

CAUSE NO. 354-23

PHOEBE MERRITT and	§	IN THE DISTRICT COURT
ABIGAIL DOTY,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	UPSHUR COUNTY, TEXAS
STANLEY GRANT, SAMUEL GRANT,	§	
WILLIAM W. GOTHARD, JR.,	§	
INSTITUTE IN BASIC LIFE PRINCIPLES,	§	
INC., and INTERNATIONAL A.L.E.R.T.	§	
ACADEMY,	§	
	§	
Defendants.	§	115TH JUDICIAL DISTRICT

PLAINTIFFS’ FIRST AMENDED PETITION

COME NOW, Phoebe Merritt and Abigail Doty (collectively, “Plaintiffs”), by and through the undersigned counsel, complaining of Stanley Grant, Samuel Grant, William W. Gothard, Jr., Institute in Basic Life Principles, Inc., and International A.L.E.R.T. Academy, and for their cause of action would show the Court:

DISCOVERY LEVEL

1. Plaintiffs intend to conduct discovery under Level 3 of Rule 190 of the Texas Rules of Civil Procedure.

ALLEGATIONS REQUIRED UNDER RULE 47

2. The damages sought herein are within the jurisdictional limits of the Court. Plaintiffs seek monetary relief over \$1,000,000.

PARTIES

- 3. Phoebe Merritt is an individual residing in the State of Washington.
- 4. Abigail Doty is an individual residing in Travis County, Texas.

5. Stanley Grant is an individual residing in Dallas County, Texas. Stanley Grant has appeared and answered herein.

6. Samuel Grant is an individual residing in Dallas County, Texas. Samuel Grant has appeared and answered herein.

7. William W. Gothard, Jr., (“Gothard”) is an individual residing in Illinois. Gothard has appeared and answered herein.

8. Institute in Basic Life Principles, Inc. (“IBLP”) is an Illinois corporation with its principal place of business in Upshur County, Texas. IBLP has appeared and answered herein.

9. International A.L.E.R.T. Academy (“A.L.E.R.T.”) is a Texas non-profit corporation. A.L.E.R.T. may be served with citation by serving its registered agent for service of process, John Tanner, at One Academy Blvd., Big Sandy, Texas 75755.

JURISDICTION AND VENUE

10. This Court has personal jurisdiction over Defendants because certain Defendants are residents of the State of Texas, all Defendants have sufficient minimum contacts with the State of Texas, and the acts and/or omissions giving rise to the claims asserted herein occurred in Texas.

11. This Court has subject matter jurisdiction over Plaintiffs’ claims against Defendants because the amount in controversy exceeds this Court’s minimum jurisdictional requirements.

12. Venue is proper in Upshur County under § 15.002 of the Texas Civil Practice & Remedies Code for the following reasons, each of which is asserted in the alternative:

- a. all or a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Upshur County;
- b. Defendant IBLP's principal office is located in Upshur County; and
- c. Defendant A.L.E.R.T.'s principal office is located in Upshur County.

INTRODUCTION

13. When they were children, both Plaintiffs were repeatedly sexually abused by their father, Defendant Stanley Grant. When she was a child, Plaintiff Phoebe Merritt also was repeatedly sexually abused by her older brother, Defendant Samuel Grant, who learned how to sexually abuse his younger sister from his father, Defendant Stanley Grant.

14. In addition to and independent of his liability arising from his own abuse of Plaintiff Phoebe Merritt, Defendant Stanley Grant had a duty to protect Plaintiff Phoebe Merritt from sexual abuse by Defendant Samuel Grant. Defendant Stanley Grant was negligent in failing to prevent the sexual abuse of Plaintiff Phoebe Merritt at the hands of Defendant Samuel Grant.

15. The sexual abuse of Plaintiffs has caused each of them to suffer horrific, catastrophic damages and will continue to cause them horrific, catastrophic damages in the future.

