

CAUSE NO. 354-23

KRISTEN BEHNE,	§	IN THE DISTRICT COURT
	§	
Plaintiff in Intervention,	§	
	§	
v.	§	
	§	UPSHUR COUNTY, TEXAS
WILLIAM W. GOTHARD, JR.,	§	
INSTITUTE IN BASIC LIFE PRINCIPLES,	§	
INC., and INTERNATIONAL A.L.E.R.T.	§	
ACADEMY,	§	
	§	
Defendants.	§	115TH JUDICIAL DISTRICT

PLAINTIFF’S ORIGINAL PETITION IN INTERVENTION

COMES NOW, Kristen Behne (“Plaintiff”), by and through the undersigned counsel, complaining of William W. Gothard, Jr., Institute in Basic Life Principles, Inc., and International A.L.E.R.T. Academy, and for her cause of action would show the Court as follows:

DISCOVERY LEVEL

1. Plaintiff intends 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. Plaintiff seeks monetary relief over \$1,000,000.

PARTIES

3. Kristen Behne is an individual residing in Dallas County, Texas.

4. William W. Gothard, Jr. (“Gothard”) is an individual residing in Illinois. Gothard may be served with citation by serving him at his residence located at 1027 West Arlington, La Grange, Illinois, 60525.

5. Institute in Basic Life Principles, Inc. (“IBLP”) is an Illinois corporation with its principal place of business in Upshur County, Texas. IBLP may be served with citation by serving its registered agent, Timothy A. Levendusky, at One Academy Blvd., Big Sandy, Texas 75755.

6. 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

7. 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 several of the acts and/or omissions giving rise to the claims asserted herein occurred in Texas.

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

9. 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 Plaintiff’s 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

10. When she was a child, Plaintiff was sexually abused and trafficked by Reid Faist. Reid Faist and Plaintiff were raised under the religious instruction of Defendants Gothard, IBLP and A.L.E.R.T.

11. The sexual abuse of Plaintiff has caused her to suffer horrific, catastrophic damages and will continue to cause her horrific, catastrophic damages in the future.

12. IBLP is a cult founded by and for all times relevant herein directed by Gothard which advocates and promotes sex abuse. Some of the IBLP sanctioned sex abuse was recently publicized in the documentary *Shiny Happy People*. Through IBLP, Gothard created and led a conspiracy among his most zealous followers that directly led to harm, including the harm to Plaintiff. 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.

13. 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 Reid Faist, into the conspiracy. Through 2019, A.L.E.R.T. conducted related indoctrination programs for teenage girls and young women called “STEP,” or “Skills Training for Emergency Preparedness.” STEP is another conspiracy program used to indoctrinate teenage girls and young women to make them ready victims for sexual predation.

14. In 2003, when she was a minor, Plaintiff was an assistant leader for an IBLP “Children’s Institute” program in Houston. At this seminar, Plaintiff approached Gothard and asked if she might meet privately with him. At this private meeting, Plaintiff reported to Gothard that she was a sex abuse victim. Gothard did not report the abuse to law enforcement or take any action to aide Plaintiff. To the contrary, Gothard rebuked Plaintiff for the “sin” of being a minor victim of sex abuse.

15. In 2004, when she was a minor, Plaintiff attended a STEP program at the A.L.E.R.T. headquarters in Big Sandy, Upshur County, Texas. At this program, Plaintiff again reported that she was a sex abuse victim, this time to STEP staff. STEP did not report the abuse to law enforcement or take any action to aide Plaintiff.

16. Plaintiff was harmed by the unlawful, overt acts taken in the furtherance of the conspiracy created and led by Gothard and IBLP.

17. Plaintiff seeks to recover her actual damages. In addition, because the harm to Plaintiff resulted from the malice, gross negligence, or both of each of the Defendants, Plaintiff seeks to recover exemplary damages from all Defendants.

FACTUAL ALLEGATIONS

IBLP and the Conspiracy

18. 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.

19. For most people, the gateway into IBLP is a “Basic Seminar” which introduces neophytes to IBLP’s culture and teachings. The culture and teachings were 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.

20. 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 a 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.

21. In the IBLP culture, 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 a grave sin for children to argue or even to express any displeasure with any command he or she has been given.

22. 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.

23. 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.

24. 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; and
- b. planned and facilitated the cover-up of these crimes and torts.

25. 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.

26. IBLP possesses all seven of these characteristics.

27. During the time Plaintiff was being sexually abused as alleged below (approximately 1991 through 2005, 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.

28. Gothard's autocratic control of IBLP ended in 2014 after it was publicly revealed that he is a serial 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.

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

30. 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.

31. 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.

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

33. 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.

34. 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.

35. 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.

36. 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.” 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.

37. 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).

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

- a. a girl or young woman must *never* question anything that her authority 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.

39. 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 benefited 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.

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

41. 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.

42. 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.

43. IBLP teachings on suffering also helped it recruit and create a ready supply of submissive, young, female sex abuse victims. Girls and young women were trained to accept 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.

