

# CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): \_\_\_\_\_ COURT (FOR CLERK USE ONLY): \_\_\_\_\_

STYLED **Lourdes Torres-Manteufel v. Douglas Phillips et al**

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:	Names of parties in case:	Person or entity completing sheet is:
Name: <b>David C. Gibbs, Esq.</b> Address: <b>2648 FM 407, Suite 240</b> City/State/Zip: <b>Bartonville, TX 76226</b> Signature: <i>David C. Gibbs III</i>	Email: <b>dgibbs@gibbsfirm.com</b> <b>dgaines@gibbsfirm.com</b> Telephone: <b>(727) 362-3700</b> Fax: <b>(727) 398-3907</b> State Bar No: <b>24026685</b>	Plaintiff(s)/Petitioner(s): <b>Lourdes Torres-Manteufel</b> Defendant(s)/Respondent(s): <b>Douglas Phillips</b> <b>Vision Forum, Inc.</b> <b>Vision Forum Ministries, Inc.</b>
		<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
		Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____
[Attach additional page as necessary to list all parties]		

**2. Indicate case type, or identify the most important issue in the case (select only 1):**

Civil			Family Law	
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)
<b>Debt/Contract</b> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input checked="" type="checkbox"/> Other Injury or Damage: <b>Nine Counts—See Petition</b>	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocal (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	<b>Other Civil</b>			
	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property	<input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____		
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<b>Probate &amp; Mental Health</b>			
	<i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings		<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____	

**3. Indicate procedure or remedy, if applicable (may select more than 1):**

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
---	---	---

**4. Indicate damages sought (do not select if it is a family law case):**

Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees  
 Less than \$100,000 and non-monetary relief  
 Over \$100,000 but not more than \$200,000  
 Over \$200,000 but not more than \$1,000,000  
 Over \$1,000,000

CAUSE NO:

LOURDES TORRES-MANTEUFEL,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
v.	§	
	§	
DOUGLAS PHILLIPS,	§	_____ JUDICIAL DISTRICT
VISION FORUM, INC., AND	§	
VISION FORUM MINISTRIES, INC.	§	
	§	
	§	
<i>Defendants.</i>	§	BEXAR COUNTY, TEXAS

**PLAINTIFF’S ORIGINAL PETITION**

COMES NOW, LOURDES TORRES-MANTEUFEL, Plaintiff in the above styled action and files this Complaint for Personal Injury and Damages, against the Defendants, DOUGLAS PHILLIPS, VISION FORUM MINISTRIES, INC., and VISION FORUM, INC., and alleges as follows:

**I. DISCOVERY CONTROL PLAN**

1. Pursuant to Texas Rule of Civil Procedure 190.3, the Plaintiff intends to conduct discovery in this case under Discovery Control Plan II.

**II. PARTIES**

2. The Plaintiff, LOURDES TORRES-MANTEUFEL (hereinafter Ms. Torres), is a resident of San Antonio, Texas. At all times herein mentioned, Ms. Torres was a resident of the Cities of Hondo and San Antonio, Texas. Pursuant to Texas Rule of Civil Procedure § 30.014, the last three digits of Ms. Torres’s Texas driver’s license number are 011. The last three digits of Ms. Torres’s Social Security Number are 719.

3. Defendant, DOUGLAS PHILLIPS, is, and at all relevant times herein mentioned was, a resident of the City of Hollywood Park, County of Bexar, State of Texas.
4. The Defendant, VISION FORUM, INC., is, and at all times herein mentioned was, a for-profit Texas corporation with its principal business office in the City of San Antonio, County of Bexar, State of Texas.
5. The Defendant, VISION FORUM MINISTRIES, INC., is, and at all times herein mentioned was, a non-profit Texas corporation with its principal business offices in the City of San Antonio, County of Bexar, State of Texas.

### **III. JURISDICTION**

6. This Court has jurisdiction over the parties in this case because all of the Defendants reside, or their principal places of business are located, within the State of Texas.
7. Texas District Court is proper and has jurisdiction over this matter because the amount in controversy exceeds the jurisdictional limits.

### **IV. VENUE**

8. Venue is proper in Bexar County District Courts because the nature of the causes of action accrued in Bexar County, Texas.
9. This suit arises from inappropriate, unwanted, and immoral sexual acts committed by Douglas Phillips against Ms. Torres. These acts primarily occurred in Bexar County, Texas.

## V. FACTS

10. Ms. Torres reasserts and incorporates by reference paragraphs 1 through 9, as if fully stated herein.
11. Defendant, Douglas Phillips, is an attorney who is not licensed to practice law in the State of Texas. Prior to moving to Texas, he was employed by the Home School Legal Defense Association (HSLDA) and takes much of the credit for “saving homeschooling.” Phillips espoused avoiding interaction with authorities at all costs. There is a pervasive sense within Phillips’s tight circle of people that they are engaged in a cosmic war, and that they avoid contact with the government and other outside groups that might hold them accountable or ask questions. Phillips used his training as a lawyer to help foster an unregulated community that operated as a “total institution” where Ms. Torres would have limited access to outside support as she came to see her situation as abusive.
12. Douglas Phillips created a sociological environment that operated as a “total institution.” The total institution concept is used to describe an environment where a person is exclusively surrounded by a large number of similarly situated people. In other words, people within a total institution work together, worship together, spend leisure and recreational time together, and even dwell together. Thus, a person within a total institution is cut off from the normal world entirely. As a closed and tightly knit unit of people, total institutions lead an enclosed and uniquely administered round of life that is peculiar to its own characteristics and beliefs.
13. As one component of the “total institution,” Douglas Phillips’s community had its own church-court system. Disputes were brought before a board of all male elders in what resembled a legal proceeding without any of the rights of the accused in secular courts.

