

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEAST DIVISION

JAMIE KAUFMANN WOODS; SHARI LUEKEN, A MINOR,
BY AND THROUGH HER NEXT FRIENDS,
RALPH LUEKEN AND MARILYN LUEKEN; RALPH LUEKEN;
MARILYN LUEKEN; ERIKA TEASLEY, A MINOR,
BY AND THROUGH HER NEXT FRIENDS, PAUL
DOUGLAS ("DOUG") HOOVER JR., AND KATRINA L. HOOVER;
PAUL DOUGLAS ("DOUG") HOOVER JR.; KATRINA HOOVER;
TRACEY BRAZIL OZUNA, JESSICA DEBOI

PLAINTIFFS

vs.

Case No. _____

BOB WILLS, AKA BOBBY RAY WILLS, AKA W. B. WILLS;
BETTY SUE WILLS; SAM GERHARDT, AKA S.L. GERHARDT;
DEBORAH GERHARDT, AKA DEBBIE GERHARDT,
JULIE GERHARDT; SHARON GOODMAN; and ANDREA HILL
DBA MOUNTAIN PARK BOARDING ACADEMY

DEFENDANTS

**PLAINTIFF'S COMPLAINT
(JURY TRIAL DEMANDED)**

Come now Plaintiffs and for their complaint state:

JURISDICTION AND VENUE

1. Plaintiffs bring this suit for claims of fraud, conversion of property, assault, battery, false imprisonment, negligence in providing medical treatment, denial of necessary medical treatment to incarcerated minors, intentional infliction of emotional distress, and the federal law claims of violation of the Americans with Disabilities Act (42 U.S.C. § 12101 et seq.), and the Fair Labor

Standards Act, 29 U.S.C. § 201 et seq.

2. Plaintiff Woods is a citizen and resident of the State of Illinois, all Plaintiffs Lueken are citizens and residents of the state of Washington, all Plaintiffs Hoover, and Plaintiff Teasley, are residents of the State of Texas, and Plaintiffs Ozuna and Deboi are residents of the State of Idaho.

3. None of the Defendants are citizens or residents of any of the states listed in the previous paragraph. No defendant is a citizen of the same state as any Plaintiff. All Defendants are citizens and residents of the state of Missouri, or Florida, or both.

4. Plaintiff claims diversity jurisdiction, pursuant to 28 U.S.C. § 1332.

5. Each Plaintiff individually claims an amount in excess of that required for diversity jurisdiction.

6. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) (2).

BACKGROUND INFORMATION

7. Defendants Bob Wills, AKA Bobby Ray Wills, AKA W. B. Wills; Betty Sue Wills; Sam Gerhardt, AKA S. L. Gerhardt; Deborah Gerhardt, AKA Debbie Gerhardt; Julie Gerhardt; Sharon Goodman, Andrea Hill, and others operate a private for profit detention facility for children, doing business as Mountain Park Boarding Academy.

8. The tax assessor of Wayne County, Missouri, correctly treats the property used by Defendants as property held by and for the use of a private for profit partnership, and not as a charitable or otherwise tax exempt organization.

9. Defendants earn an estimated \$2,000,000 to \$3,000,000 annually, little or none of which is used for bona fide religious or charitable purposes. Most of these earnings are derived from

children trafficked in interstate commerce.

10. This complaint is brought by the named Plaintiffs, which include both parents of former students and the former students themselves, to obtain redress for the systematic frauds, deceit, violence, and other corrupt and unlawful practices, perpetrated upon parents and their minor children for the financial benefit of the Defendants.

11. The term “student” or “students” is used with reservations, for the convenience of the reader, inasmuch as Mountain Park Boarding Academy does more to prevent education than to provide or even permit education.

12. It was stated and advertised to parents seeking services for their children, by written rule in the Mountain Park Boarding Academy Parent/Student Handbook, that students were not allowed to discipline one another and it was stressed to parents by Defendants and all of them that children were loved in a structured Christian atmosphere with twenty-four hour secure supervision.

13. This statement is totally false. Defendants use “coercive persuasion” and prescription drugs, administered without prescription or medical supervision, to coerce students into beating, terrorizing, mocking, or restraining other students, while maintaining “plausible deniability” of their own culpability in these violent abuses when confronted by civil authorities.

14. On information and belief, Defendants Sam and Debbie Gerhardt and Bob and Betty Wills are the beneficial owners of the majority of the property and income stream represented by Mountain Park Boarding Academy.

15. In fact the Defendants operate what amounts to a private prison, in which minors are subjected to physical and mental tortures that would find no acceptance in any civilized society.

16. Students at Mountain Park Boarding Academy are forced to guard, harass, mock, assault, and physically injure other students on command. They are not given a meaningful choice concerning whether to commit such acts against other students. They are forced to commit violent crimes against other students as a matter of survival – either be the one doing the beating, or be the one getting the beating.

17. Those who fail to comply with orders of staff members are subjected to loss of some or all privileges, loss of some or all personal belongings for an indeterminate time, beatings by other students, mockery by other students and staff, or whatever other punishment is deemed most feared by the student.

18. Secrets between parents and children are forbidden. All parents are threatened by Mountain Park administrators that discovery of keeping any secrets will be considered a voluntary withdrawal of their child by the parents, in which case the full year's tuition becomes immediately due and payable. Thus students soon learn not to say anything to their parents, because their parents will tell staff about the conversation, under threat of severe financial penalty, who will in turn severely punish the child once returned to the facility.

19. Defendants do everything possible to keep a student from leaving the facility. They lock all of the doors from the inside and outside in a manner requiring the use of a key to exit or enter. The buildings did not have suitable fire exits. During fire drills it was plain that the principle concern of the Defendants was to make sure that no student could escape the Defendants' premises if a fire broke out. Mountain Park Boarding Academy students are under constant danger of a catastrophic fire which could kill a large percentage of the student population in a single incident.

20. There are high fences with barbed or razor wire to prevent any escape or unauthorized entry into the Defendants' compound. The office had a door, but it was locked and had a staff member standing guard to prevent escapes. Defendants rewarded students who told on others who might have plans to escape.

21. Defendants in their promotional literature proclaim: "Mountain Park is NOT a medical facility nor do we follow a medical model in our approach. Medications for behavioral disorders are not made available to our students by anyone."

22. This claim is an intentional, systematic fraud upon parents and students. Defendants routinely use chlorpromazine, often marketed under the brand name Thorazine® or other brand names, to render the students incapable of substantial resistance.

23. Plaintiffs Woods, Shari Lueken, Teasley, Ozuna, and Deboi were the victims of assault by being secretly drugged by Defendants with chlorpromazine and/or other similar drugs.

24. Chlorpromazine is a prescription phenothiazine antipsychotic drug – a major tranquilizer - prescribed most commonly for the reduction of symptoms of psychotic disorders such as schizophrenia; for the short-term treatment of severe behavioral disorders in children, including explosive hyperactivity and combativeness; and for the hyperenergetic phase of manic-depressive illness (severely exaggerated moods).

25. Effects of chlorpromazine include but are not limited to:

Sedation; drowsiness; autonomic reactions - nasal congestion, nausea, obstipation (severe constipation), constipation, adynamic ileus (intestinal obstruction), urinary retention,

Miosis (abnormal contraction of the pupils) and mydriasis (abnormal pupil dilation), atonic colon (lazy colon), ejaculatory disorders, impotence, dry mouth;

Central Nervous System (C.N.S.) effects - movement disorders (dystonia, parkinsonism);

Weight gain; feeling extremely and constantly hungry;

Skin photosensitivity resulting in hyperpigmentation of the skin and skin discoloration (yellowish-brown to grayish-purple);

Epileptic fits due to lowering of the seizure threshold; jaundice – yellowing of the skin and eyes;

Liver impairment in the form of cholestasis (an arrest of the normal flow of bile resulting in jaundice), hypotensive (low blood pressure) effects including postural hypotension (low blood pressure or a sudden drop in blood pressure due to change in body position), simple tachycardia (rapid heart rate or racing heart), momentary fainting and dizziness which may occur after the first dose and occasionally these effects may be more severe and prolonged, producing a shock-like condition;

Hematological (relating to blood) disorders including agranulocytosis, which is life-threatening and potentially fatal. Due to the agranulocytosis factor, those taking chlorpromazine should be warned to report the sudden appearance of sore throat or other signs of infection and if white blood cell and differential counts indicate cellular depression, in which case chlorpromazine treatment must be stopped and antibiotics must be started; potentially fatal or disabling blood clots;

Endocrine disorders - breast engorgement may occur in females, false-positive pregnancy tests have been reported, amenorrhea (absence or cessation of menstruation), gynecomastia (a condition in which a male's breast tissue enlarges);

Hyperglycemia (high blood sugar levels), hypoglycemia (low blood sugar levels);

glycosuria (unusually high content of sugar in the urine); ocular changes (eye changes) -

Pigmentary retinopathy (disease that may impair vision if not detected and can lead to blindness), blurred vision, difficulty with nighttime vision, defective color vision, deposition of fine particles in the lens and cornea which can lead to corneal opacification (clouding of the cornea) and visual impairment;

Psychotic symptoms and catatonic-like states have been reported in those taking chlorpromazine.

26. A sample of side effect precautions for those taking chlorpromazine include:

Skin discoloration (yellowish-brown to grayish-purple) - Stay out of the sun and contact your doctor. Chlorpromazine can make your skin more sensitive to sunlight. Stay out of the sun when possible, or wear protective clothing, a sun screen preparation, and sunglasses.

Jaw, neck, and back muscle spasms; fine worm-like tongue movements; rhythmic face, mouth, or jaw movements; slow or difficult speech; difficulty swallowing; tremors; shuffling walk, drooling; inability to sit still; slow, jerky movements; sore throat; fever; skin rash; yellow skin; weakness; blurred vision; constipation, difficulty urinating. Contact your doctor.

Do not stop taking Chlorpromazine abruptly, especially if you have been taking it for a long term.

Keep all appointments with your doctor. Your dose may need to be adjusted occasionally, especially when you first take this drug.

You should have eye examinations periodically if you take Chlorpromazine for a long time.

Before taking Chlorpromazine, tell your doctor if you have heart, liver or kidney disease;

glaucoma; an enlarged prostate; difficulty urinating; asthma, emphysema, chronic bronchitis, or lung disease; or a history of seizures.

Before you take Chlorpromazine, tell your doctor if you ever had a bad reaction to insulin, shock therapy, or any other tranquilizer or if you are pregnant or breast-feeding.

If you become pregnant, notify your doctor promptly.

Before taking Chlorpromazine, tell your doctor what prescription and nonprescription drugs you are taking, especially lithium, seizure medication, sedatives, sleeping pills, narcotics (pain medication), muscle relaxants, antihistamines, and medication for depression, Parkinson's disease, hay fever, allergies, or colds.

Before having surgery, including dental surgery, with a general anesthetic, tell the doctor that you take Chlorpromazine.