16. IBLP is a cult founded by and for all times relevant herein directed by Gothard which holds and teaches distorted and heretical Christian doctrines. Over the years, Gothard's, and therefore IBLP's, actions evolved from bad teaching to the active promotion of evil, including sexual abuse of girls and young women. Some of these abuses have recently been publicized via the documentary *Shiny Happy People*, currently available on Amazon. Through IBLP, Gothard created and led a conspiracy among his most zealous followers that directly led to harm, including the harm to the plaintiffs in this case. The objectives of this conspiracy included:

- a. creating and maintaining conditions which facilitated and fostered the sexual abuse of girls and young women; and
- b. concealing such sexual abuse from law enforcement.

17. A.L.E.R.T. is a paramilitary training program for males in their late teens and early twenties that was created by Gothard and IBLP as a vehicle to carry out the conspiracy and to indoctrinate boys and young men, including Defendant Samuel Grant, into the conspiracy.

18. Plaintiffs were harmed by unlawful, overt acts taken in the furtherance of the conspiracy created and led by Gothard and IBLP.

19. Plaintiffs seek to recover their actual damages. In addition, because the harm to Plaintiffs resulted from the malice, gross negligence, or both of each of the Defendants, Plaintiffs seek to recover exemplary damages from all Defendants.

FACTUAL ALLEGATIONS

Grant Family History

20. Defendant Stanley Grant and Susan Grant married on September 15, 1990, and remained married until Susan Grant passed away on March 19, 2022. Defendant Stanley Grant and Susan Grant are the parents of Plaintiff Abigail Doty, Defendant Samuel Grant, Peter Grant, Plaintiff Phoebe Merritt, Luke Grant, Rebekah Grant, and Ruth Ann Grant.

21. In or around 1993, Defendant Stanley Grant and Susan Grant moved to 10526 Black Walnut Court, Dallas, Texas 75243 (the “Black Walnut Court home”). Defendant Stanley Grant and Susan Grant and their children lived in the Black Walnut Court home until in or about November 2011, when the family moved to 6201 Chelsea Way, Garland, Texas 75044 (the “Chelsea Way home”).

IBLP and the Conspiracy

22. In 1961, Gothard founded “Campus Teams.” Campus Teams was incorporated in Illinois on December 11, 1961. In 1974, Campus Teams changed its name to “Institute in Basic Youth Conflicts” and in 1989, the corporation was renamed “Institute in Basic Life Principles,” which remains its name today.

23. For most people, the gateway into IBLP is a “Basic Seminar” which introduces neophytes to IBLP’s culture and doctrines. These doctrines are based on and organized around the “Seven Basic Life Principles” formulated by Gothard: Design, Authority, Responsibility, Suffering, Ownership, Freedom, and Success. IBLP teaches that its followers must apply these principles to every aspect of their

lives. All IBLP doctrine, structure, and activities pleaded herein were formulated, designed, and implemented by Gothard or by others acting at Gothard's instruction and under Gothard's authority, command and control.

24. Authority, especially patriarchal authority, is at the pinnacle of all IBLP doctrine and is one of the primary bases for IBLP culture. Gothard and IBLP teach that everyone must obey the *spoken and unspoken* wishes of those in authority over them and that it is grievous sin to fail to do so. As one might expect, Gothard and IBLP are at the top of the authority structure that Gothard created. Within the family, however, husbands and fathers are the sole, absolute authority with complete control over wives and children.

25. In the IBLP world view, the corollary to authority is loyalty. Loyalty requires a wife to comply, immediately and with docility, with her husband's commands and even his unspoken wishes. In the same way, children must obey their parents. Any failure to submit to this authority structure is treated as a major dishonor of the father and a sin. IBLP teaches that it is grave sin for children to argue or even to express any displeasure with any command he or she has been given.