For Ms. Torres, this system would force her to go up against Phillips—the most powerful man in the extended community—who is a trained attorney known for his skills at argument and intimidation. If Ms. Torres were to lose, she likely would be excommunicated from her church and all other churches that are legitimate in the eyes of her community. Seeking advice from others would have been labeled as gossip and treated as a very serious sin. One could be excommunicated for this, a practice that very much protects the men in power. Ms. Torres had watched others be abused under this one-sided dispute resolution process.

14. Douglas Phillips held a high position of trust in Ms. Torres’s life, personal family circles, social circles, and her religious circle. Phillips carefully, intentionally, and effectively closed off all access to outside intervention and support necessary for her to challenge him.
15. As described herein, Douglas Phillips used Ms. Torres—against her wishes and over her objections—as a personal sex object. Douglas Phillips repeatedly groped, rubbed, and touched Ms. Torres’s crotch, breasts, and other areas of her body; rubbed his penis on her; masturbated on her; forced her to watch him masturbate on her; and ejaculated upon her. This perverse and offensive conduct repeatedly took place over the course of several years.
16. Douglas Phillips publicly admitted this offensive behavior on a blog that he controlled. Phillips stated: “There has been serious sin in my life for which God has graciously brought me to repentance. I have confessed my sin to my wife and family, my local church, and the board of Vision Forum Ministries. I engaged in a lengthy, inappropriate relationship with a woman.”

17. Phillips’s confession did not include that the unmarried woman had been a member of his total institution, and that Phillips had continued in his public ministry at Vision Forum Ministries for at least eight months after he confessed.
18. Phillips was the dominant authority figure in Ms. Torres’s life and family. He made himself her spiritual father. He was her authority figure with regard to where she lived, where she worked, where and how she worshipped, her education, her interpersonal relationships, her time and schedule, and even acted as her counselor. In other words, Phillips was the pastor of her church, her boss, her landlord, and the controller of all aspects of her life—obedience to Phillips was as obedience to God in this total institution.
19. Prior to the fall of 2013, Douglas Phillips was the self-promoted leader of what is commonly known as the “patriarchal” or “quiverfull” movement. Phillips’s teachings were generally critical of the traditional local-church as he advocated a “home-church” model that created division within evangelical circles. Phillips travelled extensively as a presenter attempting to advance his teachings.
20. Phillips was also the primary leader of a patriarchal church in Boerne, Texas. Phillips used these positions of leadership to manipulate and coerce Ms. Torres.
21. Phillips’s patriarchal movement teaches that men are, and should be, in the absolute control of women. Patriarchy considers women to primarily exist for the purposes of producing children, caring for the men, and rearing the children. Females in the patriarchal movement are discouraged from attaining higher education of any kind and are told that their sole purpose is to marry a man within the movement to meet the purposes described above. In other words, women within this movement are perceived to

exist only for the end-goals communicated by the male leaders that perceive themselves as the “patriarchs” of this world.

22. Families within patriarchal and quiverfull communities place extreme importance on maintaining their daughters’ sexual and emotional purity. Sex before marriage is held to be sin, and sex before marriage also damages a daughter’s marriage prospects. Most couples in Christian patriarchy and quiverfull circles don’t kiss before marriage, and some don’t even hold hands or embrace. Furthermore, this virginity is more than just physical; it is emotional as well. Girls are urged not to “give away pieces of their hearts” by becoming emotionally entangled with boys their age. Every teenage crush becomes suspect and dangerous. Dating is out of the question, as it is considered to be “practice for divorce.” Instead, females within these environments find husbands through parent-guided courtships, trusting their father’s guidance and obeying his leadership. Marriage is seen as a transfer of authority from the daughter’s father to her husband.
23. While Ms. Torres would have felt compelled to submit to Douglas Phillips, the purity culture would have meant at the same time, her submission made her “damaged goods” in her eyes, the eyes of her family, and her community—raising the cost for her to come forward to call him to account. She was, in fact, in a “no-win” situation.
24. Douglas Phillips asserted that God is male, and explicitly not female; that the human male is the “image and glory of God in terms of authority, while the woman is the glory of man.” That is, men are in the image of God in terms of authority over their households; women are created in God’s image in a decidedly different way, sometimes called “reflected glory.”