44. 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, older brothers, or other prominent males in a young girl's life, to sexually abuse women.

45. 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 of IBLP because he had sexually harassed and assaulted multiple female staffers, including some who were minors at the time.

46. 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.

47. Reid Faist was raised as a follower of IBLP. The Faist family introduced Plaintiff's grandparents and mother to IBLP, and they joined following a Basic Seminar in the mid-1980s. The Faist family learned, adopted, and applied IBLP teachings, including without being limited to, all of the specific teachings pled above, to their family. Plaintiff's mother also learned, adopted and applied IBLP teachings to her family. Around 1995, Plaintiff's mother became involved in IBLP's ATI Home Schooling program. Plaintiff's father decided to join and adopt IBLP's teachings when his family became involved in ATI. Plaintiff's parents homeschooled their children, including Plaintiff Kristen Behne, using ATI materials, especially Wisdom Booklets. As Plaintiff had been "parentified" at a very early age, as is standard practice in large IBLP households, she was responsible for homeschooling her siblings at times.

48. 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.

49. 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.

50. 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.

51. 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.

52. 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, Plaintiff attended these

family camps annually with her parents and siblings. During these family camps, IBLP's principles of hierarchy, control, domination, and submission were taught and reinforced.

53. In addition to the A.L.E.R.T. program, IBLP also conducted a four-week "survival skills" for girls program called S.T.E.P. at its facility in Big Sandy, Upshur County, Texas. In 2004, Plaintiff attended this program. During this four-week intensive program, IBLP's principles of hierarchy, control, domination, and submission were taught and reinforced.

54. Central to S.T.E.P.'s place in the conspiracy is its role in training girls that their bodies do not belong to them and that any sexual abuse they suffered makes them "mighty in spirit." In this way, S.T.E.P. advanced the conspiracy objectives by creating compliant sexual abuse victims.

Sexual Abuse of Plaintiff

55. The Gothard/IBLP plan for sexual abuse of girls pled above became a tragic reality for Plaintiff. Acting in furtherance of the IBLP conspiracy, Reid Faist, who is approximately fourteen (14) years older than Plaintiff Kristen Behne, began sexually abusing Plaintiff Kristen Behne when she was three (3) or four (4) years old.

56. This sexual abuse occurred on average at least once a week until Plaintiff was sixteen (16) years old.

57. Reid Faist, during the relevant time period and in addition to his own sexual abuse of Plaintiff, trafficked Plaintiff to other men for sexual abuse. On information and belief, these assaults were at times video recorded.

58. The sexual abuse of Plaintiff primarily occurred on the premises of the Faist home in an apartment above the detached garage, or in the lower level apartment of the Faist home on Ridgemont Drive.

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

Plaintiff's Cries for Help to Gothard and STEP

60. In 2003, Plaintiff attended a seminar held by IBLP with her family in Houston, Texas.

61. Plaintiff was a student leader and was granted the honor of meeting Gothard. After Gothard finished praising the team, Plaintiff Kristen Behne asked to talk with him. Plaintiff hoped that she would get assistance from the top of her Umbrella of Protection, Gothard himself.

62. Plaintiff told Gothard that she had been experiencing depression. Gothard accused Plaintiff of having unconfessed sins she needed to confess. Gothard told her that she had a spirit of uncleanness and he attempted to exorcise the spirit. Upon the termination of the exorcism, Plaintiff reported to Gothard that she felt the same as before the exorcism and Gothard responded she must have other unconfessed sins she needed to confess.

63. Plaintiff told Gothard that she had repeatedly been sexually assaulted by someone and that she had also been trafficked for sexual services.

64. Gothard told Plaintiff that her body did not belong to her, and as such it was not her body that was being hurt, and therefore nothing for her to concern herself with. Gothard also told Plaintiff she was being made mighty in spirit, and that was surely better than having an undamaged body.

65. Gothard did not report the crimes against Plaintiff, who was a fourteen (14) year old minor at the time of the report to Gothard.

66. In 2004, Plaintiff attended a four-week STEP program for girls hosted and sponsored by A.L.E.R.T.

67. While at the A.L.E.R.T. STEP program, Plaintiff began having physical manifestations of her abuse, such as non-epileptic seizures. Plaintiff's non-epileptic seizures happened approximately twice weekly for the duration of the STEP program.

68. Plaintiff was assessed by A.L.E.R.T.'s medical cadet program's leader. The cadets tested Plaintiff's blood sugar and prescribed Gatorade for her seizures.

69. Plaintiff reported that she had been sexually abused to one of the Lieutenants from A.L.E.R.T.'s medical cadet program. A.L.E.R.T. did not report the crimes against Plaintiff, who was a fifteen (15) year old minor at the time of her report to A.L.E.R.T.

CLAIMS FOR RELIEF

COUNT 1 – Negligence

(Against Gothard, IBLP, and A.L.E.R.T.)

70. Plaintiff incorporates the allegations in all previous paragraphs of this Original Petition in Intervention as if fully set forth herein.