Chlorpromazine decreases your ability to regulate body temperature, resulting in overheating or severe chilling, so avoid exposure to extreme heat or cold.

Chlorpromazine is known to cause sudden death.

27. In addition to chlorpromazine, Defendants have used Thioridazine (often marketed under the brand name Mellaril®) and other tranquilizers or antipsychotic drugs, which also have serious, long term adverse side effects up to and including sudden death.

28. Thioridazine is a piperidine phenothiazine – a major tranquilizer – an antipsychotic drug - used for the treatment of people with schizophrenia or other extreme mental conditions. The FDA has issued an "Important Drug Warning" informing physicians of the potentially deadly risks associated with Mellaril, as well as suggesting switching antipsychotic agents if possible. Mellaril is indicated only for the management of schizophrenic patients that have not responded

to other antipsychotic drugs.

29. Many of the side effects associated with the administration of Chlorpromazine/Thorazine are also associated with the administration of Thioridazine/Mellaril – both are drugs of the Phenothiazine class.

30. Defendants have generally disregarded most legal and medical restrictions on the use of chlorpromazine and related drugs. They obtain no doctor's prescription as required by law, they perform little or no medical screening prior to administration, and generally disregard most medical precautions indicated for the use of such drugs.

31. Defendants allow the children at their facility only an extremely limited amount of cold or flu medicine. This precaution is due to the interaction of chlorpromazine and related drugs with common cold and flu medications, the desire to increase the misery index of children in their care, or some combination thereof.

32. Defendants place severe restrictions on the sun exposure allowed to new children, presumably due to the sensitization of the skin caused by chlorpromazine and related drugs.

33. The children at Defendants' facility generally gain weight as a result of the use of chlorpromazine and related drugs. Defendants once again exploit this side effect to its fullest potential. Defendants mock and orchestrate the organized mockery of the students for the weight gain.

34. When it suits the sadistic desires of the Defendants, the Defendants put children who suffer chlorpromazine related weight gain on diets, feeding them inadequate and unhealthy food, to limit their weight gain.

35. Likewise, when it suits the purposes of Defendants, they force feed children who do not

eat that which Defendants wish them to eat. The typical method is to force other students to hold the victim down, hold the student's nose to ensure that the student must open his or her mouth for air, cram food into the student's mouth, then clamp hands on both the mouth and the nose until the student swallows the food or passes out.

36. Most of the girls at the Defendants' facility stop their menstrual periods, or experience major irregularity and changes of patterns of their menstrual cycles, as a result of the administration of chlorpromazine and related drugs. Defendants ignore this side effect, almost never checking for pregnancy, choosing rather to make up lies to tell to unsuspecting parents about the reason for the cessation of menstrual periods.

37. Defendants are fully aware of the effects of chlorpromazine and related drugs upon the body's urination and defecation functions. Defendants exploit and compound this particular side effect as much as possible, to inflict the maximum fear and pain on the students, to break their will, and to instill in the children the idea that they cannot even urinate or defecate except by the grace of the Defendants.

38. For example, Defendants limit toilet breaks, stare at the children or cause "orientation guides" to stare at and physically and emotionally harass children on the toilet, jerk students off toilets while they try to relieve themselves, and limit the use of toilet paper.

39. Children under the control of Defendants are often denied toilet breaks to the extent that they are forced to urinate or defecate in their clothing. Defendants then use this opportunity to inflict mental distress and fear on the rest of the children in their control.

40. The child who was unfortunate enough to urinate or defecate, or both, in their clothing are subjected to a "GI shower" in which they are stripped of their clothing, tormented with wire

brushes and other abrasives, and then dressed. After thorough physical abuse, they are forced to stand before the rest of the children and apologize. The remainder of the children are all required to mock and harass the victim.

41. Defendants pursue a deliberate strategy of using retention of bodily wastes to cause physical injury and harm. Most of the children in the custody of Defendants will suffer one or more bladder or urinary tract infections during their incarceration.

42. The Defendants limit the exposure of children in their care to sunlight, knowing the potential for skin damage due to the sensitization resulting from the use of chlorpromazine.

43. Defendants intentionally use the combination of fatigue, chlorpromazine and related drugs, harassment, poor food, lack of exercise, and overcrowding to overtax the immune systems of children within their custody, to cause illness. Illness is used as another tool in Defendants' arsenal of weapons used for coercive persuasion.

44. Defendants only rarely allow children in their custody to have medications for colds and flu, partly due to the interaction of those drugs with chlorpromazine, and partly because illness is helpful to further weaken the children within their custody.

45. Defendants deny most of the children in their custody the benefits of adequate bed rest, adequate hydration, (mainly through denial of bathroom privileges) and juices or food that tend to ameliorate the symptoms of cold and flu, and allow the body's natural defenses to attack the invading pathogens.

46. Although the deprivation of customary and effective medication for colds and flu might be explainable by the knowledge of the interaction of chlorpromazine and cold or flu medicine, the denial of adequate bed rest, hydration, and proper nutrition is explainable only by an

intentional plan to use illness as part of a “coercive persuasion” program.

47. Defendants systematically deprive children in their custody of contact with the outside world, especially law enforcement or lawyers. Defendants will not ordinarily even admit that a particular child is in their custody, even when an attorney attempts to reach the child to provide essential legal services.

48. Defendants systematically deprive children in their custody of the benefits of education, while fraudulently representing to parents that they are trying to provide a satisfactory education. Defendants force the children in their custody to do schoolwork far below their capabilities, to ensure that they become more dependent upon the Defendants as time passes, and less capable of functioning in an age appropriate educational environment.

49. Defendants deliberately use sleep deprivation to wear down and break the resistance of children in their custody. Defendants purposely prevent the children from getting to bed on time, and wake them up early. The children are routinely limited to 5 or 6 hours of sleep per night, sometimes to 3 or 4 hours of sleep per night.

50. Defendants use extreme measures to prevent the children in their custody from speaking to each other about their experiences, either at the Defendants’ facility, or prior to coming to Defendants’ facility.

51. Defendants isolate the students from each other, in part for the purpose of making it difficult for any one child to perceive the true methods of operation used by Defendants.

52. Defendants’ isolation of the children in their care from one another has rendered it necessary for multiple students to bring legal action jointly, in order to adequately demonstrate the magnitude of the cruelty and violence perpetrated against students in their custody.

53. Defendants demand and receive powers of attorney over children in their custody, which purport to allow Defendants virtually unlimited powers over the children, even in derogation of the rights and wishes of the parents and children involved.

54. Defendants terrorize and harass children in their care until they are so desperate for relief that they will agree to be “orientation guides.”

55. “Orientation guides” are in fact nothing more than personal prison guards for new students, students who are not trusted by Defendants, or students the Defendants wish to punish with a loss of liberty.

56. “Orientation guides” are not paid for their work, although their work is covered by the Fair Labor Standards Act, 29 U.S.C. § 201 et seq.

57. Job duties of an orientation guide included keeping one or two minor females within arms distance of her throughout the day, ensuring that they did all required memorization, took showers, cleaned, and did all other required tasks. An orientation guide was expected to escort her students to the bathroom and watch them while they relieved themselves. At night, the orientation guide left his or her charge(s) on their beds and she picked them up the next morning.

58. Orientation guides must be within an arm's distance from her assigned students 24 hours per day, 7 days per week, except while sleeping. If an orientation guide's student does anything wrong, or even has a “bad” attitude, the orientation guide is blamed for it.

59. Many of the children in Defendants' custody are forced to work on “safety patrol.” “Safety patrol” had nothing to do with safety. Rather, “safety patrol” was the euphemism chosen by Defendants for the security guards conscripted to prevent anyone from running away at night, when the students did not have a one on one security guard assigned.

60. Students were not at liberty to refuse being on safety patrol. If any child in the care of Defendants refused to be on safety patrol because they were too tired, the student was denounced, and sometimes put up back on orientation.

61. "Safety patrols" usually ended up missing about two hours of sleep each night for safety patrol.

62. In fact, all persons in the custody of the Defendants were forced to act as unpaid security guards, in one form or another, approximately 18 hours per day.

63. All students are at all times forced to serve as unpaid guards, to beat any other student on command by Defendants or their staff, and to catch and report potential runaways. This work is demanded of all students approximately 18 hours per day.

64. All students are required to work at such jobs as picking up rocks, brushhogging fields with weed hooks, digging ponds with shovels and wheelbarrows, and other jobs, some of which make economic sense and some of which do not.

65. Therefore, the Plaintiffs herein who have been forced to do this work are pleading and praying for compensation at the legal minimum wage, with overtime, for 18 hours for each day of confinement at Defendants' facility.

66. Defendants fail to maintain records of hours and wages in compliance with the Fair Labor Standards Act, 29 U.S.C. § 201 et seq.

67. Defendants strictly forbid the keeping of a journal, and use chlorpromazine and other powerful drugs to inhibit the ability of the children to remember details of events that take place in their custody. Therefore, the Defendants have no cause to complain of the lack of greater accuracy in the pleadings and proof of unpaid labor in Defendants' facility.

68. Defendants routinely pressure children in their care to remain with the facility as employees. Such employees are given a pittance of pay, much less than minimum wage, and are expected to enforce all demands of the Defendants against any child in their care. The employment of such persons is made possible only by Defendants' brainwashing and routine deprivation of substantial, age and intelligence appropriate education which might thereby render the child competent and confident to find employment in the "outside world."

69. Defendants routinely advise parents to use an "escort" to bring children to Mountain Park Boarding Academy, when Defendants believe that the child will not go willingly. Parents are advised to lie to their children if necessary to get them to Mountain Park Boarding Academy.

70. "Escorts" as the term is used by Defendants, are in fact nothing more than paid bounty hunters, who arrest, detain, and transport children to facilities such as Mountain Park Boarding Academy, in such manner that the child is deprived of liberty from the time that the child is seized by the escort service.

71. All Plaintiffs request and demand a jury trial.

PART 1 – JAMIE KAUFMAN WOODS

COUNT I -- VIOLATION OF AMERICANS WITH DISABILITIES ACT

72. Jamie Kaufmann Woods incorporates all other parts of the complaint to the extent legally and ethically appropriate.

73. Plaintiff, Jamie Kaufmann Woods, was enrolled and attended Mountain Park Boarding Academy in or around Patterson, Missouri, from on or about September 7, 1999 until on or about May 24, 2001.