25. Phillips argues that while men are to exercise dominion, women are to assist their husbands' dominion by serving in the home. According to Phillips, women in the "exceptional state" of being unmarried may have "more flexibility," but it is not the "ordinary and fitting role of women to work alongside men as their functional equals in public spheres of dominion."
26. Under patriarchy, the framework in Scripture is extended—out of context—to women in general. Every woman has a male authority, and that male authority looks to Christ as his authority. A woman is to obey her male authority, whether it is her father, husband, brother, or son, and he in turn is to obey Christ. By obeying her male authority, a woman is obeying God. This is seen as the natural and God-given order.
27. Douglas Phillips, and his two corporate entities (Vision Forum, Inc. and Vision Forum Ministries), are major advocates of Patriarchy. This ideology includes the belief that there are God ordained distinct gender roles and that man was created first and woman's creation was secondary. It holds that patriarchy is the divine family order ordained by God. The husband and father is the head of the household, family leader, provider, and protector; the wife and mother, created to be a helper to her husband, is a bearer of children and a "keeper at home," remaining in her God-ordained and proper sphere of dominion for a wife, the home. The children are to remain obedient to their parents, even as adults. Children are to marry through a process of courtship guided at every step by their father, and unmarried adult daughters are to remain under their fathers' authority and in their fathers' homes. This patriarchal family order is held to be divine and God ordained. Stepping outside of it is held to be rejecting God's will and listening to the lies of "the world."

28. As an example of Phillips's control, he stated: "Daughters aren't to be independent. They're not to act outside the scope of their father. As long as they're under the authority of their fathers, fathers have the ability to nullify or not the oaths and the vows. Daughters can't just go out independently and say, 'I'm going to marry whoever I want.' No. The father has the ability to say, 'No, I'm sorry, that has to be approved by me.'"
29. In the book *Quiverfull: Inside the Christian Patriarchy Movement*, it is written that women in Phillips's patriarchy are expected to ask their husbands about every detail of household management, remain silent in church, are discouraged from speaking in the company of men, and are typically considered at fault for marital difficulties, all of which are thought to stem from their lack of submission. This book also states, "Women are not allowed to speak in church." Prohibition to speak in church is "a rule so steadfast that women had to rely on their male family members or other male congregants to say anything in church: to announce a prayer request, to walk to the front of the church, to receive communion for the family . . . ."
30. Voddie Baucham, a leader in the patriarchal and quiverful movement, explains the patriarchal men's desire to be revered by younger women: "A lot of men are leaving their wives for younger women because they yearn for attention from younger women. And God gave them a daughter who can give them that." The attitudes that produce these ideas are what leads to physical, mental, verbal, spiritual, and sexual abuse of both women and daughters within the patriarchal movement.
31. 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.

32. Phillips’s practices are fraught with inconsistencies. For example, even though Phillips condemns celebrating the Christmas holiday, he actively printed Christmas themed catalogs to sell Vision Forum merchandise during the Christmas season. Also, Phillips would not allow women to wear pants, but would personally consume alcoholic beverages. Furthermore, while stating that he was not espousing racism, Phillips was fascinated with the Civil War from a Confederate perspective.
33. Females within the movement are manipulated by the male leaders. The males control and manipulate them into believing that the world revolves around the male “patriarchs.” Women, as scapegoats, are blamed for the inappropriate conduct of the men, thus preserving the men’s self-perceived collective self-image is preserved and concomitantly lowering the women’s self-esteem, so that women will fall into deeper submission under

the men's patriarchal authority. Women within this movement are instructed to do anything to please the male leaders.

34. As a result of the manipulation of this movement, Ms. Torres's thinking was altered. As described herein, Douglas Phillips—standing in a position of influence and prominence within patriarchy—methodically groomed Ms. Torres so that she would eventually participate in illicit sexual rendezvous with him promising that she could one day marry him. This grooming began when Ms. Torres was a fifteen-year-old child. Due to the years of continued conditioning and indoctrination by Phillips and the patriarchal leaders, Ms. Torres was incapable of giving consent to Phillips's sexual advances.
35. Phillips promised Ms. Torres that he would marry her and that she would be the person who would have the great privilege of being his wife. In Ms. Torres's eyes he was the primary leader of this movement and the most powerful male figure in her universe. Phillips repeatedly told Torres that this was possible because his wife, Beall Phillips, was going to die soon.
36. The Defendants Vision Forum, Inc. (for profit) and Vision Forum Ministries (not-for-profit) are two corporate entities created by Douglas Phillips. Despite the fact these are two separate entities, in essence they functioned as one. Vision Forum Ministries closed its operational business when Douglas Phillips admitted to inappropriate illicit sexual behavior to a woman that was not his wife (Ms. Torres). Both corporate entities are believed to be in active existence today.
37. As a non-profit entity, Vision Forum Ministries is controlled by a board of directors. Douglas Phillips was the President of the organization. Vision Forum Ministries' board was made aware of Phillips's illicit sexual behavior in early 2013. Despite the fact of

having this knowledge, the board of Vision Forum Ministries decided to keep Phillips in the company's highest position of leadership. This move is consistent with the ideals and beliefs of the patriarchal movement: that women exist solely for the control and pleasure of the men. When it was apparent that Phillips's behavior toward Ms. Torres could no longer remain confidential, it was only then that the board of directors of Vision Forum Ministries decided to remove Phillips from leadership. At this point, Phillips issued carefully worded public statements about his sexual improprieties, and the Vision Forum ministries board began to strategize as to how it could bring Phillips to a place where he could make a "comeback" and regain the public leadership of the ministry.

