an aid in the abuse of the victims.

37. Bill Gothard, IBLP and the Control Group are primarily responsible for the harm that occurred to Plaintiffs while they were participants in the IBLP Ministry activities and for the ongoing campaign to re-victimize these plaintiffs in the media and religious world.

38. Bill Gothard, IBLP Board and the Control Group were acting within the course and scope of the employment relationship. Bill Gothard, IBLP and the Control Group's conduct was so perverse that often the abuse would simultaneously occur while Bill Gothard or others were allegedly conducting business for IBLP. There was no time between the sexual and physical abuse and the work that Bill Gothard, IBLP and the Control Group allegedly performed for IBLP.

39. Bill Gothard, IBLP and the Control Group abandoned their legal responsibility to remain knowledgeable of the fitness of Bill Gothard and other IBLP employees. Rather, they left Bill 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.

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

41. Bill 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.

42. 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. Bill Gothard promised these attractive young women that they would be at the center of the next big thing he was planning.

43. Bill Gothard, IBLP and the 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.

44. Bill Gothard, IBLP and the 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. Bill Gothard also blamed abuse victims for the abuse they suffered and often explained that God can compensate for 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?"

45. Bill Gothard, IBLP and the Control Group held high positions of trust in the Plaintiffs' lives, personal family circles, social circles, and religious circles. Bill Gothard carefully, intentionally, and effectively closed off all access to outside intervention and support necessary for the victims to challenge him. Further, Bill Gothard oftentimes used the information gleaned from personal, private conversations as leverage to ensure his abuse never became known.

46. As described herein, Bill Gothard, IBLP and the Control Group sexually, physically, emotionally, spiritually, and/or psychologically abused the Plaintiffs. This abuse was without consent, against Plaintiffs' wishes and over their objections. This perverse and offensive conduct repeatedly took place over the course of several decades.

47. Bill Gothard, IBLP and the Control Group were the dominant authority figures in the Plaintiffs' lives. Bill 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, how they dressed, how or what they were paid, their time and schedule, and even acted as their counselor. In other words, Bill Gothard was the spiritual leader, the boss, the landlord, the accountant and the controller of all aspects of

their lives. Bill Gothard demanded obedience to him, the IBLP Board and management as if this perverse institutional obedience was synonymous with obedience to God.

48. As a result of Bill Gothard, IBLP and the Control Group's manipulation, they controlled every aspect of Plaintiffs' lives and thinking. As described herein, Bill Gothard, IBLP and the Control Group methodically groomed victims so that they would eventually participate in inappropriate activities. This was all executed through their position of power, fear, influence and prominence within a strict system of patriarchy. Due to the years of ongoing grooming, conditioning and indoctrination by Bill Gothard and the patriarchal leaders of the IBLP and the Control Group, the victims were incapable of giving consent to Bill Gothard, the IBLP Board or management's sexual advances.

#### **FACTS COMMON TO ALL ALLEGATIONS**

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

50. As stated in each individual Count below, each of the individual Plaintiffs were the victim of physical abuse, sexual abuse, sexual harassment, psychological abuse and/or inappropriate/unauthorized touching, many times while they were minors. All such abuse came at the hands of Bill Gothard, the Control Group and/or IBLP by and through its agents, employees and/or servants. Much of the sexual abuse and harassment occurred while the Plaintiffs were receiving counseling from the perpetrators/IBLP employees, agents and/or servants. 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 the IBLP programs and activities.

51. Upon information and belief, at the times relevant to their claims, Defendant IBLP's agents, employees, servants and/or directors were aware and/or should have been aware of serious allegations of physical abuse, sexual abuse, sexual harassment, psychological abuse and/or

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/servants, 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.

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

53. Upon information and belief, IBLP has seen a decline in donations, sales and annual income which has resulted in a financial crisis for IBLP.

54. Upon information and belief, IBLP has and continues to liquidate assets.

55. Upon information and belief, IBLP is attempting to sell off its 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.

56. For these reasons and as more fully set forth below, 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 1**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Gretchen Wilkinson v. Bill Gothard)***

1-56. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

60. Between 1991 and 1993, GRETCHEN WILKINSON participated in IBLP programs and became an employee of IBLP.

61. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

62. Notwithstanding said duty as aforesaid, Bill Gothard, in 1992, was guilty of aggravated criminal sexual abuse of a child, to wit, GRETCHEN WILKINSON, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with GRETCHEN WILKINSON, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by touching and fondling her genitals and breasts.

63. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against GRETCHEN WILKINSON, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

64. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

65. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 2**  
**BATTERY**  
***(Gretchen Wilkinson v. Bill Gothard)***

1-65. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-65.

66. That at all times relevant herein, it was the duty of Bill Gothard to refrain from intentionally making harmful or offensive contact with the body of GRETCHEN WILKINSON.

67. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and fondling of GRETCHEN WILKINSON's genitals and breasts.

68. The aforesaid physical and sexual contact was harmful and/or offensive.

69. The aforesaid actions on the part of Bill Gothard occurred while GRETCHEN WILKINSON was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

70. GRETCHEN WILKINSON did not and could not consent to any of the contact and conduct.

71. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against GRETCHEN WILKINSON, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

72. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

73. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 3**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Gretchen Wilkinson v. Bill Gothard)***

1-73. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-73.

74. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to GRETCHEN WILKINSON.

75. That at all times relevant herein, it was the duty of Bill Gothard to refrain from conduct that he knew, or reasonably should have known, would cause GRETCHEN WILKINSON to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and GRETCHEN WILKINSON.

76. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited GRETCHEN WILKINSON for purposes of his own gratification without regard to its impact upon the well-being of GRETCHEN WILKINSON.

77. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and fondling of minor GRETCHEN WILKINSON's genitals and breasts.

78. GRETCHEN WILKINSON was a minor at all times relevant hereto when Bill Gothard engaged in the aforementioned unwanted physical and sexual contact and conduct.

79. GRETCHEN WILKINSON did not and could not consent to any of the contact.

80. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the GRETCHEN WILKINSON, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to GRETCHEN WILKINSON.

81. As a direct and proximate result of the aforesaid conduct by Bill Gothard against GRETCHEN WILKINSON, GRETCHEN WILKINSON was and will continue to be caused severe emotional distress.

82. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

83. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 4**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Gretchen Wilkinson v. Bill Gothard)***

1-83. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-83.

84. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to GRETCHEN WILKINSON.

85. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, spiritual advisor and a qualified religious leader to whom GRETCHEN WILKINSON could trust, seek advice and confide.

86. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause GRETCHEN WILKINSON to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and GRETCHEN WILKINSON.

87. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited GRETCHEN WILKINSON for purposes of his own gratification without regard to its impact upon the well-being of GRETCHEN WILKINSON.

88. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and fondling of minor GRETCHEN WILKINSON's genitals and breasts.

89. GRETCHEN WILKINSON did not and could not consent to any of the contact.

90. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the GRETCHEN WILKINSON, or knew

that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to GRETCHEN WILKINSON.

91. As a direct and proximate result of the aforesaid conduct by Bill Gothard against GRETCHEN WILKINSON, GRETCHEN WILKINSON was and will continue to be caused severe emotional distress.

92. Bill Gothard negligently caused severe emotional distress to GRETCHEN WILKINSON.

93. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

94. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 5**  
**VICARIOUS LIABILITY – BATTERY**  
***(Gretchen Wilkinson v. IBLP)***

1-94. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-94.

95. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

96. Bill Gothard sexually abused GRETCHEN WILKINSON. In doing so, he intended to cause and made harmful and/or offensive contact with GRETCHEN WILKINSON's person.

97. GRETCHEN WILKINSON did not and could not consent to any of the contact.

98. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for GRETCHEN WILKINSON.

99. Bill Gothard and IBLP served as GRETCHEN WILKINSON's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

100. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to GRETCHEN WILKINSON.

101. While grooming, manipulating and exploiting GRETCHEN WILKINSON, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

102. IBLP did nothing to protect GRETCHEN WILKINSON against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

103. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to GRETCHEN WILKINSON by Bill Gothard.

104. IBLP acted with a conscious indifference to GRETCHEN WILKINSON's health, safety, and welfare.

105. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

106. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused GRETCHEN WILKINSON and GRETCHEN WILKINSON was and will continue to be caused severe emotional distress.

107. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

108. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 6**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Gretchen Wilkinson v. IBLP)***

1-108. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-108.

109. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to GRETCHEN WILKINSON.

110. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for GRETCHEN WILKINSON.

111. Bill Gothard and IBLP served as GRETCHEN WILKINSON's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

112. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause GRETCHEN WILKINSON to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and GRETCHEN WILKINSON.

113. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited GRETCHEN WILKINSON for purposes of his own gratification without regard to its impact upon the well-being of GRETCHEN WILKINSON.

114. While grooming, manipulating and exploiting GRETCHEN WILKINSON, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

115. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and fondling of minor GRETCHEN WILKINSON's genitals and breasts.

116. GRETCHEN WILKINSON was a minor at all times relevant hereto when Bill Gothard engaged in the aforementioned unwanted physical and sexual contact and conduct.

117. GRETCHEN WILKINSON did not and could not consent to any of the contact.

118. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the GRETCHEN WILKINSON, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to GRETCHEN WILKINSON.

119. IBLP did nothing to protect GRETCHEN WILKINSON against physical and sexual abuse while she was at IBLP headquarters and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

120. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to GRETCHEN WILKINSON by Bill Gothard.

121. IBLP acted with a conscious indifference to GRETCHEN WILKINSON's health, safety, and welfare.

122. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

123. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused GRETCHEN WILKINSON and GRETCHEN WILKINSON was and will continue to be caused severe emotional distress.

124. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

125. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 7**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Gretchen Wilkinson v. IBLP)***

1-125. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-125.

126. At all times relevant herein, IBLP was in a supervisory position as it pertained to GRETCHEN WILKINSON and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including GRETCHEN WILKINSON, that Bill Gothard employed, counseled, supervised and lead.

127. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for GRETCHEN WILKINSON.

128. Bill Gothard and IBLP served as GRETCHEN WILKINSON's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

129. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of GRETCHEN WILKINSON, and the other minor children that Bill Gothard employed, counseled, supervised and lead.

130. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants and employees.

131. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

132. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

133. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

134. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing GRETCHEN WILKINSON and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

135. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched GRETCHEN WILKINSON and his physical contact with GRETCHEN WILKINSON intensified in frequency and type of touching.

136. As a direct and proximate result of the conduct of IBLP, Bill Gothard's physical and sexual grooming of GRETCHEN WILKINSON eventually led to sexual grooming, exploitation, manipulation, sexual exploitation and sexual contact.

137. As a direct and proximate result of the conduct of IBLP, GRETCHEN WILKINSON was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

138. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on GRETCHEN

WILKINSON, thereby causing injuries and damages to GRETCHEN WILKINSON, including severe permanent emotional and psychological distress, and loss of a normal life.

139. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

140. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 8**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Gretchen Wilkinson v. IBLP)***

1-140. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-140.

141. At all times relevant herein, IBLP was in a supervisory position as it pertained to GRETCHEN WILKINSON and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including GRETCHEN WILKINSON, that Bill Gothard employed, counseled, supervised and lead.

142. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of GRETCHEN WILKINSON and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

143. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

144. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

145. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

146. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

147. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to GRETCHEN WILKINSON and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing GRETCHEN WILKINSON and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

148. As a direct and proximate result of IBLP's failure to defend GRETCHEN WILKINSON against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

149. As a direct and proximate result of IBLP's failures, GRETCHEN WILKINSON suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

150. At the time of the abuse, GRETCHEN WILKINSON did not appreciate that the act was abusive.

151. GRETCHEN WILKINSON was suffering from a condition that caused her to repress the memories of abuse and/or GRETCHEN WILKINSON did not know her injuries were caused by the abuse.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 9**  
**CIVIL CONSPIRACY**  
***(Gretchen Wilkinson v. Bill Gothard & IBLP)***

1-151. Plaintiff, GRETCHEN WILKINSON, adopts, realleges and incorporates fully herein by reference paragraphs 1-151.

152. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

153. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating

body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

154. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

155. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

156. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

157. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

158. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against GRETCHEN WILKINSON, intended to publicly shame and inflict severe emotional distress to GRETCHEN WILKINSON, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to GRETCHEN WILKINSON.

159. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, GRETCHEN WILKINSON has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, GRETCHEN WILKINSON prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 10**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jane Doe v. Bill Gothard)***

1-56. Plaintiff, Jane Doe, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

160. Between 1982 and 1989, JANE DOE participated in IBLP programs in Georgia and attended an IBLP-affiliated school and church.

161. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

162. Notwithstanding said duty as aforesaid, Bill Gothard, numerous times between 1982 and 1987, was guilty of aggravated criminal sexual abuse of a child, to wit, JANE DOE, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JANE DOE, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by touching her breast in a sexual manner.

163. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against JANE DOE, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

164. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

165. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 11**  
**BATTERY**  
***(JANE DOE v. Bill Gothard)***

1-56, 160-165. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-165.

166. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

167. At all times relevant to the abuse, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE.

168. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE.

169. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JANE DOE's breast in a sexual manner.

170. The aforesaid physical and sexual contact was harmful and/or offensive.

171. The aforesaid actions on the part of Bill Gothard occurred while JANE DOE was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

172. The aforesaid actions on the part of Bill Gothard continued until JANE DOE was approximately 19 years old.

173. JANE DOE did not and could not consent to any of the contact and conduct.

174. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JANE DOE, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

175. At the time of the abuse, JANE DOE did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

176. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 12**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**(JANE DOE v. Bill Gothard)**

1-56, 160-176. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-176.

177. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

178. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE.

179. Notwithstanding said duty as aforesaid, Bill Gothard manipulated and otherwise exploited JANE DOE for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE.

180. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JANE DOES's breast in a sexual manner.

181. JANE DOE was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1982 to 1988.

182. JANE DOE did not and could not consent to any of the contact that occurred between 1982 and 1988 and did not consent to the contact that occurred between 1988 and 1989.

183. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE.

184. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE, JANE DOE was and will continue to be caused severe emotional distress.

185. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

186. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 13**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
**(*JANE DOE v. Bill Gothard*)**

1-56, 160-186. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-186.

187. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

188. At all times relevant herein, Bill Gothard held himself out as her IBLP superior, spiritual advisor and a qualified religious leader to whom JANE DOE could trust, seek advice and confide.

189. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE.

190. Notwithstanding said duty as aforesaid, Bill Gothard manipulated and otherwise exploited JANE DOE for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE.

191. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JANE DOES's breast in a sexual manner.

192. JANE DOE was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1982 to 1988.

193. JANE DOE did not and could not consent to any of the contact that occurred between 1982 and 1988 and did not consent to the contact that occurred between 1988 and 1989.

194. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE.

195. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE, JANE DOE was and will continue to be caused severe emotional distress.

196. Bill Gothard negligently caused severe emotional distress to JANE DOE.

197. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

198. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 14**  
**VICARIOUS LIABILITY – BATTERY**  
**(JANE DOE v. IBLP)**

1-56, 160-198. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-198.

199. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

200. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

201. Bill Gothard sexually abused JANE DOE. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE's person.

202. JANE DOE did not and could not consent to any of the contact that occurred between 1982 and 1988 and did not consent to the contact that occurred between 1988 and 1989.

203. At the time of the relevant actions, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE.

204. Bill Gothard and IBLP served as JANE DOE's spiritual advisor, spiritual leader, protector and counselor during her time at the IBLP programs.

205. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader, spiritual advisor and counselor as it pertained to JANE DOE.

206. While manipulating and physically and sexually exploiting JANE DOE, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

207. IBLP did nothing to protect JANE DOE against physical and sexual abuse while she attended the IBLP programs and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

208. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE by Bill Gothard.

209. IBLP acted with a conscious indifference to JANE DOE's health, safety, and welfare.

210. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4

and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

211. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE and JANE DOE was and will continue to be caused severe emotional distress.

212. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

213. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 15**  
**VICARIOUS LIABILITY – INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
**(JANE DOE v. IBLP)**

1-56, 160-213. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-213.

214. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

215. At all times relevant to the abuse, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE.

216. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE.

217. Bill Gothard and IBLP served as JANE DOE's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

218. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE.

219. While manipulating and exploiting JANE DOE, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

220. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JANE DOE's breast in a sexual manner.

221. JANE DOE was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1982 to 1988.

222. GRETCHEN WILKINSON did not and could not consent to any of the contact.

223. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE.

224. IBLP did nothing to protect JANE DOE against physical and sexual abuse while she was at IBLP events in Georgia and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

225. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE by Bill Gothard.

226. IBLP acted with a conscious indifference to JANE DOE's health, safety, and welfare.

227. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

228. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE and JANE DOE was and will continue to be caused severe emotional distress.

229. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

230. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 16**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
**(JANE DOE v. IBLP)**

1-56, 160-230. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-230.

231. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE.

232. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE and the conduct of Bill Gothard at its programs and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership

as it pertained to the minor children, including JANE DOE, that Bill Gothard counseled, supervised and lead.

233. At the time of the relevant actions, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE.

234. Bill Gothard and IBLP served as JANE DOE's spiritual advisor, spiritual leader, protector and counselor during her time at the IBLP programs.

235. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE, and the other minor children that Bill Gothard counseled, supervised and lead.

236. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants and employees.

237. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

238. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them during IBLP programs and at various IBLP properties, including IBLP's Hinsdale, Illinois facility.

239. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

240. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JANE DOE and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

241. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JANE DOE.

242. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE.

243. As a direct and proximate result of the conduct of IBLP, JANE DOE was physically and sexually assaulted by Bill Gothard in Georgia at numerous IBLP programs.

244. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JANE DOE, thereby causing injuries and damages to JANE DOE, including severe permanent emotional and psychological distress, and loss of a normal life.

245. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

246. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 17**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
**(JANE DOE v. IBLP)**

1-56, 160-246. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-246.

247. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to the minor children attending IBLP programs, including JANE DOE, that Bill Gothard employed, counseled, supervised and lead.

248. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE and the others attending IBLP programs that Bill Gothard employed, counseled, supervised and lead from criminal acts.

249. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

250. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

251. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts, exploitation and grooming.

252. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

253. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to JANE DOE and the others attending IBLP programs that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing JANE DOE and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

254. As a direct and proximate result of IBLP's failure to defend JANE DOE against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted by Bill Gothard in Georgia at numerous IBLP programs.

255. As a direct and proximate result of IBLP's failures, JANE DOE suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

256. At the time of the abuse, JANE DOE did not appreciate that the act was abusive.

257. JANE DOE was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 18**  
**CIVIL CONSPIRACY**  
**(JANE DOE v. Bill Gothard & IBLP)**

1-56, 160-257. Plaintiff, JANE DOE, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 160-257.

258. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

259. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

260. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

261. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

262. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

263. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

264. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JANE DOE, intended to publicly shame and inflict severe emotional distress to JANE DOE, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JANE DOE.

265. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, JANE DOE has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, JANE DOE prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 19**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Melody Fedoriw v. Bill Gothard)***

1-56. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

266. Between 2011 and 2014, MELODY FEDORIW participated in IBLP programs and became an employee of IBLP.

267. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

268. Notwithstanding said duty as aforesaid, Bill Gothard, in 2012, was guilty of aggravated criminal sexual abuse of a child, to wit, MELODY FEDORIW, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with MELODY FEDORIW, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by touching her breasts and her inner thigh near her vagina.

269. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against MELODY FEDORIW, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

270. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

271. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 20**  
**BATTERY**  
***(Melody Fedoriw v. Bill Gothard)***

1-56, 266-271. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-271.

272. At all times relevant to the abuse, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE.

273. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of MELODY FEDORIW.

274. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching MELODY FEDORIW's breasts and rubbing MELODY FEDORIW's legs, inner thigh near her vagina and back in a sexual manner.

275. The aforesaid physical and sexual contact was harmful and/or offensive.

276. The aforesaid actions on the part of Bill Gothard occurred while MELODY FEDORIW was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

277. MELODY FEDORIW did not and could not consent to any of the contact and conduct.

278. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against MELODY FEDORIW, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

279. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

280. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 21**  
**INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
***(Melody Fedoriw v. Bill Gothard)***

1-56, 266-280. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-280.

281. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MELODY FEDORIW.

282. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MELODY FEDORIW to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MELODY FEDORIW.

283. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited MELODY FEDORIW for purposes of his own gratification without regard to its impact upon the well-being of MELODY FEDORIW.

284. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching MELODY FEDORIW's breasts and rubbing MELODY FEDORIW's legs, inner thigh near her vagina and back in a sexual manner.

285. MELODY FEDORIW was a minor at all times relevant hereto when Bill Gothard engaged in the aforementioned unwanted physical and sexual contact and conduct.

286. MELODY FEDORIW did not and could not consent to any of the contact.

287. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MELODY FEDORIW, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MELODY FEDORIW.

288. As a direct and proximate result of the aforesaid conduct by Bill Gothard against MELODY FEDORIW, MELODY FEDORIW was and will continue to be caused severe emotional distress.

289. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

290. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 22**  
**NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Melody Fedoriw v. Bill Gothard)***

1-56, 266-290. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-290.

291. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MELODY FEDORIW.

292. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom MELODY FEDORIW could trust, seek advice and confide.

293. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MELODY FEDORIW to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MELODY FEDORIW.

294. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited MELODY FEDORIW for purposes of his own gratification without regard to its impact upon the well-being of MELODY FEDORIW.

295. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching MELODY FEDORIW's breasts and rubbing MELODY FEDORIW's legs, inner thigh near her vagina and back in a sexual manner.

296. MELODY FEDORIW did not and could not consent to any of the contact.

297. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MELODY FEDORIW, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MELODY FEDORIW.

298. As a direct and proximate result of the aforesaid conduct by Bill Gothard against MELODY FEDORIW, MELODY FEDORIW was and will continue to be caused severe emotional distress.

299. Bill Gothard negligently caused severe emotional distress to MELODY FEDORIW.

300. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

301. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 23**  
**VICARIOUS LIABILITY – BATTERY**  
**(*Melody Fedoriw v. IBLP*)**

1-56, 266-301. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-301.

302. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

303. Bill Gothard sexually abused MELODY FEDORIW. In doing so, he intended to cause and made harmful and/or offensive contact with MELODY FEDORIW's person.