74. Due to congenital hearing loss, Plaintiff Woods was deaf and had to wear hearing aids.
75. Plaintiff Woods has been wearing a hearing aids since she was 6 years old.
76. Even while wearing her hearing aids, Plaintiff Woods sometimes had a difficult time understanding what others were saying.
77. Plaintiff Woods could hear and understand very poorly or not at all without her hearing aids.
78. At the time of Plaintiff Woods' enrollment at Mountain Park Boarding Academy Plaintiff Woods had been wearing a medically prescribed hearing aid.
79. Although Plaintiff Woods was not wearing her hearing aids at the time that her parents took her to Mountain Park, the staff was immediately informed by Plaintiff Woods that she was deaf and needed her hearing aids.
80. Plaintiff Woods was required to go without her hearing aid for the first seven to nine months that she was in Mountain Park Boarding Academy.
81. Upon arrival at Mountain Park Boarding Academy Plaintiff Woods was constantly derided by her orientation guide, Meaghan Richter, for not being able to hear.
82. The owners and staff of Mountain Park Boarding Academy were well aware that Plaintiff Woods needed her hearing aids.
83. Defendants undertook to substitute the professional judgment of the doctors caring for Plaintiff Woods with their own arbitrary and medically unqualified judgment that Plaintiff Woods did not require the use of a hearing aid.
84. On a Saturday sometime in September 1999, around noon, Plaintiff Woods was taken to Betty Wills by her orientation guide for not being able to hear what she was being told while

standing in the medicine line. Betty Wills shoved her hand and fingers forcefully into Plaintiff Woods' chest saying that Plaintiff was a liar and telling Plaintiff that she could hear just fine. Betty Wills punished Plaintiff by requiring her to write lines. This took place in the upstairs girls dorm hallway.

85. Plaintiff Woods was provided no professional medical services by any licensed or trained person during the first seven to nine months of her stay at Mountain Park Boarding Academy.

86. After Plaintiff Woods's parents sent her hearing aids, Plaintiff Woods informed her mother that they weren't working well enough and that she still couldn't hear.

87. After Plaintiff Woods' had made numerous complaints, staff member Christy O'Briant took Plaintiff Woods to an audiologist that tested her hearing and prescribed the most state of the art hearing aids, at the time, and Plaintiff Woods was told, in the presence of staff member Christy O'Briant, that she had significant loss of hearing.

88. Although the audiologist prescribed hearing aids immediately after Plaintiff Woods was tested, Plaintiff Woods did not receive the hearing aids, but was forced to wait until her parents were allowed to come for a scheduled visit. Plaintiff Woods's parents took her back to the audiologist during a visit, at which time Plaintiff Woods finally received her new hearing aids. This was about seven to nine months after Plaintiff Woods had arrived at Mountain Park.

89. All these acts violated the Americans with Disabilities Act (42 U.S.C. § 12101 et seq.)

PART 1, COUNT II -- NEGLIGENT MEDICAL TREATMENT

90. Plaintiff Woods incorporates all other parts of the complaint to the extent legally and ethically appropriate.

91. Immediately after her arrival at Mountain Park, Plaintiff Woods was forced to suffer a

great amount of unwarranted and undeserved punishment for not being able to hear and Plaintiff Woods was denied any contact with her parents for the first three weeks after her arrival at Mountain Park.

92. In a desperate attempt to let her parents know of the abuse she was suffering at Mountain Park, Plaintiff Woods swallowed an open safety pin in the hope that she would receive medical treatment at a hospital and with the belief that she would get to see her parents and would be able to tell them of the unbearable abuse she was suffering at the hands of the defendants.

93. After swallowing the open safety pin while in dorm #4 on a Sunday morning in September of 1999, the open safety pin got stuck and lodged in Plaintiff Woods's throat: Plaintiff Woods could barely breathe because of the pain.

94. Defendants Debbie Gerhardt and Betty Wills were alerted and came downstairs to the dorm room and started yelling at Plaintiff Woods and telling her how stupid she was but at the same time the Defendants were telling her things such as, "It ain't that bad, you're fine."

95. Instead of getting Plaintiff Woods medical treatment Defendant Betty Wills made Plaintiff Woods drink oil and eat some bread.

96. Defendant Debbie Gerhardt taunted Plaintiff Woods by telling her that she was going to be at Mountain Park for a long time for what she had done.

97. Plaintiff Woods was never taken to the doctor, and when she finally did pass the open safety pin, it was very painful and there was blood in her stool: Plaintiff Woods was never taken to the doctor in order to be checked for any internal injuries the open safety pin might have caused.

98. Plaintiff Woods was watched when she went to the bathroom or showered.

99. Plaintiff Woods often could not force herself to urinate or defecate with someone watching her due to embarrassment.
100. After a long time of not being able to relieve herself, Plaintiff Woods was in much pain and couldn't walk normally due to the overwhelming pain. None of Plaintiff Woods's clothes fit because her stomach had become so swollen. Plaintiff Woods was in more pain than she had ever experienced in her life.
101. One day the Plaintiff Woods just couldn't take the pain any more and she refused to go to P.E. where she would be required to do jumping jacks and exercises.
102. Plaintiff Woods told her orientation guide that she couldn't do the exercises, that she was too sick.
103. Plaintiff Woods's orientation guide told her to, "suck it up."
104. When Plaintiff Woods told her orientation guide she would not do that, her orientation guide grabbed her and pushed her toward the doors in an attempt to force her outside.
105. Plaintiff Woods was able to jerk away from her orientation guide and she began to walk the opposite direction in which she was being forced to go and she told her orientation guide that she wanted to speak to the guy in charge, to which her orientation guide replied, "the guy in charge of this place will make you do more and he won't see you anyway."
106. Plaintiff Woods kept walking in the opposite direction in an attempt to find someone in charge and her orientation guide called for help and six other girls came and dragged Plaintiff Woods down by her hair and held her down until the staff came in.
107. The staff members ordered the girls to pick Plaintiff Woods up and carry her outside; the girls complied and carried Plaintiff Woods, who was in excruciating pain and was crying, and

forced her to do the exercises in disregard of the terrible pain she was suffering.

108. Plaintiff Woods was an athlete, accustomed to exercise, and would not have protested exercise but for the pain.

109. Mountain Park Boarding Academy demanded and received money, believed to be \$500, for her medical account, but Plaintiff Woods received no substantial benefit from this money.

110. Most of the Plaintiff Woods's day was devoted to working.

111. Defendants were frequently negligent or grossly negligent in providing medical care, as shown by the following examples, as well as the examples already stated.

112. Plaintiff Woods did not have a menstrual period for ten to eleven months while at Mountain Park Boarding Academy and when she voiced her concerns over this, she was mocked and she was not ever taken to a doctor to ascertain the cause of her missed menstrual periods. The cessation of Plaintiff Woods's menstrual periods and the denial of medical attention caused Plaintiff Woods great distress.

113. As a result of the acts and omissions of the Defendants, Plaintiff Woods has suffered severe and lasting emotional and mental trauma. As a result of the acts and omissions of the Defendants, Plaintiff Woods is to the present day so emotionally and mentally damaged that she has not been able to relate to friends, co-workers, and others in the normal manner of a person who has not suffered the trauma Plaintiff Woods suffered at the hands of the Defendants. The acts and omissions of the Defendants have caused a great deterioration of the quality of life of Plaintiff Woods.

**PART 1, COUNT III ---- ASSAULT AND BATTERY, FALSE IMPRISONMENT,
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

114. Plaintiff Woods incorporates all other parts of the complaint to the extent legally and ethically appropriate.

115. Plaintiff was born 7-22-1983 and thus entitled to her liberty, under Missouri law, no later than 7-22-2000.

116. Defendants and all of them confined Plaintiff Woods while she was a minor without legal justification by the use of fraud and deceit on the Plaintiff Woods and her parents, from on or about September 7, 1999 until on or about May 24, 2001.

117. Although Defendants and all of them provided parents with a Boarding Academy Parent/Student Handbook, Plaintiff Woods was never shown the handbook while being confined there.

118. Defendants and all of them have falsely imprisoned Plaintiff Woods, and Defendants and all of them, knowingly acted in a manner that created a substantial risk to the life, body, and health of Plaintiff Woods while she was a child less than seventeen years old.

119. Defendants and all of them have falsely imprisoned Plaintiff Woods, and Defendants and all of them, knowingly acted in a manner that created a substantial risk to the life, body, and health of Plaintiff Woods while she was more than seventeen years old.

120. Shortly after arrival at Mountain Park, Plaintiff Woods was weighed and forced to orally take something that staff member Andrea Hill told her was "worm medicine." Plaintiff Woods tried to refuse it and although Plaintiff Woods loudly insisted that she didn't want to take the medicine and Plaintiff Woods told the staff member that she thought they were trying to drug her, Plaintiff Woods was unsuccessful in her attempts to refuse the potion. Against Plaintiff Woods's loud protests, she was forced to take a thick liquid solution.

121. After being forced to take the solution, Plaintiff Woods remembers that she couldn't keep her eyes open, that she couldn't concentrate and Plaintiff Woods knew that she had been drugged and that the "worm medicine" given to her had caused these effects; and for many weeks after her arrival, Plaintiff Woods would openly warn other new arrivals when staff was in the process of giving them the oral solution that they shouldn't take it because they were being drugged.

122. Two or three days after her arrival at Mountain Park, Plaintiff Woods demanded that she be allowed to call an attorney in order to secure her release from Mountain Park and Plaintiff Woods also demanded that she be allowed to call the police. Plaintiff Woods wanted to call an attorney or the police primarily because the staff didn't believe that Plaintiff Woods could not hear and the staff was punishing her because of her disability. Although Plaintiff Woods was deaf, she was an excellent lip reader. Plaintiff Woods wanted to call the police to report the staff's actions.

123. Plaintiff Woods was called a whore, threatened that she would be at Mountain Park for more than a year, told that her parents hated her, and told that she was not allowed to cry. When she could not keep from crying, she was punished for crying.

124. Although Plaintiff Woods did manage to pick up the phone within her first few days of being at Mountain Park, in an attempt to phone the police and report the abuse, a staff member jerked the phone from Plaintiff Woods's hand and the staff member told Plaintiff Woods that she could not use the phone.

125. Plaintiff Woods questioned that directive. In response, Plaintiff Woods was informed by staff member Nicole Vaughn and orientation guide Meghan Richter that her parents had signed over all of their parental rights to Mountain Park Boarding Academy and that the police could do

nothing to help because Mountain Park Boarding Academy was not a state institution – that Mountain Park didn't have to listen to the law.

126. Defendants committed numerous physical assaults upon the Plaintiff Woods, by pulling her hair, by manhandling her, and by instructing other students and staff members to bodily carry her and throw her to the ground.

127. Mountain Park intentionally inflicted emotional distress on the Plaintiff Woods by refusing necessary medical care, by the standing threats of beatings and arbitrary punishments, and by constant degradation and humiliation.

128. On learning that Plaintiff Woods had received self defense or martial arts training that she had taken at her previous high school, Defendants began to call on Plaintiff Woods to beat other girls on demand.

129. On one occasion, Plaintiff Woods was called and told by staff members to 'do whatever it takes' to shut up a mentally challenged 13 year old girl named Felicia Jones who was repeatedly hitting her head against the wall and wailing at the top of her lungs.

130. On direct orders from staff, Plaintiff Woods beat the Felicia Jones so badly that she bloodied her from head to toe.

131. Felicia Jones was in a shower at the time. Plaintiff Woods was ordered to wash off her bloody body in cold water.

132. Plaintiff Woods was forced by the staff to keep Felicia Jones under the freezing cold shower for nearly an hour, so long that the girl's lips turned such a dark purple that they were almost black.