38. On or about November 19, 1999, Ms. Torres met Defendant Douglas Phillips and his wife Elizabeth Beall (hereinafter Beall) Phillips at a conference. Ms. Torres was fifteen-years-old at the time and attending the conference with her family.
39. Between November of 1999 and January of 2007, Douglas Phillips and Ms. Torres's family became friends. Ms. Torres spent many hours in Douglas Phillips's home, with and without her family, specifically assisting Phillips's wife in caring for their children and running the family farm. As time passed, Ms. Torres was invited on various trips with the family (to many states like Hawaii, Virginia, and Florida. Ms. Torres was even invited to go on trips outside of the country). Ms. Torres's expenses were always paid on these trips and many times, if her family was invited, their expenses were also paid. Ms. Torres's family was not financially in a position to participate in many of these trips apart from Douglas Phillips's financial support. Douglas Phillips invited Ms. Torres, and her family, on these trips so that he could spend time with Ms. Torres, and begin to indoctrinate her with the patriarchal mindset. Phillips subtly began to manipulate Ms.

Torres, so that he could use her for his sexual gratification. This calculated, planned, and methodical grooming process went on for many years.

40. Between 2006–2007 Douglas Phillips began to pay special attention to Ms. Torres. He started complimenting her regularly on her “home-making skills,” her beauty, and her devotion to his wife and family. He began inviting her to come with him and the family on their family vacations, he started asking her personal questions about her life plans, thoughts and dreams. He repeatedly told her she was a member of his family and that he would take care of her and she never needed to go to school or seek employment opportunities apart from employment under his control. During this time Defendant also started giving Ms. Torres money for personal use.
41. In July of 2007 Douglas Phillips invited Ms. Torres to “help” him on one of his events. That night when standing next to Ms. Torres, Douglas Phillips put his hand under her hair around the back of her neck and massaged her neck. Another time Douglas Phillips sat next to her while she watched a movie with his children. While watching the movie, Phillips reached out and massaged her leg. He also began calling her, e-mailing her, and chatting online with her. Many times these communications were nothing more than expressing his desire to be with her, asking “When are you coming over?” and saying “I can’t wait to see you!”
42. In October of 2007, Douglas Phillips invited Ms. Torres and her family to live with them as they were moving into a new home.
43. While Ms. Torres was living with Douglas Phillips and his family in October of 2007, Douglas Phillips entered Ms. Torres’s bedroom and without her consent began touching her breasts, stomach, back, neck, and waist. Phillips then began to masturbate and

ejaculated on her. Ms. Torres asked Phillips to stop and broke down crying. Despite Ms. Torres's repeated requests for Phillips to stop masturbating and ejaculating on her, Phillips proceeded to return and repeat this perverse and offensive conduct. Each night that Phillips returned, Ms. Torres requested that he stop. Defendant blatantly disregarded her requests but continued to masturbate and ejaculate on her each night.

44. Douglas Phillips, on the evenings he visited Ms. Torres, persuaded her that he was not doing anything wrong, that he intended to marry Ms. Torres, and that his wife would die shortly and enable him to marry Ms. Torres. He further repeatedly told Ms. Torres that he loved her, that he would take care of her, and that what they were doing was not wrong. He also stated that if it was wrong, it was completely her fault.
45. Between November of 2007 and January of 2008 Beall Phillips stopped inviting Ms. Torres over to help her with the children and household chores. Douglas Phillips was no longer able to have one-on-one time with Ms. Torres as she stopped coming to his home.
46. When Ms. Torres stopped coming to Douglas Phillips's home, he began personally contacting Ms. Torres and requesting that she assist him in his business, that she come take pictures at Vision Forum events, that she come to his home and help him work on a radio drama series, and that she help him judge movie competitions. He also began texting, calling, and e-mailing her about his daily activities, his hopes and dreams, and often including in his communication his love for Ms. Torres and his intent to marry her.
47. Ms. Torres—not wanting to disappoint the man that controlled every facet of her life—was manipulated to serve Douglas Phillips in his business endeavors between the years of 2008–2012.

48. While Ms. Torres was helping Douglas Phillips with his business endeavors, he repeatedly used any time alone with her to gratify his sexual desires. He would place his hand under her shirt, rub her legs, stomach, and neck, kiss her face and body, rub his penis on her, masturbate in front of her and on her, and ejaculate on her—all while assuring Ms. Torres that she would soon be his wife, praising her for her chastity and loyalty.
49. Ms. Torres was unable to consent to the sexual contact and repeatedly asked Defendant Douglas Phillips to stop. However, Ms. Torres did not tell anyone about Defendant's conduct because he manipulated her into believing that it would ruin his reputation, destroy his ministry, and get her in trouble with the church.
50. Near the end of 2012, Ms. Torres stopped working with Defendant Douglas Phillips, stopped attending the church that he led, and told her parents and a friend about Defendant, his conduct toward her, and their relationship to break free from the complete control that Douglas Phillips had over her life.
51. On or about January 2, 2013—after 12:00 midnight—when Ms. Torres had refused to be alone with Defendant Douglas Phillips for several weeks, had stopped assisting him with Vision Forum work projects, and was no longer communicating with Douglas Phillips, Douglas Phillips came over to Ms. Torres's house around midnight and began knocking on her bedroom window. Ms. Torres's family heard the noise and Ms. Torres's brother and father went outside and chased Douglas Phillips without knowing it was him. When they caught him Defendant stated he had come to "pay" Ms. Torres for her Vision Forum work. Ms. Torres's father told Defendant Douglas Phillips to leave and he left.
52. The next morning Defendant Douglas Phillips and his wife returned to Ms. Torres's home to speak with Ms. Torres and her parents. Defendant Douglas Phillips repeatedly tried to

Ms. Torres but her parents did not allow it and dismissed her from the conversation. Phillips then proceeded to speak with Ms. Torres's parents and reassure them everything was fine and that he and Ms. Torres should continue to be "friends" and work together on "ministry" projects. Defendant's wife broke down crying and did not say anything. Ms. Torres's parents asked Defendant Douglas Phillips to stop talking and leave. Ms. Torres's father escorted Defendant out of the house.