26. IBLP explicitly instructs parents to mete out corporal punishment which rises to the level of physical abuse on children, even infants, who do not instantly obey any command, no matter how trivial. IBLP teaches parents to train their children in the same ways animals are trained. For example, "blanket training" involves placing an infant or toddler on a blanket and then placing a toy or other object that the child wants near the blanket. When the child reaches for the object,

the parent strikes the child. This process continues until the child sits still and stops trying to get the object. As taught by Gothard and IBLP, Defendant Stanley Grant and Susan Grant used abusive corporal punishment on their children, including Plaintiffs.

27. In 1984, Gothard and IBLP began offering homeschooling curriculum and programs which it called the “Advanced Training Institute” (“ATI”). On information and belief, ATI is not a separate legal entity, but is a name given by IBLP to its homeschooling operations and programs. ATI trained parents to homeschool, provided a network for IBLP followers who homeschooled their children, and sold curriculum materials and seminars to homeschoolers. On information and belief, ATI has ceased operation other than selling dated curriculum materials.

28. ATI curriculum materials center around “Wisdom Booklets” that were based on IBLP’s basic principles, especially patriarchal authority. Through ATI, Gothard and IBLP indoctrinated children and ATI was a central means by which Gothard and IBLP:

- a. groomed girls and young women to be readily available, compliant victims of sexual assault by male IBLP authorities, including the fathers and brothers of the victims, and
- b. planned and facilitated the cover-up of these crimes and torts.

29. IBLP is a cult. Definitions of cults (sometimes referred to in academic and legal contexts as “High Control Groups” (“HCGs”)) vary, but common characteristics of HCGs include:

- a. a charismatic, authoritarian leader;
- b. extreme devotion or dedication to the leader and his doctrines;
- c. thought reform programs to persuade, control, and socialize members;
- d. strictly enforced rules of conduct which isolate followers from anyone who is not a part of the group;
- e. psychological dependency on the group's leadership, rules, and doctrines;
- f. doctrines, authoritarian structure, and activities which exploit members to advance the leadership's goals; and
- g. resulting psychological harm to members, their families, and the community.

30. IBLP possesses all seven characteristics of these characteristics.

31. During the time that one of or both Plaintiffs were being sexually abused as alleged below (approximately 1996 through 2011, hereinafter the "relevant time period"), Gothard was the unquestioned authority at IBLP. Gothard was the founder of the movement, supreme spiritual leader of the movement, President of the corporation, and a member of the corporation's board of directors until 2014. As such, all of the allegations against IBLP herein are likewise allegations against Gothard, who directed and controlled IBLP.

32. Gothard's autocratic control of IBLP ended in 2014 after it was publicly revealed that he is a sexual abuser and harasser of girls and young women with a long history of using IBLP to groom and supply his victims and conceal his misconduct.

33. At least until 2014, all of the IBLP directors were males.

34. IBLP doctrine also encouraged its followers to associate to the greatest extent possible only with other IBLP followers. In so doing, IBLP intentionally isolated its followers from the broader society and pulled its followers into a closed and tightly controlled world.

35. IBLP controlled the flow and content of information to its followers and the patterns of reward and punishment experienced by its followers. In so doing, IBLP created social conditions that erased or minimized the previous or non-institutional identities of its followers.

36. IBLP used its teachings, programs, and authority structure to create dependency by its followers and to control their thoughts and actions.

37. IBLP teachings on patriarchal authority and the corresponding duty of loyalty owed by children is intended to create and has created ideal victims for sexual assault.

38. Gothard never married or, on information and belief, even dated. Nevertheless, central to IBLP doctrine established by Gothard is an unhealthy preoccupation with sex. IBLP's teachings on human sexuality are neither biblical nor consistent with orthodox Christian doctrine, yet they are taught as the Word of God mediated through Gothard.

39. IBLP teaches that its followers should have as many children as possible. In this regard, IBLP goes far beyond merely forbidding artificial birth control, rather IBLP doctrine is that married couples must actively try to have as many children as possible.

