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11
12 *in pro per*

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ARIZONA
15

16 Kimberly R. Sweidy,
17 Plaintiff,

18 v.

19 Spring Ridge Academy, an Arizona
corporation, Jean Courtney,
20 Suzanne Courtney, Brandon Courtney,
Erin Smith, Leslie Filsinger,
21 Justin Zych, Kate Deily,
Veronica Borges

22 Defendants.
23
24

Case No. CV-21-08013-PCT-SPL

**DECLARATION OF
EMMA JASMINE KERRIGAN**

25 I, Emma Jasmine Kerrigan, under penalty of perjury, hereby declare that I am a former
26 Spring Ridge Academy (“SRA”) student. If called upon to testify as a witness, I would
27 and could competently testify, under penalty of perjury, to the following facts:

28 ///

1. I am Emma Jasmine Kerrigan. I attended SRA from October 2013–June 26, 2015, the day the Supreme Court ruled on gay marriage.

Prior to attending SRA, I attended Trails Carolina in North Carolina, a Wilderness Program.

My parents hired educational consultant Jodi Dobson: <https://dobconsult.com/site>. My parents chose SRA because it was the only therapeutic boarding school that advertised any evidence-based healthcare (DBT/CBT therapy).

At breakfast, we were allowed two honey packets and one jam packet. One day, Jeannie Courtney “dropped in” on breakfast. She insisted that we be allowed only one honey packet or one jam packet. She stated that it was “too much sugar.” For a while afterwards, I cannot remember exactly how long, that was the new rule. While our allowance was always limited, Jeannie wanted it severely limited.

Jeannie Courtney required that we participate in Cross Fit every morning. I also chose to do gym and Running Club. Running Club was two times a week. Gym was two to three times a week, depending on if it was an “A” week or a “B” week. I completed a 5K at least twice a week. The amount of exercise I did was the start of my unhealthy relationship with my body and moderation in exercise.

Prior to SRA, I never had eating or exercise issues or body image issues. I developed disordered eating at SRA. I developed disordered exercise at SRA. To this day, I still struggle with these issues and how to act in moderation.

In Family Workshop 2, Brandon Courtney was talking about nicknames and teasing within the family. This included friendly banter. Brandon Courtney stated emphatically and unequivocally that all such behavior was completely inappropriate and abusive. My Dad pushed back.

My Dad did not agree with this position. He specifically challenged this “One-Size-Fits-All” model. He challenged the Victim Mentality. And my Dad stated that he believed that Resilience should be the goal.

This “One-Size-Fits-All” model is the basis for everything that SRA believes and

1 does. SRA has no awareness of or appreciation for different students, different cultures,
2 different ages, different values, different backgrounds, different histories, different
3 temperaments, and different mental health issues or challenges. Everyone is placed in the
4 same “box.”

5 10. While at SRA, I had a medical issue for which I saw an off-campus doctor. I do
6 not remember his name, and I do not think I was ever told. I also was not told anything
7 prior to the appointment, I was simply taken off campus. The doctor conducted a vaginal
8 exam. It turned out to be nothing. However, I was 15 years old, and an SRA chaperone
9 stayed in the room with me, behind a curtain. I was not offered a nurse. I could not speak
10 to the doctor privately. I was extremely uncomfortable. I was given no option to make
11 me comfortable or afford me privacy.

12 11. While at SRA, I was placed on birth control for menstrual cramps and acne. I had
13 to discuss my medical history with an SRA employee, Ceci Hammond. She was the
14 “head” of the medication room and was not there all the time. This person was not
15 qualified. This person was not a medical professional. This person had no duty of care.
16 This person was not bound by the Hippocratic Oath. I was not protected by the rules and
17 laws that should have protected me and my medical privacy. SRA hired unqualified
18 idiots who just followed orders, regardless of the legality or ethics.

19 12. When I was at home, at 12 years old, I was given privacy, no parent, alone with the
20 doctor to speak freely, one on one.