53. On or about, January of 2013 and/or February 2013, Ms. Torres and her parents went to the elders at Boerne Christian Fellowship Church, the church that Defendant Douglas Phillips led and the church Ms. Torres and her family attended, informed the church leadership of Defendant's conduct, left the church, and broke off all contact with Defendant and his family.
54. On October 3, 2013, Ms. Torres received an e-mail from Beall Phillips threatening her if she did not keep silent about what happened to her, i.e., her abuse:

During the last ten weeks, and ultimately for the last nine months, you have been lighting bombs all across the country. Right now, you may have a perception of peace, but what you don't know is that these bombs are about to explode in a manner that will change all of our lives forever. It will affect your life, your marriage prospects . . . your parents . . . and thousands of other people. It is far worse than you imagine. The VFM board has encouraged me to let you know about these and to work with you to give you an opportunity to stop impending destruction.

## **VI. CAUSES OF ACTION**

### **COUNT 1—BATTERY** *(Against Douglas Phillips)*

55. Ms. Torres reasserts and incorporates by reference paragraphs 1 through 56 as if fully stated herein and further alleges as follows:

56. As stated in the facts above, Douglas Phillips harmfully and offensively touched Ms. Torres over the course of many years, the latest of which is the fall of 2012.
57. This direct and immediate contact by Douglas Phillips to Ms. Torres repeatedly occurred over the course of many years.
58. The nature of this touching—unwarranted rubbing, groping, and grabbing of Ms. Torres’s crotch, breasts, and other areas of her body; masturbating upon her; and ejaculating upon her—was harmful and offensive and Douglas Phillips had reason to know that this contact was harmful and offensive.
59. Ms. Torres did not consent to this touching and at times verbally rebuked Douglas Phillips for touching her.
60. A reasonable person in Ms. Torres’s position would find Douglas Phillips’s touching to be harmful and offensive.
61. Ms. Torres demands damages in an amount to be determined at trial.

**COUNT 2—ASSAULT** *(Against Douglas Phillips)*

62. Ms. Torres reasserts and incorporates by reference paragraphs 1 through 63 as if fully stated herein and further alleges as follows:
63. As stated in the facts above, Douglas Phillips harmfully and offensively touched Ms. Torres over the course of many years, the latest of which is the fall of 2012.
64. This direct and immediate contact by Douglas Phillips to Ms. Torres repeatedly occurred over the course of many years.
65. The nature of this touching—unwarranted rubbing, groping, and grabbing of Ms. Torres’s crotch, breasts, and other areas of her body; masturbating upon her; and ejaculating upon

her—was harmful and offensive and Douglas Phillips had reason to know that this contact was harmful and offensive.

66. Because of the repeated and incessant nature of Douglas Phillips's sexual instincts and desires, Ms. Torres was placed in fear of imminent offensive bodily contact by Defendant Douglas Phillips—namely, Ms. Torres was placed in fear of Douglas Phillips finding her alone, groping the sensitive and private parts of her body, masturbating on her, and ejaculating upon her.
67. A reasonable person in Ms. Torres's position would have regarded the imminent touching of Douglas Phillips as threatening, harmful, and offensive.
68. Ms. Torres did not consent to the imminent touching and experienced apprehension from Douglas Phillips's action.
69. Ms. Torres demands damages in an amount to be determined at trial.

**COUNT 3—SEXUAL BATTERY** (*Against Douglas Phillips*)

70. Ms. Torres re-alleges paragraphs 1 through 71 and incorporates the same by reference as if fully stated herein and further alleges as follows:
71. Ms. Torres, on or about December 10, 2012, was in her home with Douglas Phillips, Liberty Phillips, Josh Phillips, Nathan Barnes, and Rebecca Barnes judging movie submissions for a Vision Forum competition.
72. During the judging, Ms. Torres went alone to the kitchen to prepare lunch.
73. Shortly after Ms. Torres left the group, Defendant Douglas Phillips left the group and went into the kitchen.

74. Douglas Phillips approached Ms. Torres and intentionally placed his hands on her body, touching her stomach and breasts, masturbated on her, and ejaculated in her face. His physical contact with her was intentional, harmful, unwanted, and offensive.
75. Defendant Douglas Phillips intended to cause unwanted offensive sexual contact with Ms. Torres and did in fact make unwanted offensive sexual contact with Ms. Torres.
76. Ms. Torres did not consent to Defendant Douglas Phillips's actions and a reasonable person would find his actions offensive.
77. Ms. Torres has been harmed by Defendant Douglas Phillips's actions and is entitled to damages in an amount to be determined at trial.