40. IBLP demands extreme conservative dress by females and that females who do not follow this teaching are guilty of setting “eye traps.” *See* Ex. A (Wisdom Booklet 15 at 623, 625). According to IBLP teaching, “men have a problem with their eyes,” and that girls and young women who do not follow IBLP teaching are harming men by setting a trap. “The shorter the skirt, the more vicious the trap.” *See* <https://www.tiktok.com/@imterra/video/7240899566533578030> (last accessed July 26, 2023). Girls and young women were also taught that if they dressed in any manner other than as directed and approved by IBLP, they were inviting sexual assault from men and boys.

41. IBLP’s doctrine on how women dress is a part of its larger doctrine that most women who are sexually assaulted are at least as guilty as their assailant. For example, IBLP teaches the doctrine of “crying out” under which a female victim of sexual assault must “cry out for help” when she is attacked. “God has established some very strict guidelines of responsibility for a woman who is attacked. She is to cry out for help. *The victim who fails to do this is equally guilty with the attacker.*” *See* Ex. B (Wisdom Booklet 36 at 1839) (emphasis added).

42. Thus, IBLP followers are indoctrinated to believe *both* that:

- a. a girl or young woman must *never* question anything that her father does to her, including invasions of her body; and
- b. if a girl or young woman fails adequately to cry out when sexually assaulted, she is equally responsible with the attacker for the assault.

43. This irreconcilable dilemma for girls and young women is a deliberate feature of IBLP doctrine and the conspiracy. Putting girls and young women in this

impossible position developed in large part because Gothard himself is a serial sexual assaulter of girls and young women and personally benefitted from a culture which:

- a. recruited and groomed girls and young women to be victims of sexual assault;
- b. shamed female victims of sexual assault into silence; and
- c. excused male assaulters.

44. IBLP also conflates and blurs the lines between the father-daughter and husband-wife relationships, particularly through two IBLP doctrines: parentification and courtship.

45. Parentification is the highly ritualized practice of enlisting older children, especially older daughters, in a large family to act as co-parents for the younger children. Through parentification, very young girls effectively are treated as adults and not children. By parentification, a father's relationship with his daughter is made more like his relationship with his wife than his relationship with his child.

46. Courtship is the IBLP-approved alternative to dating which places the fathers of the courtship couple, but especially the father of the girl, in control of the courtship process. Through courtship, if a teenage or young adult male has normal desires for a romantic relationship with a girl or young woman, the couple must submit to the authority and commands of the father of the girl or young woman. Additionally, both before and during courtship, fathers and daughters are taught they must have an adequate closeness for the daughter to have a successful marriage later in life. Through pre-courtship and courtship, IBLP intentionally and effectively sexualizes the father-daughter relationship.

47. IBLP doctrines on suffering also helped it recruit and create a ready supply of submissive, young, female sex abuse victims. Girls and young women were taught that when they are sexually assaulted, they should be thankful because God will use the suffering to increase their spirituality. Thus, girls and young women were taught that reporting sexual assault or seeking to hold the attacker accountable were acts of disobedience and defiance directly to God.

48. Through these means and others, Gothard molded IBLP into a sex abuse conspiracy. IBLP's doctrines, particularly those on authority, sexuality, and suffering, became a blueprint for fathers and older brothers to sexually abuse their daughters and younger sisters.

49. This atmosphere of abuse and victim blaming advanced Gothard's personal goal of sexually abusing girls and young women with impunity. Gothard and other senior leaders within IBLP have a long history of serial sexual abuse of girls and young women. For example, Gothard's brother, Steven Gothard, was removed from his senior position in the organization for sexually harassing and having sex with multiple female staffers. In 2014, Gothard himself was forced out at IBLP because he had sexually harassed and assaulted multiple female staffers, including some who were minors at the time.

50. During the relevant time period, IBLP taught its followers to conceal sexual abuse and to prevent law enforcement authorities from discovering or prosecuting the sexual abuse which was an objective of the IBLP conspiracy. IBLP taught that law enforcement, especially agencies such as Texas Child Protective

Services, were agents of Satan and that it was therefore a moral imperative to lie to law enforcement about allegations of abuse.