21 13. While at SRA, I was taken off anti-depressants without the proper involvement of
22 a properly licensed medical professional. This was a “joint” decision between me and my
23 SRA “therapist,” Anna Seno, Licensed Clinical Social Worker. In hindsight, I do not
24 believe that Anna Seno possessed the proper education, training, and licensing to
25 understand and address my particular challenges. The psychiatrist, whose name I do not
26 remember, rubber-stamped this decision.

27 14. From what I can remember, Jeannie Courtney did not think that girls should be on
28 mood-altering medication, so getting off of it was a good way to prove my “progress” in

1 the program. In other words, getting off medication demonstrated that SRA had “fixed”
2 me enough that I no longer needed medication.

3 15. Regarding my diagnosis of ADHD, my SRA teachers were “surveyed” and it was
4 “determined,” based on their unqualified feedback, that I did not have ADHD.

5 16. Academics at SRA are not rigorous or challenging. SRA does not prioritize
6 academics. I was bored. It was quite easy for me to do well, academically, at SRA. This
7 should not have served as the basis for concluding that I do not have ADHD.

8 17. Months later, the psychiatrist that SRA used stated, without further investigation,
9 “You don’t have ADHD because you’re doing well in school.”

10 18. Upon returning home, I visited a Princeton-trained psychiatrist. Within two
11 sessions, she administered the proper globally-recognized surveys and concluded that I
12 have ADHD and Bipolar type II. I was prescribed medication for both conditions. She
13 worked with me and my parents. I am still on the medication. This has been (and still is)
14 life-changing for me.

15 19. At SRA, my ADHD was dismissed based of teachers’ feedback. Teachers are not
16 qualified to make this judgment. They should not have been asked to do so. And they,
17 themselves, should not have done so. Mental health diagnoses cannot be outsourced to
18 teachers. I suffered needlessly at SRA.

19 20. At SRA, there are posters that they use. In particular, a main one that was
20 repeatedly referenced was, “Based On Results, You’ve Created Your Own Intention.”

21 21. Sometimes this is true. Sometimes this is not true. At SRA, it was used as a
22 blanket statement.

23 22. In reality, some occurrences are outside one’s control. In reality, there are
24 unintended consequences. For instance, if you light a candle and the apartment ends up
25 burning down, this alone is not proof that you intended to burn down the apartment. You
26 might simply enjoy candles.

27 23. If you go jogging and get raped, you didn’t intend to get raped. That is victim
28 blaming.

1 24. At SRA, we were constantly told that we had horrible intentions, even when that
2 was not true and there was no evidence to support this. Students were told that they
3 creating their own reality in situations that were outside their control, including sexual
4 assault and familial sexual abuse.

5 25. For example, some of my fellow cohort students and I were participating in a
6 Phase Four group. We thought it would be fun (and clever) to lampoon AA's "12 steps."
7 We created "12 Steps To Create ISIS at SRA," which included: stealing cookies from the
8 cafeteria; getting Cadillac Escalades; punching Brandon in the face; and stealing the
9 Quest bars (granola/protein bars we had as snacks). I do not remember the rest, but I'm
10 sure that they were all innocuous, except the one about Brandon.

11 26. At that time, for us, ISIS was synonymous with chaos. We weren't allowed to
12 watch the news. We did not understand the complexity and seriousness of what was
13 happening. How could we? We were not allowed to watch the news and we did not want
14 to use our precious little time talking with our parents, or on our visits, catching up on
15 global geopolitics.

16 27. All of us in that cohort were dropped a phase (a frequent punishment for
17 infractions, you lose all the privileges granted by the upper phase and have to "earn" it
18 back) and threatened with losing our graduations. This was in April/May 2015, I believe.
19 I was due to graduate in June. I did not know whether that was still going ahead.

20 28. We were sat on the floor of the All Purpose Room ("APR") with every staff
21 member, teacher, therapist, Community Life Director ("CLD"), and other student sitting
22 in chairs around us. Our backs were literally against the wall. We were shouted at by one
23 of the therapists, Kimberly Campbell, who told us that ISIS would love to come to SRA
24 and "gang rape" us all. I remember this. I remember how unprofessional and
25 uncomfortable it made me that a therapist, whose caseload consisted of those with more
26 "extreme" levels of trauma (actual gang rapes, molestation, parents dying, etc.), was
27 shouting this at a bunch of uninformed teenage girls.