**COUNT 4—FRAUD** (*Against Douglas Phillips*)

78. Ms. Torres re-alleges paragraphs 1 through 79 and incorporates the same by reference as if fully stated herein and further alleges as follows:
79. Between 2007 and January 2013, Defendant Douglas Phillips—on countless occasions—made false statements to Ms. Torres that he was going to marry her, that he would always provide for her and take care of her, and that she was a member of his family.
80. Defendant made these statements knowing them to be false, at the time he made them, or it least made them in reckless disregard for the truth.
81. Defendant made these statements with the intent to have Ms. Torres rely on these statements and act upon them or at least not resist his sexual advances.
82. He intentionally used his position within the patriarchal movement to manipulate Ms. Torres to gratify his own sexual desires, and any time Ms. Torres resisted or requested

that his advances stop, he would spend time talking to her about his plans for their future together—fully aware that based on his teachings, adopted and personalized by Ms. Torres, that a woman’s value and role in society depended on marriage.

83. Ms. Torres did in fact rely on Defendant’s statements. She did not at all times refuse Defendant’s sexual advances, but submitted to them based on the fraudulent statements Defendant had made to her.

84. Ms. Torres, in relying on Defendant’s false statements, has suffered injury and damages in an amount to be proven at trial.

**COUNT 5—INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**  
*(Against Douglas Phillips)*

85. Ms. Torres re-alleges paragraphs 1 through 86 and incorporates the same by reference as if fully stated herein and further alleges as follows:

86. Defendant Douglas Phillips, while employed by Vision Forum Ministries, a non-profit Texas organization, and Vision Forum, Inc. repeatedly over a period of five years, from 2007–2012, intentionally and deliberately inappropriately touched Ms. Torres’s breasts, stomach, legs, buttocks, crotch, masturbated in her presence and on her, and ejaculated on her. All of these disgusting and perverse actions were done without her consent.

87. His conduct was extreme and outrageous not only because Ms. Torres did not consent to it, but also because Douglas Phillips held a high position of trust in Ms. Torres’s life, personal family circles, social circles, and her religious circle. Phillips carefully, intentionally, and effectively closed off all access to outside intervention and support necessary for her to challenge him. He had been her mentor, counselor, pastor, elder, employer, and friend since she was fifteen-years-old. She had been at his home serving in

his family several days a week between 2000–2007, at his urging she had forgone opportunities to attain higher education, and she had accepted his teachings that the woman’s role was to serve men in the home, and believed Phillips when he stated that she was “part of his family” and he would take care of her.

88. Ms. Torres has suffered extreme severe emotional distress from Defendant Douglas Phillips’s unwanted sexual contact. Ms. Torres has constant anxiety that Defendant Douglas Phillips will attempt to contact her again. Ms. Torres is prone to outbursts of anger or crying when she is reminded of the previous years of abuse, has trouble sleeping at night due to fear, and has actually been forced to leave home and many friends behind due to their connections to Defendant Douglas Phillips. She has sought professional counseling and is still being counseled through her trauma.
89. The emotional distress is also extreme in the sense that Defendant Douglas Phillips’s conduct had completely destroyed Ms. Torres’s life philosophy. Defendant Douglas Phillips is a leader in the patriarchal movement which espouses the belief that a woman’s primary life purpose is to marry and have as many children as she can, that she should remain at home with her father until she is married, that she should not leave the home and pursue a four year or higher degree, and that she should not work outside the home in an environment of which her father or husband does not approve.
90. Ms. Torres was raised and lived in an environment with family and friends who all shared these same beliefs about the role of women in society. Men were considered protectors, providers, and wise counselors, they were expected to lay down their lives for women and cherish and treasure them, especially their daughters, wives and sisters. Men are held

in very high esteem in this belief system as they are revered for being the head of the home and the final decision makers on all aspects of a woman's life.

91. Defendant Douglas Phillips, as a leader in this movement, knowing Ms. Torres accepted these beliefs, knowing that she was expected to submit to the requests of men, used his position of power, influence, and trust, to gratify his sexual desires by promising that he would marry Ms. Torres, that he would always provide for her take care of her, and that she was already a member of his family. When she objected to his conduct he told her he was not doing anything wrong because of his intent to marry her in the future and that even if he were doing anything wrong, it was completely her fault.
92. Ms. Torres has suffered extreme, severe emotional distress because of the extreme and outrageous conduct of Defendant Douglas Phillips. Ms. Torres is entitled to damages in an amount to be determined at trial.

**COUNT 6—NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
*(Against All Defendants)*

93. Ms. Torres re-alleges paragraphs 1 through 94 and incorporates the same by reference herein as if fully alleged and further alleges as follows:
94. Defendant Douglas Phillips, while employed by Vision Forum Ministries, Inc., and Vision Forum, Inc., repeatedly over a period of five years, from 2007-2012, inappropriately touched Ms. Torres's breasts, stomach, legs, buttocks, crotch, masturbated on her, and ejaculated on her without her consent.
95. At the time Ms. Torres was harmed, Douglas Phillips was acting within the course and scope of his duties on behalf of Vision Forum Ministries and Vision Forum, Inc.