304. MELODY FEDORIW did not and could not consent to any of the contact.

305. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MELODY FEDORIW.

306. Bill Gothard and IBLP served as MELODY FEDORIW's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

307. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to MELODY FEDORIW.

308. While grooming, manipulating and exploiting MELODY FEDORIW, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

309. IBLP did nothing to protect MELODY FEDORIW against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

310. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to MELODY FEDORIW by Bill Gothard.

311. IBLP acted with a conscious indifference to MELODY FEDORIW's health, safety, and welfare.

312. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

313. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused MELODY FEDORIW and MELODY FEDORIW was and will continue to be caused severe emotional distress.

314. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

315. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 24**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Melody Fedoriw v. IBLP)***

1-56, 266-315. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-315.

316. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to MELODY FEDORIW.

317. At all times relevant to the abuse, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MELODY FEDORIW.

318. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of MELODY FEDORIW.

319. Bill Gothard and IBLP served as MELODY FEDORIW's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

320. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MELODY FEDORIW to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MELODY FEDORIW.

321. While manipulating and exploiting MELODY FEDORIW, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

322. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching MELODY FEDORIW's breasts and rubbing MELODY FEDORIW's legs, inner thigh near her vagina and back in a sexual manner.

323. MELODY FEDORIW was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 2013 and 2014.

324. MELODY FEDORIW did not and could not consent to any of the contact.

325. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MELODY FEDORIW, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MELODY FEDORIW.

326. IBLP did nothing to protect MELODY FEDORIW against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

327. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to MELODY FEDORIW by Bill Gothard.

328. IBLP acted with a conscious indifference to MELODY FEDORIW's health, safety, and welfare.

329. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4

and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

330. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused MELODY FEDORIW and MELODY FEDORIW was and will continue to be caused severe emotional distress.

331. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

332. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 25**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Melody Fedoriw v. IBLP)***

1-56, 266-332. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-332.

333. At all times relevant herein, IBLP was in a supervisory position as it pertained to MELODY FEDORIW and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including MELODY FEDORIW, that Bill Gothard employed, counseled, supervised and lead.

334. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MELODY FEDORIW.

335. Bill Gothard and IBLP served as MELODY FEDORIW's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

336. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of MELODY FEDORIW, and the others that Bill Gothard employed, counseled, supervised and lead.

337. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

338. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

339. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

340. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

341. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and

continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing MELODY FEDORIW and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

342. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched MELODY FEDORIW and his physical contact with MELODY FEDORIW intensified in frequency and type of touching.

343. As a direct and proximate result of the conduct of IBLP, Bill Gothard's grooming of MELODY FEDORIW led to psychological manipulation, inappropriate physical contact and sexual contact and exploitation.

344. As a direct and proximate result of the conduct of IBLP, MELODY FEDORIW was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

345. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on MELODY FEDORIW, thereby causing injuries and damages to MELODY FEDORIW, including severe permanent emotional and psychological distress, and loss of a normal life.

346. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

347. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 26**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Melody Fedoriw v. IBLP)***

1-56, 266-347. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-347.

348. At all times relevant herein, IBLP was in a supervisory position as it pertained to MELODY FEDORIW and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including MELODY FEDORIW, that Bill Gothard employed, counseled, supervised and lead.

349. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of MELODY FEDORIW and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

350. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

351. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

352. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

353. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

354. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to MELODY FEDORIW and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing MELODY FEDORIW and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

355. As a direct and proximate result of IBLP's failure to defend MELODY FEDORIW against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

356. As a direct and proximate result of IBLP's failures, MELODY FEDORIW suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

357. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

358. MELODY FEDORIW was suffering from a condition that caused her to repress the memories of abuse and/or MELODY FEDORIW did not know her injuries were caused by the abuse.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 27**  
**CIVIL CONSPIRACY**  
***(Melody Fedoriw v. Bill Gothard & IBLP)***

1-56, 266-358. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-358.

359. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

360. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

361. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

362. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

363. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

364. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

365. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against MELODY FEDORIW, intended to publicly shame and inflict severe emotional distress to MELODY FEDORIW, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to MELODY FEDORIW.

366. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, MELODY FEDORIW has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 28**  
**VIOLATION OF THE GENDER VIOLENCE ACT**  
***(MELODY FEDORIW v. Bill Gothard)***

1-56, 266-366. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-3366.

367. In 2013 and 2014, Bill Gothard engaged in unwanted physical and sexual contact and conduct with MELODY FEDORIW, including touching MELODY FEDORIW's breasts and rubbing MELODY FEDORIW's legs, inner thigh near her vagina, and back in a sexual manner.

368. The aforesaid physical and sexual contact was harmful and/or offensive.

369. MELODY FEDORIW did not consent to any of the contact and conduct.

370. At all times relevant to Bill Gothard's unwanted contact with MELODY FEDORIW in 2013 and 2014, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

371. Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of Illinois and this constitutes gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

372. As a direct and proximate result of Bill Gothard's conduct, MELODY FEDORIW has been subjected to gender-related violence, and pursuant to Section 15 of the Act, 740 ILCS 82/15, may recover from Bill Gothard compensatory damages, punitive damages, plaintiff's attorney's fees, and her costs of suit in pursuing this action.

373. At the time of the abuse, MELODY FEDORIW did not appreciate that the act was abusive.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against defendant Bill Gothard, for an amount in excess of \$50,000.00, plus punitive damages in an

amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 29**  
**VIOLATION OF THE GENDER VIOLENCE ACT**  
**(*MELODY FEDORIW v. IBLP*)**

1-56, 266-373. Plaintiff, MELODY FEDORIW, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 266-373.

374. At all times relevant hereto, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

375. At all times relevant hereto, the defendant, IBLP, owed MELODY FEDORIW a duty of reasonable care, which included a duty to protect her from the risk of assault by its employees with known sexual deviant propensities, known histories of sexual misconduct, and known histories of physical intrusions of a sexual nature.

376. Defendant Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of Illinois and thus constituting gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

377. At all times relevant hereto, defendant IBLP knew of the necessity and had the opportunity and ability to control its employee Bill Gothard to prevent him from sexually assaulting and committing gender-related violence on MELODY FEDORIW.

378. The defendant IBLP perpetrated gender-related violence by encouraging or assisting Bill Gothard by its failure to supervise and monitor Bill Gothard; and after IBLP learned of and was aware of Bill Gothard's deviant sexual tendencies, history of sexual misconduct, and history of physical intrusions of a sexual nature, doing nothing about it and doing nothing to secure the safety of MELODY FEDORIW.

379. The defendant IBLP perpetrated gender-related violence by assisting the acts of gender-related violence by allowing Bill Gothard to be alone with MELODY FEDORIW and allowing him to touch MELODY FEDORIW after IBLP knew or should have known that John Gothard had inappropriately touched other girls under IBLP's care.

380. The defendant IBLP's actions violated the Illinois Gender Violence Act.

381. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, as described above, MELODY FEDORIW was sexually assaulted and battered by John Gothard.

382. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, MELODY FEDORIW has suffered mental anguish.

383. Because of IBLP's violation of the Illinois Gender Violence Act, MELODY FEDORIW has been subjected to gender-related violence and pursuant to Section 15 of the Act, 740 ILCS 82/15, may recover from IBLP compensatory damages, punitive damages, and plaintiff's attorney's fees and costs in bringing this action.

**WHEREFORE**, MELODY FEDORIW prays for judgment in her favor and against defendant IBLP, for an amount in excess of \$50,000.00, plus punitive damages in an amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 30**  
**BATTERY**  
***(Charis Barker v. Bill Gothard)***

1-56. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

384. Between 1999 and 2000, CHARIS BARKER participated in IBLP programs and became an employee of IBLP.

385. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of CHARIS BARKER.

386. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching CHARIS BARKER's legs and inner thighs with his feet and rubbing her legs with his hands in a sexual manner.

387. The aforesaid physical and sexual contact was harmful and/or offensive.

388. CHARIS BARKER did not consent to any of the contact and conduct.

389. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against CHARIS BARKER, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

390. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

391. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 31**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Charis Barker v. Bill Gothard)***

1-56, 384-391. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-391.

392. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CHARIS BARKER.

393. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CHARIS BARKER to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CHARIS BARKER.

394. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited CHARIS BARKER for purposes of his own gratification without regard to its impact upon the well-being of CHARIS BARKER.

395. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching CHARIS BARKER's legs and inner thighs with his feet and rubbing her legs with his hands in a sexual manner.

396. CHARIS BARKER did not consent to any of the contact.

397. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CHARIS BARKER, or

knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CHARIS BARKER.

398. As a direct and proximate result of the aforesaid conduct by Bill Gothard against CHARIS BARKER, CHARIS BARKER was and will continue to be caused severe emotional distress.

399. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

400. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 32**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Charis Barker v. Bill Gothard)***

1-56, 384-400. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-400.

401. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CHARIS BARKER.

402. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom CHARIS BARKER could trust, seek advice and confide.

403. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CHARIS BARKER to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CHARIS BARKER.

404. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited CHARIS BARKER for purposes of his own gratification without regard to its impact upon the well-being of CHARIS BARKER.

405. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching CHARIS BARKER's legs and inner thighs with his feet and rubbing her legs with his hands in a sexual manner.

406. CHARIS BARKER did not consent to any of the contact.

407. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CHARIS BARKER, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CHARIS BARKER.

408. As a direct and proximate result of the aforesaid conduct by Bill Gothard against CHARIS BARKER, CHARIS BARKER was and will continue to be caused severe emotional distress.

409. Bill Gothard negligently caused severe emotional distress to CHARIS BARKER.

410. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

411. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 33**  
**VICARIOUS LIABILITY – BATTERY**  
**(*Charis Barker v. IBLP*)**

1-56, 384-411. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-411.

412. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

413. Bill Gothard sexually abused CHARIS BARKER. In doing so, he intended to cause and made harmful and/or offensive contact with CHARIS BARKER's person.

414. CHARIS BARKER did not consent to any of the contact.

415. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CHARIS BARKER.

416. Bill Gothard and IBLP served as CHARIS BARKER's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

417. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to CHARIS BARKER.

418. While grooming, manipulating and exploiting CHARIS BARKER, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

419. IBLP did nothing to protect CHARIS BARKER against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

420. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to CHARIS BARKER by Bill Gothard.

421. IBLP acted with a conscious indifference to CHARIS BARKER's health, safety, and welfare.

422. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

423. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused CHARIS BARKER and CHARIS BARKER was and will continue to be caused severe emotional distress.

424. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

425. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 34**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Charis Barker v. IBLP)***

1-56, 384-425. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-425.

426. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to CHARIS BARKER.

427. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CHARIS BARKER.

428. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of CHARIS BARKER.

429. Bill Gothard and IBLP served as CHARIS BARKER's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

430. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CHARIS BARKER to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CHARIS BARKER

431. While manipulating and exploiting CHARIS BARKER, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

432. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching CHARIS BARKER's legs and inner thighs with his feet and rubbing her legs with his hands in a sexual manner.

433. CHARIS BARKER did not consent to any of the contact and conduct.

434. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CHARIS BARKER, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CHARIS BARKER.

435. IBLP did nothing to protect CHARIS BARKER against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

436. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to CHARIS BARKER by Bill Gothard.

437. IBLP acted with a conscious indifference to CHARIS BARKER's health, safety, and welfare.

438. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

439. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused CHARIS BARKER and CHARIS BARKER was and will continue to be caused severe emotional distress.

440. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

441. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 35**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Charis Barker v. IBLP)***

1-56, 384-441. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-441.

442. At all times relevant herein, IBLP was in a supervisory position as it pertained to CHARIS BARKER and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including CHARIS BARKER, that Bill Gothard employed, counseled, supervised and lead.

443. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CHARIS BARKER.

444. Bill Gothard and IBLP served as CHARIS BARKER's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

445. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of CHARIS BARKER, and the others that Bill Gothard employed, counseled, supervised and lead.

446. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

447. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

448. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

449. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

450. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing CHARIS BARKER and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

451. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched CHARIS BARKER and his physical contact with CHARIS BARKER became more frequent and inappropriate.

452. As a direct and proximate result of the conduct of IBLP, Bill Gothard's grooming of CHARIS BARKER led to psychological manipulation, inappropriate physical contact and sexual contact and exploitation.

453. As a direct and proximate result of the conduct of IBLP, CHARIS BARKER was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

454. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on CHARIS BARKER, thereby causing injuries and damages to CHARIS BARKER, including severe permanent emotional and psychological distress, and loss of a normal life.

455. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

456. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 36**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Charis Barker v. IBLP)***

1-56, 384-456. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-456.

457. At all times relevant herein, IBLP was in a supervisory position as it pertained to CHARIS BARKER and the conduct of Bill Gothard and IBLP knew, or reasonably should have

known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including CHARIS BARKER, that Bill Gothard employed, counseled, supervised and lead.

458. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of CHARIS BARKER and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

459. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

460. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

461. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

462. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

463. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to CHARIS BARKER and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have

known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing CHARIS BARKER and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

464. As a direct and proximate result of IBLP's failure to defend CHARIS BARKER against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

465. As a direct and proximate result of IBLP's failures, CHARIS BARKER suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

466. At the time of the abuse, CHARIS BARKER did not appreciate that the act was abusive.

467. CHARIS BARKER was suffering from a condition that caused her to repress the memories of abuse and/or CHARIS BARKER did not know her injuries were caused by the abuse.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 37**  
**CIVIL CONSPIRACY**  
***(Charis Barker v. Bill Gothard & IBLP)***

1-56, 384-467. Plaintiff, CHARIS BARKER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 384-467.

468. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-

conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

469. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

470. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

471. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

472. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

473. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

474. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against CHARIS BARKER, intended to publicly shame and inflict severe emotional distress to CHARIS BARKER, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to CHARIS BARKER.

475. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, CHARIS BARKER has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, CHARIS BARKER prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 37**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Rachel Frost v. Bill Gothard)***

1-56. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

476. Between 1992 and 1995, RACHEL FROST participated in IBLP programs and became an employee of IBLP.

477. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

478. Notwithstanding said duty as aforesaid, Bill Gothard, in 1992 through 1993, was guilty of aggravated criminal sexual abuse of a child, to wit, RACHEL FROST, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with RACHEL FROST, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

479. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against RACHEL FROST, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

480. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

481. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 38**  
**BATTERY**  
***(Rachel Frost v. Bill Gothard)***

1-56, 476-481. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-481.

482. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of RACHEL FROST.

483. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching RACHEL FROST's thighs and shoulders with his hands in a sexual manner, rubbing his foot up RACHEL FROST's legs in a sexual manner and grabbing her by the hair/neck in a sexual manner.

484. The aforesaid physical and sexual contact was harmful and/or offensive.

485. The aforesaid actions on the part of Bill Gothard occurred while RACHEL FROST was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

486. The aforesaid actions on the part of Bill Gothard continued until RACHEL FROST was approximately 18 years old.

487. RACHEL FROST did not and could not consent to any of the contact that occurred between 1992 and 1994 and did not consent to the contact that occurred between 1994 and 1995.

488. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against RACHEL FROST, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

489. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

490. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 39**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Rachel Frost v. Bill Gothard)***

1-56, 476-490. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-490.

491. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL FROST.

492. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL FROST to

experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL FROST.

493. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited RACHEL FROST for purposes of his own gratification without regard to its impact upon the well-being of RACHEL FROST.

494. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching RACHEL FROST's thighs and shoulders with his hands in a sexual manner, rubbing his foot up RACHEL FROST's legs in a sexual manner and grabbing her by the hair/neck in a sexual manner.

495. RACHEL FROST was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1992 and 1994.

496. RACHEL FROST did not and could not consent to any of the contact that occurred between 1992 and 1994 and did not consent to the contact that occurred between 1994 and 1995.

497. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL FROST, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL FROST.

498. As a direct and proximate result of the aforesaid conduct by Bill Gothard against RACHEL FROST, RACHEL FROST was and will continue to be caused severe emotional distress.

499. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

500. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 40**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Rachel Frost v. Bill Gothard)***

1-56, 476-500. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-500.

501. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL FROST.

502. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom RACHEL FROST could trust, seek advice and confide.

503. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL FROST to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL FROST.

504. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited RACHEL FROST for purposes of his own gratification without regard to its impact upon the well-being of RACHEL FROST.

505. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching RACHEL FROST's thighs and shoulders with his hands in a sexual manner, rubbing his foot up RACHEL FROST's legs in a sexual manner and grabbing her by the hair/neck in a sexual manner.

506. RACHEL FROST did not and could not consent to any of the contact that occurred between 1992 and 1994 and did not consent to the contact that occurred between 1994 and 1995.

507. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL FROST, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL FROST.

508. As a direct and proximate result of the aforesaid conduct by Bill Gothard against RACHEL FROST, RACHEL FROST was and will continue to be caused severe emotional distress.

509. Bill Gothard negligently caused severe emotional distress to RACHEL FROST.

510. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

511. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 41**  
**VICARIOUS LIABILITY – BATTERY**  
***(Rachel Frost v. IBLP)***

1-56, 476-511. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-511.

512. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

513. Bill Gothard sexually abused RACHEL FROST. In doing so, he intended to cause and made harmful and/or offensive contact with RACHEL FROST's person.

514. RACHEL FROST did not and could not consent to any of the contact that occurred between 1992 and 1994 and did not consent to the contact that occurred between 1994 and 1995.

515. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL FROST.

516. Bill Gothard and IBLP served as RACHEL FROST's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

517. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to RACHEL FROST.

518. While grooming, manipulating and exploiting RACHEL FROST, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

519. IBLP did nothing to protect RACHEL FROST against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

520. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RACHEL FROST by Bill Gothard.

521. IBLP acted with a conscious indifference to RACHEL FROST's health, safety, and welfare.

522. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

523. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused RACHEL FROST and RACHEL FROST was and will continue to be caused severe emotional distress.

524. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

525. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 42**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Rachel Frost v. IBLP)***

1-56, 476-525. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-525.

526. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL FROST.

527. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL FROST.

528. Bill Gothard and IBLP served as RACHEL FROST's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

529. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of RACHEL FROST.

530. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL FROST to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL FROST

531. While manipulating and exploiting RACHEL FROST, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

532. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching RACHEL FROST's thighs and shoulders with his hands in a sexual manner, rubbing his foot up RACHEL FROST's legs in a sexual manner and grabbing her by the hair/neck in a sexual manner.

533. RACHEL FROST did not and could not consent to any of the contact that occurred between 1992 and 1994 and did not consent to the contact that occurred between 1994 and 1995.

534. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL FROST, or knew

that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL FROST.

535. IBLP did nothing to protect RACHEL FROST against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

536. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RACHEL FROST by Bill Gothard.

537. IBLP acted with a conscious indifference to RACHEL FROST's health, safety, and welfare.

538. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

539. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused RACHEL FROST and RACHEL FROST was and will continue to be caused severe emotional distress.

540. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

541. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 43**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Rachel Frost v. IBLP)***

1-56, 476-541. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-541.

542. At all times relevant herein, IBLP was in a supervisory position as it pertained to RACHEL FROST and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including RACHEL FROST, that Bill Gothard employed, counseled, supervised and lead.

543. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL FROST.

544. Bill Gothard and IBLP served as RACHEL FROST's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

545. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of RACHEL FROST, and the others that Bill Gothard employed, counseled, supervised and lead.

546. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

547. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

548. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

549. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

550. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing RACHEL FROST and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

551. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched RACHEL FROST and his physical contact with RACHEL FROST intensified in frequency and type of touching.

552. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched RACHEL FROST and his physical contact with RACHEL FROST became more frequent and inappropriate.

553. As a direct and proximate result of the conduct of IBLP, Bill Gothard's grooming of RACHEL FROST led to psychological manipulation, inappropriate physical contact and sexual contact and exploitation.

554. As a direct and proximate result of the conduct of IBLP, RACHEL FROST was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

555. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on RACHEL FROST, thereby causing injuries and damages to RACHEL FROST, including severe permanent emotional and psychological distress, and loss of a normal life.

556. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

557. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 44**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Rachel Frost v. IBLP)***

1-56, 476-557. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-557.

558. At all times relevant herein, IBLP was in a supervisory position as it pertained to RACHEL FROST and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including RACHEL FROST, that Bill Gothard employed, counseled, supervised and lead.

559. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of RACHEL FROST and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

560. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

561. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

562. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

563. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

564. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to RACHEL FROST and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing RACHEL FROST and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

565. As a direct and proximate result of IBLP's failure to defend RACHEL FROST against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

566. As a direct and proximate result of IBLP's failures, RACHEL FROST suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

567. At the time of the abuse, RACHEL FROST did not appreciate that the act was abusive.

568. RACHEL FROST was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL FROST did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 45**  
**CIVIL CONSPIRACY**  
***(Rachel Frost v. Bill Gothard & IBLP)***

1-56, 476-568. Plaintiff, RACHEL FROST, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 476-568.

569. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

570. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

571. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

572. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

573. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

574. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

575. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against RACHEL FROST, intended to publicly shame and inflict severe emotional distress to RACHEL FROST, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to RACHEL FROST.

576. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, RACHEL FROST has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, RACHEL FROST prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 46**  
**BATTERY**  
***(Rachel Lees v. Bill Gothard)***

1-56. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

577. Between 1992 and 1996, RACHEL LEES participated in IBLP programs and became an employee of IBLP.

578. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL LEES.

579. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL LEES.

580. Bill Gothard and IBLP served as RACHEL LEES's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

581. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of RACHEL LEES.

582. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing RACHEL LEES's legs with his feet in a sexual manner, rubbing her shoulders in a sexual manner, holding RACHEL LEE's hand on his inner thighs in a sexual manner, placing his head on RACHEL LEE's chest and rubbing his face and lips against RACHEL LEE's face in a sexual manner.

583. The aforesaid physical and sexual contact was harmful and/or offensive.

584. RACHEL LEES did not consent to any of the contact and conduct.

585. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against RACHEL LEES, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

586. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

587. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 47**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Rachel Lees v. Bill Gothard)***

1-56, 577-587. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-587.

588. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL LEES.

589. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL LEES to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL LEES.

590. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited RACHEL LEES for purposes of his own gratification without regard to its impact upon the well-being of RACHEL LEES.

591. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing RACHEL LEES's legs with his feet in a sexual manner, rubbing her shoulders in a sexual manner, holding RACHEL LEE's hand on his inner thighs in a sexual manner, placing his head on RACHEL LEE's chest and rub his face and lips against RACHEL LEE's face in a sexual manner.

592. RACHEL LEES did not consent to any of the contact.

593. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL LEES, or knew

that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL LEES.

594. As a direct and proximate result of the aforesaid conduct by Bill Gothard against RACHEL LEES, RACHEL LEES was and will continue to be caused severe emotional distress.

595. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

596. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 48**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Rachel Lees v. Bill Gothard)***

1-56, 577-596. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-596.

597. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL LEES.

598. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom RACHEL LEES could trust, seek advice and confide.

599. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL LEES to

experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL LEES.

600. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited RACHEL LEES for purposes of his own gratification without regard to its impact upon the well-being of RACHEL LEES.

601. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing RACHEL LEES's legs with his feet in a sexual manner, rubbing her shoulders in a sexual manner, holding RACHEL LEE's hand on his inner thighs in a sexual manner, placing his head on RACHEL LEE's chest and rub his face and lips against RACHEL LEE's face in a sexual manner.

602. RACHEL LEES did not consent to any of the contact.

603. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL LEES, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL LEES.

604. As a direct and proximate result of the aforesaid conduct by Bill Gothard against RACHEL LEES, RACHEL LEES was and will continue to be caused severe emotional distress.

605. Bill Gothard negligently caused severe emotional distress to RACHEL LEES.

606. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

607. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 49**  
**VICARIOUS LIABILITY – BATTERY**  
***(Rachel Lees v. IBLP)***

1-56, 577-607. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-607.

608. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

609. Bill Gothard sexually abused RACHEL LEES. In doing so, he intended to cause and made harmful and/or offensive contact with RACHEL LEES's person.

610. RACHEL LEES did not consent to any of the contact.

611. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL LEES.

612. Bill Gothard and IBLP served as RACHEL LEES's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

613. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to RACHEL LEES.

614. While grooming, manipulating and exploiting RACHEL LEES, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

615. IBLP did nothing to protect RACHEL LEES against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

616. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RACHEL LEES by Bill Gothard.

617. IBLP acted with a conscious indifference to RACHEL LEES's health, safety, and welfare.

618. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

619. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused RACHEL LEES and RACHEL LEES was and will continue to be caused severe emotional distress.

620. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

621. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 50**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**(*Rachel Lees v. IBLP*)**

1-56, 577-621. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-621.

622. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RACHEL LEES.

623. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL LEES.

624. Bill Gothard and IBLP served as RACHEL LEES's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

625. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of RACHEL LEES.

626. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause RACHEL LEES to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and RACHEL LEES

627. While manipulating and exploiting RACHEL LEES, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

628. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing RACHEL LEES's legs with his feet in a sexual manner, rubbing her shoulders in a sexual manner, holding RACHEL LEE's hand on his inner

thighs in a sexual manner, placing his head on RACHEL LEE's chest and rub his face and lips against RACHEL LEE's face in a sexual manner.

629. RACHEL LEES did not consent to any of the contact.

630. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RACHEL LEES, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RACHEL LEES.

631. IBLP did nothing to protect RACHEL LEES against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

632. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RACHEL LEES by Bill Gothard.

633. IBLP acted with a conscious indifference to RACHEL LEES's health, safety, and welfare.

634. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

635. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused RACHEL LEES and RACHEL LEES was and will continue to be caused severe emotional distress.

636. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

637. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 51**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Rachel Lees v. IBLP)***

1-56, 577-637. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-637.

638. At all times relevant herein, IBLP was in a supervisory position as it pertained to RACHEL LEES and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including RACHEL LEES, that Bill Gothard employed, counseled, supervised and lead.

639. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for RACHEL LEES.

640. Bill Gothard and IBLP served as RACHEL LEES's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

641. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of RACHEL LEES, and the others that Bill Gothard employed, counseled, supervised and lead.

642. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

643. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

644. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

645. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

646. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing RACHEL LEES and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

647. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched RACHEL LEES and his physical contact with RACHEL LEES became more frequent and inappropriate.

648. As a direct and proximate result of the conduct of IBLP, Bill Gothard's grooming of RACHEL LEES led to psychological manipulation, inappropriate physical contact and sexual contact and exploitation.

649. As a direct and proximate result of the conduct of IBLP, RACHEL LEES was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP, in several other states and other countries throughout the world.

650. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on RACHEL LEES, thereby causing injuries and damages to RACHEL LEES, including severe permanent emotional and psychological distress, and loss of a normal life.

651. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

652. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 52**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Rachel Lees v. IBLP)***

1-56, 577-652. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-652.

653. At all times relevant herein, IBLP was in a supervisory position as it pertained to RACHEL LEES and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including RACHEL LEES, that Bill Gothard employed, counseled, supervised and lead.

654. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of RACHEL LEES and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

655. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

656. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

657. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

658. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

659. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to RACHEL LEES and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing RACHEL LEES and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

660. As a direct and proximate result of the conduct of IBLP, RACHEL LEES was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP, in several other states and other countries throughout the world.

661. As a direct and proximate result of IBLP's failures, RACHEL LEES suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

662. At the time of the abuse, RACHEL LEES did not appreciate that the act was abusive.

663. RACHEL LEES was suffering from a condition that caused her to repress the memories of abuse and/or RACHEL LEES did not know her injuries were caused by the abuse.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 53**  
**CIVIL CONSPIRACY**  
***(Rachel Lees v. Bill Gothard & IBLP)***

1-56, 577-663. Plaintiff, RACHEL LEES, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 577-663.

664. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

665. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

666. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

667. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

668. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

669. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

670. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against RACHEL LEES, intended to publicly shame and inflict severe emotional distress to RACHEL LEES, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to RACHEL LEES.

671. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, RACHEL LEES has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, RACHEL LEES prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 54**  
**BATTERY**  
***(Jane Doe III v. Bill Gothard)***

1-56. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

672. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE III.

673. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE III.

674. Bill Gothard and IBLP served as JANE DOE III's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

675. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE III.

676. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including placing his hand on JANE DOE III's leg and inner thigh in a sexual manner, rubbing JANE DOE III's shoulders, arms and hands in a sexual manner and rub his feet on JANE DOE III's feet in a sexual manner.

677. The aforesaid physical and sexual contact was harmful and/or offensive.

678. JANE DOE III did not consent to any of the contact and conduct.

679. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JANE DOE III, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

680. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

681. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 55**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe III v. Bill Gothard)***

1-56, 672-681. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-681.

682. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE III.

683. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE III to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE III.

684. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE III for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE III.

685. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including placing his hand on JANE DOE III's leg and inner thigh in a sexual manner, rubbing JANE DOE III's shoulders, arms and hands in a sexual manner and rub his feet on JANE DOE III's feet in a sexual manner.

686. JANE DOE III did not and could not consent to any of the contact.

687. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE III, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE III.

688. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE III, JANE DOE III was and will continue to be caused severe emotional distress.

689. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

690. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 56**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jane Doe III v. Bill Gothard)***

1-56, 672-690. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-690.

691. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE III.

692. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JANE DOE III could trust, seek advice and confide.

693. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE III to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE III.

694. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE III for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE III.

695. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including placing his hand on JANE DOE III's leg and inner thigh in a sexual manner, rubbing JANE DOE III's shoulders, arms and hands in a sexual manner and rub his feet on JANE DOE III's feet in a sexual manner.

696. JANE DOE III did not and could not consent to any of the contact.

697. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE III, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE III.

698. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE III, JANE DOE III was and will continue to be caused severe emotional distress.

699. Bill Gothard negligently caused severe emotional distress to JANE DOE III.

700. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

701. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 57**  
**VICARIOUS LIABILITY – BATTERY**  
**(*Jane Doe III v. IBLP*)**

1-56, 672-701. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-701.

702. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

703. Bill Gothard sexually abused JANE DOE III. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE III's person.

704. JANE DOE III did not consent to any of the contact.

705. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE III.

706. Bill Gothard and IBLP served as JANE DOE III's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

707. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JANE DOE III.

708. While grooming, manipulating and exploiting JANE DOE III, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

709. IBLP did nothing to protect JANE DOE III against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

710. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE III by Bill Gothard.

711. IBLP acted with a conscious indifference to JANE DOE III's health, safety, and welfare.

712. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

713. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE III and JANE DOE III was and will continue to be caused severe emotional distress.

714. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

715. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 58**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe III v. IBLP)***

1-56, 672-715. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-715.

716. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE III.

717. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE III.

718. Bill Gothard and IBLP served as JANE DOE III's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

719. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE III.

720. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE III to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE III

721. While manipulating and exploiting JANE DOE III, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

722. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including placing his hand on JANE DOE III's leg and inner thigh in a sexual manner, rubbing JANE DOE III's shoulders, arms and hands in a sexual manner and rub his feet on JANE DOE III's feet in a sexual manner.

723. JANE DOE III did not consent to any of the contact.

724. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE III, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE III.

725. IBLP did nothing to protect JANE DOE III against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

726. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE III by Bill Gothard.

727. IBLP acted with a conscious indifference to JANE DOE III's health, safety, and welfare.

728. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

729. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE III and JANE DOE III was and will continue to be caused severe emotional distress.

730. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

731. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 59**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jane Doe III v. IBLP)***

1-56, 672-731. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-731.

732. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE III and the conduct of Bill Gothard and IBLP knew, or reasonably should have known,

that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including JANE DOE III, that Bill Gothard employed, counseled, supervised and lead.

733. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE III.

734. Bill Gothard and IBLP served as JANE DOE III's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

735. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE III, and the others that Bill Gothard employed, counseled, supervised and lead.

736. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

737. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

738. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

739. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

740. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JANE DOE III and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

741. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched JANE DOE III and his physical contact with JANE DOE III intensified in frequency and type of touching.

742. As a direct and proximate result of the conduct of IBLP, Bill Gothard's grooming of JANE DOE III led to psychological manipulation, inappropriate physical contact and sexual contact and exploitation.

743. As a direct and proximate result of the conduct of IBLP, JANE DOE III was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

744. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JANE DOE III, thereby causing injuries and damages to JANE DOE III, including severe permanent emotional and psychological distress, and loss of a normal life.

745. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

746. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 60**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jane Doe III v. IBLP)***

1-56, 672-746. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-746.

747. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE III and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, volunteers and employees, including JANE DOE III, that Bill Gothard employed, counseled, supervised and lead.

748. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE III and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

749. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

750. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

751. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

752. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

753. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to JANE DOE III and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing JANE DOE III and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

754. As a direct and proximate result of IBLP's failure to defend JANE DOE III against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

755. As a direct and proximate result of IBLP's failures, JANE DOE III suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

756. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

757. JANE DOE III was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE III did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 61**  
**CIVIL CONSPIRACY**  
***(Jane Doe III v. Bill Gothard & IBLP)***

1-56, 672-757. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-757.

758. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

759. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

760. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

761. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

762. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

763. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

764. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JANE DOE III, intended to publicly shame and inflict severe emotional distress to JANE DOE III, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JANE DOE III.

765. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, 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**, JANE DOE III prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 62**  
**VIOLATION OF THE GENDER VIOLENCE ACT**  
**(JANE DOE III v. Bill Gothard)**

1-56, 672-765. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-765.

766. In 2011, Bill Gothard engaged in unwanted physical and sexual contact and conduct with JANE DOE III, including placing his hand on JANE DOE III's leg and inner thigh in a sexual manner, rubbing JANE DOE III's shoulders, arms, and hands in a sexual manner and rubbing his feet on JANE DOE III's feet in a sexual manner.

767. The aforesaid physical and sexual contact was harmful and/or offensive.

768. JANE DOE III did not consent to any of the contact and conduct.

769. At all times relevant to Bill Gothard's unwanted contact with JANE DOE III, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

770. Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of Illinois and this constitutes gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

771. As a direct and proximate result of Bill Gothard's conduct, JANE DOE III has been subjected to gender-related violence, and pursuant to Section 15 of the Act, 740 ILCS 82/15, may

recover from Bill Gothard compensatory damages, punitive damages, plaintiff's attorney's fees, and her costs of suit in pursuing this action.

772. At the time of the abuse, JANE DOE III did not appreciate that the act was abusive.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against defendant Bill Gothard, for an amount in excess of \$50,000.00, plus punitive damages in an amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 63**  
**VIOLATION OF THE GENDER VIOLENCE ACT**  
**(JANE DOE III v. IBLP)**

1-56, 672-772. Plaintiff, JANE DOE III, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 672-772.

773. At all times relevant hereto, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

774. At all times relevant hereto, the defendant, IBLP, owed JANE DOE III a duty of reasonable care, which included a duty to protect her from the risk of assault by its employees with known sexual deviant propensities, known histories of sexual misconduct, and known histories of physical intrusions of a sexual nature.

775. Defendant Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of

Illinois and thus constituting gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

776. At all times relevant hereto, defendant IBLP knew of the necessity and had the opportunity and ability to control its employee Bill Gothard to prevent him from sexually assaulting and committing gender-related violence on JANE DOE III.

777. The defendant IBLP perpetrated gender-related violence by encouraging or assisting Bill Gothard by its failure to supervise and monitor Bill Gothard; and after IBLP learned of and was aware of Bill Gothard's deviant sexual tendencies, history of sexual misconduct, and history of physical intrusions of a sexual nature, doing nothing about it and doing nothing to secure the safety of JANE DOE III.

778. The defendant IBLP perpetrated gender-related violence by assisting the acts of gender-related violence by allowing Bill Gothard to be alone with JANE DOE III and allowing him to touch JANE DOE III after IBLP knew or should have known that John Gothard had inappropriately touched other girls under IBLP's care.

779. The defendant IBLP's actions violated the Illinois Gender Violence Act.

780. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, as described above, JANE DOE III was sexually assaulted and battered by John Gothard.

781. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, JANE DOE III has suffered mental anguish.

782. Because of IBLP's violation of the Illinois Gender Violence Act, JANE DOE III has been subjected to gender-related violence and pursuant to Section 15 of the Act, 740 ILCS 82/15, may recover from IBLP compensatory damages, punitive damages, and plaintiff's attorney's fees and costs in bringing this action.

**WHEREFORE**, JANE DOE III prays for judgment in her favor and against defendant IBLP, for an amount in excess of \$50,000.00, plus punitive damages in an amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 64**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jamie Deering v. Bill Gothard)***

1-56. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

783. Between 1993 and 1999, JAMIE DEERING participated in IBLP programs and became an employee of IBLP.

784. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

785. Notwithstanding said duty as aforesaid, Bill Gothard, in 1993 through 1994, was guilty of aggravated criminal sexual abuse of a child, to wit, JAMIE DEERING, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JAMIE DEERING, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by touching her vaginal area and forcing her to touch his groin.

786. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against JAMIE DEERING, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

787. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

788. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 65**  
**BATTERY**  
***(Jamie Deering v. Bill Gothard)***

1-56, 783-788. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-788.

789. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JAMIE DEERING.

790. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JAMIE DEERING.

791. Bill Gothard and IBLP served as JAMIE DEERING's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

792. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JAMIE DEERING.

793. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including exposing his genitals to JAMIE DEERING, touching JAMIE DEERING's knees and hands in a sexual manner and touching and massaging JAMIE DEERING's groin area in a sexual manner.

794. The aforesaid physical and sexual contact was harmful and/or offensive.

795. The aforesaid actions on the part of Bill Gothard occurred while JAMIE DEERING was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

796. The aforesaid actions on the part of Bill Gothard continued until JAMIE DEERING was approximately 20 years old.

797. JAMIE DEERING did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

798. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JAMIE DEERING, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

799. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

800. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 66**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jamie Deering v. Bill Gothard)***

1-56, 783-800. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-800.

801. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JAMIE DEERING.

802. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JAMIE DEERING to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JAMIE DEERING.

803. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JAMIE DEERING for purposes of his own gratification without regard to its impact upon the well-being of JAMIE DEERING.

804. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including exposing his genitals to JAMIE DEERING, forced JAMIE DEERING to touch his groin area on top of his clothing, touching JAMIE DEERING's thighs, back and hair with his hands in a sexual manner, rubbing his foot up JAMIE DEERING's legs in a sexual manner and rubbing JAMIE DEERING's vaginal area in a sexual manner.

805. JAMIE DEERING was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1993 and 1996.

806. JAMIE DEERING did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

807. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JAMIE DEERING, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JAMIE DEERING.

808. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JAMIE DEERING, JAMIE DEERING was and will continue to be caused severe emotional distress.

809. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

810. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 67**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jamie Deering v. Bill Gothard)***

1-56, 783-810. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-810.

811. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JAMIE DEERING.

812. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JAMIE DEERING could trust, seek advice and confide.

813. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JAMIE DEERING to

experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JAMIE DEERING.

814. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JAMIE DEERING for purposes of his own gratification without regard to its impact upon the well-being of JAMIE DEERING.

815. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including exposing his genitals to JAMIE DEERING, forced JAMIE DEERING to touch his groin area on top of his clothing, touching JAMIE DEERING's thighs, back and hair with his hands in a sexual manner, rubbing his foot up JAMIE DEERING's legs in a sexual manner and rubbing JAMIE DEERING's vaginal area in a sexual manner.

816. JAMIE DEERING did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

817. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JAMIE DEERING, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JAMIE DEERING.

818. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JAMIE DEERING, JAMIE DEERING was and will continue to be caused severe emotional distress.

819. Bill Gothard negligently caused severe emotional distress to JAMIE DEERING.

820. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

821. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 68**  
**VICARIOUS LIABILITY – BATTERY**  
***(Jamie Deering v. IBLP)***

1-56, 783-821. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-821.

822. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

823. Bill Gothard sexually abused JAMIE DEERING. In doing so, he intended to cause and made harmful and/or offensive contact with JAMIE DEERING's person.

824. JAMIE DEERING did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

825. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JAMIE DEERING.

826. Bill Gothard and IBLP served as JAMIE DEERING's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

827. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JAMIE DEERING.

828. While grooming, manipulating and exploiting JAMIE DEERING, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

829. IBLP did nothing to protect JAMIE DEERING against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

830. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JAMIE DEERING by Bill Gothard.

831. IBLP acted with a conscious indifference to JAMIE DEERING's health, safety, and welfare.

832. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4.

833. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JAMIE DEERING and JAMIE DEERING was and will continue to be caused severe emotional distress.

834. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

835. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 69**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jamie Deering v. IBLP)***

1-56, 783-835. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-825.

836. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JAMIE DEERING.

837. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JAMIE DEERING.

838. Bill Gothard and IBLP served as JAMIE DEERING's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

839. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JAMIE DEERING.

840. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JAMIE DEERING to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JAMIE DEERING.

841. While manipulating and exploiting JAMIE DEERING, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

842. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including exposing his genitals to JAMIE DEERING, forced JAMIE DEERING to touch his groin area on top of his clothing, touching JAMIE DEERING's

thighs, back and hair with his hands in a sexual manner, rubbing his foot up JAMIE DEERING's legs in a sexual manner and rubbing JAMIE DEERING's vaginal area in a sexual manner.

843. JAMIE DEERING did not consent to any of the contact.

844. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JAMIE DEERING, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JAMIE DEERING.

845. IBLP did nothing to protect JAMIE DEERING against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

846. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JAMIE DEERING by Bill Gothard.

847. IBLP acted with a conscious indifference to JAMIE DEERING's health, safety, and welfare.

848. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

849. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JAMIE DEERING and JAMIE DEERING was and will continue to be caused severe emotional distress.

850. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

851. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 70**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jamie Deering v. IBLP)***

1-56, 783-851. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-851.

852. At all times relevant herein, IBLP was in a supervisory position as it pertained to JAMIE DEERING and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JAMIE DEERING, that Bill Gothard employed, counseled, supervised and lead.

853. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JAMIE DEERING.

854. Bill Gothard and IBLP served as JAMIE DEERING's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

855. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JAMIE DEERING, and the others that Bill Gothard employed, counseled, supervised and lead.

856. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

857. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

858. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

859. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

860. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JAMIE DEERING and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

861. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JAMIE DEERING.

862. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JAMIE DEERING.

863. As a direct and proximate result of the conduct of IBLP, JAMIE DEERING was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP, in several other states and other countries throughout the world.

864. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JAMIE DEERING, thereby causing injuries and damages to JAMIE DEERING, including severe permanent emotional and psychological distress, and loss of a normal life.

865. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

866. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 71**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jamie Deering v. IBLP)***

1-56, 783-866. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 783-866.

867. At all times relevant herein, IBLP was in a supervisory position as it pertained to JAMIE DEERING and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it

pertained to the minor children, including JAMIE DEERING, that Bill Gothard employed, counseled, supervised and lead.

868. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JAMIE DEERING and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

869. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

870. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

871. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

872. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

873. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to JAMIE DEERING and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a

substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing JAMIE DEERING and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

874. As a direct and proximate result of IBLP's failure to defend JAMIE DEERING against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

875. As a direct and proximate result of IBLP's failures, JAMIE DEERING suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

876. At the time of the abuse, JAMIE DEERING did not appreciate that the act was abusive.

877. JAMIE DEERING was suffering from a condition that caused her to repress the memories of abuse and/or JAMIE DEERING did not know her injuries were caused by the abuse.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 72**  
**CIVIL CONSPIRACY**  
***(Jamie Deering v. Bill Gothard & IBLP)***

1-56, 783-877. Plaintiff, JAMIE DEERING, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 222-296.

878. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-

conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

879. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

880. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

881. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

882. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

883. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

884. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JAMIE DEERING, intended to publicly shame and inflict severe emotional distress to JAMIE DEERING, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JAMIE DEERING.

885. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, JAMIE DEERING has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, JAMIE DEERING prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 73**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Ruth Copley Burger v. Kenneth Copley)***

1-56. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

886. Between 1994 and 2002, RUTH COPLEY BURGER participated in IBLP programs and stayed at the Indianapolis Training Center between 1994 and 1995.

887. That at all times relevant herein, it was the duty of Kenneth Copley to refrain from committing aggravated criminal sexual abuse of a child.