51. At some point after they married, Defendant Stanley Grant and Susan Grant became followers of IBLP. The couple learned, adopted, and applied IBLP teachings, including without being limited to, all of the specific teachings pled above, to their family. Defendant Stanley Grant and Susan Grant homeschooled their children, including Plaintiffs Abigail Doty and Phoebe Merritt, using ATI materials, especially Wisdom Booklets.

52. The IBLP indoctrination of boys and young men was carried out in large part through a paramilitary training program for males in their late teens and early twenties. The program, called “A.L.E.R.T.,” began in 1994 and originally was based at a facility on the upper peninsula of Michigan, but in 2000, the training center and the headquarters for the program were moved to Big Sandy in Upshur County, Texas. A.L.E.R.T. was incorporated in Texas in 2002 and since that time has maintained a separate corporate identity. A.L.E.R.T. has its headquarters at the IBLP headquarters in Upshur County. A.L.E.R.T. uses IBLP real property in Upshur County, Texas for most of its activities. A.L.E.R.T. was central to the IBLP conspiracy. A.L.E.R.T. was one of the primary means by which Gothard and IBLP reinforced the ATI and IBLP principles of hierarchy, control, domination, and submission.

53. IBLP funneled boys into the A.L.E.R.T. program, including “A.L.E.R.T. cadets.” A.L.E.R.T. cadets was the program for boys ages eight through eighteen that

was used at IBLP family conferences and family camps as a recruiting tool for the more extensive training at the Upshur County facility.

54. Through A.L.E.R.T. training at the Upshur County facility, IBLP indoctrinated boys and young men into the Gothard/IBLP sex abuse cult, teaching them to abuse and to overlook abuse. For example, through A.L.E.R.T. training, boys and young men were taught to “victim blame” female sexual abuse victims and to excuse their own sexual misconduct. Moreover, during the relevant time period, the A.L.E.R.T. training on domination and submission was essential to creating both the abusers and the abused.

55. The A.L.E.R.T. program taught that Christian masculinity was physical, overpowering, and aggressive. Thus, in the name of promoting “manliness,” through A.L.E.R.T., IBLP taught and promoted the physical, mental, and emotional subjugation of women and girls. While IBLP was training girls to be victims, it was also training boys to be attackers.

56. Defendants Samuel Grant and Stanley Grant participated in the A.L.E.R.T. cadet program and Samuel attended and graduated from the A.L.E.R.T. Academy in Big Sandy, Upshur County, Texas.

57. In addition to the A.L.E.R.T. program, IBLP also held family camps at its facility in Big Sandy, Upshur County, Texas. During the relevant time period, Plaintiffs attended these family camps annually with their parents and siblings, including Defendants Stanley Grant and Samuel Grant. During these family camps,

IBLP's principles of hierarchy, control, domination, and submission were taught and reinforced.

Sexual Abuse of Plaintiffs

58. The Gothard/IBLP plan for sexual abuse of girls pled above became a tragic reality for Plaintiffs. Defendant Stanley Grant began sexually abusing Plaintiff Abigail Doty when she was three (3) or four (4) years old.

59. Plaintiff Phoebe Merritt's earliest memories are of being abused by her father, Defendant Stanley Grant, and her brother, Defendant Samuel Grant. Defendant Stanley Grant began sexually abusing Plaintiff Phoebe Merritt when she was eighteen (18) months old. This sexual abuse occurred on average at least once a week until Plaintiff Phoebe Merritt was approximately thirteen (13) years old.

60. The sexual abuse of Plaintiffs was part of a pattern of abuse which continued with the abuse of their younger sisters.

61. Defendant Samuel Grant was frequently in the room during and observed Defendant Stanley Grant's sexual abuse of Plaintiff Phoebe Merritt while he was giving her a bath. Eventually, Defendant Samuel Grant began sexually abusing his sister, Plaintiff Phoebe Merritt, when Defendant Stanley Grant was not present.