133. Plaintiff Woods had no choice but to do what she was told or she would have eventually

been the one beaten to a bloody pulp. It was either be the one doing the beating or be the one who was getting beaten.

134. Due to the constant mental and physical abuse, Felicia Jones eventually became totally catatonic and had to be constantly cared for by four orientation guides. Felicia Jones totally shut down and she had to be dressed and undressed, physically bathed by others, and fed by those orientation guides because she couldn't feed herself and would have starved.

135. Plaintiff Woods is still severely tormented by the memories of what she was forced to do to that young girl even though Plaintiff Woods didn't have a free choice in the matter.

136. Plaintiff Woods was prevented from telling anybody, even her parents, about the horrible abuses taking place inside Mountain Park Boarding Academy because all phone calls from parents were monitored, all mail was censored, and parents were not allowed to keep anything a child said a secret from the Mountain Park Boarding Academy staff.

137. Plaintiff Woods has repeatedly requested a copy of her transcript from Mountain Park Boarding Academy, by proper requests through proper channels.

138. All these requests have been ignored. Plaintiff Woods has suffered great financial loss and hardship due to the refusal of Defendants to release a transcript, which would then allow her greater educational opportunities and finances.

PART I, COUNT IV ---- FAILURE TO PAY MINIMUM WAGE AND OVERTIME

139. Plaintiff Woods incorporates all other parts of the complaint to the extent legally and ethically appropriate.

140. Plaintiff Woods was not paid for her work for the defendants.

141. Plaintiff Woods was forced to work as an unpaid security guard, inasmuch as she was compelled to act as an unpaid security guard at all times and catch or attack anyone who might try to escape.

142. Plaintiff Woods seeks compensation at the prevailing minimum wage, plus overtime, for all relevant periods, based upon 18 hours of work for every day at Mountain Park Boarding Academy.

PART 2 – SHARI LUEKEN

PART 2, COUNT I – ASSAULT, BATTERY, FALSE IMPRISONMENT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

143. Plaintiff Shari Lueken incorporates all other parts of the complaint to the extent legally and ethically appropriate.

144. Defendants and all of them have falsely imprisoned Plaintiff Shari Lueken, and Defendants and all of them, knowingly acted in a manner that created a substantial risk to the life, body, and health of Plaintiff Shari Lueken while she was a child less than seventeen years old.

145. Shortly after arrival at Mountain Park, Plaintiff Shari Lueken was weighed and then forced to take orally something that a staff member told her was "worm medicine".

146. Defendants and all of them confined Plaintiff Shari Lueken, without legal justification, by the use of fraud and deceit on the minor Plaintiff Shari Lueken and her parents, from approximately June 23, 2000, until June 20, 2002.

147. Although Defendants and all of them provided parents with a Mountain Park Boarding Academy Parent/Student Handbook, Plaintiff Shari Lueken was never shown or allowed to read the handbook while being confined there.

148. Defendants allowed and encouraged assault to be committed upon the Plaintiff Shari Lueken by allowing other students to pull her hair while physically dragging her around the outdoor running track.

149. Mountain Park intentionally inflicted emotional distress on the Plaintiff Shari Lueken by the standing threats of beatings and arbitrary punishments, and by constant degradation and humiliation by both students and staff members, and by refusing necessary medical care for Plaintiff Shari Lueken's underlying attachment disorder.

150. As a result of this misconduct, Plaintiff Shari Lueken's parents have been required to place Plaintiff Shari Lueken in a licensed psychiatric facility for long-term inpatient treatment which had to be pursued immediately after Plaintiff Shari Lueken's removal from Mountain Park Boarding Academy.

151. Plaintiff Shari Lueken was denied reasonable and open communication with her parents. Her phone calls were monitored and her letters were read and censored and in spite of the fact that Defendants were aware of Plaintiff Shari Lueken's existing attachment disorder, Plaintiff Shari Lueken was prevented from communicating the intentional and unjustified emotional distress and physical abuse that was being inflicted on her by both the students and the staff members. This exacerbated her preexisting medical condition

152. Plaintiff Shari Lueken was forced to endure humiliation by being required to carry around and sit on a "baby stool" and sleep on "baby sheets."

153. Plaintiff Shari Lueken was falsely accused and tormented with punishment and threats of punishment by staff members based on their false accusations that Plaintiff Shari Lueken had stolen diamonds and gold.

154. The administration of chlorpromazine without the consent of the Plaintiff Shari Lueken herein, as described more fully in other paragraphs of this complaint, constitutes a battery against the Plaintiff Shari Lueken.

PART 2, COUNT II – NEGLIGENCE

155. Plaintiff Shari Lueken was not allowed to tell her parents about any of this abuse, or the injuries and symptoms of injuries that she was experiencing.

156. Plaintiff Shari Lueken became severely depressed due to the physical and mental abuse and constant threats of abuse. Plaintiff Shari Lueken began to self mutilate, cutting herself, as a means to deal with her anguish. She was not allowed to tell her parents that she wanted and needed professional psychiatric help for fear of being punished and ridiculed because those at Mountain Park Boarding Academy openly expressed to all of the students that such professional counseling was "brainwashing".

157. Due to the negligence of Defendants in failing to properly screen staff, and in failing to hire qualified staff, Plaintiff Shari Lueken was taken into a young staff member's on-campus apartment where Plaintiff Shari Lueken and the staff member engaged in acts of self mutilation (cutting themselves) on several occasions throughout Plaintiff Shari Lueken's stay at Mountain Park Boarding Academy. The staff member was a former Mountain Park student and graduate of

Mountain Park Boarding Academy by the name of Erin Sherhan (spelling uncertain).

158. Due to the negligence of Defendants in not allowing students to use automated dish washing equipment for a facility that had well in excess of 100 students and staff members, while being forced to wash dishes by hand, Plaintiff Shari Lueken severely cut her finger on a broken drinking glass. Plaintiff Shari Lueken's injury required six stitches, and it is likely that this injury has resulted in permanent nerve damage in Plaintiff Shari Lueken's index finger on her right hand.

159. Plaintiff Shari Lueken had very poor eyesight requiring the use of prescription eyeglasses to correct her vision so that she could perform her schoolwork and could see to function normally in performing daily tasks.

160. Plaintiff Shari Lueken had her prescription eyeglasses taken away from her during class as punishment. Plaintiff Shari Lueken's eyesight, as noted by Plaintiff Shari Lueken's eye doctor after examination, had deteriorated three times more rapidly than that expected of a similar patient with a similar eye condition, and Plaintiff Shari Lueken's eye doctor commented that he was really surprised to see such rapid deterioration of Plaintiff Shari Lueken's eyesight and this observation and comment was made after Plaintiff Shari Lueken had already been in attendance at Mountain Park Boarding Academy. This deterioration is consistent with the administration of chlorpromazine, in a grossly negligent manner, as well as the other neglectful and abusive practices of Defendants.

161. No reasonable child care provider in similar circumstances would have committed the negligent acts complained of herein.

PART 2, COUNT III – CONVERSION

162. Plaintiff Shari Lueken's parents sent Plaintiff Shari Lueken a cake for her 16th birthday.

163. Plaintiff Shari Lueken was not allowed to eat even one bite of her own 16th birthday cake that her parents had paid for, but was instead forced to stand in the corner the entire time that the staff members and students ate the cake. Plaintiff Shari Lueken was not allowed to receive even one gift that her parents had sent.

164. Defendants stole a piccolo worth \$1,500 from Plaintiff Shari Lueken. Sometime in December 2000, Plaintiff Shari Lueken's parents had shipped by United Parcel Services (UPS), three musical instruments packaged together in the same box: A flute, a saxophone, and a piccolo. Defendants gave Plaintiff Shari Lueken the flute and saxophone, but lied to Plaintiff Shari Lueken saying that her parents did not send the piccolo, in order to convert the piccolo to their own use and benefit.

PART 2, COUNT IV ---- FAILURE TO PAY MINIMUM WAGE AND OVERTIME

165. Plaintiff Shari Lueken incorporates all other parts of the complaint to the extent legally and ethically appropriate.

166. Plaintiff Shari Lueken was not paid for her work for the defendants.

167. Plaintiff Shari Lueken was forced to work as an unpaid security guard, inasmuch as she was compelled to act as an unpaid security guard at all times and catch or attack anyone who might try to escape.

168. Plaintiff Shari Lueken seeks compensation at the prevailing minimum wage, plus overtime, for all relevant periods, based upon 18 hours of work for every day at Mountain Park

Boarding Academy.

PART 3 – RALPH AND MARILYN LUEKEN

PART 3, COUNT I – FRAUD

169. Plaintiffs Ralph and Marilyn Lueken incorporate all other parts of the complaint to the extent legally and ethically appropriate.

170. Plaintiffs Ralph Lueken and Marilyn Lueken, husband and wife, are the adoptive parents of Shari Lueken, a minor.

171. Plaintiffs, Ralph and Marilyn Lueken, enrolled their daughter Shari Lueken, a minor, in Mountain Park Boarding Academy on or about June 23, 2000, and she was a student there until on or about June 20, 2002, at a cost of approximately \$1,250 per month.

172. Shari Lueken was previously medically diagnosed as having an attachment disorder and also as suffering from Attention Deficit Hyperactivity Disorder (ADHD) and depression.

173. Defendants were informed of Shari's attachment disorder history, her diagnosis of ADHD, and her history of depression by Plaintiffs prior to her enrollment in the Mountain Park Boarding Academy by Plaintiffs Ralph and Marilyn Lueken.

174. Plaintiffs Ralph and Marilyn Lueken believed the numerous representations of Defendants that Mountain Park Boarding Academy offered hope and help to troubled teens, through positive peer influence, without the use of behavior modification type drugs, without the use of students to punish or discipline other students, and because of the advertised loving atmosphere.

175. Defendants and all of them confined Plaintiffs Ralph and Marilyn Lueken's daughter, through fraud and deception, from approximately June 23, 2000, until approximately June 20, 2002.

176. Defendants provided Plaintiffs Ralph and Marilyn Lueken with a Boarding Academy Parent/Student Handbook. Unbeknownst to Plaintiffs Ralph and Marilyn Lueken, their daughter was never shown or allowed to read the handbook while being confined there.

177. In direct violation of the terms of the contract made between Plaintiffs Ralph and Marilyn Lueken and Defendants, Defendants, without Plaintiffs Ralph and Marilyn Lueken knowledge or approval, allowed and encouraged assaults to be committed upon Shari Lueken by allowing other students to pull her hair while physically dragging her around the outdoor running track.

178. Plaintiffs Ralph and Marilyn Lueken were subjected to intentional degradation and humiliation by Mountain Park Boarding Academy personnel for writing messages of a positive and encouraging nature to their daughter in their letters.