888. Notwithstanding said duty as aforesaid, Kenneth Copley, in 1996 through 2000, was guilty of aggravated criminal sexual abuse of a child, to wit, RUTH COPLEY BURGER, in that Kenneth Copley, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with RUTH COPLEY BURGER, who was at least thirteen (13) years of age but under seventeen (17) years of age when the acts were committed, by touching her buttocks and rubbing his genital area against her.

889. Kenneth Copley also knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual

gratification of the victim or the accused) with RUTH COPLEY BURGER, when she was eleven (11) to thirteen (13) years of age when the acts were committed.

890. As a direct and proximate result of the aggravated criminal sexual abuse by Kenneth Copley against RUTH COPLEY BURGER, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

891. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

892. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 74**  
**BATTERY**

***(Ruth Copley Burger v. Kenneth Copley)***

1-56, 886-892. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-892.

893. At all times relevant herein, Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RUTH BURGER.

894. At all times relevant hereto, IBLP and Kenneth Copley voluntarily took over physical custody of and control and responsibility for RUTH BURGER.

895. Kenneth Copley, Bill Gothard and IBLP served as RUTH BURGER's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

896. That at all times relevant herein, it was the duty of Kenneth, to refrain from intentionally making harmful or offensive contact with the body of RUTH BURGER.

897. Notwithstanding said duty as aforesaid, Ken Copley engaged in unwanted physical and sexual contact and conduct at the Indianapolis Training Center including rubbing RUTH COPLEY BURGER's buttocks, fondling and groping RUTH COPLEY BURGER, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner while she was clothed, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner after removing all her clothing, rubbing RUTH COPLEY BURGER's exposed genital area/pubic mound in a sexual manner and physically hitting and/or slapping RUTH COPLEY BURGER. The aforesaid physical and sexual contact was harmful and/or offensive.

898. The aforesaid actions on the part of Kenneth Copley occurred while RUTH COPLEY BURGER was who was at least thirteen (13) years of age but under seventeen (17) years of age when the acts were committed.

899. Kenneth Copley's abuse also continued to occur while RUTH COPLEY BURGER seventeen (17) to nineteen (19) years of age when the acts were committed.

900. RUTH COPLEY BURGER did not and could not consent to any of the contact that occurred between 1994 and 2001 and did not consent to the contact that occurred between 2001 and 2002.

901. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against RUTH COPLEY BURGER, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

902. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

903. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against Kenneth Copley, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 76**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Ruth Copley Burger v. Kenneth Copley)***

1-56, 886-903. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-903.

904. At all times relevant herein, RUTH COPLEY BURGER was Kenneth Copley's adopted daughter.

905. At all times relevant herein, Kenneth Copley served as Senior Staff Member and Biblical Teacher at IBLP's Indianapolis Training Center.

906. Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RUTH COPLEY BURGER.

907. That at all times relevant herein, it was the duty of Kenneth Copley, to refrain from conduct that he knew, or reasonably should have known, would cause RUTH COPLEY BURGER

to experience severe emotional distress given all the facts and circumstances existing between Kenneth Copley and RUTH COPLEY BURGER.

908. Notwithstanding said duty as aforesaid, Kenneth Copley groomed, manipulated and otherwise exploited RUTH COPLEY BURGER for purposes of his own gratification without regard to its impact upon the well-being of RUTH COPLEY BURGER.

909. Notwithstanding said duty as aforesaid, Ken Copley engaged in unwanted physical and sexual contact and conduct at the Indianapolis Training Center including rubbing RUTH COPLEY BURGER's buttocks, fondling and groping RUTH COPLEY BURGER, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner while she was clothed, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner after removing all her clothing, rubbing RUTH COPLEY BURGER's exposed genital area/pubic mound in a sexual manner and physically hitting and/or slapping RUTH COPLEY BURGER. The aforesaid physical and sexual contact was harmful and/or offensive.

910. RUTH COPLEY BURGER was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1994 and 2001.

911. RUTH COPLEY BURGER did not and could not consent to any of the contact that occurred between 1994 and 2001 and did not consent to the contact that occurred between 2001 and 2002.

912. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RUTH COPLEY BURGER, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RUTH COPLEY BURGER.

913. As a direct and proximate result of the aforesaid conduct by Bill Gothard against RUTH COPLEY BURGER, RUTH COPLEY BURGER was and will continue to be caused severe emotional distress.

914. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

915. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against Kenneth Copley, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 76**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Ruth Copley Burger v. Kenneth Copley)***

1-56, 886-915. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-915.

916. At all times relevant herein, Kenneth Copley served as Senior Staff Member and Biblical Teacher at IBLP's Indianapolis Training Center.

917. Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RUTH COPLEY BURGER.

918. At all times relevant herein, Kenneth Copley held himself out as her IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom RUTH COPLEY BURGER could trust, seek advice and confide.

919. That at all times relevant herein, it was the duty of Kenneth Copley, to refrain from conduct that he knew, or reasonably should have known, would cause RUTH COPLEY BURGER to experience severe emotional distress given all the facts and circumstances existing between Kenneth Copley and RUTH COPLEY BURGER.

920. Notwithstanding said duty as aforesaid, Kenneth Copley groomed, manipulated and otherwise exploited RUTH COPLEY BURGER for purposes of his own gratification without regard to its impact upon the well-being of RUTH COPLEY BURGER.

60. Notwithstanding said duty as aforesaid, Ken Copley engaged in unwanted physical and sexual contact and conduct at the Indianapolis Training Center including rubbing RUTH COPLEY BURGER's buttocks, fondling and groping RUTH COPLEY BURGER, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner while she was clothed, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner after removing all her clothing, rubbing RUTH COPLEY BURGER's exposed genital area/pubic mound in a sexual manner and physically hitting and/or slapping RUTH COPLEY BURGER. The aforesaid physical and sexual contact was harmful and/or offensive.

921. RUTH COPLEY BURGER did not and could not consent to any of the contact that occurred between 1994 and 2001 and did not consent to the contact that occurred between 2001 and 2002.

922. At all times relevant herein, Kenneth Copley knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RUTH COPLEY BURGER, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RUTH COPLEY BURGER.

923. As a direct and proximate result of the aforesaid conduct by Kenneth Copley against RUTH COPLEY BURGER, RUTH COPLEY BURGER was and will continue to be caused severe emotional distress.

924. Kenneth Copley negligently caused severe emotional distress to RUTH COPLEY BURGER.

925. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

926. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against Kenneth Copley, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 77**  
**VICARIOUS LIABILITY – BATTERY**  
***(Ruth Copley Burger v. IBLP)***

1-56, 886-926. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-926.

927. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

928. Kenneth Copley sexually abused RUTH COPLEY BURGER. In doing so, he intended to cause and made harmful and/or offensive contact with RUTH COPLEY BURGER's person.

929. RUTH COPLEY BURGER did not and could not consent to any of the contact that occurred between 1994 and 2001 and did not consent to the contact that occurred between 2001 and 2002.

930. At all times relevant hereto, IBLP and Kenneth Copley voluntarily took over physical custody of and control and responsibility for RUTH COPLEY BURGER.

931. Kenneth Copley and IBLP served as RUTH COPLEY BURGER's parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

932. At all times relevant herein, Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to RUTH COPLEY BURGER.

933. While grooming, manipulating and exploiting RUTH COPLEY BURGER, Kenneth Copley was acting within the course and scope of his employment and with the authority of IBLP.

934. IBLP did nothing to protect RUTH COPLEY BURGER against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Kenneth Copley with the authority, instrumentalities, tools, facility and privacy to abuse her.

935. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RUTH COPLEY BURGER by Kenneth Copley.

936. IBLP acted with a conscious indifference to RUTH COPLEY BURGER's health, safety, and welfare.

937. IBLP, through its Board of Directors, employees, servants, agents, Bill Gothard and Kenneth Copley, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4.

938. As a direct and proximate result of the aforesaid conduct by IBLP, Kenneth Copley physically and sexually abused RUTH COPLEY BURGER and RUTH COPLEY BURGER was and will continue to be caused severe emotional distress.

939. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

940. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 78**  
**VICARIOUS LIABILITY – INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
***(Ruth Copley Burger v. IBLP)***

1-56, 886-940. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-940.

941. At all times relevant herein, Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to RUTH BURGER.

942. At all times relevant hereto, IBLP and Kenneth Copley voluntarily took over physical custody of and control and responsibility for RUTH BURGER.

943. Kenneth Copley, Bill Gothard and IBLP served as RUTH BURGER's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

944. That at all times relevant herein, it was the duty of Kenneth Copley, to refrain from intentionally making harmful or offensive contact with the body of RUTH BURGER.

945. That at all times relevant herein, it was the duty of Kenneth Copley, to refrain from conduct that he knew, or reasonably should have known, would cause RUTH BURGER to experience severe emotional distress given all the facts and circumstances existing between Kenneth Copley and RUTH BURGER.

946. While manipulating and exploiting RUTH BURGER, Kenneth Copley was acting within the course and scope of his employment and with the authority of IBLP.

947. Notwithstanding said duty as aforesaid, Ken Copley engaged in unwanted physical and sexual contact and conduct at the Indianapolis Training Center including rubbing RUTH COPLEY BURGER's buttocks, fondling and groping RUTH COPLEY BURGER, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner while she was clothed, grinding his body and genital area against RUTH COPLEY BURGER in a sexual manner after removing all her clothing, rubbing RUTH COPLEY BURGER's exposed genital area/pubic mound in a sexual manner and physically hitting and/or slapping RUTH COPLEY BURGER. The aforesaid physical and sexual contact was harmful and/or offensive.

948. RUTH BURGER did not consent to any of the contact.

949. At all times relevant herein, Kenneth Copley knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the RUTH BURGER, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to RUTH BURGER.

950. IBLP did nothing to protect RUTH BURGER against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by

failing to supervise Kenneth Copley and providing Kenneth Copley with the authority, instrumentalities, tools and privacy to abuse her.

951. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RUTH BURGER by Kenneth Copley.

952. IBLP acted with a conscious indifference to RUTH BURGER's health, safety, and welfare.

953. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

954. As a direct and proximate result of the aforesaid conduct by IBLP, Kenneth Copley physically and sexually abused RUTH BURGER and RUTH BURGER was and will continue to be caused severe emotional distress.

955. At the time of the abuse, RUTH BURGER did not appreciate that the act was abusive.

956. RUTH BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH BURGER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 79**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Ruth Copley Burger v. IBLP)***

1-56, 886-956. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-956.

957. At all times relevant herein, IBLP was in a supervisory position as it pertained to RUTH COPLEY BURGER and the conduct of Kenneth Copley and IBLP knew, or reasonably should have known, that Kenneth Copley was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including RUTH COPLEY BURGER, that Kenneth Copley counseled, supervised, taught, lead and controlled.

958. At all times relevant hereto, IBLP and Kenneth Copley voluntarily took over physical custody of and control and responsibility for RUTH COPLEY BURGER.

959. Kenneth Copley and IBLP served as RUTH COPLEY BURGER's parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

960. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Kenneth Copley in order to provide for the safety and protection of RUTH COPLEY BURGER, and the others that Kenneth Copley taught, counseled, supervised and lead.

961. IBLP knew, or reasonably should have known, that prior to the allegations herein, Kenneth Copley had a history of sexual misconduct, physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior in the past.

962. IBLP knew, or reasonably should have known, that prior to the allegations herein, Kenneth Copley commonly engaged in acts of physical and sexual abuse, sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

963. IBLP knew, or reasonably should have known, that prior to the allegations herein, Kenneth Copley posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

964. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Kenneth Copley's conduct when IBLP knew, or reasonably should have known, that Kenneth Copley's conduct, as aforesaid, demonstrated that Kenneth Copley posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Kenneth Copley's conduct was necessary in order to avoid exposing RUTH COPLEY BURGER and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

965. As a direct and proximate result of the conduct of IBLP, Kenneth Copley inappropriately touched and assaulted RUTH COPLEY BURGER.

966. As a direct and proximate result of the conduct of IBLP, Kenneth Copley had access to and the opportunity to manipulate and physically and sexually exploited of RUTH COPLEY BURGER.

967. As a direct and proximate result of the conduct of IBLP, RUTH COPLEY BURGER was physically and sexually assaulted by Kenneth Copley at IBLP's Indianapolis Training Center.

968. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Kenneth Copley was allowed to commit acts of physical and sexual abuse on RUTH

COPLEY BURGER, thereby causing injuries and damages to RUTH COPLEY BURGER, including severe permanent emotional and psychological distress, and loss of a normal life.

969. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

970. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 80**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Ruth Copley Burger v. IBLP)***

1-56, 886-970. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-970.

971. At all times relevant herein, IBLP was in a supervisory position as it pertained to RUTH COPLEY BURGER and the conduct of Kenneth Copley and IBLP knew, or reasonably should have known, that Kenneth Copley was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including RUTH COPLEY BURGER, that Kenneth Copley counseled, supervised, taught, lead and controlled.

972. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Kenneth Copley in order to provide for the safety and protection of RUTH COPLEY BURGER and the others that Kenneth Copley counseled, supervised, taught, lead and controlled.

973. IBLP knew, or reasonably should have known, that prior to the allegations herein, Kenneth Copley had a history of sexual misconduct, physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior in the past.

974. IBLP knew, or reasonably should have known, that prior to the allegations herein, Kenneth Copley commonly engaged in acts of physical and sexual abuse, sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

975. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Kenneth Copley posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, teachings, counsel and lead.

976. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to RUTH COPLEY BURGER and the others that Kenneth Copley counseled, supervised, taught and lead from criminal acts when IBLP knew, or reasonably should have known, that Kenneth Copley's conduct, as aforesaid, demonstrated that Kenneth Copley posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing RUTH COPLEY BURGER and the others that Kenneth Copley counseled, supervised, taught and lead to a substantial risk of abuse or serious harm.

977. As a direct and proximate result of IBLP's failure to defend RUTH COPLEY BURGER against Kenneth Copley's physical, sexual and criminal acts, she was physically and sexually assaulted at IBLP's Indianapolis Training Center.

978. As a direct and proximate result of IBLP's failures, RUTH COPLEY BURGER suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

979. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

980. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 81**  
**CIVIL CONSPIRACY**  
***(Ruth Copley Burger v. Kenneth Copley & IBLP)***

1-56, 886-980. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-980.

981. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

982. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

983. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

984. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

985. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

986. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

987. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against RUTH COPLEY BURGER, intended to publicly shame and inflict severe emotional distress to RUTH COPLEY BURGER, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to RUTH COPLEY BURGER.

988. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, 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**, RUTH COPLEY BURGER prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 82**  
**FALSE IMPRISONMENT**  
***(Ruth Copley Burger v. Kenneth Copley)***

1-56, 886-988. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-988.

989. As a staff member at the IBLP Training Center, Kenneth Copley had keys that provided him access to locked rooms at the Center.

990. Between 1994 and 2002, on numerous occasions, Kenneth Copley directed Plaintiff RUTH COPLEY BURGER to an enclosed room to which he had access in the Training Center with the intent to confine her within the fixed boundaries of that room for the purposes of sexually abusing her.

991. On each of those occasions in the years 1994 to 2002, Kenneth Copley's actions directly resulted in the confinement of Plaintiff RUTH COPLEY BURGER within fixed boundaries against her will.

992. Plaintiff RUTH COPLEY BURGER never consented to the confinement within fixed boundaries imposed by Kenneth Copley's conduct.

993. At the time of each confinement, Plaintiff RUTH COPLEY BURGER was conscious of the confinement, but she was not conscious that it was wrongful.

994. At the time of each confinement, Plaintiff RUTH COPLEY BURGER was either physically prevented from leaving the fixed boundaries of the room or was unaware that she could leave in defiance of Kenneth Copley, her step-father and IBLP staff member.

995. Subsequent to the confinement by Kenneth Copley, Plaintiff RUTH COPLEY BURGER suffered severe emotional and psychological harm as a result of the confinement

996. As a direct and proximate result of the confinement of Plaintiff RUTH COPLEY BURGER by Kenneth Copley, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

997. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of confinement and/or RUTH COPLEY BURGER did not know her injuries were caused by the confinement.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against Kenneth Copley, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 83**  
**FALSE IMPRISONMENT**  
***(Ruth Copley Burger v. IBLP)***

1-56, 886-997. Plaintiff, RUTH COPLEY BURGER, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 886-997.

998. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

999. Kenneth Copley confined RUTH COPLEY BURGER against her consent to fixed boundaries. In doing so, he intended to cause and made harmful and/or offensive contact with RUTH COPLEY BURGER's person.

1000. RUTH COPLEY BURGER did not and could not consent to any of the confinement that occurred between 1994 and 2002.

1001. At all times relevant hereto, IBLP and Kenneth Copley voluntarily took over physical custody of and control and responsibility for RUTH COPLEY BURGER.

1002. Kenneth Copley and IBLP served as RUTH COPLEY BURGER's parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1003. At all times relevant herein, Kenneth Copley was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to RUTH COPLEY BURGER.

1004. While grooming, manipulating, confining, and exploiting RUTH COPLEY BURGER, Kenneth Copley was acting within the course and scope of his employment and with the authority of IBLP.

1005. IBLP did nothing to protect RUTH COPLEY BURGER against unlawful confinement while she was employed by IBLP and further facilitated such abuse by providing Kenneth Copley with the authority, instrumentalities, tools, facility and privacy to confine her.

1006. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to RUTH COPLEY BURGER by Kenneth Copley.

1007. IBLP acted with a conscious indifference to RUTH COPLEY BURGER's health, safety, and welfare.

1008. IBLP, through its Board of Directors, employees, servants, agents, Bill Gothard and Kenneth Copley, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 IBLP and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1009. As a direct and proximate result of the aforesaid conduct by IBLP, Kenneth Copley unlawfully confined RUTH COPLEY BURGER, and RUTH COPLEY BURGER was and will continue to be caused severe emotional distress.

1010. At the time of the abuse, RUTH COPLEY BURGER did not appreciate that the act was abusive.

1011. RUTH COPLEY BURGER was suffering from a condition that caused her to repress the memories of abuse and/or RUTH COPLEY BURGER did not know her injuries were caused by the abuse.

**WHEREFORE**, RUTH COPLEY BURGER prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 84**  
**BATTERY**  
***(Joy Simmons v. Bill Gothard)***

1-56. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1012. Beginning in 1993, JOY SIMMONS participated in IBLP programs. Between 1993 and 1996 and again from 1999 through 2005, volunteered and worked at the Indianapolis Training Center and IBLP in Hinsdale, Illinois.

1013. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JOY SIMMONS.

1014. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JOY SIMMONS.

1015. Bill Gothard and IBLP served as JOY SIMMONS's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1016. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JOY SIMMONS.

1017. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing JOY SIMMONS's hands and back in a sexual manner, rubbing his foot up JOY SIMMONS's legs in a sexual manner, rubbing JOY SIMMONS' knee with his hand in a sexual manner.

1018. JOY SIMMONS did not consent to any of the contact.

1019. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JOY SIMMONS, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1020. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1021. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 85**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Joy Simmons v. Bill Gothard)***

1-56, 1011-1021. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1021.

1022. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JOY SIMMONS.

1023. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JOY SIMMONS to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JOY SIMMONS.

1024. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JOY SIMMONS for purposes of his own gratification without regard to its impact upon the well-being of JOY SIMMONS.

1025. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing JOY SIMMONS's hands and back in a sexual manner and rubbing his foot up JOY SIMMONS's legs in a sexual manner.

1026. JOY SIMMONS did not consent to any of the contact.

1027. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JOY SIMMONS, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JOY SIMMONS.

1028. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JOY SIMMONS, JOY SIMMONS was and will continue to be caused severe emotional distress.

1029. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1030. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 86**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Joy Simmons v. Bill Gothard)***

1-56, 1011-1030. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1030.

1031. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JOY SIMMONS.

1032. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JOY SIMMONS could trust, seek advice and confide.

1033. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JOY SIMMONS to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JOY SIMMONS.

1034. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JOY SIMMONS for purposes of his own gratification without regard to its impact upon the well-being of JOY SIMMONS.

1035. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing JOY SIMMONS's hands and back in a sexual manner and rubbing his foot up JOY SIMMONS's legs in a sexual manner.

1036. JOY SIMMONS did not consent to any of the contact.

1037. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JOY SIMMONS, or knew

that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JOY SIMMONS.

1038. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JOY SIMMONS, JOY SIMMONS was and will continue to be caused severe emotional distress.

1039. Bill Gothard negligently caused severe emotional distress to JOY SIMMONS.

1040. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1041. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 87**  
**VICARIOUS LIABILITY – BATTERY**  
***(Joy Simmons v. IBLP)***

1-56, 1011-1041. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1041.

1042. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

1043. Bill Gothard sexually abused JOY SIMMONS. In doing so, he intended to cause and made harmful and/or offensive contact with JOY SIMMONS's person.

1044. JOY SIMMONS did not consent to any of the contact.

1045. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JOY SIMMONS.

1046. Bill Gothard and IBLP served as JOY SIMMONS's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1047. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JOY SIMMONS.

1048. While grooming, manipulating and exploiting JOY SIMMONS, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1049. IBLP did nothing to protect JOY SIMMONS against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1050. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JOY SIMMONS by Bill Gothard.

1051. IBLP acted with a conscious indifference to JOY SIMMONS's health, safety, and welfare.

1052. IBLP, through its Board of Directors, employees, servants, agents, Bill Gothard and David York, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1053. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JOY SIMMONS and JOY SIMMONS was and will continue to be caused severe emotional distress.

1054. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1055. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 88**  
**VICARIOUS LIABILITY – INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
***(Joy Simmons v. IBLP)***

1-56, 1011-1055. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1055.

1056. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JOY SIMMONS.

1057. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JOY SIMMONS.

1058. Bill Gothard and IBLP served as JOY SIMMONS's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1059. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JOY SIMMONS.

1060. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JOY SIMMONS to

experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JOY SIMMONS.

1061. While manipulating and exploiting JOY SIMMONS, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1062. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including rubbing JOY SIMMONS's hands and back in a sexual manner and rubbing his foot up JOY SIMMONS's legs in a sexual manner.

1063. JOY SIMMONS did not consent to any of the contact.

1064. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JOY SIMMONS, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JOY SIMMONS.

1065. IBLP did nothing to protect JOY SIMMONS against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1066. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JOY SIMMONS by Bill Gothard.