62. During the relevant time period, Susan Grant knew or reasonably should have known that Defendant Stanley Grant was abusing or had abused Plaintiff Abigail Doty and Plaintiff Phoebe Merritt. During the relevant time period, both Susan Grant and Defendant Stanley Grant knew or reasonably should have

known that Defendant Samuel Grant was abusing or had abused Plaintiff Phoebe Merritt.

63. Much of the sexual abuse of Plaintiffs occurred in either the Black Walnut Court home or the Chelsea Way home. Plaintiff Abigail Doty was also sexually abused by Defendant Stanley Grant at the home of Steve and Celeste Tenpenny located at 9466 Heatherdale Drive, Dallas, Texas 75243. During the relevant time period, the Tenpennys were leaders of the A.L.E.R.T. cadet program attended by Defendant Samuel Grant.

64. On December 17, 2018, Defendant Samuel Grant and his younger brother, Luke Grant, pleaded guilty to indecency with a child (Texas Penal Code § 21.11) for their repeated sexual assaults of one of Plaintiffs' younger sisters. The sexual assault of Plaintiffs' younger sister was carried out as part of and in furtherance of the same IBLP conspiracy of which Plaintiffs were victims. As with the abuse of Plaintiff Phoebe Merritt by Defendant Samuel Grant, Defendant Stanley Grant and Susan Grant knew or reasonably should have known of the abuse, but did not take any action to protect the victim.

65. The sexual abuse of Plaintiffs has resulted in each Plaintiff suffering severe physical pain and suffering, mental anguish, loss of the enjoyment of life, and medical expenses.

CLAIMS FOR RELIEF

COUNT 1 - ASSAULT (Against Stanley Grant)

66. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

67. A person commits the tort of assault when he: (1) intentionally, knowingly, or recklessly causes bodily injury to another; (2) intentionally or knowingly threatens another with imminent bodily injury; or (3) intentionally or knowingly causes physical contact with another when he knows or should reasonably believe that the other will regard the contact as offensive or provocative. Texas Pattern Jury Charges – General Negligence, Intentional Personal Torts, Workers’ Compensation § 6.6.

68. Defendant Stanley Grant repeatedly sexually assaulted both Plaintiffs.

69. Defendant Stanley Grant repeatedly sexually assaulted Plaintiff Abigail Doty beginning when she was three (3) or four (4) years old.

70. Defendant Stanley Grant sexually assaulted Plaintiff Phoebe Merritt from the time she was eighteen (18) months old.

71. The sexual assaults of Plaintiffs by Defendant Stanley Grant were a proximate cause of Plaintiffs’ damages.

COUNT 2 - ASSAULT (Against Samuel Grant)

72. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

73. A person commits the tort of assault when he: (1) intentionally, knowingly, or recklessly causes bodily injury to another; (2) intentionally or knowingly threatens another with imminent bodily injury; or (3) intentionally or knowingly causes physical contact with another when he knows or should reasonably believe that the other will regard the contact as offensive or provocative. Texas Pattern Jury Charges – General Negligence, Intentional Personal Torts, Workers’ Compensation § 6.6.

74. Defendant Samuel Grant repeatedly sexually assaulted Defendant Phoebe Merritt. Defendant Samuel Grant sexually assaulted Plaintiff Phoebe Merritt from the time she was three (3) or four (4) years old.

75. The sexual assaults of Plaintiff Phoebe Merritt by Defendant Samuel Grant were a proximate cause of Plaintiff Phoebe Merritt’s damages.

**COUNT 3 - FALSE IMPRISONMENT
(Against Stanley Grant)**

76. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

77. The essential elements of false imprisonment are: (1) willful detention; (2) without consent; and (3) without authority of law. *Sears, Roebuck & Co. v. Castillo*, 693 S.W.2d 374, 375 (Tex. 1985).