96. As a direct and proximate result of Douglas Phillips's actions, Ms. Torres has suffered harm and is entitled to damages in an amount to be determined at trial.
97. His conduct was extreme and outrageous not only because Ms. Torres did not consent to it, but because Douglas Phillips held a high position of trust in Ms. Torres's life, personal family circles, social circles, and her religious circle. He had been her mentor, counselor, pastor, elder, employer, and friend since she was fifteen-years-old. She had been at his home serving in his family several days a week between 2000-2007, at his urging she had forgone the opportunity to attain higher education, and she had accepted his teachings that a woman's role was to serve the men in the home, and believed Phillips when he told her that she was "part of his family" and that he would take care of her.
98. Ms. Torres has suffered extreme severe emotional distress from Defendant Douglas Phillips's unwanted sexual contact. Ms. Torres has constant anxiety that Defendant Douglas Phillips will attempt to contact her again. Ms. Torres is prone to outbursts of anger, physical trembling, and crying when she contemplates the previous years of abuse, has trouble sleeping at night due to fear, often experiences a lack of appetite and nausea, and has actually been forced to leave home and many friends behind due to their connections to Defendant Douglas Phillips. She has sought professional counseling and is being counseled through her trauma.
99. The emotional distress is also extreme in the sense that Defendant Douglas Phillips's conduct had completely destroyed Ms. Torres's life philosophy. Defendant Douglas Phillips is a leader in the patriarchy movement which espouses the belief that a woman's primary life purpose is to marry and have as many children as she can, that she should remain at home with her father until she is married, that she should not leave the home

and pursue higher education, and that she should not work outside the home in an environment of which her father or husband does not approve.

100. Ms. Torres was raised and lived in an environment with family and friends who all shared these same beliefs about the role of women in society. Men were considered protectors, providers, and wise counselors. Men are held in very high esteem in this belief system as they are revered for being the head of the home and the final decision makers on all aspects of a woman's life.

101. Defendant Douglas Phillips, as a leader in this movement, knowing that Ms. Torres accepted these beliefs, knowing that she was expected to submit to the requests of men, used his position of power, influence, and trust, to gratify his sexual desires by promising that he would marry Ms. Torres, that he would always take care of her, and that she was already a member of his family. When she objected to his conduct he told her he was not doing anything wrong because of his intent to marry her in the future and that even if he were doing anything wrong it was entirely her fault.

102. Ms. Torres has suffered extreme and severe emotional distress and this emotional distress has manifested itself in bodily injury. Her emotional distress has been caused by the outrageous conduct of Defendant Douglas Phillips. Ms. Torres is entitled to damages in an amount to be determined at trial.

**COUNT 7—SEXUAL EXPLOITATION** (*Against All Defendants*)

103. Ms. Torres re-alleges paragraphs 1 through 102 and incorporates the same by reference herein as if fully alleged and further alleges as follows:

104. Defendant Douglas Phillips, while employed by Vision Forum Ministries, Inc., and Vision Forum, Inc., repeatedly over a period of five years, from 2007–2012, inappropriately touched Ms. Torres’s breasts, stomach, legs, buttocks, crotch, masturbated on her, and ejaculated on her without her consent.
105. At the time Ms. Torres was harmed, Douglas Phillips was acting within the course and scope of his duties on behalf of Vision Forum Ministries and Vision Forum, Inc.
106. As a direct and proximate result of Douglas Phillips’s actions, Ms. Torres has suffered harm and is entitled to damages in an amount to be determined at trial.
107. At all times relevant to this petition, defendant was a "mental health services provider" under Texas Civil Practice and Remedies Code § 81.001(2), in that defendant was an unlicensed counselor and was a member of the clergy.
108. From 2003 to January 2012, Ms. Torres was a "patient" of defendant's under Texas Civil Practice and Remedies Code § 81.001(3), in that Ms. Torres, as an individual, obtained mental health services from defendant through secular counseling to assist Ms. Torres in understanding conscious or subconscious motivations, resolve emotional, attitudinal, and relationship conflicts and modifying feelings, attitudes, and behaviors that interfered with Ms. Torres's effective emotional, social, or intellectual functioning.
109. During the course of providing secular counseling to Ms. Torres, Defendant Douglas Phillips engaged in sexual contact with Ms. Torres as defined by Texas Civil Practice and Remedies Code § 81.001(4), as follows: Defendant Douglas Phillips touched Ms. Torres’s breast and body with the intent to arouse and gratify his own sexual desires.
110. During the course of providing secular professional counseling to Ms. Torres, Defendant Douglas Phillips engaged in sexual exploitation of Ms. Torres as defined by Texas Civil

Practice and Remedies Code § 81.001(5), in that Defendant Douglas Phillips intentionally and repeatedly masturbated and ejaculated on Ms. Torres and touched her back, breasts, stomach, crotch, and legs, and kissed her, for the purpose of gratifying his own sexual desires.

111. During the course of the counseling he exploited Ms. Torres's trust and friendship for sexual gratification by telling her he loved her, that he was going to marry her, that he already considered her to be a member of his family, by giving her money to her for her own personal use, by promising to take care of her physical needs, by having her help him in his business, and by having her take care of his children. He also repeatedly, when she objected to his conduct, stated that what he was doing was not wrong.
112. From the time Ms. Torres graduated from high school and started considering attending college, Defendant Douglas Phillips, began counseling and mentoring Ms. Torres. He asked her what her vision was for her life, he asked her what her deepest desires were, he counseled her not to pursue higher education, counseled her to work for him, and counseled her that she was a member of his family and he would take care of her.
113. Over a period of time he did incorporate Ms. Torres into his family, inviting her to work for him at Vision Forum Ministries and Vision Forum, Inc., which operated almost exclusively out of his home. He also invited her to come on family vacation and to attend Vision Forum Ministries' events in other states.
114. As a direct and proximate result of defendant's violation of Texas Civil Practice and Remedies Code § 81 as set forth above, Ms. Torres was injured in that she experienced mental and emotional anguish, loss of reputation, loss of friendships and dating relationships, depression, medical costs, and counseling costs.