1067. IBLP acted with a conscious indifference to JOY SIMMONS's health, safety, and welfare.

1068. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4

and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1069. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JOY SIMMONS and JOY SIMMONS was and will continue to be caused severe emotional distress.

1070. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1071. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 89**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Joy Simmons v. IBLP)***

1-56, 1011-1071. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1071.

1072. At all times relevant herein, IBLP was in a supervisory position as it pertained to JOY SIMMONS and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including JOY SIMMONS, that Bill Gothard employed, counseled, supervised and lead.

1073. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JOY SIMMONS.

1074. Bill Gothard and IBLP served as JOY SIMMONS's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1075. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JOY SIMMONS, and the others that Bill Gothard employed, counseled, supervised and lead.

1076. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1077. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1078. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1079. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1080. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and

adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JOY SIMMONS and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

1081. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JOY SIMMONS.

1082. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JOY SIMMONS.

1083. As a direct and proximate result of the conduct of IBLP, JOY SIMMONS was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1084. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JOY SIMMONS, thereby causing injuries and damages to JOY SIMMONS, including severe permanent emotional and psychological distress, and loss of a normal life.

1085. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1086. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 90**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Joy Simmons v. IBLP)***

1-56, 1011-1086. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1086.

1087. At all times relevant herein, IBLP was in a supervisory position as it pertained to JOY SIMMONS and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including JOY SIMMONS, that Bill Gothard employed, counseled, supervised and lead.

1088. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JOY SIMMONS and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1089. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

1090. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

1091. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

1092. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

1093. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to JOY SIMMONS and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing JOY SIMMONS and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

1094. As a direct and proximate result of IBLP's failure to defend JOY SIMMONS against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

1095. As a direct and proximate result of IBLP's failures, JOY SIMMONS suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

1096. At the time of the abuse, JOY SIMMONS did not appreciate that the act was abusive.

1097. JOY SIMMONS was suffering from a condition that caused her to repress the memories of abuse and/or JOY SIMMONS did not know her injuries were caused by the abuse.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 91**  
**CIVIL CONSPIRACY**  
***(Joy Simmons v. Bill Gothard & IBLP)***

1-56, 1011-1097. Plaintiff, JOY SIMMONS, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1011-1097.

1098. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1099. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1100. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1101. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1102. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1103. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1104. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JOY SIMMONS, intended to publicly shame and inflict severe emotional distress to JOY SIMMONS, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JOY SIMMONS.

1105. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, JOY SIMMONS has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, JOY SIMMONS prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 92**  
**BATTERY**  
***(Jane Doe IV v. Bill Gothard)***

1-56. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1106. Between 2006 and 2009, JANE DOE IV volunteered and became an employee of IBLP.

1107. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE IV.

1108. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE IV.

1109. Bill Gothard and IBLP served as JANE DOE IV's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1110. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE IV.

1111. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, forcing JANE DOE IV's hand under his jacket, playing with JANE DOE IV's hair in a sexual manner and rubbing his foot up JANE DOE IV's legs in a sexual manner.

1112. JANE DOE IV did not consent to any of the contact.

1113. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JANE DOE IV, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1114. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1115. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 93**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe IV v. Bill Gothard)***

1-56, 1106-1115. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1115.

1116. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE IV.

1117. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE IV to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE IV.

1118. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE IV for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE IV.

1119. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, forcing JANE DOE IV's hand under his jacket, playing with JANE DOE IV's hair in a sexual manner and rubbing his foot up JANE DOE IV's legs in a sexual manner.

1120. JANE DOE IV did not consent to any of the contact.

1121. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE IV, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE IV.

1122. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE IV, JANE DOE IV was and will continue to be caused severe emotional distress.

1123. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1124. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 94**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jane Doe IV v. Bill Gothard)***

1-56, 1106-1125. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1124.

1125. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE IV.

1126. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JANE DOE IV could trust, seek advice and confide.

1127. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE IV to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE IV.

1128. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE IV for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE IV.

1129. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, forcing JANE DOE IV's hand under his jacket, playing with JANE DOE IV's hair in a sexual manner and rubbing his foot up JANE DOE IV's legs in a sexual manner.

1130. JANE DOE IV did not consent to any of the contact.

1131. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE IV, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE IV.

1132. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE IV, JANE DOE IV was and will continue to be caused severe emotional distress.

1133. Bill Gothard negligently caused severe emotional distress to JANE DOE IV.

1134. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1135. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 95**  
**VICARIOUS LIABILITY – BATTERY**  
***(Jane Doe IV v. IBLP)***

1-56, 1106-1135. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1135.

1136. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

1137. Bill Gothard sexually abused JANE DOE IV. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE IV's person.

1138. JANE DOE IV did not consent to any of the contact.

1139. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control over JANE DOE IV.

1140. Bill Gothard and IBLP served as JANE DOE IV's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1141. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JANE DOE IV.

1142. While grooming, manipulating and exploiting JANE DOE IV, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1143. IBLP did nothing to protect JANE DOE IV against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1144. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE IV by Bill Gothard.

1145. IBLP acted with a conscious indifference to JANE DOE IV's health, safety, and welfare.

1146. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1147. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE IV and JANE DOE IV was and will continue to be caused severe emotional distress.

1148. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1149. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 96**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe IV v. IBLP)***

1-56, 1106-1149. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1149.

1150. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE IV.

1151. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE IV.

1152. Bill Gothard and IBLP served as JANE DOE IV's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1153. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE IV.

1154. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE IV to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE IV.

1155. While manipulating and exploiting JANE DOE IV, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1156. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, forcing JANE DOE IV's hand under his jacket, playing with JANE DOE IV's hair in a sexual manner and rubbing his foot up JANE DOE IV's legs in a sexual manner.

1157. JANE DOE IV did not consent to any of the contact.

1158. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE IV, or knew

that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE IV.

1159. IBLP did nothing to protect JANE DOE IV against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1160. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE IV by Bill Gothard.

1161. IBLP acted with a conscious indifference to JANE DOE IV's health, safety, and welfare.

1162. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1163. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE IV and JANE DOE IV was and will continue to be caused severe emotional distress.

1164. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1165. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 97**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jane Doe IV v. IBLP)***

1-56, 1106-1166. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1166.

1166. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE IV and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including JANE DOE IV, that Bill Gothard employed, counseled, supervised and lead.

1167. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE IV.

1168. Bill Gothard and IBLP served as JANE DOE IV's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1169. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE IV, and the others that Bill Gothard employed, counseled, supervised and lead.

1170. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1171. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1172. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1173. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1174. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JANE DOE IV and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

1175. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JANE DOE IV.

1176. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE IV.

1177. As a direct and proximate result of the conduct of IBLP, JANE DOE IV was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1178. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JANE DOE IV, thereby causing injuries and damages to JANE DOE IV, including severe permanent emotional and psychological distress, and loss of a normal life.

1179. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1180. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 98**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jane Doe IV v. IBLP)***

1-56, 1106-1180. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1180.

1181. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE IV and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including JANE DOE IV, that Bill Gothard employed, counseled, supervised and lead.

1182. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE IV and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1183. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

1184. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

1185. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

1186. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

1187. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to JANE DOE IV and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing JANE DOE IV and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

1188. As a direct and proximate result of IBLP's failure to defend JANE DOE IV against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

1189. As a direct and proximate result of IBLP's failures, JANE DOE IV suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

1190. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1191. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 99**  
**CIVIL CONSPIRACY**  
***(Jane Doe IV v. Bill Gothard & IBLP)***

1-56, 1106-1191. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1191.

1192. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1193. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard,

IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1194. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1195. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1196. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1197. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1198. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JANE DOE IV, intended to publicly shame and inflict severe emotional distress to JANE DOE IV, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JANE DOE IV.

1199. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, 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**, JANE DOE IV prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 100**  
**VIOLATION OF THE GENDER VIOLENCE ACT**  
**(JANE DOE IV v. Bill Gothard)**

1-56, 1106-1199. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1199.

1200. Between 2006 and 2009, JANE DOE IV volunteered and became an employee of IBLP.

1201. During the years 2006 through 2009, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothes to reveal an erection, forcing JANE DOE IV's hand under his jacket, playing with JANE DOES IV's hair in a sexual manner and rubbing his foot up JANE DOE IV's legs in a sexual manner.

1202. The aforesaid physical and sexual contact was harmful and/or offensive.

1203. JANE DOE IV did not consent to any of the contact and conduct.

1204. At all times relevant to Bill Gothard's unwanted contact with JANE DOE IV between 2006 and 2009, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

1205. Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of Illinois and this constitutes gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

1206. As a direct and proximate result of Bill Gothard's conduct, JANE DOE IV has been subjected to gender-related violence, and pursuant to Section 15 of the Act, 740 ILCS 82/15, may recover from Bill Gothard compensatory damages, punitive damages, plaintiff's attorney's fees, and her costs of suit in pursuing this action.

1207. At the time of the abuse, JANE DOE IV did not appreciate that the act was abusive.

1208. JANE DOE IV was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE IV did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00, plus punitive damages in an amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 101**  
**ILLINOIS GENDER VIOLENCE ACT**  
***(Jane Doe IV v. IBLP)***

1-56, 1106-1208. Plaintiff, JANE DOE IV, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1106-1208.

1209. At all times relevant hereto, there was in full force and effect the Illinois Gender Violence Act, 740 ILCS 82/1 et seq. Section 10 of the Act, 740 ILCS 82/10 provides:

Cause of action: Any person who has been subjected to gender-related violence as defined in Section 5 may bring a civil action for damages, injunctive relief, or other appropriate relief against a person or persons perpetrating that gender-related violence. For purposes of this Section, "perpetrating" means either personally committing the gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.

1210. At all times relevant hereto, the defendant, IBLP, owed JANE DOE IV a duty of reasonable care, which included a duty to protect her from the risk of assault by its employees with

known sexual deviant propensities, known histories of sexual misconduct, and known histories of physical intrusions of a sexual nature.

1211. Defendant Bill Gothard's conduct as alleged above constituted a physical intrusion of a sexual nature under coercive conditions satisfying the elements of battery under the laws of Illinois and thus constituting gender-related violence as defined by Section 5 of the Gender Violence Act. 740 ILCS 82/5.

1212. At all times relevant hereto, defendant IBLP knew of the necessity and had the opportunity and ability to control its employee Bill Gothard to prevent him from sexually assaulting and committing gender-related violence on JANE DOE IV.

1213. The defendant IBLP perpetrated gender-related violence by encouraging or assisting Bill Gothard by its failure to supervise and monitor Bill Gothard; and after IBLP learned of and was aware of Bill Gothard's deviant sexual tendencies, history of sexual misconduct, and history of physical intrusions of a sexual nature, doing nothing about it and doing nothing to secure the safety of JANE DOE IV.

1214. The defendant IBLP perpetrated gender-related violence by assisting the acts of gender-related violence by allowing Bill Gothard to be alone with JANE DOE IV and allowing him to touch JANE DOE IV after IBLP knew or should have known that John Gothard had inappropriately touched other girls under IBLP's care.

1215. The defendant IBLP's actions violated the Illinois Gender Violence Act.

1216. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, as described above, JANE DOE IV was sexually assaulted and battered by John Gothard.

1217. As a direct and proximate result of IBLP's violation of the Illinois Gender Violence Act, JANE DOE IV has suffered mental anguish.

1218. Because of IBLP's violation of the Illinois Gender Violence Act, JANE DOE IV has been subjected to gender-related violence and pursuant to Section 15 of the Act, 740 ILCS 82/15, may recover from IBLP compensatory damages, punitive damages, and plaintiff's attorney's fees and costs in bringing this action.

**WHEREFORE**, JANE DOE IV prays for judgment in her favor and against defendant IBLP, for an amount in excess of \$50,000.00, plus punitive damages in an amount to be determined at trial, and for her attorney's fees and costs of suit in prosecuting this action.

**COUNT 102**  
**BATTERY**  
***(Carmen Okhmatovski v. Bill Gothard)***

1-56. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1219. Between 1996 and 1997, CARMEN OKHMATOVSKI was an employee of IBLP.

1220. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CARMEN OKHMATOVSKI.

1221. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CARMEN OKHMATOVSKI.

1222. Bill Gothard and IBLP served as CARMEN OKHMATOVSKI's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1223. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of CARMEN OKHMATOVSKI.

1224. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of CARMEN OKHMATOVSKI.

1225. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, playing with CARMEN OKHMATOVSKI's hair in a sexual manner, rubbing CARMEN OKHMATOVSKI's arms, legs hair and back in a sexual manner, rubbing CARMEN OKHMATOVSKI's feet with his feet in a sexual manner and rubbing her knee and inner thigh in a sexual manner.

1226. CARMEN OKHMATOVSKI did not consent to any of the contact.

1227. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against CARMEN OKHMATOVSKI, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1228. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1229. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 103**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Carmen Okhmatovski v. Bill Gothard)***

1-56, 1219-1229. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1229.

1230. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CARMEN OKHMATOVSKI.

1231. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CARMEN OKHMATOVSKI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CARMEN OKHMATOVSKI.

1232. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited CARMEN OKHMATOVSKI for purposes of his own gratification without regard to its impact upon the well-being of CARMEN OKHMATOVSKI.

1233. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, playing with CARMEN OKHMATOVSKI's hair in a sexual manner, rubbing CARMEN OKHMATOVSKI's arms, legs hair and back in a sexual manner, rubbing CARMEN OKHMATOVSKI's feet with his feet in a sexual manner and rubbing her knee and inner thigh in a sexual manner.

1234. CARMEN OKHMATOVSKI did not consent to any of the contact.

1235. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CARMEN

OKHMATOVSKI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CARMEN OKHMATOVSKI.

1236. As a direct and proximate result of the aforesaid conduct by Bill Gothard against CARMEN OKHMATOVSKI, CARMEN OKHMATOVSKI was and will continue to be caused severe emotional distress.

1237. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1238. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 104**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Carmen Okhmatovski v. Bill Gothard)***

1-56, 1219-1238. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1238.

1239. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CARMEN OKHMATOVSKI.

1240. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom CARMEN OKHMATOVSKI could trust, seek advice and confide.

1241. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CARMEN OKHMATOVSKI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CARMEN OKHMATOVSKI.

1242. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited CARMEN OKHMATOVSKI for purposes of his own gratification without regard to its impact upon the well-being of CARMEN OKHMATOVSKI.

1243. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, playing with CARMEN OKHMATOVSKI's hair in a sexual manner, rubbing CARMEN OKHMATOVSKI's arms, legs hair and back in a sexual manner, rubbing CARMEN OKHMATOVSKI's feet with his feet in a sexual manner and rubbing her knee and inner thigh in a sexual manner.

1244. CARMEN OKHMATOVSKI did not consent to any of the contact.

1245. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CARMEN OKHMATOVSKI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CARMEN OKHMATOVSKI.

1246. As a direct and proximate result of the aforesaid conduct by Bill Gothard against CARMEN OKHMATOVSKI, CARMEN OKHMATOVSKI was and will continue to be caused severe emotional distress.

1247. Bill Gothard negligently caused severe emotional distress to CARMEN OKHMATOVSKI.

1248. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1249. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 105**  
**VICARIOUS LIABILITY – BATTERY**  
***(Carmen Okhmatovski v. IBLP)***

1-56, 1219-1249. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1249.

1250. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting potential victims against abuse or neglect by providing for the proper supervision and avenues of reporting for victims of abuse.

1251. Bill Gothard sexually abused CARMEN OKHMATOVSKI. In doing so, he intended to cause and made harmful and/or offensive contact with CARMEN OKHMATOVSKI's person.

1252. CARMEN OKHMATOVSKI did not consent to any of the contact.

1253. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control over CARMEN OKHMATOVSKI.

1254. Bill Gothard and IBLP served as CARMEN OKHMATOVSKI's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1255. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to CARMEN OKHMATOVSKI.

1256. While grooming, manipulating and exploiting CARMEN OKHMATOVSKI, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1257. IBLP did nothing to protect CARMEN OKHMATOVSKI against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1258. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to CARMEN OKHMATOVSKI by Bill Gothard.

1259. IBLP acted with a conscious indifference to CARMEN OKHMATOVSKI's health, safety, and welfare.

1260. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1261. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused CARMEN OKHMATOVSKI and CARMEN OKHMATOVSKI was and will continue to be caused severe emotional distress.

1262. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1263. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 106**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Carmen Okhmatovski v. IBLP)***

1-56, 1219-1263. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1263.

1264. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to CARMEN OKHMATOVSKI.

1265. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CARMEN OKHMATOVSKI.

1266. Bill Gothard and IBLP served as CARMEN OKHMATOVSKI's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1267. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of CARMEN OKHMATOVSKI.

1268. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause CARMEN OKHMATOVSKI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and CARMEN OKHMATOVSKI.

1269. While manipulating and exploiting CARMEN OKHMATOVSKI, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1270. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including spreading his legs while clothed to reveal an erection, playing with CARMEN OKHMATOVSKI's hair in a sexual manner, rubbing CARMEN OKHMATOVSKI's arms, legs hair and back in a sexual manner, rubbing CARMEN OKHMATOVSKI's feet with his feet in a sexual manner and rubbing her knee and inner thigh in a sexual manner.

1271. CARMEN OKHMATOVSKI did not consent to any of the contact.

1272. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the CARMEN OKHMATOVSKI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to CARMEN OKHMATOVSKI.

1273. IBLP did nothing to protect CARMEN OKHMATOVSKI against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1274. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to CARMEN OKHMATOVSKI by Bill Gothard.

1275. IBLP acted with a conscious indifference to CARMEN OKHMATOVSKI's health, safety, and welfare.

1276. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4

and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1277. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused CARMEN OKHMATOVSKI and CARMEN OKHMATOVSKI was and will continue to be caused severe emotional distress.

1278. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1279. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 107**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Carmen Okhmatovski v. IBLP)***

1-56, 1219-1279. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1279.

1280. At all times relevant herein, IBLP was in a supervisory position as it pertained to CARMEN OKHMATOVSKI and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including CARMEN OKHMATOVSKI, that Bill Gothard employed, counseled, supervised and lead.

1281. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for CARMEN OKHMATOVSKI.

1282. Bill Gothard and IBLP served as CARMEN OKHMATOVSKI's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1283. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of CARMEN OKHMATOVSKI, and the others that Bill Gothard employed, counseled, supervised and lead.

1284. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1285. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1286. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1287. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1288. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and

continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing CARMEN OKHMATOVSKI and other IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership to a substantial risk of serious harm.

1289. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted CARMEN OKHMATOVSKI.

1290. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of CARMEN OKHMATOVSKI.

1291. As a direct and proximate result of the conduct of IBLP, CARMEN OKHMATOVSKI was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1292. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on CARMEN OKHMATOVSKI, thereby causing injuries and damages to CARMEN OKHMATOVSKI, including severe permanent emotional and psychological distress, and loss of a normal life.

1293. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1294. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 108**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Carmen Okhmatovski v. IBLP)***

1-56, 1219-1294. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1294.

1295. At all times relevant herein, IBLP was in a supervisory position as it pertained to CARMEN OKHMATOVSKI and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the IBLP participants, including CARMEN OKHMATOVSKI, that Bill Gothard employed, counseled, supervised and lead.

1296. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of CARMEN OKHMATOVSKI and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1297. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and/or engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP/ATII participants, volunteers and employees.

1298. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP/ATII participants and employees and would spend an inordinate amount of time with them at IBLP/ATII properties, including IBLP's Hinsdale, Illinois facility.

1299. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate sexual conduct, criminal acts and grooming.

1300. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP/ATII participants, volunteers and employees under his supervision, employ, counsel and lead.

1301. Notwithstanding said duty as aforesaid, IBLP failed to provide sufficient, proper and adequate protection to CARMEN OKHMATOVSKI and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts when IBLP knew, or reasonably should have known, that Bill Gothard's conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his supervision and that sufficient, proper and adequate protection was necessary in order to avoid exposing CARMEN OKHMATOVSKI and the others that Bill Gothard employed, counseled, supervised and lead to a substantial risk of abuse or serious harm.

1302. As a direct and proximate result of IBLP's failure to defend CARMEN OKHMATOVSKI against Bill Gothard's physical, sexual and criminal acts, she was physically and sexually assaulted in DuPage County, Illinois, on the property of IBLP and elsewhere.

1303. As a direct and proximate result of IBLP's failures, CARMEN OKHMATOVSKI suffered injuries and damages, including severe permanent emotional and psychological distress, and loss of a normal life.

1304. At the time of the abuse, CARMEN OKHMATOVSKI did not appreciate that the act was abusive.

1305. CARMEN OKHMATOVSKI was suffering from a condition that caused her to repress the memories of abuse and/or CARMEN OKHMATOVSKI did not know her injuries were caused by the abuse.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 109**  
**CIVIL CONSPIRACY**  
***(Carmen Okhmatovski v. Bill Gothard & IBLP)***

1-56, 1219-1305. Plaintiff, CARMEN OKHMATOVSKI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1219-1305.

1306. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1307. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1308. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1309. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1310. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1311. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1312. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against CARMEN OKHMATOVSKI, intended to publicly shame and inflict severe emotional distress to CARMEN OKHMATOVSKI, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to CARMEN OKHMATOVSKI.

1313. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, CARMEN OKHMATOVSKI has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, CARMEN OKHMATOVSKI prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 110**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jennifer Spurlock v. Bill Gothard)***

1-56. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1314. Between 1993 and 1995, JENNIFER SPURLOCK participated in IBLP programs and worked as a volunteer and employee at the Indianapolis Training Center and IBLP headquarters in Hinsdale, Illinois.

1315. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

1316. Notwithstanding said duty as aforesaid, Bill Gothard, in 1993, was guilty of aggravated criminal sexual abuse of a child, to wit, JENNIFER SPURLOCK, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JENNIFER SPURLOCK, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by touching her breasts and vaginal areas in a sexual manner.

1317. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against JENNIFER SPURLOCK, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

1318. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1319. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 111**  
**BATTERY**  
***(Jennifer Spurlock v. Bill Gothard)***

1-56, 1314-1319. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1319.

1320. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1321. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JENNIFER SPURLOCK.

1322. Bill Gothard and IBLP served as JENNIFER SPURLOCK's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1323. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JENNIFER SPURLOCK

1324. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JENNIFER SPURLOCK.