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

72. Upon receiving Plaintiff's reports of sexual abuse, both Defendant Gothard and Defendant A.L.E.R.T. had a duty to report Plaintiff's abuse to law enforcement authorities and to act reasonably to protect Plaintiff from further abuse.

73. Defendants Gothard and A.L.E.R.T. breached their duties to Plaintiff which proximately caused Plaintiff to suffer damages.

COUNT 2 – CIVIL CONSPIRACY

(Against Gothard, IBLP, and A.L.E.R.T.)

74. Plaintiff incorporates the allegations in all previous paragraphs of this Original Petition in Intervention as if fully set forth herein.

75. 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)).

76. Defendants Gothard, IBLP, A.L.E.R.T., and Reid Faist were all members of the civil conspiracy planned and devised by Gothard and implemented through IBLP.

77. The objectives of this conspiracy included:

- a. creating and maintaining conditions which facilitated and fostered the sexual abuse of young females;
- b. recruiting and procuring girls and young women for sexual abuse; and
- c. concealing such sexual abuse from law enforcement.
- d. Defendants Gothard, IBLP, A.L.E.R.T., and Reid Faist had a meeting of the minds on the objectives 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 objectives 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. Reid Faist joined the conspiracy after it had begun, agreed with Gothard, A.L.E.R.T. and IBLP on the objectives 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.

78. Reid Faist engaged in the following unlawful, overt acts in furtherance of the objects of the conspiracy:

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

79. Plaintiff suffered harm caused by one or more of the unlawful, overt acts engaged in by Reid Faist 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)**

80. Plaintiff incorporates the allegations in all previous paragraphs of this Original Petition in Intervention as if fully set forth herein.

81. Plaintiff has suffered damages caused by the tortious conduct described above. Additionally, it is reasonably probable that Plaintiff will continue suffering such damages in the future.

82. The damages suffered by Plaintiff 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)**

83. Plaintiff incorporates the allegations in all previous paragraphs of this Original Petition in Intervention as if fully set forth herein.

84. As alleged above, the harm to Plaintiff 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, Plaintiff seeks recovery of exemplary damages from each Defendant as allowed under Chapter 41 of the Texas Civil Practice and Remedies Code.

85. Certain overt acts taken in furtherance of the conspiracy which caused harm to Plaintiff 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 Plaintiff's claim for punitive damages.

STATUTE OF LIMITATIONS; DISCOVERY RULE

86. Plaintiff incorporates the allegations in all previous paragraphs of this Original Petition in Intervention as if fully set forth herein.

87. The personal injuries to Plaintiff for which she seeks to recover damages in this action arise from 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 Plaintiff's 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 Plaintiff herein are timely.

88. In the alternative, Plaintiff pleads that the discovery rule applies to the claims pleaded herein and that all such claims are, therefore, timely.

RULE 193.7 NOTICE

89. 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 Plaintiff intends to use all such documents as allowed under that Rule.

JURY DEMAND

90. Plaintiff demands a jury trial and has tendered the appropriate fee.

PRAYER FOR RELIEF

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

Dated: February 2, 2024

/s/ Keith Langston

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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 2nd day of February, 2024.

/s/ Keith L. Langston
Keith L. Langston

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Tracy Rector on behalf of Anthony Bruster
Bar No. 24036280
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Envelope ID: 84112033
Filing Code Description: Counter Claim/Cross
Action/Interpleader/Intervention/Third Party
Filing Description: Original Petition in Intervention
Status as of 2/5/2024 8:40 AM CST

Associated Case Party: Institute in Basic Life Principles, Inc.

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
John Hull	24050791	jhull@brusterpllc.com	2/2/2024 5:08:46 PM	SENT
Anthony Kyle Bruster	24036280	akbruster@brusterpllc.com	2/2/2024 5:08:46 PM	SENT
T. Wesley Holmes	9908495	wholmes@brusterpllc.com	2/2/2024 5:08:46 PM	SENT

Automated Certificate of eService

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Tracy Rector on behalf of Anthony Bruster
Bar No. 24036280
trector@brusterpllc.com
Envelope ID: 84112033
Filing Code Description: Counter Claim/Cross
Action/Interpleader/Intervention/Third Party
Filing Description: Original Petition in Intervention
Status as of 2/5/2024 8:40 AM CST

Associated Case Party: Phoebe Merritt

Name	BarNumber	Email	TimestampSubmitted	Status
Anthony Bruster		akbruster@brusterpllc.com	2/2/2024 5:08:46 PM	SENT

Associated Case Party: Stanley Grant

Name	BarNumber	Email	TimestampSubmitted	Status
Charles Chessnut		crc@chapter7-11.com	2/2/2024 5:08:46 PM	SENT

Associated Case Party: Samuel Grant

Name	BarNumber	Email	TimestampSubmitted	Status
Charles Chessnut		crc@chapter7-11.com	2/2/2024 5:08:46 PM	SENT

Associated Case Party: WilliamW.Gothard

Name	BarNumber	Email	TimestampSubmitted	Status
J. ShelbySharpe		utlawman@aol.com	2/2/2024 5:08:46 PM	SENT