115. As a result of these injuries, Ms. Torres has suffered damages in an amount to be determined at trial.

**COUNT 8—NEGLIGENT SUPERVISION**  
*(Against Vision Forum Ministries and Vision Forum, Inc.)*

116. Ms. Torres reasserts and incorporates by reference each and every allegation contained in paragraphs 1 through 117 above as if fully set forth herein and further alleges as follows:

117. Vision Forum Ministries and Vision Forum, Inc. allowed Douglas Phillips to serve as speaker, promoter, and operations manager for Vision Forum Ministries, in essence, the CEO. Part of his duties also included counseling and mentoring others regarding specific biblical beliefs involving church formation, parental roles in the family, and discipline of children.

118. Vision Forum Ministries and Vision Forum, Inc. knew, or should have known in the exercise of reasonable care, that Douglas Phillips was a danger to Ms. Torres.

119. Despite Vision Forum Ministries' and Vision Forum, Inc.'s knowledge that Douglas Phillips was a danger to Ms. Torres, these Defendants failed to take reasonable measures to supervise Mr. Phillips and prevent further injury to Ms. Torres and others.

120. Vision Forum Ministries and Vision Forum, Inc. was negligent in supervising Douglas Phillips and their negligent supervision was a substantial factor in causing Ms. Torres's harm.

121. Ms. Torres has suffered harm and is entitled to damages in an amount to be proven at trial.

**COUNT 9—NEGLIGENT RETENTION**  
*(Against Vision Forum Ministries and Vision Forum, Inc.)*

122. Ms. Torres reasserts and incorporates by reference each and every allegation contained in paragraphs 1 through 123 above as if fully set forth herein and further alleges as follows:
123. Vision Forum Ministries and Vision Forum, Inc. allowed Douglas Phillips to serve as speaker, promoter and operations manager for Vision Forum Ministries, in essence, the CEO. Part of his duties also included counseling and mentoring others regarding specific biblical beliefs involving church formation, parental roles in the family, and discipline of children.
124. Vision Forum Ministries and Vision Forum, Inc. knew, or should have known in the exercise of reasonable care, that Douglas Phillips was a danger to Ms. Torres.
125. Despite Vision Forum Ministries and Vision Forum, Inc.'s knowledge that Mr. Phillips was a danger to Ms. Torres, these Defendants negligently retained Mr. Phillips in the positions of highest leadership within Vision Forum Ministries and Vision Forum, Inc.
126. Vision Forum Ministries and Vision Forum, Inc.'s negligent retention of Douglas Phillips was a substantial factor in causing Ms. Torres's harm.
127. Ms. Torres has suffered harm and is entitled to damages in an amount to be proven at trial.

**XIII. REQUEST FOR A JURY TRIAL**

136. Ms. Torres hereby requests a trial by jury of all issues of fact in this case and herewith tenders the jury fee.

## **IX. REQUEST FOR DISCLOSURES**

137. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Ms. Torres requests that all Defendants disclose the information and material described in Rule 194.2 of the Texas Rules of Civil Procedure. Ms. Torres specifically requests that the responding party to produce the responsive documents at the undersigned law offices within fifty (50) days of this request.

## **X. RELIEF SOUGHT**

128. Ms. Torres seeks monetary relief against Defendant Douglas Phillips.
129. Ms. Torres seeks monetary relief against Defendant Vision Forum Ministries, Inc.
130. Ms. Torres seeks monetary relief against Defendant Vision Forum, Inc.

## **XI. PRAYER**

WHEREFORE, Ms. Torres prays for judgment against Defendant as follows:

- (a) For trial by jury;
- (b) For judgment in Ms. Torres's favor for damages outlined herein:
  - i. General damages;
  - ii. Special damages; and
  - iii. Exemplary damages;
- (c) That all costs be taxed against the Defendants, including attorneys' fees; and
- (d) For any and all further relief from Defendant as this Honorable Court deems just.

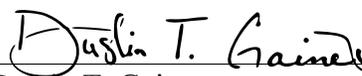
April 15, 2014

Respectfully Submitted,



---

David C. Gibbs III  
Texas Bar # 24026685  
dgibbs@gibbsfirm.com  
Gibbs Law Firm, P.A.  
2648 FM 407  
Suite 240  
Bartonville, TX 76226  
Telephone: (727) 362-3700  
Facsimile: (727) 398-3907



---

Dustin T. Gaines  
Texas Bar # 24087553  
dgaines@gibbsfirm.com  
Gibbs Law Firm, P.A.  
2648 FM 407  
Suite 240  
Bartonville, TX 76226  
Telephone: (727) 362-3700  
Facsimile: (727) 398-3907

ATTORNEYS FOR PLAINTIFF  
Dated this 15th day of April, 2014