1325. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JENNIFER SPURLOCK's face and hair in a sexual manner, rubbing his body against JENNIFER SPURLOCK in a sexual manner, placing his head on JENNIFER SPURLOCK's breasts, touching and squeezing of JENNIFER SPURLOCK's breasts, rubbing JENNIFER SPURLOCK's inner thigh and back in a sexual manner and placing his hands on JENNIFER SPURLOCK's vaginal area in a sexual manner.

1326. The aforesaid physical and sexual contact was harmful and/or offensive.

1327. Upon information and belief, the aforesaid actions on the part of Bill Gothard occurred while JENNIFER SPURLOCK was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1328. The aforesaid actions on the part of Bill Gothard continued until JENNIFER SPURLOCK was approximately 18 years old.

1329. JENNIFER SPURLOCK did not and could not consent to any of the contact.

1330. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JENNIFER SPURLOCK, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1331. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1332. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 112**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jennifer Spurlock v. Bill Gothard)***

1-56, 1314-1332. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1332.

1333. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1334. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JENNIFER SPURLOCK to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JENNIFER SPURLOCK.

1335. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JENNIFER SPURLOCK for purposes of his own gratification without regard to its impact upon the well-being of JENNIFER SPURLOCK.

1336. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JENNIFER SPURLOCK's face and hair in a sexual manner, rubbing his body against JENNIFER SPURLOCK in a sexual manner, placing his head on JENNIFER SPURLOCK's breasts, touching, fondling and squeezing of JENNIFER SPURLOCK's breasts, rubbing JENNIFER SPURLOCK's inner thigh and back in a sexual manner and placing his hands on and rubbing JENNIFER SPURLOCK's vaginal area in a sexual manner.

1337. JENNIFER SPURLOCK was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1993 and 1996.

1338. JENNIFER SPURLOCK did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred after 1996.

1339. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JENNIFER SPURLOCK,

or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JENNIFER SPURLOCK.

1340. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JENNIFER SPURLOCK, JENNIFER SPURLOCK was and will continue to be caused severe emotional distress.

1341. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1342. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 113**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jennifer Spurlock v. Bill Gothard)***

1-56, 1314-1342. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1342.

1343. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1344. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JENNIFER SPURLOCK could trust, seek advice and confide.

1345. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JENNIFER SPURLOCK to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JENNIFER SPURLOCK.

1346. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JENNIFER SPURLOCK for purposes of his own gratification without regard to its impact upon the well-being of JENNIFER SPURLOCK.

1347. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JENNIFER SPURLOCK's face and hair in a sexual manner, rubbing his body against JENNIFER SPURLOCK in a sexual manner, placing his head on JENNIFER SPURLOCK's breasts, touching, fondling and squeezing of JENNIFER SPURLOCK's breasts, rubbing JENNIFER SPURLOCK's inner thigh and back in a sexual manner and placing his hands on and rubbing JENNIFER SPURLOCK's vaginal area in a sexual manner.

1348. JENNIFER SPURLOCK did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

1349. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JENNIFER SPURLOCK, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JENNIFER SPURLOCK.

1350. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JENNIFER SPURLOCK, JENNIFER SPURLOCK was and will continue to be caused severe emotional distress.

1351. Bill Gothard negligently caused severe emotional distress to JENNIFER SPURLOCK.

1352. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1353. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 115**  
**VICARIOUS LIABILITY – BATTERY**  
***(Jennifer Spurlock v. IBLP)***

1-56, 1314-1353. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1353.

1354. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1355. A juvenile delinquent named Jarvis was admitted to the IBLP program in Indianapolis when JENNIFER SPURLOCK was sixteen (16) years old and working as a leader in training.

1356. Jarvis made numerous physical threats, sexual threats and inappropriately touched JENNIFER SPURLOCK numerous times. These actions made JENNIFER SPURLOCK fearful and she reported each threat to IBLP staff and management, who took no action to protect her from Jarvis.

1357. When JENNIFER SPURLOCK was sixteen (16) years old, Jarvis physically assaulted JENNIFER SPURLOCK and attempted to carry out sexual acts against her.

1358. JENNIFER SPURLOCK did not and could not consent to any of the contact from Jarvis.

1359. Bill Gothard sexually abused JENNIFER SPURLOCK. In doing so, he intended to cause and made harmful and/or offensive contact with JENNIFER SPURLOCK's person.

1360. JENNIFER SPURLOCK did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred after 1996.

1361. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for JENNIFER SPURLOCK.

1362. Bill Gothard and IBLP served as JENNIFER SPURLOCK's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1363. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1364. While grooming, manipulating and exploiting JENNIFER SPURLOCK, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1365. IBLP did nothing to protect JENNIFER SPURLOCK against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by failing to supervise Jarvis and providing him the opportunity, instrumentalities, tools and privacy to abuse her.

1366. IBLP did nothing to protect JENNIFER SPURLOCK against physical and sexual abuse while she was employed by IBLP and further facilitated such abuse by failing to supervise Jarvis and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1367. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JENNIFER SPURLOCK by Jarvis and Bill Gothard.

1368. IBLP acted with a conscious indifference to JENNIFER SPURLOCK's health, safety, and welfare.

1369. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1370. As a direct and proximate result of the aforesaid conduct by IBLP, Jarvis and Bill Gothard physically and sexually abused JENNIFER SPURLOCK and JENNIFER SPURLOCK was and will continue to be caused severe emotional distress.

1371. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1372. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 116**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jennifer Spurlock v. IBLP)***

1-56, 1314-1372. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1372.

1373. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1374. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JENNIFER SPURLOCK.

1375. Bill Gothard and IBLP served as JENNIFER SPURLOCK's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1376. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JENNIFER SPURLOCK.

1377. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JENNIFER SPURLOCK to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JENNIFER SPURLOCK.

1378. While manipulating and exploiting JENNIFER SPURLOCK, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1379. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching JENNIFER SPURLOCK's face and hair in a sexual manner, rubbing his body against JENNIFER SPURLOCK in a sexual manner, placing his head on JENNIFER SPURLOCK's breasts, touching, fondling and squeezing of JENNIFER SPURLOCK's breasts, rubbing JENNIFER SPURLOCK's inner thigh and back in a sexual manner and placing his hands on and rubbing JENNIFER SPURLOCK's vaginal area in a sexual manner.

1380. JENNIFER SPURLOCK did not consent to any of the contact.

1381. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JENNIFER SPURLOCK, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JENNIFER SPURLOCK.

1382. IBLP did nothing to protect JENNIFER SPURLOCK against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1383. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JENNIFER SPURLOCK by Bill Gothard.

1384. IBLP acted with a conscious indifference to JENNIFER SPURLOCK's health, safety, and welfare.

1385. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4

and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1386. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JENNIFER SPURLOCK and JENNIFER SPURLOCK was and will continue to be caused severe emotional distress.

1387. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1388. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 117**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jennifer Spurlock v. IBLP)***

1-56, 1314-1388. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1388.

1389. At all times relevant herein, IBLP was in a supervisory position as it pertained to JENNIFER SPURLOCK and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JENNIFER SPURLOCK, that Bill Gothard employed, counseled, supervised and lead.

1390. At all times relevant herein, IBLP was in a supervisory position as it pertained to JENNIFER SPURLOCK and the conduct of Jarvis and IBLP knew, or reasonably should have known, that Jarvis was in a position with access to JENNIFER SPURLOCK, opportunity to physically and/or sexually assault JENNIFER SPURLOCK and indicated a desire to physically and/or sexually assault JENNIFER SPURLOCK.

1391. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for JENNIFER SPURLOCK.

1392. Bill Gothard, IBLP and the Indianapolis Training Center served as JENNIFER SPURLOCK's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1393. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Jarvis and Bill Gothard in order to provide for the safety and protection of JENNIFER SPURLOCK, and the others that they employed, counseled, supervised and lead.

1394. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1395. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1396. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1397. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1398. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Jarvis had made threats of a violent, physical and sexual nature against JENNIFER SPURLOCK.

1399. IBLP knew, or reasonably should have known, that prior to the allegations herein, Jarvis posed an immediate, substantial and continuing threat to the health, safety and welfare of JENNIFER SPURLOCK and all IBLP participants, volunteers and employees.

1400. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard and Jarvis' conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that each posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard and Jarvis' conduct was necessary in order to avoid exposing JENNIFER SPURLOCK and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1401. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JENNIFER SPURLOCK.

1402. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JENNIFER SPURLOCK.

1403. As a direct and proximate result of the conduct of IBLP, JENNIFER SPURLOCK was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1404. As a direct and proximate result of the conduct of IBLP, Jarvis inappropriately touched and assaulted JENNIFER SPURLOCK.

1405. As a direct and proximate result of the conduct of IBLP, Jarvis had access to and the opportunity to physically and sexually assault JENNIFER SPURLOCK.

1406. As a direct and proximate result of the conduct of IBLP, JENNIFER SPURLOCK was physically and sexually assaulted by Jarvis at the Indianapolis Training Center.

1407. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard and Jarvis were allowed to commit acts of physical and sexual abuse on JENNIFER SPURLOCK, thereby causing injuries and damages to JENNIFER SPURLOCK, including severe permanent emotional and psychological distress, and loss of a normal life.

1408. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1409. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 118**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jennifer Spurlock v. IBLP)***

1-56, 1314-1409. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1409.

1410. At all times relevant herein, IBLP was in a supervisory position as it pertained to JENNIFER SPURLOCK and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JENNIFER SPURLOCK, that Bill Gothard employed, counseled, supervised and lead.

1411. At all times relevant herein, IBLP was in a supervisory position as it pertained to JENNIFER SPURLOCK and the conduct of Jarvis and IBLP knew, or reasonably should have known, that Jarvis was in a position with access to JENNIFER SPURLOCK, opportunity to physically and/or sexually assault JENNIFER SPURLOCK and indicated a desire to physically and/or sexually assault JENNIFER SPURLOCK.

1412. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JENNIFER SPURLOCK and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1413. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Jarvis in order to provide for the safety and protection of JENNIFER SPURLOCK and the others that IBLP employed, counseled, supervised and lead from criminal acts.

1414. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1415. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1416. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1417. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1418. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Jarvis had made threats of a violent, physical and sexual nature against JENNIFER SPURLOCK.

1419. IBLP knew, or reasonably should have known, that prior to the allegations herein, Jarvis posed an immediate, substantial and continuing threat to the health, safety and welfare of JENNIFER SPURLOCK and all IBLP participants, volunteers and employees.

1420. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard and Jarvis' conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that each posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under

IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard and Jarvis' conduct was necessary in order to avoid exposing JENNIFER SPURLOCK and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1421. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JENNIFER SPURLOCK.

1422. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JENNIFER SPURLOCK.

1423. As a direct and proximate result of the conduct of IBLP, JENNIFER SPURLOCK was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1424. As a direct and proximate result of the conduct of IBLP, Jarvis inappropriately touched and assaulted JENNIFER SPURLOCK.

1425. As a direct and proximate result of the conduct of IBLP, Jarvis had access to and the opportunity to physically and sexually assault JENNIFER SPURLOCK.

1426. As a direct and proximate result of the conduct of IBLP, JENNIFER SPURLOCK was physically and sexually assaulted by Jarvis at the Indianapolis Training Center.

1427. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard and Jarvis were allowed to commit acts of physical and sexual abuse on JENNIFER SPURLOCK, thereby causing injuries and damages to JENNIFER SPURLOCK, including severe permanent emotional and psychological distress, and loss of a normal life.

1428. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1429. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 119**  
**CIVIL CONSPIRACY**  
***(Jennifer Spurlock v. Bill Gothard & IBLP)***

1-56, 1314-1429. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1429.

1430. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1431. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1432. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1433. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1434. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1435. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1436. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JENNIFER SPURLOCK, intended to publicly shame and inflict severe emotional distress to JENNIFER SPURLOCK, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JENNIFER SPURLOCK.

1437. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, JENNIFER SPURLOCK has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 120**  
**FALSE IMPRISONMENT**  
***(Jennifer Spurlock v. Bill Gothard)***

1-56, 1314-1438. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1438.

1438. At the age of fifteen (15), JENNIFER SPURLOCK attended an IBLP Girls' Conference in 1993, where Bill Gothard took notice of her, convinced her parents that she should

participate in the IBLP program, and subsequently arranged for her transfer to the IBLP headquarters in Hinsdale, Illinois when she was sixteen (16) years old.

1439. In 1994, Bill Gothard had JENNIFER SPURLOCK placed in an isolated single room at the end of a hallway at the IBLP headquarters with the intent of to confine her within the fixed boundaries of that room in order to control her actions and her access to other people.

1440. In 1995, when JENNIFER SPURLOCK was sixteen (16) years old, Bill Gothard had JENNIFER SPURLOCK transferred to a two-bedroom apartment near the IBLP headquarters in Hinsdale, Illinois with the intent to confine her within fixed boundaries of that apartment in order to control her actions and her access to other people.

1441. During the years 1994 through 1998, on numerous occasions, Bill Gothard confined Plaintiff JENNIFER SPURLOCK to his office with the intent to confine her within the fixed boundaries of that room for the purposes of sexually abusing her.

1442. During the years 1994 through 1998, on numerous occasions, Bill Gothard confined Plaintiff JENNIFER SPURLOCK to his personal car and the IBLP van with the intent to confine her within the fixed boundaries of that room for the purposes of sexually abusing her.

1443. On each of those occasions in the years 1994 to 1998, Bill Gothard's actions directly resulted in the confinement of Plaintiff JENNIFER SPURLOCK within fixed boundaries against her will.

1444. Plaintiff JENNIFER SPURLOCK never consented to the confinement within fixed boundaries imposed by Bill Gothard's conduct.

1445. At the time of each confinement, Plaintiff JENNIFER SPURLOCK was conscious of the confinement, but she was not conscious that it was wrongful.

1446. At the time of each confinement, Plaintiff JENNIFER SPURLOCK was either physically prevented from leaving the fixed boundaries of the room or was unaware that she could

leave in defiance of Bill Gothard, who was in a position of authority over her mentor, spiritual leader, and employer.

1447. As a direct and proximate result of the confinement of Plaintiff JENNIFER SPURLOCK by Bill Gothard, she was subsequently caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1448. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of confinement and/or JENNIFER SPURLOCK did not know her injuries were caused by the confinement.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 121**  
**FALSE IMPRISONMENT**  
***(Jennifer Spurlock v. IBLP)***

1-56, 1314-1448. Plaintiff, JENNIFER SPURLOCK, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1314-1429.

1449. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1450. Bill Gothard confined JENNIFER SPURLOCK without her consent to fixed boundaries during the years 1994 through 1998. In doing so, he intended to confine her fixed boundaries in order to abuse her sexually and/or control her access to other people.

1451. JENNIFER SPURLOCK did not and could not consent to any of the confinement that occurred between 1994 and 1998.

1452. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JENNIFER SPURLOCK.

1453. Bill Gothard and IBLP served as JENNIFER SPURLOCK's parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1454. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JENNIFER SPURLOCK.

1455. While grooming, manipulating, confining, and exploiting JENNIFER SPURLOCK, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1456. IBLP did nothing to protect JENNIFER SPURLOCK against unlawful confinement while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools, facility, and access to privacy to confine her.

1457. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JENNIFER SPURLOCK by Bill Gothard.

1458. IBLP acted with a conscious indifference to JENNIFER SPURLOCK's health, safety, and welfare.

1459. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard unlawfully confined JENNIFER SPURLOCK, and JENNIFER SPURLOCK was and will continue to be caused severe emotional distress.

1460. At the time of the abuse, JENNIFER SPURLOCK did not appreciate that the act was abusive.

1461. JENNIFER SPURLOCK was suffering from a condition that caused her to repress the memories of abuse and/or JENNIFER SPURLOCK did not know her injuries were caused by the abuse.

**WHEREFORE**, JENNIFER SPURLOCK prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 122**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Megan Lind v. Bill Gothard)***

1-56. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1462. Between 1990 and 2000, MEGAN LIND participated in IBLP programs and worked as a volunteer and employee at the Indianapolis Training Center and IBLP headquarters in Hinsdale, Illinois.

1463. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

1464. Notwithstanding said duty as aforesaid, Bill Gothard, in 1996, was guilty of aggravated criminal sexual abuse of a child, to wit, MEGAN LIND, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with MEGAN LIND, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1465. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against MEGAN LIND, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

1466. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1467. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 123**  
**BATTERY**  
***(Megan Lind v. Bill Gothard)***

1-56, 1462-1467. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1467.

1468. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1469. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MEGAN LIND.

1470. Bill Gothard and IBLP served as MEGAN LIND's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1471. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of MEGAN LIND.

1472. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing MEGAN LIND's legs with his hands and feet in a sexual manner and rubbing her hands.

1473. The aforesaid physical and sexual contact was harmful and/or offensive.

1474. The aforesaid actions on the part of Bill Gothard occurred while MEGAN LIND was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1475. The aforesaid actions on the part of Bill Gothard continued until MEGAN LIND was approximately 18 years old.

1476. MEGAN LIND did not and could not consent to any of the contact that occurred between 1996 and 1998 and did not consent to the contact that occurred after 1998.

1477. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against MEGAN LIND, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1478. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1479. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 124**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Megan Lind v. Bill Gothard)***

1-56, 1462-1479. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1479.

1480. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1481. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MEGAN LIND to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MEGAN LIND.

1482. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited MEGAN LIND for purposes of his own gratification without regard to its impact upon the well-being of MEGAN LIND.

1483. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing MEGAN LIND's leg in a sexual manner and rubbing her hand in a sexual manner.

1484. MEGAN LIND was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1996 and 1998.

1485. MEGAN LIND did not and could not consent to any of the contact that occurred between 1996 and 1998 and did not consent to the contact that occurred after 1998.

1486. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MEGAN LIND, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MEGAN LIND.

1487. As a direct and proximate result of the aforesaid conduct by Bill Gothard against MEGAN LIND, MEGAN LIND was and will continue to be caused severe emotional distress.

1488. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1489. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 125**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Megan Lind v. Bill Gothard)***

1-56, 1462-1489. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1489.

1490. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1491. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom MEGAN LIND could trust, seek advice and confide.

1492. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MEGAN LIND to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MEGAN LIND.

1493. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited MEGAN LIND for purposes of his own gratification without regard to its impact upon the well-being of MEGAN LIND.

1494. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing MEGAN LIND's leg in a sexual manner and rubbing her hand in a sexual manner.

1495. MEGAN LIND did not and could not consent to any of the contact that occurred between 1993 and 1996 and did not consent to the contact that occurred between 1996 and 1999.

1496. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MEGAN LIND, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MEGAN LIND.

1497. As a direct and proximate result of the aforesaid conduct by Bill Gothard against MEGAN LIND, MEGAN LIND was and will continue to be caused severe emotional distress.

1498. Bill Gothard negligently caused severe emotional distress to MEGAN LIND.

1499. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1500. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 126**  
**VICARIOUS LIABILITY – BATTERY**  
***(Megan Lind v. IBLP)***

1-56, 1462-1500. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1500.

1501. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1502. Bill Gothard physically and sexually abused MEGAN LIND. In doing so, he intended to cause and made harmful and/or offensive contact with MEGAN LIND's person.

1503. MEGAN LIND did not and could not consent to any of the contact that occurred between 1996 and 1998 and did not consent to the contact that occurred after 1998.

1504. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for MEGAN LIND.

1505. Bill Gothard and IBLP served as MEGAN LIND's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1506. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1507. While grooming, manipulating and exploiting MEGAN LIND, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1508. IBLP did nothing to protect MEGAN LIND against physical and sexual abuse while she was at the Indianapolis Training Center or IBLP headquarters and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1509. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to MEGAN LIND by Bill Gothard.

1510. IBLP acted with a conscious indifference to MEGAN LIND's health, safety, and welfare.

1511. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1512. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused MEGAN LIND and MEGAN LIND was and will continue to be caused severe emotional distress.

1513. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1514. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 126**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Megan Lind v. IBLP)***

1-56, 1462-1514. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1514.

1515. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1516. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MEGAN LIND.

1517. Bill Gothard and IBLP served as MEGAN LIND's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1518. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of MEGAN LIND.

1519. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause MEGAN LIND to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and MEGAN LIND.

1520. While manipulating and exploiting MEGAN LIND, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1521. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing MEGAN LIND's leg in a sexual manner and rubbing her hand in a sexual manner.

1522. MEGAN LIND did not consent to any of the contact.

1523. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the MEGAN LIND, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to MEGAN LIND.

1524. IBLP did nothing to protect MEGAN LIND against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by

failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1525. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to MEGAN LIND by Bill Gothard.

1526. IBLP acted with a conscious indifference to MEGAN LIND's health, safety, and welfare.

1527. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1528. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused MEGAN LIND and MEGAN LIND was and will continue to be caused severe emotional distress.

1529. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1530. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 127**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Megan Lind v. IBLP)***

1-56, 1462-1530. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1460-1530.

1531. At all times relevant herein, IBLP was in a supervisory position as it pertained to MEGAN LIND and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including MEGAN LIND, that Bill Gothard employed, counseled, supervised and lead.

1532. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for MEGAN LIND.

1533. Bill Gothard, IBLP and the Indianapolis Training Center served as MEGAN LIND's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1534. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of MEGAN LIND, and the others that they employed, counseled, supervised and lead.

1535. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1536. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1537. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1538. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1539. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing MEGAN LIND and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1540. As a direct and proximate result of the conduct of IBLP, Bill Gothard physically and sexually assaulted MEGAN LIND.

1541. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of MEGAN LIND.

1542. As a direct and proximate result of the conduct of IBLP, MEGAN LIND was physically and sexually assaulted by Bill Gothard at the Indianapolis Training Center, in DuPage County, Illinois, on the property of IBLP and elsewhere.

1543. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on MEGAN LIND, thereby causing injuries and damages to MEGAN LIND, including severe permanent emotional and psychological distress, and loss of a normal life.

1544. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1545. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 128**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Megan Lind v. IBLP)***

1-56, 1462-1545. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1545.

1546. At all times relevant herein, IBLP was in a supervisory position as it pertained to MEGAN LIND and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including MEGAN LIND, that Bill Gothard employed, counseled, supervised and lead.