179. Plaintiffs Ralph and Marilyn Lueken were coerced into putting up with the taunts by Defendants due to the contract they had signed and felt that they would be forced to pay full tuition if they removed their daughter before their contractual agreement had expired, not knowing that the Defendants had secured the contract through fraudulent representations and claims.

180. Defendants further defrauded Plaintiffs Ralph and Marilyn Lueken by the failure to report that Shari Lueken's mental state was deteriorating.

181. After withdrawing their daughter from Mountain Park Boarding Academy, Plaintiffs Ralph and Marilyn Lueken had to place their minor daughter in a licensed psychiatric facility for

long-term inpatient treatment due to the severely deteriorated mental state of their minor daughter, which inpatient treatment is still ongoing, at substantial cost to Plaintiffs Ralph and Marilyn Lueken.

182. Plaintiffs Ralph and Marilyn Lueken were not informed that the staff members directly in charge of the students, including their minor daughter, were mostly recent Mountain Park Boarding Academy graduates who had no training whatsoever in dealing with troubled teens

183. Plaintiffs Ralph and Marilyn Lueken were not informed that Defendants locked all of the doors from the inside and outside in a manner requiring the use of a key to exit or enter; that Plaintiffs Ralph and Marilyn Lueken were not informed that there were no fire exits and no fire drills; or that the dormitories were essentially fire traps that could have easily killed all of the girls in a dormitory, including their daughter.

184. Plaintiffs Ralph and Marilyn Lueken were not informed of the treatment accorded their minor daughter, including but not limited to false accusations that Shari Lueken had stolen diamonds and gold; that Shari Lueken was not allowed to eat even one bite of her 16th birthday cake that Plaintiffs Ralph and Marilyn Lueken had paid for; that Shari Lueken was not allowed to receive gifts from Plaintiffs Ralph and Marilyn Lueken; that she was not allowed to freely communicate the conditions at Defendants' facility; or that she was not allowed to freely communicate her physical and mental condition to her parents.

185. Plaintiffs Ralph and Marilyn Lueken were defrauded of their \$500 medical escrow account. Their daughter received no benefit and they received no refund. Defendants have withheld the return of those funds without legal justification.

186. Plaintiffs Ralph and Marilyn Lueken piccolo was converted to the use and benefit of

Defendants.

187. Defendants purposely deprived parents of their hard-earned money by arbitrarily and capriciously returning clothing items mailed to Shari Lueken at the parents' expense. The money was taken from an Incidental Expense Account set up and maintained by the parents: Plaintiffs Ralph and Marilyn Lueken had replenished their daughter's account with \$300 in January 2002, and not one penny was returned to Plaintiffs Ralph and Marilyn Lueken after they removed their daughter from the school in June 2002, and Plaintiffs Ralph and Marilyn Lueken have never received an accounting for that money.

188. Shari Lueken was frequently not allowed to attend classes beyond lunch time. During her time at Mountain Park Boarding Academy, Shari Lueken was required, without compensation, to dust, clean toilets, do dishes, clean the pool, clean Sam Gerhardt's office, and on one occasion, during the winter, to get into the freezing pool water to retrieve a fork from the bottom of the pool – which had not been put in the pool by Shari Lueken. On one particular occasion, Shari Lueken, and all of the other students, were taken out of classes for the entire school day in order to clean the facility because a special guest was coming for a visit. Plaintiffs Ralph and Marilyn Lueken were not informed of the use of their daughter's labor in this manner.

189. Just prior to the 2000 Presidential election, Shari Lueken was forced, without compensation, to campaign and use her phone time to tell Plaintiffs Ralph and Marilyn Lueken to vote for George W. Bush for President because the staff members claimed that if Bush wasn't elected, the school would be forced to close due to a Democrat being in control of the country. Plaintiffs Ralph and Marilyn Lueken paid for the long-distance phone call during which Plaintiffs Ralph and Marilyn Lueken's daughter was required to campaign.

190. Plaintiffs Ralph and Marilyn Lueken have been damaged financially by the fraud and other misconduct of Defendants. At a minimum, Plaintiffs Ralph and Marilyn Lueken suffered the loss of the basic tuition costs they paid to Mountain Park Boarding Academy: A sum totaling, at a minimum, \$28,800. As a result of the acts and omissions of the Defendants, Plaintiffs Ralph and Marilyn Lueken are presently having to pay for costly professional inpatient treatment for their minor daughter in an attempt to correct the damage caused by the Defendants to Shari Lueken. The acts and omissions of the Defendants and their purposeful fraud and intentional misrepresentations concerning their operations have caused a great deterioration of the quality of family life of Plaintiffs Ralph and Marilyn Lueken and their daughter Shari Lueken.

PART 4 – ERIKA TEASLEY

PART 4, COUNT I – ASSAULT AND BATTERY, FALSE IMPRISONMENT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

191. Plaintiff Erika Teasley (Plaintiff Teasley) incorporates all other parts of the complaint to the extent legally and ethically appropriate.

192. Plaintiff, Erika Teasley, was enrolled and attended Mountain Park Boarding Academy from on or about January 18th 2003, until on or about May 16th 2003.

193. Defendants and all of them confined Plaintiff Teasley while she was a minor without legal justification by the use of fraud and deceit on Plaintiff Teasley and her parents.

194. Prior to being enrolled in Mountain Park Boarding Academy, Plaintiff Teasley did not have a history of any psychiatric disorders and Plaintiff Teasley had never taken any type of behavior modification type drugs, or drugs for depression or hyperactivity disorder.

195. Mountain Park Boarding Academy enrollment personnel were informed of Plaintiff

Teasley's history pertaining to non-use and lack of need for any psychiatric drugs. Mountain Park enrollment personnel were fully informed of the fact that Plaintiff Teasley had never been on any type of behavior modification drugs or drugs for depression in her life because Plaintiff Teasley had never needed such medications.

196. Defendants and all of them have falsely imprisoned Plaintiff Teasley, and Defendants and all of them, knowingly acted in a manner that created a substantial risk to the life, body, and health of Plaintiff Teasley while she was a child less than seventeen years old.

197. Defendants and all of them confined Plaintiff Teasley, without legal justification, by the use of fraud and deceit on the minor Plaintiff Teasley and her parents, from approximately January 18th 2003, until on or about May 16th 2003.

198. Although Defendants and all of them provided Plaintiff Teasley's parents with a Boarding Academy Parent/Student Handbook, unbeknownst to Plaintiff Teasley's parents, Plaintiff Teasley was never shown or allowed to read the handbook while being confined there. The fact that the handbook is falsely titled as being a "Student" handbook is a purposeful deception on the part of the Defendants.

199. Defendants and all of them committed the tort of battery on Plaintiff Teasley by administering chlorpromazine and other dangerous antipsychotic drugs without obtaining a valid prescription and without Plaintiff Teasley's or Plaintiff Teasley's parents' knowledge or consent and without having Plaintiff Teasley examined by a doctor prior to administration of the drugs.

200. After Plaintiff Teasley had been in Mountain Park for two or three days, staff member Ms. Sharon Goodman started giving Plaintiff Teasley a little white pill. Ms. Goodman said it was for a "bug" that was going around and Ms. Goodman would watch Plaintiff Teasley take the

pill and then make Plaintiff Teasley open her mouth to show Ms. Goodman it was gone.

201. While Ms. Goodman was gone, staff member Mrs. Julie Gerhardt gave the white pill to Plaintiff Teasley and Plaintiff Teasley took the white pill every day and sometimes twice a day up until the Wednesday before Plaintiff Teasley left Mountain Park.

202. After taking the pill administered by Mountain Park staff members, Plaintiff Teasley felt drowsy and not really in control. Plaintiff Teasley was only dimly aware of what she was doing or what was going on around her after taking the pill.

203. Plaintiff Teasley remembers that the students mainly got the pill twice per day when the school got a lot of new girls or when girls were getting in trouble by Deborah Gerhardt in disciplinary assemblies called "POW WOWS."

204. Plaintiff Teasley and the other children in Defendants' facility were given the white pills twice per day some of the time. Mr. Sam Gerhardt and his wife, Mrs. Deborah Gerhardt, would sit facing the girls, including Plaintiff Teasley, when they were given the pills during evening meals, and the single staff sitting at a student's table would watch the pill being taken at breakfast because the single staff ate with the students at breakfast.

205. Plaintiff Teasley was never specifically told what the small white pills were – she wasn't told a brand or trade name. The small white pill was not given because "there was a bug going around." Defendants simply lied about the content of the pill and the reasons for its administration.

206. Plaintiff Teasley was forced by Defendants to drink milk that tasted sour and old. Plaintiff Teasley and the other students were required to drink a glass of milk in the mornings. Defendants and their staff made the students drink all of the milk or fruit juice they were given.

Students were limited to only one glass of either juice or milk at breakfast

207. Defendants administered chlorpromazine or other mind altering drugs through their morning milk or fruit juice.

208. Mountain Park intentionally inflicted emotional distress on the Plaintiff Teasley by the standing threats of beatings and arbitrary punishments, and by constant degradation and humiliation by both students and staff members, by requiring students to obtain permission from other students called "orientation guides" for virtually everything they did, including trips to the restroom, requests for medical care, etc.

209. Plaintiff Teasley was told that some of the new girls would throw or have "fits." But all of the students, including Plaintiff Teasley, were forced to ignore any such girl who they had been told was having a fit or throwing a fit and act like everything was normal. The staff would block off a large area around a girl who was having a "fit." The staff would tackle such a girl to the ground until the staff felt like letting her up. It never happened to Plaintiff Teasley and Plaintiff Teasley never actually saw a girl throw a fit or have a fit, but Plaintiff Teasley did hear girls who would scream as if the staff were hurting them very badly. The guides were not allowed to know what was going on and they were not allowed to have anything to do with such matters.

210. In information and belief, a high percentage of these fits were actually seizures caused by the administration of chlorpromazine and related drugs, rather than any misbehavior.

211. On or about March 25, 2003, Plaintiff Teasley noticed that her arm was irritated. When she looked down she noticed that she had a burn on her right arm on the inside of her wrist. Plaintiff Teasley didn't and does not know where the burn came from or what had happened.

212. On or about May 9, 2003, Plaintiff Teasley awoke and found two more burns on her arm. One burn was in the middle of Plaintiff Teasley's right arm on the inside and the other burn was about two inches further up her arm.

213. Plaintiff Teasley told and showed her orientation guide (Tabytha Gundelach) the burns. Tabytha told Plaintiff Teasley that it was caused by Plaintiff Teasley's curling iron. Plaintiff Teasley told Tabytha the burns weren't from her curling iron. Tabytha ignored Plaintiff Teasley and turned on her blow dryer and it was not discussed any further even though Plaintiff Teasley wanted to explain to Tabytha that her curling iron was old and didn't even work to curl her hair, and would not get hot enough to burn Plaintiff Teasley.

214. Plaintiff Teasley's orientation guide did not report the burns to staff and Plaintiff Teasley was afraid to say anything for fear of punishment. Those burns have resulted in permanent scarring.