78. Defendant Stanley Grant repeatedly detained Plaintiffs without consent and without authority of law.

79. Defendant Stanley Grant repeatedly falsely imprisoned Plaintiff Abigail Doty beginning when she was three (3) or four (4) years old.

80. Defendant Stanley Grant repeatedly falsely imprisoned Plaintiff Phoebe Merritt beginning when she was eighteen (18) months old.

81. The false imprisonments of Plaintiffs by Defendant Stanley Grant were a proximate cause of Plaintiffs' damages.

**COUNT 4 - FALSE IMPRISONMENT
(Against Samuel Grant)**

82. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

83. The essential elements of false imprisonment are: (1) willful detention; (2) without consent; and (3) without authority of law. *Sears, Roebuck & Co. v. Castillo*, 693 S.W.2d 374, 375 (Tex. 1985).

84. Defendant Samuel Grant repeatedly detained Plaintiff Phoebe Merritt without consent and without authority of law.

85. Defendant Samuel Grant repeatedly falsely imprisoned Defendant Phoebe Merritt. Defendant Samuel Grant repeatedly falsely imprisoned Plaintiff Phoebe Merritt beginning when she was three (3) or four (4) years old.

86. The false imprisonments of Plaintiff Phoebe Merrit by Defendant Samuel Grant were a proximate cause of Plaintiff Phoebe Merritt's damages.

**COUNT 5 – NEGLIGENCE
(Against Stanley Grant)**

87. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

88. The elements of a claim for negligence are: (1) a legal duty, (2) breach of that duty, and (3) damages proximately caused by the breach.

89. As the father of Plaintiff Phoebe Merritt, Defendant Stanley Grant had a duty to protect Plaintiff Phoebe Merritt from known dangers.

90. Defendant Stanley Grant knew that Defendant Samuel Grant was sexually abusing and falsely imprisoning Plaintiff Phoebe Merritt.

91. Defendant Stanley Grant breached the duty he owed Plaintiff Phoebe Merritt by failing to act as a reasonably prudent father to protect Plaintiff Phoebe Merritt from sexual assault and false imprisonment by Defendant Samuel Grant.

92. Defendant Stanley Grant's breach of the duty he owed Plaintiff Phoebe Merritt proximately caused Plaintiff Phoebe Merritt's damages.

COUNT 6 – CIVIL CONSPIRACY
(Against Gothard, IBLP, A.L.E.R.T., Stanley Grant, and Samuel Grant)

93. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

94. The elements of a civil conspiracy are: (1) two or more persons, (2) an object to be accomplished, (3) a meeting of the minds on the object or course of action, (4) one or more unlawful, overt acts; and (5) damages as a proximate result. *Agar Corp., Inc. v. Electro Circuits Int'l, LLC*, 580 S.W.3d 136, 141 (Tex. 2019) (quoting *Massey v. Armco Steel Co.*, 652 S.W.2d 932, 934 (Tex. 1983)).

95. Defendants Gothard, IBLP, A.L.E.R.T., Stanley Grant, and Samuel Grant were all members of the civil conspiracy planned and devised by Gothard and implemented through IBLP.

96. The objectives of this conspiracy included:

- a. creating and maintaining conditions which facilitated and fostered the sexual abuse of young females by male family members;
- b. recruiting and procuring girls and young women for sexual abuse; and
- c. concealing such sexual abuse from law enforcement.

97. Defendants Gothard, IBLP, A.L.E.R.T., Stanley Grant, and Samuel Grant had a meeting of the minds on the objects to be accomplished, specifically the repeated and systematic sexual abuse of girls and young women and the concealment of such abuse. As pled above, Gothard, A.L.E.R.T. and IBLP established the objects to be accomplished and courses of action to be pursued, implemented the courses of action, and provided instruction and training for co-conspirators in those courses of action. Stanley Grant and Samuel Grant joined the conspiracy after it had begun, agreed with Gothard, A.L.E.R.T. and IBLP on the objects to be achieved and the courses of action to be pursued, received instruction and training in those courses of action, and committed tortious acts in furtherance of the conspiracy as pled above.