28 29. We were told that ISIS wants to kill girls like us. We were told that making things

1 like the bastardized 12 Steps would lead to that. I am fairly confident that some version
2 of “based on results, you have created your intention” was said.

3 30. I was singled out. My therapist was “extremely disappointed” in me. Brandon
4 was “extremely disappointed” in me, especially, as he and I occasionally talked about
5 liking the Foo Fighters and their new-at-the-time album, *Sonic Highways*.

6 31. I do not remember exactly how we had to earn back our Phase Four privileges, but
7 I remember Jeannie saying how disappointed she was that some of us did not personally
8 apologize to her. I was one of the ones who did not. Eventually I got back to Phase Four
9 and graduated as previously scheduled. I think it took about two weeks.

10 32. During the Action workshop, we had to come up with a Name Tag that represented
11 the negative things about ourselves. Whatever we proposed had to be “workshopped” by
12 Jeannie Courtney and the other students in the workshop. In other words, our proposal
13 had to be “approved” as being negative enough.

14 33. The first time, I was kicked out of the Action workshop during the Giver/Taker
15 exercise. My friends were in Action with me. There were also some SRA staff people
16 and Upper Phase students staffing Action, as well as an SRA graduate who had returned
17 to staff Action.

18 34. The Giver/Taker exercise was a nebulous concept. Nothing was explained or
19 defined. And a bunch of students got kicked out of Action during the Giver/Taker
20 exercise.

21 35. You had to state whether you thought you were a “Giver” or a “Taker.” The other
22 students when voted. If the student liked you, the student voted “Giver.” If the student
23 didn’t like you, the student voted “Taker.” In reality, in order to “pass,” you had to
24 accurately assess how popular you were.

25 36. I remember that we had to indicate whether we were a “Giver” or a “Taker” in two
26 contexts: 1) the workshop; and 2) the school.

27 37. I alleged that I was a “Giver.” I felt very vulnerable. When the vote was taken,
28 the “Takers” won. There was no discussion.

38. Jeannie Courtney then pronounced that I was not “self-aware.” In fact, she stated that everyone who was deemed a “Taker” was not “self-aware.” She opined that there is a difference between people’s views of themselves and how they are perceived by others. She challenged me to investigate how I could align my self-perception with the group perception.

39. Then I was publicly dismissed. I would have to repeat Action until I completed it successfully, as defined by Jeannie Courtney. Otherwise, I could not graduate.

40. The second time, I was so proud that I came up with a Name Tag that was popularly approved as being sufficiently negative. My approved Name Tag was, “Not Good Enough.” I was proud that it didn’t get changed. I was so proud that it was so negative.

41. During the Stretches, I was assigned the Wizard from the *Wizard of Oz*. I had to dress up as the Wizard. I was told by Jeannie Courtney that this was because I was entertaining and charming to others, but behind my “mask,” I was scared.

42. I was told that I lived behind a facade of making people laugh. (However, I enjoy making people laugh. I liked this about myself.)

43. I was also labeled a “liar” because of the falsehoods I told to my parents, the same types of falsehoods that are common to all teenagers. When I was 23 years old, I confessed this to my parents. And they assured me that the “transgressions” I was confessing to were the exact same “transgressions” they had committed as teenagers.

44. I had to dance to the song “He’s The Wizard” from *The Wiz*. As required, I danced by myself in front of the room. I had fun. I was 15. Everyone laughed.

45. Later, I was required to dance to Christina Aguilera’s cover song called “Reflection,” originally from *Mulan*. It was slow and emotional. I was up there by myself. I was really uncomfortable. There is a line in the song that says, “I will never pass for a perfect bride or a perfect daughter.” The perfect daughter line was particularly upsetting, as that’s what my Name Tag was referring to—that I was never going to be enough for my parents.

1 46. According to Jeannie Courtney, I wasn't doing well enough during the dance. She
2 stopped the song. Then she faced me towards the wall. She told me to look at my
3 shadow. She was picking up my arms and moving them. She told me to dance with my
4 shadow. She told me to connect to myself and stop performing for everyone else.

