

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

GRETCHEN WILKINSON, <i>et. al.</i>)	
)	
Plaintiffs,)	
)	Case No. 2015 L 980
v.)	
)	Hon. Judge Kenneth L. Popejoy
INSTITUTE IN BASIC LIFE PRINCIPLES, INC.)	
and WILLIAM W. GOTHARD, JR.,)	Courtroom 2020
)	
Defendants.)	

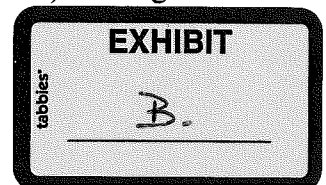
AFFIDAVIT OF ROGER BLAIR, D.D.S.

Roger Blair, D.D.S., being first duly sworn on oath deposes and states, as follows:

1. I have personal knowledge of the facts stated herein and if sworn as a witness would testify competently hereto.

2. In the afternoon of May 19, 2015, I was at the home of Bill Gothard. I was there to assist Mr. Gothard with some computer related work because he is not very sophisticated when it comes to technology.

3. While I was at Mr. Gothard's home on May 19, 2015, two people came to the front door and came into his home to talk. One of them was David Gibbs, III, and the other was a lady lawyer, but I do not know her name. We all talked there for about thirty minutes. Mr. Gibbs stated that they had been working together on something in the area and they wanted to come by to talk. Mr. Gibbs stated that he was familiar with what was happening on the website "Recovering Grace." At that time, Bill Gothard and I were both aware that his father, David Gibbs, Jr., had worked with Bill Gothard in the past and was involved in the investigation regarding allegations made on the "Recovering Grace" website. Bill Gothard welcomed David Gibbs and his lady lawyer associate into his home and openly discussed what was going on with both Bill's allegations and what had transpired at the Institute in Basic Life Principles (the Institute). During



the conversation with Mr. Gibbs, Institute Board member and Bill's friend, John Stancil, Bill was very at ease with Mr. Gibbs and talked openly about his issues with Recovering Grace and the Institute. Bill and Mr. Gibbs discussed at some length what John Stancil had tried to do to get Bill back on the Institute Board. Mr. Gibbs spoke like he already had knowledge of what John Stancil had been trying to do for Bill and conveyed both the message and impression that he was there along with John Stancil to help Bill through his pending issues.

4. It appeared to me at that time that Mr. Gibbs and his lady associate were there to help Bill properly think what to do regarding those problems. After approximately thirty minutes, it was decided that Bill and Mr. Gibbs would go out for a late lunch or early dinner. I was asked if I wanted to join them and I agreed. The lady lawyer declined, saying she had to go elsewhere.

5. We went a Boston Market on Ogden Avenue in Westmont and were there for approximately 90 to 120 minutes. I recall that both Mr. Gibbs and I ordered meatloaf. Mine was with sweet potatoes and Bill Gothard just ordered some side items.

6. At the Boston Market restaurant that evening, we discussed a number of things. Bill and Mr. Gibbs talked like they were old friends and Bill was obviously encouraged to listen to the advice and recommendations of Mr. Gibbs and, in fact, said that. Mr. Gibbs talked about how the founders of multiple national ministries had been under attack in recent years, specifically discussing at some length Bob Jones of the Bob Jones University of South Carolina, and James Dobson from the Focus On the Family ministry. Mr. Gibbs described how they worked through their issues and told Bill not to be discouraged that he could work through this. Mr. Gibbs stated that he knew how to help him resolve issues Bill had with people who were complaining about him on Recovering Grace, as well as the existing members of the Board of Trustees from the Institute.

7. Bill stated to Mr. Gibbs how he had faith in his father, David Gibbs, Jr., and indicated that he was very encouraged and ecstatic that David Gibbs, III, would be working with

him and advising him in resolving matters at hand. It appeared to me that Mr. Gibbs easily won Bill's confidence and Bill answered all questions raised by Mr. Gibbs without hesitation. Mr. Gibbs spoke as if he were connected to the individuals behind Recovering Grace and had inside knowledge that would be valuable to Bill. I recall Mr. Gibbs saying, "I know how to handle it." He stated that Bill "was wronged" and that it was unfair that "people are trying to destroy your ministry as well as other ministries." Mr. Gibbs stated that he had read allegations on the Recovering Grace website and he knew that they were false. He said that he knew how to adequately respond to "get rid of it." Although he did not provide specifics, he was very clear that he knew "how to handle it."

8. At no time that day, did Mr. Gibbs ever state or even suggest that he represented any of the women who had complained about Bill or the Institute on the Recovering Grace website. At no time that day did Mr. Gibbs ever state or even suggest that he was investigating anything for the benefit of anyone else. It was my impression and obviously Bill's impression based upon my observations of what the two of them said back and forth, that Bill sincerely believed that Mr. Gibbs was there to help him.

9. During the dinner meeting, Bill and Mr. Gibbs discussed at length how to get Bill back on the Institute's Board. They discussed two members of the Board who were on Bill's side, John Stancil and Anthony Burrus. Mr. Gibbs stated that he knew how to make the Institute stand up and take notice. He was going to show the Board that the negative claims and statements made on the Recovering Grace website had no merit and that he would help get Bill redeemed and reinstated. Then, after Bill was reinstated to the Board, he could help arrange meetings with people who had posted negative comments on the Recovering Grace website so that they could be helped.

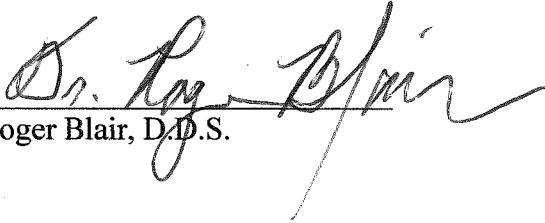
10. During that dinner meeting, Bill and Mr. Gibbs talked extensively about postings from females on the Recovering Grace website, who claimed that there were improper touchings and who had made allegations of sexual harassment or misconduct. Bill and Mr. Gibbs discussed in detail, what Bill knew about those ladies. Many of those allegations dated back twenty to thirty years and Bill had a specific recollection about who they were and their background and their experience at the Institute and ATI. Bill also explained as to at least some of them, his knowledge of their background and what he knew about their parents and family. Bill openly discussed his inter-actions with those women and his relationship with them. In doing so, it was my understanding that Mr. Gibbs was there to help counsel Bill on how to confront, both publicly and privately. At no time did I ever think that Mr. Gibbs was there to investigate Bill regarding a potential lawsuit on behalf of those women, against either the Institute or Bill himself. Just the opposite, it was my impression and belief throughout the entire evening that Mr. Gibbs was there to assist Bill. Bill indicated that after the allegations about him were posted on Recovering Grace, and as part of his desire to redeem his name and return to the Board, his supporters began providing him with information regarding those individuals. Bill also had his own information from years ago that he also has. They discussed together what that information was.

11. Bill and Mr. Gibbs also discussed what the current members of the Institute's Board were doing and I specifically recall their discussing certain aspects of the Institute, including Nashville, Tennessee property, as well as local property in the Oak Brook area. Mr. Gibbs asked Bill questions about the Institute properties and Bill openly responded.

12. After the dinner meeting was over and we went our separate ways, Bill told me that he was rejoicing that David Gibbs, III was going to help him through his problems. At no time did Bill ever state or suggest to me that he thought David Gibbs, III was investigating him or the

Institute so that he could bring claims against the Institute, or him. Just the opposite, Bill stated that he was ecstatic Mr. Gibbs was there to counsel and assist him.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Roger Blair, D.D.S.