98. Stanley Grant and Samuel Grant engaged in the following unlawful, overt acts in furtherance of the objects of the conspiracy:

- a. sexually assaulting Plaintiffs as pleaded above;
- b. negligently failing to protect Plaintiffs from sexual abuse as pleaded above; and
- c. concealing the sexual assaults as pleaded above.

99. Plaintiffs suffered harm caused by one or more of the unlawful, overt acts engaged in by Defendants Stanley Grant and Samuel Grant in furtherance of the objects of the conspiracy. As co-conspirators, Gothard, IBLP, and A.L.E.R.T. are jointly and severally liable for all damages caused by the unlawful, overt acts taken in furtherance of the conspiracy.

**COMPENSATORY DAMAGES
(Sought from all Defendants)**

100. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

101. Plaintiffs have each suffered damages caused by the tortious conduct of Defendants described above. Additionally, it is reasonably probable that Plaintiffs will continue suffering such damages in the future.

102. The damages suffered by Plaintiffs include past and future physical pain and suffering, past and future mental anguish, past and future loss of the enjoyment of life, and past and future medical expenses.

**PUNITIVE DAMAGES
(Sought from all Defendants)**

103. Plaintiffs incorporate the allegations in all previous paragraphs of this First Petition as if fully set forth herein.

104. As alleged above, the harm to Plaintiffs resulted from the malice, gross negligence, (as those terms are defined in Section 41.001 of the Texas Civil Practice and Remedies Code) or both of each of the Defendants. Accordingly, Plaintiffs seek recovery of exemplary damages from each Defendant as allowed under Chapter 41 of the Texas Civil Practice and Remedies Code.

105. Certain acts of certain Defendants are described as a felony under one or more of the sections of the Penal Code set forth in Section 41.008(c) of the Texas Civil Practices and Remedies Code and was committed knowingly or intentionally. As such, the limitation on the amount of recovery in Section 41.008 of the Texas Civil Practice and Remedies Code does not apply to Plaintiffs' claim for punitive damages.

STATUTE OF LIMITATIONS; DISCOVERY RULE

106. Plaintiffs incorporate the allegations in all previous paragraphs of this First Amended Petition as if fully set forth herein.

107. The personal injuries to Plaintiffs for which they seek to recover damages in this action arise as a result of conduct that violates one or more of the Penal Code sections listed in Texas Civil Practice & Remedies Code § 16.0045(a). Accordingly, the statute of limitations applicable to Plaintiffs' claims asserted herein (specifically including, without being limited to, civil conspiracy, *Agar Corp., Inc. v. Electro Circuits Int'l, LLC*, 580 S.W.3d 136, 142-44 (Tex. 2019)) is thirty (30) years after the date the causes of action accrued. As such, all claims pleaded by Plaintiffs herein are timely.

108. In the alternative, Plaintiffs plead that the discovery rule applies to the claims pleaded herein and that all such claims are, therefore, timely.

RULE 193.7 NOTICE

109. All documents produced by Defendants in response to written discovery served herein are authenticated for use at any pretrial proceeding and

trial under Rule 193.7 of the Texas Civil Procedure and Plaintiffs intend to use all such documents as allowed under that Rule.

JURY DEMAND

110. Plaintiffs demand a jury trial and have tender the appropriate fee.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray for judgment against Defendants as pleaded herein, and for all other just relief, at law or in equity, to which they may be justly entitled.

Dated: October 12, 2023

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was forwarded to all counsel of record via e-serve this 12th day of October 2023.

/s/ Keith L. Langston _____
Keith L. Langston

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Anthony Bruster

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Envelope ID: 80522125

Filing Code Description: Amended Filing

Filing Description: Plaintiff's First Amended Petition

Status as of 10/12/2023 1:01 PM CST

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Anthony Bruster
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Envelope ID: 80522125
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