215. Plaintiff Teasley was routinely subjected to verbal abuse by the staff members. Plaintiff Teasley was kept on orientation the whole time she was there, because the staff members didn't trust her and they said Plaintiff Teasley wasn't progressing any and that Plaintiff Teasley wasn't showing enough evidence of change and sorrow in her life.

216. Plaintiff Teasley was denied open communication with her parents. Her phone calls were monitored and her letters were read and censored and Plaintiff Teasley was prevented from communicating the intentional and unjustified emotional distress that was being inflicted on her by the staff members and others. Even when a letter written by Plaintiff Teasley was sent to her parents, Sam Gerhardt would add comments to Plaintiff Teasley's letters and would tell Plaintiff Teasley's parents that she was lying when Plaintiff Teasley was telling the truth of a matter.

PART 4, COUNT II – NEGLIGENCE

217. Plaintiff Teasley incorporates all other parts of the complaint to the extent legally and ethically appropriate.

218. While Plaintiff Teasley was at Mountain Park, she had a tooth that had chipped totally off – a molar which was used for chewing food. Staff members gave Plaintiff Teasley what she believes was Tylenol, Ibuprofen, or Excedrin or some combination thereof, and occasionally some baby orajel, for awful headaches she was having. Those medications did little or nothing to take away the pain caused by the broken tooth. Plaintiff Teasley would tell Mrs. Julie Gerhardt and Ms. Sharon Goodman, both staff members, 2 or 3 times a day - every time they had medicine call – about the awful pain her chipped tooth was causing her and the staff just ignored Plaintiff Teasley. It took approximately two-and-one-half (2 ½) months before Plaintiff Teasley was finally taken to the dentist because staff told Plaintiff Teasley that she couldn't go to the dentist until she had been at Mountain Park for four (4) months.

219. Mr. Norman Harmon, a staff member, finally took Plaintiff Teasley to the dentist only after Plaintiff Teasley's mother made repeated calls telling the staff to take her daughter to the dentist. Plaintiff Teasley, a child, was forced to endure severe chronic pain for over two and one half months because there was an absurd "rule" that students could not go to a dentist until they had been at Mountain Park for at least four months and had Plaintiff Teasley's mother not intervened, Plaintiff Teasley would have not been allowed to get relief for the excruciating pain at all.

220. Plaintiff Teasley did not have a menstrual period the entire time that she was at Mountain Park Boarding Academy and when she voiced her concerns to staff and her orientation guides,

she was mocked and sneered at and told that she was probably pregnant. Plaintiff Teasley was never taken to a doctor to determine why she had ceased menstruating and her concerns that she voiced fell on deaf ears. Plaintiff Teasley's menstrual periods resumed in June 2003 - the month after she left Mountain Park Boarding Academy and returned home.

221. Defendants recognized the menstrual cessation and menstrual irregularities as a side effect of chlorpromazine, and simply took the opportunity to mock and harass Plaintiff Teasley.

222. While at Mountain Park, Plaintiff Teasley suffered from blurred vision that was like a fog over her eyes, consistent with the administration of chlorpromazine.

223. Plaintiff Teasley suffered from constipation while she was at Mountain Park, also consistent with chlorpromazine.

224. Plaintiff Teasley suffered from a severe sore throat for about three weeks starting shortly before her birthday, March 18th. Plaintiff Teasley's temperature was taken during medicine calls and she had a fever that lasted approximately a week. She ran fevers of: 100.2; 101.0; 102.2; 103.0; the medication given to Plaintiff Teasley for her fever was Tylenol, with Ibuprofen being alternated on different days. Plaintiff Teasley was not taken to a doctor nor was she seen or treated by any medical personnel, just Mountain Park staff members.

225. Defendants recognized the fevers, constipation, menstrual irregularities, and other changes in Plaintiff Teasley's body as signs that the chlorpromazine was causing severe damage to her body, and through gross negligence did not discontinue the chlorpromazine or adjust the dosage.

226. Plaintiff Teasley was placed on a strict diet and lost weight while at Mountain Park Boarding Academy.

PART 4, COUNT III ---- FAILURE TO PAY MINIMUM WAGE AND OVERTIME

227. Plaintiff incorporates all other parts of the complaint to the extent legally and ethically appropriate.

228. Plaintiff Teasley was not paid for her work for the defendants.

229. Plaintiff Teasley was forced to work as an unpaid security guard, inasmuch as she was compelled to act as an unpaid security guard at all times and catch or attack anyone who might try to escape.

230. Plaintiff Teasley seeks compensation at the prevailing minimum wage, plus overtime, for all relevant periods, based upon 18 hours of work for every day at Mountain Park Boarding Academy.

PART 5 – PAUL DOUGLAS ("DOUG") HOOVER JR.; KATRINA HOOVER;

COUNT I – FRAUD

231. Plaintiffs Paul Douglas (“Doug”) Hoover, Jr., and Katrina Hoover (Plaintiffs Hoover) incorporate all other parts of the complaint to the extent legally and ethically appropriate.

232. Defendants and all of them have defrauded Plaintiffs Hoover in the manner set forth more fully in the following paragraphs.

233. Plaintiffs Hoover are the parents of Erika Teasley.

234. Defendants and all of them confined Erika Teasley, through fraud and deception, from approximately January 18th 2003 until on or about May 16th 2003.

235. In direct violation of the terms of the contract made between Plaintiffs Hoover and Defendants, the Defendants, without the knowledge or approval of Plaintiffs Hoover, allowed and encouraged assault to be committed upon Erika Teasley by allowing another student, an orientation guide, to hit and slap their daughter upside her head and violently pull on their daughter's arm. The gross negligence (or intentional harm) of Defendants allowed Erika Teasley to receive burns on her arm which are believed will result in permanent scarring.

236. Mountain Park Boarding Academy enrollment personnel were informed of Erika Teasley's history pertaining to non-use and non-need of any so-called psychiatric drugs, that Erika Teasley had never been on any type of behavior modification drugs or drugs for depression in her life because Erika Teasley had never needed such medications.

237. Mountain Park Boarding Academy enrollment personnel were informed of Plaintiffs desire that their daughter not be put on such medications.

238. Despite this knowledge, and Mountain Park Boarding Academy's written pledge not to use such drugs, Erika Teasley was secretly drugged, without a doctor's prescription or adequate medical supervision, while attending Mountain Park Boarding Academy, with Chlorpromazine and Thioridazine, both behavior modification drugs.

239. Mountain Park intentionally inflicted emotional distress on the Plaintiffs Hoover by returning letters to Plaintiffs Hoover which contained thinly veiled threats of arbitrary punishments on Erika Teasley while Defendants were in physical control and had physical

custody of Erika Teasley in the State of Missouri, knowing that Plaintiffs Hoover were hundreds of miles away in the State of Texas and could do nothing to protect their daughter from the threats, nor could Plaintiffs Hoover defend themselves against the verbal assaults for fear that their daughter would suffer the consequences.

240. Plaintiffs Hoover were subjected to intentional degradation and humiliation by Mountain Park Boarding Academy personnel for writing messages of a positive and encouraging nature to their daughter in their letters. Plaintiffs Hoover were coerced into putting up with the taunts by Defendants due to the contract they had signed and felt that they would be forced to pay full tuition if they removed their daughter before their contractual agreement had expired, not knowing that the Defendants had secured the contract through fraudulent claims and representations.

241. Plaintiffs Hoover were further deceived and defrauded by Defendants failure to report that Erika Teasley's mental and physical state was deteriorating.

242. Defendants fraudulently represented to Plaintiffs Hoover that their program was based on positive peer pressure, knowing full well that their program was based on intentional and constant degradation and humiliation and extreme emotional and physical cruelty that was inflicted by staff members and students.

243. Plaintiffs Hoover were not informed that the staff members directly in charge of the students, including their minor daughter, were mostly recent Mountain Park Boarding Academy “graduates,” individuals who had just completed the brainwashing and torment that Mountain Park Boarding Academy planned to inflict on Erika Teasley.

244. These new “graduates” had almost no training in dealing with troubled teens. The

training that they did receive was mostly provided by Mountain Park Boarding Academy personnel and consisted mainly of teaching them how to abuse the students without leaving marks or getting caught, and how to lie to any public servant who might investigate any claims of abuse.

245. Defendants assured Plaintiffs Hoover that their daughter's safety would be paramount. Plaintiffs Hoover were not informed that Defendants locked all of the doors from the inside and outside in a manner requiring the use of a key to exit or enter, that there were no fire exits and no fire drills, or that the dormitories were essentially fire traps, which could easily kill most or all the students in an entire dorm, due to Defendants fixation on escape prevention, and tightfisted refusal to implement inexpensive fire safety equipment and precautions.

246. Unbeknownst to Plaintiffs Hoover, their minor daughter was denied open communication with them. Her phone calls were monitored and her letters were read and censored.

247. Defendants were aware of Erika Teasley's increasing depression and physical ailments being suffered by their daughter, yet prevented her from freely communicating to her parents the intentional and unjustified emotional distress and physical abuse that was being inflicted on her by both the students and the staff members.

248. Plaintiffs Hoover would not have sent their daughter to Mountain Park Boarding Academy if they had been told the truth concerning the conditions and treatment of children at Mountain Park Boarding Academy.

249. Plaintiffs Hoover would have removed their daughter from Mountain Park Boarding Academy more quickly if they had been able to receive free and uncensored communication from their daughter.

250. Due to the negligence of Defendants' refusal and failure to hire qualified staff, Erika Teasley was forced to report the burns on her arm to another student and Plaintiff was not allowed to receive treatment for those burns in a timely manner which might have prevented life-long scarring.

251. The acts and omissions of the Defendants and their purposeful fraud and intentional misrepresentations concerning their operations have caused a great deterioration of the quality of family life of Plaintiffs Hoover and Erika Teasley.

PART 6 – TRACEY BRAZIL OZUNA

COUNT I – ASSAULT, BATTERY, FALSE IMPRISONMENT, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

252. Plaintiff Tracey Brazil Ozuna incorporates all other parts of the complaint to the extent legally and ethically appropriate.

253. Plaintiff, Tracey Brazil Ozuna, (Plaintiff Ozuna) was enrolled and attended Mountain Park Boarding Academy in or around Patterson, Missouri, twice: The first enrollment was on or about December 31st, 1995, and lasted until on or about April 13th (mid-April), 1996; the second enrollment began on or about February 9, 1997, and lasted until on or about December 24th or 25th, 1997.

254. Defendants and all of them confined Plaintiff Ozuna while she was a minor without legal justification by the use of fraud and deceit on the Plaintiff Ozuna and her parents, from on or about December 31st, 1995, until on or about April 13th (mid-April), 1996, and again from on or about February 9, 1997, until on or about December 24th or 25th, 1997.

255. Plaintiff Ozuna was 12 years old when she was initially put into Mountain Park Boarding

Academy; Plaintiff Ozuna's older sister Michele Brazil was currently in the program and Plaintiff Ozuna's parents sent her there primarily to keep her older sister company.

