Gibbs Law Firm is honored to represent over twenty victims of abuse against Gothard and IBLP. Eighteen of these brave individuals are the current plaintiffs in the amended lawsuit that was filed in DuPage County earlier this week. Our legal team appreciates their confidence, and I consider it a privilege to be their lead counsel.

Pedophilia is a strong evil. Manipulation, lies, and secrecy drive the engine of this sexual abuse. Because it is so secretive, it is impossible to gauge whether a sex offender is ever truly repentant. Gothard is a master at the manipulation, lies, and secrecy that have allowed him and IBLP to abuse children for decades.

There are many different kinds of predators in the world, but the class of people who exploit trust do follow a pattern of careful selection, grooming, isolation, abuse, and redirection of blame. Gothard and IBLP used and abused a unique and extraordinary position of authority. Most poignant is that it was a spiritual and a moral authority within a community that places the highest value on these two things. Further, the ideology and the community itself play a powerful role in setting up the conditions for the abuse, and fostering the harm emanating from it. Most perpetrators do not have an entire institution and ideology to support them.

## From the complaint that was filed:

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

A typical defense to rape and molestation charges is to attack and lie about the victims and those that provide support for the victims. Gothard espouses this type of "the victim was part of the problem" thinking as explained in the lawsuit:

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

Gothard was fully aware that I was the attorney for Lourdes Torres against Gothard's protégé, Douglas Phillips, and Gothard was mentioned by name in that Texas lawsuit in April 2014:

Dr. Julie Ingersoll (Associate Professor of Religious Studies at the University of North Florida) described the role of women in patriarchy in a 2003 article on Religion Dispatches: "In biblical patriarchy, the refrain of 'women and children first' hides an

agenda whereby the women are 'first' only insofar as they keep their place which is subordinate to men . . . tragically, a biblical woman is also 'first' to take the blame for marital problems, 'first' to be excommunicated as part of church discipline, 'first' to serve her father and then her husband in his vision for dominion." Groups like Teach Them Diligently (operated by David Nunnery), Family Covenant Ministries (operated by Jon Summers), National Center for Family Integrated Churches (operated by Scott Brown), Voddie Baucham Ministries (operated by Voddie Bauchum), Advanced Training Institute Conferences (operated by Tim Levendusky), and Generations with Vision (operated by Kevin Swanson), to name a few, continue to promote and encourage the philosophy of patriarchy while others who espoused this teaching, such as Bill Gothard or Jack Schaap, have stepped down or are incarcerated for crimes against children.

Gothard was also fully aware that my father and I had professionally and personally separated years earlier in 2012, as my father asked Gothard, his close personal friend, to "help counsel him and our family."

These motions will be fully opposed in court and are full of misstatements and lies. From the complaint, we explained about Gothard and his manipulations and stalking of victims:

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

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

In this lawsuit, Gothard has constantly attempted to manipulate and control the lawyers for the plaintiffs. On December 31, 2015, he sent a letter threatening "greater damage to your clients and to the cause of Christ if you expand and refine your lawsuit." He also seemed to threaten death to the lawyers by stating, "Jesus affirmed the death penalty for doing this when he stated, "He that curseth father or mother, let him die the death." He additionally explained that the "emotional damages of your clients" were caused by "whispering" and "tale-bearing" against him. He further stated that "Christianity is under attack in the world" and that he wants "nothing to do with your amended lawsuit."

Both Gothard and his follower's affidavits contain false statements under oath. These motions are based on those false statements. In fact, Gothard had his Original Affidavit sealed by the court and then changed the wording of his Amended Affidavit to try to avoid the fact that he made false statements under oath. Despite Mr. Gaffney's knowledge that Gothard and Blair's affidavits both contain false statements under oath, he refiled both of them. That is an unfortunate abuse of the legal process, but one that trial lawyers face regularly.

I am guilty of aggressively representing my clients, the victims of abuse by Gothard and IBLP. I have endured Gothard's attempts to manipulate and threaten my law firm and the victims we represent. I am confident that the court will sort out the facts and see that Gothard continues to victimize those whom he abused.

To be abundantly clear, I have not and would not represent Gothard. His attorney's motion is a desperate attempt to attack the law firm that is publicly and legally holding him accountable for years of child abuse. Even if Gothard and his followers are able to successfully lie to the court and have my law firm removed from the case, the lawsuit for the victims will go forward with other legal counsel. His actions are nothing more than a diversionary attack against the law firm that has brought this case the international attention that these victims deserve. This entire disqualification issue has nothing to do with the truth of our client's allegations. IBLP and Gothard do not seem to understand that.

Pedophiles are masters of diversion so people do not focus on the evil that they have done.