1547. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of MEGAN LIND and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1548. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1549. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1550. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1551. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1552. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing MEGAN LIND and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1553. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted MEGAN LIND.

1554. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of MEGAN LIND.

1555. As a direct and proximate result of the conduct of IBLP, MEGAN LIND was physically and sexually assaulted by Bill Gothard at the Indianapolis Training Center, in DuPage County, Illinois, on the property of IBLP and elsewhere.

1556. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on MEGAN LIND, thereby causing injuries and damages to MEGAN LIND, including severe permanent emotional and psychological distress, and loss of a normal life.

1557. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1558. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 129**  
**CIVIL CONSPIRACY**  
***(Megan Lind v. Bill Gothard & IBLP)***

1-56, 1462-1558. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1558.

1559. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1560. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard,

IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1561. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1562. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1563. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1564. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1565. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against MEGAN LIND, intended to publicly shame and inflict severe emotional distress to MEGAN LIND, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to MEGAN LIND.

1566. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, MEGAN LIND has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 130**  
**FALSE IMPRISONMENT**  
***(Megan Lind v. Bill Gothard)***

1-56, 1462-1566. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1566.

1567. In 1998, MEGAN LIND was a “leader in training” at the Indianapolis Training Center. When she arrived at the ITC, she was confined to a locked room for at least five (5) days. She was instructed that she was to stay in that room and not leave. Her meals were brought to her. Although the room had a bathroom, she was not permitted to close the bathroom door in her room. MEGAN LIND was only permitted to leave by escort to attend a counseling session with Bill Gothard.

1568. MEGAN LIND’s confinement at the Indianapolis Training Center by the IBLP staff constitutes "criminal confinement," pursuant to Bums Ind. Code Ann. § 35-42-3-3, a felony.

1569. By confining MEGAN LIND to a locked room, Bill Gothard acted with the intent to confine her to the fixed boundaries of that room in order to control her access to other people.

1570. During that time, on numerous occasions, Bill Gothard confined Plaintiff MEGAN LIND to his office with the intent to confine her within the fixed boundaries of that room for the purposes of sexually abusing her.

1571. During the counseling session, Bill Gothard sexually harassed MEGAN LIND by sitting close to her, touching her, holding her hand and rubbing her leg.

1572. On each of those occasions, Bill Gothard’s actions directly resulted in the confinement of Plaintiff MEGAN LIND within fixed boundaries against her will.

1573. Plaintiff MEGAN LIND never consented to the confinement within fixed boundaries imposed by Bill Gothard’s conduct.

1574. At the time of each confinement, Plaintiff MEGAN LIND was conscious of the confinement, but she was not conscious that it was wrongful.

1575. At the time of each confinement, Plaintiff MEGAN LIND was either physically prevented from leaving the fixed boundaries of the room or was unaware that she could leave in defiance of Bill Gothard, who was in a position of authority over her mentor, spiritual leader, and employer.

1576. As a direct and proximate result of the confinement of Plaintiff MEGAN LIND by Bill Gothard, she was subsequently caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1577. MEGAN LIND was suffering from a condition that caused her to repress the memories of confinement and/or MEGAN LIND did not know her injuries were caused by the confinement.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 131**  
**FALSE IMPRISONMENT**  
***(Megan Lind v. IBLP)***

1-56, 1462-1577. Plaintiff, MEGAN LIND, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1462-1577.

1578. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1579. Bill Gothard confined MEGAN LIND without her consent to fixed boundaries during the year 1998. In doing so, he intended to confine her fixed boundaries in order to abuse her sexually and/or control her access to other people.

1580. MEGAN LIND did not consent to any of the confinement that occurred in 1998.

1581. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for MEGAN LIND.

1582. Bill Gothard and IBLP served as MEGAN LIND's parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1583. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to MEGAN LIND.

1584. While grooming, manipulating, confining, and exploiting MEGAN LIND, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1585. IBLP did nothing to protect MEGAN LIND against unlawful confinement while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard with the authority, instrumentalities, tools, facility, and access to privacy to confine her.

1586. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to MEGAN LIND by Bill Gothard.

1587. IBLP acted with a conscious indifference to MEGAN LIND's health, safety, and welfare.

1588. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard unlawfully confined MEGAN LIND, and MEGAN LIND was and will continue to be caused severe emotional distress.

1589. At the time of the abuse, MEGAN LIND did not appreciate that the act was abusive.

1590. MEGAN LIND was suffering from a condition that caused her to repress the memories of abuse and/or MEGAN LIND did not know her injuries were caused by the abuse.

**WHEREFORE**, MEGAN LIND prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 132**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jane Doe V v. Bill Gothard)***

1-56. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1591. Between 1995 and 1997, JANE DOE V participated in IBLP programs and worked as a volunteer and employee for IBLP.

1592. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

1593. Notwithstanding said duty as aforesaid, Bill Gothard, from 1995 to 1997, was guilty of aggravated criminal sexual abuse of a child, to wit, JANE DOE V, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JANE DOE V, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1594. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against JANE DOE V, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

1595. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1596. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 132**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jane Doe V v. Matt Heard)***

1-56. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1597. Between 1995 and 1997, JANE DOE V participated in IBLP programs and worked as a volunteer and employee for IBLP.

1598. That at all times relevant herein, it was the duty of IBLP staff member Matt Heard to refrain from committing aggravated criminal sexual abuse of a child.

1599. Notwithstanding said duty as aforesaid, Matt Heard, in 1997, was guilty of aggravated criminal sexual abuse of a child, to wit, JANE DOE V, in that Matt Heard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JANE DOE V, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed, by vaginally penetrating her.

1600. As a direct and proximate result of the aggravated criminal sexual abuse by Matt Heard against JANE DOE V, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

1601. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1602. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Matt Heard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 133**  
**BATTERY**  
***(Jane Doe V v. Bill Gothard)***

1-56, 1597-1602. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1602.

1603. At all times relevant herein, IBLP and Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1604. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1605. Bill Gothard and IBLP served as JANE DOE V's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1606. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE V.

1607. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE V's leg in a sexual manner, rubbing JANE DOE V's hand in a sexual manner, touching JANE DOE V's face and hair in a sexual manner.

1608. The aforesaid physical and sexual contact was harmful and/or offensive.

1609. The aforesaid actions on the part of Bill Gothard occurred while JANE DOE V was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1610. The aforesaid actions on the part of Bill Gothard continued until JANE DOE V was approximately 15 years old.

1611. JANE DOE V did not and could not consent to any of the contact.

1612. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JANE DOE V, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1613. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1614. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 134**  
**BATTERY**  
***(Jane Doe V v. Matt Heard)***

1-56, 1597-1614. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1614.

1615. At all times relevant herein, IBLP and Matt Heard were in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1616. That at all times relevant herein, it was the duty of Matt Heard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE V.

1617. Notwithstanding said duty as aforesaid, Matt Heard engaged in unwanted physical and sexual contact and conduct including forced, non-consensual sexual intercourse and other non-consensual sex acts.

1618. The aforesaid physical and sexual contact was harmful and/or offensive.

1619. The aforesaid actions on the part of Matt Heard occurred while JANE DOE V was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1620. The aforesaid actions on the part of Matt Heard occurred at an IBLP conference in Knoxville, Tennessee when JANE DOE V was approximately 14 years old.

1621. JANE DOE V did not and could not consent to any of the contact.

1622. As a direct and proximate result of the harmful and/or offensive conduct by Matt Heard against JANE DOE V, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1623. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1624. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Matt Heard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 135**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe V v. Bill Gothard)***

1-56, 1597-1624. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1957-1624.

1625. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1626. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE V.

1627. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE V for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE V.

1628. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE V's leg in a sexual manner, rubbing JANE DOE V's hand in a sexual manner, touching JANE DOE V's face and hair in a sexual manner.

1629. JANE DOE V was a minor at the time of Bill Gothard's unwanted physical and sexual contact.

1630. JANE DOE V did not and could not consent to any of the contact.

1631. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1632. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE V, JANE DOE V was and will continue to be caused severe emotional distress.

1633. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1634. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 136**  
**INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
***(Jane Doe V v. Matt Heard)***

1-56, 1597-1634. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 222-235.

1635. At all times relevant herein, Matt Heard was in a position of trust, confidence and leadership through his position at IBLP as it pertained to JANE DOE V.

1636. That at all times relevant herein, it was the duty of Matt Heard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience severe emotional distress given all the facts and circumstances existing between Matt Heard and JANE DOE V.

1637. Notwithstanding said duty as aforesaid, Matt Heard manipulated and otherwise exploited JANE DOE V for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE V.

1638. Notwithstanding said duty as aforesaid, Matt Heard engaged in unwanted physical and sexual contact and conduct including forced, non-consensual sexual intercourse and other non-consensual sex acts.

1639. JANE DOE V was a minor at the time of Matt Heard's unwanted physical and sexual contact.

1640. JANE DOE V did not and could not consent to any of the contact.

1641. At all times relevant herein, Matt Heard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1642. As a direct and proximate result of the aforesaid conduct by Matt Heard against JANE DOE V, JANE DOE V was and will continue to be caused severe emotional distress.

1643. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1644. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Matt Heard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 137**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jane Doe V v. Bill Gothard)***

1-56, 1597-1644. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1644.

1645. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1646. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JANE DOE V could trust, seek advice and confide.

1647. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE V.

1648. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE V for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE V.

1649. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE V's leg in a sexual manner, rubbing JANE DOE V's hand in a sexual manner, touching JANE DOE V's face and hair in a sexual manner.

1650. JANE DOE V did not and could not consent to any of the contact.

1651. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1652. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE V, JANE DOE V was and will continue to be caused severe emotional distress.

1653. Bill Gothard negligently caused severe emotional distress to JANE DOE V.

1654. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1655. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 138**  
**NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jane Doe V v. Matt Heard)***

1-56, 1597-1655. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1655.

1656. At all times relevant herein, Matt Heard was in a position of trust, confidence and leadership through his position at IBLP as it pertained to JANE DOE V.

1657. At all times relevant herein, Matt Heard held himself out as her IBLP superior to whom JANE DOE V could trust, seek advice and confide.

1658. That at all times relevant herein, it was the duty of Matt Heard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience

severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE V.

1659. Notwithstanding said duty as aforesaid, Matt Heard manipulated and otherwise exploited JANE DOE V for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE V.

1660. Notwithstanding said duty as aforesaid, Matt Heard engaged in unwanted physical and sexual contact and conduct including forced, non-consensual sexual intercourse and other non-consensual sex acts.

1661. JANE DOE V did not and could not consent to any of the contact.

1662. At all times relevant herein, Matt Heard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1663. As a direct and proximate result of the aforesaid conduct by Matt Heard against JANE DOE V, JANE DOE V was and will continue to be caused severe emotional distress.

1664. Matt Heard negligently caused severe emotional distress to JANE DOE V.

1665. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1666. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Matt Heard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 139**  
**VICARIOUS LIABILITY – BATTERY**  
***(Jane Doe V v. IBLP)***

1-56, 1597-1666. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1666.

1667. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1668. Bill Gothard physically and sexually abused JANE DOE V. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE V's person.

1669. Matt Heard physically and sexually abused JANE DOE V. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE V's person.

1670. JANE DOE V did not and could not consent to any of the contact.

1671. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1672. Bill Gothard and IBLP served as JANE DOE V's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1673. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1674. While grooming, manipulating and exploiting JANE DOE V, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1675. IBLP did nothing to protect JANE DOE V against physical and sexual abuse while she was at the Indianapolis Training Center or IBLP headquarters and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1676. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE V by Bill Gothard.

1677. At all times relevant herein, Matt Heard was in a position of trust, confidence and leadership through his position at IBLP as it pertained to JANE DOE V.

1678. While manipulating and exploiting JANE DOE V, Matt Heard was acting within the course and scope of his employment and with the authority of IBLP.

1679. IBLP did nothing to protect JANE DOE V against physical and sexual abuse while she was in Knoxville, Tennessee and further facilitated such abuse by failing to supervise Matt Heard and providing him the opportunity, instrumentalities, tools and privacy to abuse her.

1680. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE V by Matt Heard.

1681. IBLP acted with a conscious indifference to JANE DOE V's health, safety, and welfare.

1682. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1683. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard and Matt Heard physically and sexually abused JANE DOE V and JANE DOE V was and will continue to be caused severe emotional distress.

1684. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1685. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 140**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe V v. IBLP)***

1-56, 1597-1685. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1685.

1686. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1687. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1688. Bill Gothard and IBLP served as JANE DOE V's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1689. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE V.

1690. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE V.

1691. While manipulating and exploiting JANE DOE V, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1692. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE V's leg in a sexual manner, rubbing JANE DOE V's hand in a sexual manner, touching JANE DOE V's face and hair in a sexual manner.

1693. JANE DOE V did not consent to any of the contact.

1694. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1695. IBLP did nothing to protect JANE DOE V against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1696. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE V by Bill Gothard.

1697. IBLP acted with a conscious indifference to JANE DOE V's health, safety, and welfare.

1698. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1699. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE V and JANE DOE V was and will continue to be caused severe emotional distress.

1700. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1701. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 141**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe V v. IBLP)***

1-56, 1597-170. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1701.

1702. At all times relevant herein, Matt Heard was in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1703. At all times relevant hereto, IBLP voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1704. Bill Gothard, IBLP and Matt Heard served as JANE DOE V's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1705. That at all times relevant herein, it was the duty of Matt Heard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE V.

1706. That at all times relevant herein, it was the duty of Matt Heard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE V to experience severe emotional distress given all the facts and circumstances existing between Matt Heard and JANE DOE V.

1707. While manipulating and exploiting JANE DOE V, Matt Heard was acting within the course and scope of his employment and with the authority of IBLP.

1708. Notwithstanding said duty as aforesaid, Matt Heard engaged in unwanted physical and sexual contact and conduct including forced, non-consensual sexual intercourse and other non-consensual sex acts.

1709. JANE DOE V did not consent to any of the contact.

1710. At all times relevant herein, Matt Heard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE V, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE V.

1711. IBLP did nothing to protect JANE DOE V against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Matt Heard and providing Matt Heard with the authority, instrumentalities, tools and privacy to abuse her.

1712. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE V by Matt Heard.

1713. IBLP acted with a conscious indifference to JANE DOE V's health, safety, and welfare.

1714. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1715. As a direct and proximate result of the aforesaid conduct by IBLP, Matt Heard physically and sexually abused JANE DOE V and JANE DOE V was and will continue to be caused severe emotional distress.

1716. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1717. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 142**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jane Doe V v. IBLP)***

1-56, 1597-1717. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1717.

1718. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE V and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained

to the minor children, including JANE DOE V, that Bill Gothard employed, counseled, supervised and lead.

1719. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE V and the conduct of Matt Heard and IBLP knew, or reasonably should have known, that Matt Heard was in a position with access to JANE DOE V, opportunity to physically and/or sexually assault JANE DOE V.

1720. At all times relevant hereto, IBLP, the Indianapolis Training Center and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1721. Bill Gothard, IBLP and the Indianapolis Training Center served as JANE DOE V's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1722. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard and Matt heard in order to provide for the safety and protection of JANE DOE V, and the others that they employed, counseled, supervised and lead.

1723. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1724. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1725. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1726. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1727. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Matt Heard had previously demonstrated physical and/or sexual interest in JANE DOE V and made physical and/or sexual advances against JANE DOE V.

1728. IBLP knew, or reasonably should have known, that prior to the allegations herein, Matt Heard posed an immediate, substantial and continuing threat to the health, safety and welfare of JANE DOE V and all IBLP participants, volunteers and employees.

1729. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard and Matt Heard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that each posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard and Matt Heard's conduct was necessary in order to avoid exposing JANE DOE V and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1730. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JANE DOE V.

1731. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE V.

1732. As a direct and proximate result of the conduct of IBLP, JANE DOE V was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1733. As a direct and proximate result of the conduct of IBLP, Matt Heard inappropriately touched and physically and sexually assaulted JANE DOE V.

1734. As a direct and proximate result of the conduct of IBLP, Matt Heard had access to and the opportunity to physically and sexually assault JANE DOE V.

1735. As a direct and proximate result of the conduct of IBLP, JANE DOE V was physically and sexually assaulted by Matt Heard in Knoxville, Tennessee at an IBLP conference.

1736. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard and Matt Heard were allowed to commit acts of physical and sexual abuse on JANE DOE V, thereby causing injuries and damages to JANE DOE V, including severe permanent emotional and psychological distress, and loss of a normal life.

1737. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1738. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 143**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jane Doe V v. IBLP)***

1-56, 1597-1738. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1738.

1739. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE V and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JANE DOE V, that Bill Gothard employed, counseled, supervised and lead.

1740. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE V and the conduct of Matt Heard and IBLP knew, or reasonably should have known, that Jarvis was in a position with access to JANE DOE V, opportunity to physically and/or sexually assault JANE DOE V, demonstrated physical and/or sexual interest in JANE DOE V and made physical and/or sexual advances against JANE DOE V.

1741. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE V and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1742. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Matt Heard in order to provide for the safety and protection of JANE DOE V and the others that IBLP employed, counseled, supervised and lead from criminal acts.

1743. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1744. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1745. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1746. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1747. IBLP knew, or reasonably should have known, that prior to the allegations herein, that Matt Heard had previously demonstrated physical and/or sexual interest in JANE DOE V and made physical and/or sexual advances against JANE DOE V.

1748. IBLP knew, or reasonably should have known, that prior to the allegations herein, Matt Heard posed an immediate, substantial and continuing threat to the health, safety and welfare of JANE DOE V and all IBLP participants, volunteers and employees.

1749. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard and Matt Heard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that each posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard and Matt Heard's conduct was necessary in order to avoid exposing JANE DOE V and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1750. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JANE DOE V.

1751. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE V.

1752. As a direct and proximate result of the conduct of IBLP, JANE DOE V was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1753. As a direct and proximate result of the conduct of IBLP, Matt Heard inappropriately touched and physically and sexually assaulted JANE DOE V.

1754. As a direct and proximate result of the conduct of IBLP, Matt Heard had access to and the opportunity to physically and sexually assault JANE DOE V.

1755. As a direct and proximate result of the conduct of IBLP, JANE DOE V was physically and sexually assaulted by Matt Heard in Knoxville, Tennessee at an IBLP conference.

1756. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard and Matt Heard were allowed to commit acts of physical and sexual abuse on JANE DOE V, thereby causing injuries and damages to JANE DOE V, including severe permanent emotional and psychological distress, and loss of a normal life.

1757. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1758. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 144**  
**CIVIL CONSPIRACY**  
***(Jane Doe V v. Bill Gothard & IBLP)***

1-56, 1597-1758. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1578.

1759. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1760. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1761. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1762. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1763. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1764. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1765. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JANE DOE V, intended to publicly shame and inflict severe emotional distress to JANE DOE V, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JANE DOE V.

1766. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, 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**, JANE DOE V prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 145**  
**FALSE IMPRISONMENT**  
***(Jane Doe V v. Bill Gothard)***

1-56, 1597-1766. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1566.

1767. In 1996, Bill Gothard sent JANE DOE V to the ITC in Indianapolis where she was held in seclusion for three weeks. During that time, she was not permitted to speak with anyone.

1768. By confining JANE DOE V to seclusion, Bill Gothard acted with the intent to confine her to fixed boundaries in order to control her access to other people.

1769. Bill Gothard's actions directly resulted in the confinement of Plaintiff JANE DOE V within fixed boundaries against her will.

1770. Plaintiff JANE DOE V never consented to the confinement within fixed boundaries imposed by Bill Gothard's conduct.

1771. JANE DOE V's confinement at the Indianapolis Training Center by the IBLP staff constitutes "criminal confinement," pursuant to Bums Ind. Code Ann. § 35-42-3-3, a felony.

1772. At the time of the confinement, Plaintiff JANE DOE V was conscious of the confinement, but she was not conscious that it was wrongful.

1773. At the time of the confinement, Plaintiff JANE DOE V was either physically prevented from leaving the fixed boundaries to which she had been confined or was unaware that she could leave in defiance of Bill Gothard, who was in a position of authority over her as mentor and spiritual leader.

1774. As a direct and proximate result of the confinement of Plaintiff JANE DOE V by Bill Gothard, she was subsequently caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1775. JANE DOE V was suffering from a condition that caused her to repress the memories of confinement and/or JANE DOE V did not know her injuries were caused by the confinement.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 146**  
**FALSE IMPRISONMENT**  
***(Jane Doe V v. IBLP)***

1-56, 1597-1775. Plaintiff, JANE DOE V, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1597-1575.

1776. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1777. Bill Gothard confined JANE DOE V without her consent to fixed boundaries during the year 1996. In doing so, he intended to confine her fixed boundaries in order to control her access to other people.

1778. In 1997, JANE DOE V was returned to ITC from Tennessee, where she beaten for having been raped, and Mr. and Mrs. Gergeni (IBLP staff at ITC) locked her in a “prayer room” alone and often without food for weeks. In doing so, IBLP staff intended to confine JANE DOE V to fixed boundaries in order to control her access to other people.

1779. When she was released from confinement in 1998, JANE DOE V escaped ITC while on a hike, and when she was returned, IBLP staff again confined JANE DOE V to the “prayer room” for weeks. In doing so, IBLP staff intended to confine JANE DOE V to fixed boundaries in order to control her access to other people.

1780. In both of the 1997 incidents, IBLP staff actions directly resulted in the confinement of Plaintiff JANE DOE V within fixed boundaries against her will.

1781. JANE DOE V did not consent to the confinements that occurred in 1996 and 1997.

1782. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE V.

1783. Bill Gothard and IBLP served as JANE DOE V’s parent, teacher, counselor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1784. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision, leadership, counselor, spiritual leader and spiritual advisor as it pertained to JANE DOE V.

1785. While grooming, manipulating, confining, and exploiting JANE DOE V, Bill Gothard and other IBLP staff were acting within the course and scope of their employment and with the authority of IBLP.

1786. IBLP did nothing to protect JANE DOE V against unlawful confinement while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard and other staff with the authority, instrumentalities, tools, facility, and access to privacy to confine her.

1787. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE V by Bill Gothard and other IBLP staff.

1788. IBLP acted with a conscious indifference to JANE DOE V's health, safety, and welfare.

1789. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard and other IBLP staff unlawfully confined JANE DOE V, and JANE DOE V was and will continue to be caused severe emotional distress.