256. Plaintiff Ozuna was taken by a male and female hired-escort team the second time she was sent to Mountain Park, said escorts having been recommended by Mountain Park Boarding Academy staff.

257. Plaintiff Ozuna's parents were not in the house when the escorts arrived, on recommendation of said escorts. The house was completely empty when the escorts woke Plaintiff Ozuna up at 2 a.m. and took her away from her home in California and escorted her to Mountain Park Boarding Academy in Missouri.

258. Shortly after arrival at Mountain Park, Plaintiff Ozuna was weighed and then forced to take orally something that a staff member told her was "worm medicine" which in reality was chlorpromazine.

259. Although Defendants and all of them provided parents with a Boarding Academy Parent/Student Handbook, Plaintiff Ozuna was never shown the handbook while being confined there.

260. Defendants and all of them have falsely imprisoned Plaintiff Ozuna, and Defendants and all of them, knowingly acted in a manner that created a substantial risk to the life, body, and health of Plaintiff Ozuna.

261. Plaintiff Ozuna was arbitrarily and openly denounced by Mountain Park Boarding Academy staff members, and particularly headmistress Deborah Gerhardt, as being a spoiled child with a bad attitude.

262. Sometime in or around January 1996, in fifth dorm at about 7 p.m., Plaintiff Ozuna was

accused of having a bad attitude, and Plaintiff Ozuna was given swats by staff member Laura Matthews that were witnessed by staff member Sara Day. Ms. Matthews and Ms. Day had Plaintiff Ozuna lean forward over a chair so that Plaintiff Ozuna would not fall during the forceful swats that were given with a large wooden paddle.

263. Ms. Matthews hit Plaintiff Ozuna 8 times and told Plaintiff Ozuna that if she protested in any way she would get an extra swat for each time she fought against it.

264. After the severe paddling, and as extra punishment, Plaintiff Ozuna was immediately forced to sit and write lines and it was very painful for Plaintiff Ozuna to remain seated in order to write the lines, but Plaintiff Ozuna had no choice but to endure the pain and complete writing the lines, else she would have received more swats.

265. The next day during an afternoon shower, Plaintiff Ozuna discovered that she had bruises present on her behind from the paddling. The bruised areas were extremely painful and the painful and bruised areas were present for at least a week, yet Plaintiff Ozuna was required to sit in class and endure great pain due to the injuries caused by the paddling.

266. At the time of the paddling incident, Plaintiff Ozuna was forced to sign a card saying that staff member Laura Matthews had given Plaintiff Ozuna swats and that staff member Sara Day had witnessed it. The card did not say how many swats Plaintiff Ozuna had been given or have any other information on it, other than the time and date.

267. Immediately after receiving the brutal swats, chief female staff member at Mountain Park, Deborah Gerhardt, told Plaintiff Ozuna that because she was a spoiled brat who had nothing good to say, she was no longer allowed to speak to other students or staff members, that Plaintiff Ozuna was only allowed to speak to her orientation guide, fellow student, Jennifer Jones, and the

only thing Plaintiff Ozuna was permitted to communicate was to tell her orientation guide if she needed to go to the bathroom, and the only thing Plaintiff Ozuna could say to her orientation guide was, "bathroom," if Plaintiff Ozuna had to use the restroom.

268. Plaintiff Ozuna was not allowed to speak or be spoken to unless a worker chose to speak to her and then Plaintiff Ozuna was only allowed to respond to what they said. At the whim of Deborah Gerhardt, Plaintiff Ozuna lived in virtual silence for almost two full weeks before she was given permission to speak again.

269. A student by the name of Will Futrelle was killed by classmates at Mountain Park Boarding Academy and Child Protective Services (CPS) came to Mountain Park Boarding Academy in March or April, 1996, to investigate the operations at Mountain Park, and staff members were sitting outside the room where they were interviewing the students.

270. Mountain Park staff had told the students before they went in to be interviewed by CPS that the students did not have to answer any of the questions asked by CPS and the Mountain Park staff "encouraged" the students to give CPS their testimonies instead, and tell them how much Mountain Park had "helped us."

271. Although CPS workers demanded to speak privately with every student in the facility, when Plaintiff Ozuna's turn came, there were several workers, including Kim Watson, sitting in the room just outside the door where the private CPS interviews were being conducted, trying to listen in, and Plaintiff Ozuna was unsure how much the workers could hear, and the workers were timing students while they were being interviewed by CPS.

272. Due to the surveillance by Mountain Park staff members, Plaintiff Ozuna was too scared to tell CPS anything, and instead, Plaintiff Ozuna said nothing except the answers she was

expected to say by Mountain Park staff members and Plaintiff Ozuna told CPS false things such as, "I'm happy; I love it here; God has transformed my life."

273. Plaintiff Ozuna did not say what she really wanted to say because Plaintiff Ozuna was not given the chance to speak freely due to the eavesdropping and timing and the prior intimidation by Mountain Park staff members.

274. After the CPS visit to Mountain Park, in an effort to further intimidate the students, staff members interrogated Plaintiff Ozuna and other students by asking what they had said during the confidential CPS interviews, with the main person questioning Plaintiff Ozuna being worker Kim Watson. Deborah Gerhardt also questioned Plaintiff Ozuna concerning her responses to CPS questions.

275. At the end of March or April, 1997, on or around the one-year-anniversary of Will Futrelle's killing, CPS came back to interview everyone again, but once again, in the two or three weeks before CPS came, Mountain Park staff members prepped everyone on what to say and what questions students did not have to respond to.

276. Although Mountain Park had been tipped off and was expecting CPS to come back at that time, Plaintiff Ozuna had decided to speak out about the maltreatment of students, regardless of who was listening, but Plaintiff Ozuna was never given the opportunity to speak to CPS. When CPS came Sam and Deborah Gerhardt instructed Plaintiff Ozuna's orientation guide, Brooke Wheeler, to take Plaintiff Ozuna to them.

277. Sam and Deborah Gerhardt told Plaintiff Ozuna that she was going to leave for the day and would not be allowed to talk to any of the CPS social workers, that Plaintiff Ozuna would be escorted outside and down the driveway to staff members, Matt McFadden (spelling uncertain)

and his wife.

278. Plaintiff Ozuna was warned by the Gerhardts that if she was stopped and asked who she was by any CPS workers on the way out of the building, Plaintiff Ozuna was to lie and say that she was a staff member's child.

279. Mountain Park staff members, Matt McFadden and his wife, drove Plaintiff Ozuna around in their car all day and kept Plaintiff Ozuna away from the facility. The McFaddens did not bring Plaintiff Ozuna back to the facility until they had confirmed on the phone that CPS had left. When Plaintiff Ozuna returned to the facility, everyone was getting ready for bed.

280. Due to Plaintiff Ozuna being denied the right to speak freely to CPS workers, she was unable to communicate the maltreatment of the students and herself that was taking place at Mountain Park Boarding Academy.

281. Throughout the entire time Plaintiff Ozuna was at Mountain Park, Plaintiff Ozuna's freedom of speech was taken away. If staff did not like what Plaintiff Ozuna said in a letter, she was forced to rewrite it. If Plaintiff Ozuna was allowed a phone call from her parents, there was always someone listening. Plaintiff Ozuna was not allowed to talk to other "new students" while she was on orientation or anyone else who was being punished and had been abnormally "separated", and kept from communication, just like Plaintiff Ozuna.

282. Plaintiff Ozuna was constantly threatened by staff members and student workers that until she didn't want to go home she would never be allowed to leave Mountain Park.

283. Plaintiff Ozuna was instructed that if her parents said they were taking her home, she was to tell a staff member who would then try to convince her parents to allow her to stay longer at Mountain Park.

284. Such constant warnings and threats were given to Plaintiff Ozuna by nearly every girl who had been there long enough to get off of orientation, and by many staff members, including Kim Watson and Mary Lansdowne. If the child did not pretend that he or she did not want to go home, he or she would most likely be put back on orientation, and that Mountain Park staff would convince the child's parents, through lies and deceit, that the child was "not ready" to leave.

285. The bathroom stalls had no doors, and while on orientation, Plaintiff Ozuna and the other students on orientation had absolutely no privacy. Plaintiff Ozuna and other children were directly watched and harassed while using the bathroom, ridiculed if they took too long.

286. If Plaintiff Ozuna or any of the others being stared at complained at all about someone sitting directly in front of them in order to watch them while they were relieving themselves, the complaining child would be accused of masturbating or having something to hide, and would also be watched even more closely and harassed more severely.

287. Even after Plaintiff Ozuna got off orientation, it was considered suspicious if Plaintiff Ozuna asked someone not to sit in front of her while she used the toilet and Plaintiff Ozuna constantly felt degraded and humiliated by the lack of privacy.

PART 6, COUNT II – NEGLIGENT MEDICAL CARE

288. Defendants were frequently negligent or grossly negligent in providing medical care, as shown by the following examples.

289. Due to the negligent administration of chlorpromazine, Plaintiff Ozuna did not have a menstrual period during her first enrollment, and Plaintiff Ozuna did not have a menstrual period

for at least 8 months during her second enrollment while at Mountain Park Boarding Academy.

290. Plaintiff Ozuna was not ever taken to a doctor to ascertain the cause of her missed menstrual periods. Defendants rather undertook to diagnose and treat Plaintiff Ozuna themselves.

291. The cessation of Plaintiff Ozuna's menstrual periods and the denial of medical attention caused Plaintiff Ozuna great fear and distress.

292. As a result of the acts and omissions of the Defendants, Plaintiff Ozuna has suffered severe and lasting emotional and mental trauma and has been diagnosed as suffering from Post Traumatic Stress Disorder directly related to the emotional trauma she suffered at Mountain Park Boarding Academy and Plaintiff Ozuna has had to undergo and pay for professional therapy in order to treat the disorder.

293. As a result of the acts and omissions of the Defendants, Plaintiff Ozuna has suffered severe psychiatric and mental injury. As a result of the acts and omissions of the Defendants, Plaintiff Ozuna is to the present day emotionally and mentally damaged to the point that Plaintiff Ozuna has not been able to obtain education or employment commensurate with her level of intelligence, and has not been able to relate to friends and others in the normal manner of a person who has not suffered the trauma Plaintiff Ozuna suffered at the hands of the Defendants. The acts and omissions of the Defendants have caused a great deterioration of the quality of life of the Plaintiff Ozuna.

PART 6, COUNT III ---- FAILURE TO PAY MINIMUM WAGE AND OVERTIME

294. Plaintiff Ozuna incorporates all other parts of the complaint to the extent legally and ethically appropriate.

295. Plaintiff Ozuna was not paid for her work for the defendants.

296. During her second enrollment, after approximately 5 ½ to 6 months had passed, Plaintiff Ozuna became an orientation guide and Plaintiff Ozuna was an orientation guide on and off until she left Mountain Park.

297. Job duties of an orientation guide included keeping one or two minor females within arms distance of her throughout the day, ensuring that they did all required memorization, took showers, cleaned, and did all other required tasks. An orientation guide was expected to escort her students to the bathroom and watch them while they relieved themselves. At night, the orientation guide left his or her charge(s) on their beds and she picked them up the next morning.

298. While Plaintiff Ozuna was an orientation guide, she had to be within an arm's distance from her girls 24 hours per day, 7 days per week, except when her girl was sleeping. If “her” girls were not displaying a good attitude, staff members blamed Plaintiff Ozuna.

299. It was Plaintiff Ozuna's job to catch runaways. She had to stay awake at least one extra hour out of each night and watch for them on Safety Patrol (SP).

300. Plaintiff Ozuna was on “safety patrol” every night after she became a single girl (off orientation, but not an orientation guide), and after being put on safety patrol Plaintiff Ozuna continued to do that job until she left. Plaintiff Ozuna was on safety patrol for six to seven months.

301. “Safety patrol” had nothing to do with safety. Rather, “safety patrol” was the euphemism chosen by Defendants for the security guards conscripted to prevent anyone from running away.

302. Plaintiff Ozuna was not at liberty to refuse being on safety patrol. If any child in the care of Defendants refused to be on safety patrol because they were too tired, the student was denounced, and sometimes put up back on orientation.

303. Plaintiff Ozuna was deprived of sleep while working for Defendants without pay. Plaintiff Ozuna's safety-patrol-shift varied every night, but it always lasted for at least an hour, and Plaintiff Ozuna was awakened fifteen to twenty minutes before her shift began.

304. Plaintiff Ozuna was required to stay at her assigned post until her replacement came at the end of her shift. Her total time required for this duty often exceeded two hours in a day.

305. Plaintiff Ozuna had two different safety guard posts while she was at Mountain Park Boarding Academy. One post required that Plaintiff Ozuna sit in a chair by the door and guard it; and Plaintiff Ozuna's other post required that she walk through the dorms with a flashlight making sure no one got out of bed or was awake and Plaintiff Ozuna was required to check in every ten or fifteen minutes with each of the girls who were sitting in the "guard" positions.

306. Plaintiff Ozuna usually ended up missing about two hours of sleep each night she was on safety patrol by the time she made it back to her bed.

307. In fact, all persons in the custody of the Defendants were forced to act as unpaid security guards, in one form or another, approximately 18 hours per day.

308. Plaintiff Ozuna seeks compensation at the prevailing minimum wage, plus overtime, for 18 hours for every day she was at Mountain Park Boarding Academy.

PART 7 – JESSICA DEBOI

PART 7, COUNT I – ASSAULT, BATTERY, FALSE IMPRISONMENT,

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

309. Plaintiff Jessica Deboi incorporates all other parts of the complaint to the extent legally and ethically appropriate.

310. Plaintiff, Jessica Deboi, formerly Jessica Brazil, was enrolled and attended Mountain Park Boarding Academy in or around Patterson, Missouri from about April 26th (late April), 1997, and lasted until on or about December 24th or 25th, 1997.

311. Defendants and all of them confined Plaintiff Deboi while she was a minor without legal justification by the use of fraud and deceit on Plaintiff Deboi and her parents. Plaintiff Deboi was confined with locked doors and tall fences topped with barbed wire.

312. When Plaintiff Deboi arrived at Mountain Park Boarding Academy she was immediately given chlorpromazine disguised as worm medicine. Defendants continued to give Plaintiff Deboi chlorpromazine for the duration of her stay at Mountain Park Boarding Academy.

313. The surreptitious administration of drugs into Plaintiff Deboi's body constituted the tort of battery.

314. Neither Plaintiff Deboi nor her parents were told about the drugging.

315. Plaintiff Deboi's parents would not have sent her to Mountain Park Boarding Academy if they had know that Defendants routinely engaged in the surreptitious administration of chlorpromazine and related drugs.

316. Plaintiff Deboi was taunted, humiliated, and arbitrarily and capriciously deprived of privileges of all sorts during her stay at Mountain Park Boarding Academy.

317. Plaintiff Deboi was abused emotionally by the Defendants during her stay at Mountain

Park Boarding Academy. She was regularly humiliated in public. She was not allowed to express sadness, anger, or to cry or otherwise not put on a “happy face.”

318. Plaintiff Deboi was deprived of opportunities for physical exercise. This deprivation, coupled with the surreptitious administration of chlorpromazine, resulted in a weight gain of more than 15 pounds.

319. Plaintiff Deboi was deprived of healthful nutrition. Due to the use of chlorpromazine, Plaintiff Deboi suffered almost constant hunger pangs even as she gained weight.

320. Plaintiff Deboi, as an “orientation guide” was forced to catch a girl named Amy Putnam and throw her to the ground for trying to leave.

321. Plaintiff Deboi was kept in a constant state of exhaustion, which when coupled with chlorpromazine and the constant harassment by Defendants, rendered clear and reasoned thinking extremely difficult.

322. Plaintiff Deboi was deprived of free and open communication with her parents. At one time, she wrote a letter to her parents saying that she was not being allowed to have adequate physical exercise. Plaintiff Deboi was forced to rewrite the letter, and humiliated and told that she was a worthless person.

323. Defendants told Plaintiff Deboi that she was a worthless, spoiled child who didn’t deserve such fine parents as would send their children to Mountain Park Boarding Academy. Plaintiff Deboi was told that she would have probably died without them, that she was insignificant because she was not a legal adult, and that she would have never “found Jesus” without the help of Defendants.

324. Prior to Mountain Park Boarding Academy, Plaintiff Deboi was an honor student and an

accomplished athlete.

325. During Plaintiff Deboi's confinement at Mountain Park Boarding Academy, Plaintiff Deboi never read a book, wrote a paper, gave a speech, had a class discussion, watched the news, or studied current events.

326. The deprivation of educational opportunities was particularly devastating and damaging to the Plaintiff Deboi.

327. Since her confinement at Mountain Park Boarding Academy, Plaintiff Deboi has suffered recurring nightmares about being sent back to Mountain Park Boarding Academy, being back at Mountain Park Boarding Academy, or trying to run away from Mountain Park Boarding Academy.

328. These nightmares, caused solely by the misconduct of Defendants, has deprived Plaintiff Deboi of sleep and caused long term fear and anxiety in Plaintiff Deboi.

329. Plaintiff Deboi now suffers from Post Traumatic Stress Disorder (PTSD) as a direct result of the Defendants' abuses perpetrated on Plaintiff Deboi, as set forth herein. Plaintiff Deboi also suffers panic attacks and fear of group settings, due to the intentional and neglectful treatment of the Defendants. Plaintiff Deboi has been forced to seek counseling and medical treatment of the PTSD and symptoms thereof which have resulted from the wrongful conduct of Defendants.

PART 7, COUNT II – NEGLIGENT MEDICAL TREATMENT

330. Defendants drugged Plaintiff Deboi with chlorpromazine during her stay at their facility.

331. This caused Plaintiff Deboi's periods to cease beginning her first month there. She did not have any period at all for the first 6 months, although she normally had a very regular period.

When her period did return it was much lighter than normal.

332. Plaintiff Deboi had extremely severe constipation the first month, and continued to have constipation for the remaining months, due to the administration of chlorpromazine.

333. Defendants failed to inform Plaintiff Deboi of the potentially fatal interaction of chlorpromazine with other drugs.

334. As a result, Plaintiff Deboi took Sudafed on her second visit with her parents, just before an ocean cruise to the Bahamas.

335. Plaintiff Deboi passed out in the bathroom in the middle of the night. Plaintiff Deboi's mother found her and tried to awaken her. As Plaintiff Deboi woke up she vomited. Plaintiff Deboi was so dehydrated from the abuse of Mountain Park Boarding Academy and from the vomiting that had occurred, it was extremely difficult to get an IV started on Plaintiff Deboi. Plaintiff Deboi nearly died and probably would have died but for the expertise of the medical team in starting the IV despite Plaintiff Deboi's dehydrated condition.

336. Plaintiff Deboi had many tests run, but could not determine the cause of the medical emergency, because no one at the time realized that Defendants were surreptitiously administering chlorpromazine, often at dangerously high doses.

337. Defendants were well aware of the adverse effects of using common cold or flu medicines together with chlorpromazine.

338. At one point during Plaintiff Deboi's stay at Mountain Park Boarding Academy, nearly half of the girls were sick with the flu. No medication was given. Only a few were allowed bed rest.

PART 7, COUNT III ---- FAILURE TO PAY MINIMUM WAGE AND OVERTIME

339. Plaintiff incorporates all other parts of the complaint to the extent legally and ethically appropriate.

340. Plaintiff Deboi was not paid for her work for the defendants.

341. Plaintiff Deboi was an orientation guide at Mountain Park Boarding Academy for about three months.

342. It was Plaintiff Deboi's job to catch runaways. She had to stay awake at least one extra hour out of each night and watch for them on Safety Patrol (SP).

343. Plaintiff Deboi was on "safety patrol" every night after she became a single girl (off orientation, but not an orientation guide), and after being put on safety patrol Plaintiff Deboi continued to do that job until she left. Plaintiff Deboi was on safety patrol for six to seven months.

344. Plaintiff Deboi was deprived of sleep while working for Defendants without pay. Plaintiff Deboi's safety-patrol-shift varied every night, but it always lasted for at least an hour, and Plaintiff Deboi was awakened fifteen to twenty minutes before her shift began.

345. Plaintiff Deboi was required to stay at her assigned post until her replacement came at the end of her shift. Her total time required for this duty often exceeded two hours in a day.

346. Plaintiff Deboi had two different safety guard posts while she was at Mountain Park Boarding Academy. One post required that Plaintiff Deboi sit in a chair by the door and guard it; and Plaintiff Deboi's other post required that she walk through the dorms with a flashlight making sure no one got out of bed or was awake and Plaintiff Deboi was required to check in every ten or fifteen minutes with each of the girls who were sitting in the "guard" positions.

347. Plaintiff Duboi seeks compensation at the prevailing minimum wage, plus overtime, for

all relevant periods, based upon 18 hours of work for every day at Mountain Park Boarding Academy.

348. All Plaintiffs request and demand a jury trial.

WHEREFORE, Plaintiffs pray for compensatory and punitive damages in the following amounts for each respective Plaintiff:

Jamie Kaufmann Woods:	\$2,600,000 compensatory, \$3,000,000 punitive
Shari Lueken	\$2,800,000 compensatory, \$5,000,000 punitive
Ralph and Marilyn Lueken	\$1,500,000 compensatory, \$3,000,000 punitive
Erika Teasley	\$1,500,000 compensatory, \$2,500,000 punitive
Paul and Katrina Hoover	\$1,100,000 compensatory, \$3,000,000 punitive
Tracey Brazil Ozuna	\$2,000,000 compensatory, \$4,000,000 punitive
Jessica Deboi	\$1,900,000 compensatory, \$3,000,000 punitive

Plaintiffs furthermore pray costs and attorney's fees, and all other and further relief as may be appropriate, whether or not specifically prayed.

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