1790. At the time of the abuse, JANE DOE V did not appreciate that the act was abusive.

1791. JANE DOE V was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE V did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE V prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 147**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Daniel Dorsett v. Bill Gothard)***

1-56. Plaintiff, DANIEL DORSETT, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1792. Between 1993 and 1996, DANIEL DORSETT participated in IBLP programs and worked as a volunteer and employee for IBLP.

1793. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to DANIEL DORSETT.

1794. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause DANIEL DORSETT to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and DANIEL DORSETT.

1795. Notwithstanding said duty as aforesaid, DANIEL DORSETT observed Bill Gothard manipulate, exploit and physically and sexually abuse numerous females for purposes of his own gratification without regard to its impact upon the well-being of DANIEL DORSETT and/or the female victims.

1796. Notwithstanding said duty as aforesaid, Bill Gothard threatened DANIEL DORSETT regarding his observations and instructed DANIEL DORSETT to disregard any and all manipulation, exploitation and physical and sexual abuse he observed at IBLP.

1797. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the DANIEL DORSETT, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to DANIEL DORSETT.

1798. As a direct and proximate result of the aforesaid conduct by Bill Gothard against numerous females in the presence of DANIEL DORSETT and threats to DANIEL DORSET for reporting, DANIEL DORSETT was and will continue to be caused severe emotional distress.

1799. At the time of the abuse, DANIEL DORSETT did not appreciate that the acts against him were wrong.

1800. DANIEL DORSETT was suffering from a condition that caused him to repress the memories of abuse and Bill Gothard's threats and/or DANIEL DORSETT did not know his injuries were caused by the abuse he witnessed and Bill Gothard's threats.

**WHEREFORE**, DANIEL DORSETT prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 148**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Daniel Dorsett v. Bill Gothard)***

1-56, 1792-1800. Plaintiff, DANIEL DORSETT, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1792-1800.

1801. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to DANIEL DORSETT.

1802. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause DANIEL DORSETT to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and DANIEL DORSETT.

1803. Notwithstanding said duty as aforesaid, DANIEL DORSETT observed Bill Gothard manipulate, exploit and physically and sexually abuse numerous females for purposes of his own gratification without regard to its impact upon the well-being of DANIEL DORSETT and/or the female victims.

1804. Notwithstanding said duty as aforesaid, Bill Gothard threatened DANIEL DORSETT regarding his observations and instructed DANIEL DORSETT to disregard any and all manipulation, exploitation and physical and sexual abuse he observed at IBLP.

1805. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the DANIEL DORSETT, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to DANIEL DORSETT.

1806. As a direct and proximate result of the aforesaid conduct by Bill Gothard against DANIEL DORSETT, DANIEL DORSETT was and will continue to be caused severe emotional distress.

1807. Bill Gothard negligently caused severe emotional distress to DANIEL DORSETT.

1808. At the time of the abuse, DANIEL DORSETT did not appreciate that the acts against him were wrong.

1809. DANIEL DORSETT was suffering from a condition that caused him to repress the memories of abuse and Bill Gothard's threats and/or DANIEL DORSETT did not know his injuries were caused by the abuse he witnessed and Bill Gothard's threats.

**WHEREFORE**, DANIEL DORSETT prays for judgment in his favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 149**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Daniel Dorsett v. IBLP)***

1-56, 1792-1809. Plaintiff, DANIEL DORSETT, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1792-1809.

1810. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to DANIEL DORSETT.

1811. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause DANIEL DORSETT to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and DANIEL DORSETT.

1812. Notwithstanding said duty as aforesaid, DANIEL DORSETT observed Bill Gothard manipulate, exploit and physically and sexually abuse numerous females for purposes of his own gratification without regard to its impact upon the well-being of DANIEL DORSETT and/or the female victims.

1813. Notwithstanding said duty as aforesaid, Bill Gothard threatened DANIEL DORSETT regarding his observations and instructed DANIEL DORSETT to disregard any and all manipulation, exploitation and physical and sexual abuse he observed at IBLP.

1814. While manipulating and exploiting females and his threats to DANIEL DORSETT, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1815. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the DANIEL DORSETT, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to DANIEL DORSETT.

1816. IBLP did nothing to protect DANIEL DORSETT against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by

failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse females in DANIEL DORSETT's presence and threaten DANIEL DORSETT.

1817. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of harm to DANIEL DORSETT by Bill Gothard.

1818. IBLP acted with a conscious indifference to DANIEL DORSETT's health, safety, and welfare.

1819. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1820. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused females in DANIEL DORSETT's presence, threatened DANIEL DORSETT after the abuse took place and DANIEL DORSETT was and will continue to be caused severe emotional distress.

1821. At the time of the abuse, DANIEL DORSETT did not appreciate that the acts against him were wrong.

1822. DANIEL DORSETT was suffering from a condition that caused him to repress the memories of abuse and Bill Gothard's threats and/or DANIEL DORSETT did not know his injuries were caused by the abuse he witnessed and Bill Gothard's threats.

**WHEREFORE**, DANIEL DORSETT prays for judgment in his favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 150**  
**CIVIL CONSPIRACY**  
***(Daniel Dorsett v. Bill Gothard & IBLP)***

1-56, 1792-1822. Plaintiff, DANIEL DORSETT, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1792-1822.

1823. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1824. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of threats, physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1825. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1826. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1827. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1828. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1829. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against DANIEL DORSETT, intended to publicly shame and inflict severe emotional distress to DANIEL DORSETT, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to DANIEL DORSETT.

1830. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, DANIEL DORSETT has suffered and will in the future continue to suffer injuries of a personal and pecuniary nature, and severe emotional distress.

**WHEREFORE**, DANIEL DORSETT prays for judgment in his favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 151**  
**FALSE IMPRISONMENT**  
**(DANIEL DORSETT v. IBLP)**

1-56, 1792-1830. Plaintiff, DANIEL DORSETT, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1792-1830.

1831. In January of 1996, IBLP staff held DANIEL DORSETT in confinement for admitting to having "sinful thoughts."

1832. By confining DANIEL DORSETT to seclusion, IBLP staff acted with the intent to confine him to fixed boundaries.

1833. IBLP's actions directly resulted in the confinement of Plaintiff DANIEL DORSETT within fixed boundaries against his will.

1834. Plaintiff DANIEL DORSETT did not consent to the confinement within fixed boundaries imposed by IBLP's conduct.

1835. At the time of the confinement, Plaintiff DANIEL DORSETT was conscious of the confinement, but he was not conscious that it was wrongful.

1836. At the time of the confinement, Plaintiff DANIEL DORSETT was either physically prevented from leaving the fixed boundaries to which he had been confined or was unaware that he could leave in defiance of IBLP staff, who were in a position of authority over him as mentors and spiritual leaders.

1837. Locking DANIEL DORSETT in a room against his will constitutes unlawful restraint in violation of Illinois Compiled Statutes Annotated 720 ILCS 5/10-3, a felony.

1838. At all times relevant herein, Bill Gothard and IBLP staff were in a position of trust, confidence, supervision, leadership, spiritual leader and spiritual advisor as it pertained to DANIEL DORSETT.

1839. Bill Gothard and IBLP staff served as DANIEL DORSETT's teacher, counselor, spiritual advisor, spiritual leader and protector during his time at IBLP.

1840. While confining DANIEL DORSETT, IBLP staff were acting within the course and scope of their employment and with the authority of IBLP.

1841. IBLP did nothing to protect DANIEL DORSETT against unlawful confinement while she was employed by IBLP and further facilitated such abuse by providing Bill Gothard and other staff with the authority, instrumentalities, tools, facility, and access to privacy to confine him.

1842. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to DANIEL DORSETT by Bill Gothard and other IBLP staff.

1843. IBLP acted with a conscious indifference to DANIEL DORSETT's health, safety, and welfare.

1844. As a direct and proximate result of the aforesaid conduct by IBLP staff, IBLP unlawfully confined DANIEL DORSETT, and DANIEL DORSETT was and will continue to be caused severe emotional distress.

1845. At the time of the abuse, DANIEL DORSETT did not appreciate that the act was abusive.

1846. DANIEL DORSETT was suffering from a condition that caused him to repress the memories of abuse and/or DANIEL DORSETT did not know her injuries were caused by the abuse.

**WHEREFORE**, DANIEL DORSETT prays for judgment in his favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 152**  
**AGGRAVATED CRIMINAL SEXUAL ABUSE**  
***(Jane Doe VI v. Bill Gothard)***

1-56. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56.

1847. Between 1991 and 1998, JANE DOE VI participated in IBLP programs and worked as a volunteer and employee of IBLP.

1848. That at all times relevant herein, it was the duty of Bill Gothard to refrain from committing aggravated criminal sexual abuse of a child.

1849. Notwithstanding said duty as aforesaid, upon information and belief, Bill Gothard, in 1991 and 1992, was guilty of aggravated criminal sexual abuse of a child, to wit, JANE DOE VI, in that Bill Gothard, a person seventeen (17) years of age or older, knowingly committed an act of sexual conduct (meaning any intentional or knowing touching or fondling by the victim or the accused for the purpose of sexual gratification of the victim or the accused) with JANE DOE VI, who was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1850. As a direct and proximate result of the aggravated criminal sexual abuse by Bill Gothard against JANE DOE VI, she was caused to suffer injuries and damages including permanent and serious emotional and psychological distress, and loss of a normal life.

1851. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1852. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 153**  
**BATTERY**  
***(Jane Doe VI v. Bill Gothard)***

1-56, 1847-1852. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1852.

1853. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE VI.

1854. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE VI's leg and feet in a sexual manner, wrapping his legs around JANE DOE VI's legs, rubbing and holding JANE DOE VI's hand in a sexual manner.

1855. The aforesaid physical and sexual contact was harmful and/or offensive.

1856. The aforesaid actions on the part of Bill Gothard occurred while JANE DOE VI was at least thirteen (13) years of age but under seventeen (17) years of age when the act was committed.

1857. The aforesaid actions on the part of Bill Gothard continued until JANE DOE VI was approximately 23 years old.

1858. JANE DOE VI did not and could not consent to any of the contact that occurred between 1991 and 1993 and did not consent to the contact that occurred after 1993.

1859. As a direct and proximate result of the harmful and/or offensive conduct by Bill Gothard against JANE DOE VI, she was caused to suffer injuries and damages including severe permanent emotional and psychological distress, and loss of a normal life.

1860. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1861. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 154**  
**INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
***(Jane Doe VI v. Bill Gothard)***

1-56, 1847-1861. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1861.

1862. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE VI.

1863. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE VI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE VI.

1864. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE VI for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE VI.

1865. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE VI's leg and feet in a sexual manner, wrapping his legs around JANE DOE VI's legs, rubbing and holding JANE DOE VI's hand in a sexual manner.

1866. JANE DOE VI was a minor at the time of Bill Gothard's unwanted physical and sexual contact and conduct that occurred between 1991 and 1993.

1867. JANE DOE VI did not and could not consent to any of the contact that occurred between 1991 and 1993 and did not consent to the contact that occurred after 1993.

1868. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE VI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE VI.

1869. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE VI, JANE DOE VI was and will continue to be caused severe emotional distress.

1870. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1871. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 155**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DIRECT VICTIM**  
***(Jane Doe VI v. Bill Gothard)***

1-56, 1847-1871. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1871.

1872. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE VI.

1873. At all times relevant herein, Bill Gothard held himself out as her employer, IBLP superior, counselor, spiritual advisor and a qualified religious leader to whom JANE DOE VI could trust, seek advice and confide.

1874. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE VI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE VI.

1875. Notwithstanding said duty as aforesaid, Bill Gothard groomed, manipulated and otherwise exploited JANE DOE VI for purposes of his own gratification without regard to its impact upon the well-being of JANE DOE VI.

1876. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE VI's leg and feet in a sexual manner, wrapping his legs around JANE DOE VI's legs, rubbing and holding JANE DOE VI's hand in a sexual manner.

1877. JANE DOE VI did not and could not consent to any of the contact that occurred between 1991 and 1993 and did not consent to the contact that occurred after 1993.

1878. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE VI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE VI.

1879. As a direct and proximate result of the aforesaid conduct by Bill Gothard against JANE DOE VI, JANE DOE VI was and will continue to be caused severe emotional distress.

1880. Bill Gothard negligently caused severe emotional distress to JANE DOE VI.

1881. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1882. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against Bill Gothard, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 156**  
**VICARIOUS LIABILITY – BATTERY**  
***(Jane Doe VI v. IBLP)***

1-56, 1847-1882. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1882.

1883. At all times relevant herein, there was a strong policy in the State of Illinois in favor of protecting minors in order to decrease the likelihood of abuse or neglect of said minors by providing for the proper supervision of individuals who were in frequent contact with minors.

1884. Bill Gothard physically and sexually abused JANE DOE VI. In doing so, he intended to cause and made harmful and/or offensive contact with JANE DOE VI's person.

1885. JANE DOE VI did not and could not consent to any of the contact that occurred between 1991 and 1993 and did not consent to the contact that occurred after 1993.

1886. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE VI.

1887. Bill Gothard and IBLP served as JANE DOE VI's employer, counselor, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1888. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, counselor, spiritual leader and spiritual advisor as it pertained to JANE DOE VI.

1889. While grooming, manipulating and exploiting JANE DOE VI, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1890. IBLP did nothing to protect JANE DOE VI against physical and sexual abuse while she was at IBLP headquarters and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1891. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE VI by Bill Gothard.

1892. IBLP acted with a conscious indifference to JANE DOE VI's health, safety, and welfare.

1893. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1894. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE VI and JANE DOE VI was and will continue to be caused severe emotional distress.

1895. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1896. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 157**  
**VICARIOUS LIABILITY – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
***(Jane Doe VI v. IBLP)***

1-56, 1847-1896. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1869.

1897. At all times relevant herein, Bill Gothard was in a position of trust, confidence, supervision (employment and parental), leadership, spiritual leader and spiritual advisor as it pertained to JANE DOE VI.

1898. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE VI.

1899. Bill Gothard and IBLP served as JANE DOE VI's counselor, supervisor, spiritual advisor, spiritual leader and protector during her time at IBLP.

1900. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from intentionally making harmful or offensive contact with the body of JANE DOE VI.

1901. That at all times relevant herein, it was the duty of Bill Gothard, to refrain from conduct that he knew, or reasonably should have known, would cause JANE DOE VI to experience severe emotional distress given all the facts and circumstances existing between Bill Gothard and JANE DOE VI.

1902. While manipulating and exploiting JANE DOE VI, Bill Gothard was acting within the course and scope of his employment and with the authority of IBLP.

1903. Notwithstanding said duty as aforesaid, Bill Gothard engaged in unwanted physical and sexual contact and conduct including touching and rubbing JANE DOE VI's leg and feet in a sexual manner, wrapping his legs around JANE DOE VI's legs, rubbing and holding JANE DOE VI's hand in a sexual manner.

1904. JANE DOE VI did not consent to any of the contact.

1905. At all times relevant herein, Bill Gothard knew, or should have known, that his conduct, as aforesaid, would inflict severe emotional distress upon the JANE DOE VI, or knew that there was a high probability that his conduct, as aforesaid, would cause severe emotional distress to JANE DOE VI.

1906. IBLP did nothing to protect JANE DOE VI against physical and sexual abuse while she was working for or participating in IBLP activities and further facilitated such abuse by failing to supervise Bill Gothard and providing Bill Gothard with the authority, instrumentalities, tools and privacy to abuse her.

1907. IBLP acted with malice and/or a reckless indifference to the unreasonable risk of abuse to JANE DOE VI by Bill Gothard.

1908. IBLP acted with a conscious indifference to JANE DOE VI's health, safety, and welfare.

1909. IBLP, through its Board of Directors, employees, servants, agents and Bill Gothard, were aware of the physical and sexual abuse and failed to report it as required by 325 ILCS 5/4 and Bill Gothard and IBLP (by and through its agents, servants and employees) conspired to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1910. As a direct and proximate result of the aforesaid conduct by IBLP, Bill Gothard physically and sexually abused JANE DOE VI and JANE DOE VI was and will continue to be caused severe emotional distress.

1911. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1912. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 158**  
**WILLFUL AND WANTON FAILURE TO SUPERVISE (IBLP)**  
***(Jane Doe VI v. IBLP)***

1-56, 1847-1912. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1912.

1913. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE VI and the conduct of Bill Gothard and IBLP knew, or reasonably should have known,

that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JANE DOE VI, that Bill Gothard employed, counseled, supervised and lead.

1914. At all times relevant hereto, IBLP and Bill Gothard voluntarily took over physical custody of and control and responsibility for JANE DOE VI.

1915. Bill Gothard and IBLP served as JANE DOE VI's employer, spiritual advisor, spiritual leader, protector and parental figure during her time at IBLP.

1916. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE VI, and the others that they employed, counseled, supervised and lead.

1917. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1918. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1919. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1920. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1921. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JANE DOE VI and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1922. As a direct and proximate result of the conduct of IBLP, Bill Gothard physically and sexually assaulted JANE DOE VI.

1923. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE VI.

1924. As a direct and proximate result of the conduct of IBLP, JANE DOE VI was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1925. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JANE DOE VI, thereby causing injuries and damages to JANE DOE VI, including severe permanent emotional and psychological distress, and loss of a normal life.

1926. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1927. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 159**  
**FAILURE TO PROTECT ANOTHER FROM A CRIMINAL ATTACK**  
***(Jane Doe VI v. IBLP)***

1-56, 1847-1927. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 1847-1927.

1928. At all times relevant herein, IBLP was in a supervisory position as it pertained to JANE DOE VI and the conduct of Bill Gothard and IBLP knew, or reasonably should have known, that Bill Gothard was in a position of trust, confidence, supervision and leadership as it pertained to the minor children, including JANE DOE VI, that Bill Gothard employed, counseled, supervised and lead.

1929. At all times relevant herein, IBLP had a duty to properly monitor, supervise and be aware of the conduct of Bill Gothard in order to provide for the safety and protection of JANE DOE VI and the others that Bill Gothard employed, counseled, supervised and lead from criminal acts.

1930. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard had physically abused, sexually molested and engaged in inappropriate, deviant, aberrant and criminal behavior toward IBLP participants, volunteers and employees.

1931. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard commonly engaged in acts of sexual innuendo and suggestion and other forms of inappropriate physical and/or sexual conduct and grooming.

1932. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard isolated IBLP participants, volunteers and employees and would spend an inordinate amount of time with them at IBLP properties, including IBLP's Hinsdale, Illinois facility.

1933. IBLP knew, or reasonably should have known, that prior to the allegations herein, Bill Gothard posed an immediate, substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under his employ, counsel, supervision and leadership.

1934. Notwithstanding said duty, IBLP failed to provide sufficient, proper and adequate supervision of Bill Gothard's conduct when IBLP knew, or reasonably should have known, that their conduct, as aforesaid, demonstrated that Bill Gothard posed a substantial and continuing threat to the health, safety and welfare of all IBLP participants, volunteers and employees under IBLP's employ, counsel, supervision and leadership and that sufficient, proper and adequate supervision of Bill Gothard's conduct was necessary in order to avoid exposing JANE DOE VI and other IBLP participants, volunteers and employees under its employ, counsel, supervision and leadership to a substantial risk of serious harm.

1935. As a direct and proximate result of the conduct of IBLP, Bill Gothard inappropriately touched and assaulted JANE DOE VI.

1936. As a direct and proximate result of the conduct of IBLP, Bill Gothard had access to and the opportunity to manipulate and physically and sexually exploited of JANE DOE VI.

1937. As a direct and proximate result of the conduct of IBLP, JANE DOE VI was physically and sexually assaulted by Bill Gothard in DuPage County, Illinois, on the property of IBLP and elsewhere.

1938. As a direct and proximate result of the willful and wanton conduct of IBLP as aforesaid, Bill Gothard was allowed to commit acts of physical and sexual abuse on JANE DOE VI, thereby causing injuries and damages to JANE DOE VI, including severe permanent emotional and psychological distress, and loss of a normal life.

1939. At the time of the abuse, JANE DOE VI did not appreciate that the act was abusive.

1940. JANE DOE VI was suffering from a condition that caused her to repress the memories of abuse and/or JANE DOE VI did not know her injuries were caused by the abuse.

**WHEREFORE**, JANE DOE VI prays for judgment in her favor and against IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**COUNT 160**  
**CIVIL CONSPIRACY**  
***(Jane Doe VI v. Bill Gothard & IBLP)***

1-56, 1847-1940. Plaintiff, JANE DOE VI, adopts, realleges and incorporates fully herein by reference paragraphs 1-56 and 222-296.

1941. As described more fully in the preceding paragraphs, Bill Gothard, the Control Group, IBLP (by and through its agents, servants and employees), and other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means, namely to fraudulently conceal the sexual abuse that had been and was being perpetrated at IBLP.

1942. In February 2014, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' agreed to conduct an unreasonable investigation through an unqualified investigating body regarding allegations of physical abuse, sexual abuse and sexual harassment by Bill Gothard, IBLP employees, servants and/or agents against IBLP participants, volunteers and employees, and to publicly disclose information refuting all allegations of wrongdoing.

1943. In furtherance of the conspiracy, Bill Gothard, IBLP, the Control Group and other unknown co-conspirators committed overt acts pursuant to their common scheme and were otherwise willful participants in joint activity.

1944. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators approved the sham CLA investigation and public disclosure of false and/or unsupported information refuting all allegations of wrongdoing from the investigation.

1945. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' misconduct was undertaken with malice, willfulness, and reckless indifference to the rights of others.

1946. Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' conduct was tortious in nature.

1947. The actions taken by Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' actions were willfully and wantonly taken against JANE DOE VI, intended to publicly shame and inflict severe emotional distress to JANE DOE VI, or done with knowledge that there was a high probability that their conduct would cause shame and severe emotional distress to JANE DOE VI.

1948. As a proximate result of Bill Gothard, IBLP, the Control Group and other unknown co-conspirators' civil conspiracy, 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**, JANE DOE VI prays for judgment in her favor and against Bill Gothard and IBLP, for an amount in excess of \$50,000.00 plus costs of suit and any further relief the Court deems equitable and just.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury.

Respectfully Submitted,

MEYERS & FLOWERS, LLC



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