5 47. Finally Jeannie Courtney backed off. I "danced with my shadow." Then I got to
6 go in the back corner and eat a sandwich for dinner.

7 48. To this day, I cannot watch *Mulan*.

8 49. SRA had bizarre punishments called "Restrictions." A student might be put on
9 "Mirror Restriction" or "Book Restriction" or "iPod Restriction." Once a whole bedroom
10 of students was put on "Toilet Restriction" because one of the students was throwing up
11 after meals. She had an eating disorder. This was SRA's solution. She couldn't go into
12 the toilet room. And neither could any of her roommates. Regrettably, they all still
13 needed to urinate and defecate.

14 50. When I moved to Phase Four, I went home for a visit prior to Commitment. I was
15 told to return with a bag or backpack. I knew why, because I had observed other Phase
16 Four students. Upon returning to SRA, the backpack was filled with five pounds of
17 playground-type sand. We had to keep it with us at all times.

18 51. Notebooks were also kept in the backpack, as well as a string of beads. We were
19 supposed to write our values in the notebook and on the beads.

20 52. During Commitment, there was a daily meeting with the other girls in
21 Commitment. We had to discuss our values. We had to journal about how we were
22 living. Our strings of beads were hanging from our bags or backpacks. Many students
23 would fiddle with the beads. We joked about them being a rosary. We were told to stop
24 disrespecting "the process." By this time, we knew what SRA wanted to hear, as we
25 chatted about our values. This went on for about one month. The sandbag went
26 everywhere with us, even to bed. The students who traveled home during Commitment
27 took their sandbag with them.

28 53. One evening, we were blindfolded and loaded into a van. We drove for 20 to 30

1 minutes to the middle of nowhere. It was the desert. The only light was moonlight.

2 54. One by one, we were taken from the van, blindfold then removed. We were
3 pointed in different directions at different intervals. A hole was made in the bag before
4 we started walking.

5 55. Apparently, the sand represented our burdens that we were carrying around.
6 Shame was one of our burdens. We were to leave our sand and our burdens on the desert
7 floor as we walked.

8 56. In reality, I was scared. It was dark. I could not see. There were rocks. There
9 were spiky and pointy plants. I was sure there were snakes. There were likely all manner
10 of desert animals. I was concerned about what would happen if I fell or if someone else
11 fell.

12 57. The exercise was dangerous and frightening. Surely there was a better metaphor
13 that could have been used to make whatever point they were trying to make.

14 58. After the exercise, we got s'mores.

15 59. Ten years after leaving SRA, I still have nightmares. Recently during a trip home
16 to my childhood house; I stayed there for two nights. Both nights, I had nightmares about
17 being sent back to SRA.

18 60. I can't get rid of the nightmares, and my experience was mostly the "standard"
19 one, save the 12 Steps incident. Most girls had the same experience as me, at a minimum.

20 61. It's been harder than I thought to get over what happened to me at SRA. For so
21 long, I told myself I was fine. But I was not fine.

22 62. I'm grateful for my own personal drive to succeed, to do well *despite* SRA, not
23 because of it.

24 63. When I returned home after SRA, I had to repeat my junior year of high school
25 because of the inadequate and substandard academics at SRA. I needed a proper
26 education to take the SATs and continue on at a good college.

27 64. I completed a Bachelors Degree in Law in the UK, graduating with a First
28 (equivalent of a 4.0 GPA, I think). I got into a world-renowned university for my Masters

1 Degree in International Commercial Law, which I obtained with Merit.

2 65. I work in an extremely competitive and challenging field now, reliant heavily on
3 having superb interpersonal skills. I am good at my job. I am successful. SRA made it
4 harder to be successful in this context. I am succeeding despite.

5 66. I had to relearn how to be social. I had to unlearn SRA's tattling through FYIs that
6 gained us advantage through betrayal.

7 67. Everything I experienced at SRA hampered me. I have worked very hard to move
8 on. I am pissed off that SRA's abuse still has a hold over me. Those years, 14 to 16, are
9 pivotal years of development in a young girl's life. They were stripped from me.

10 68. SRA attempted to ingrain their value system in me. No one and nothing should
11 have that power.

12
13 Respectfully Submitted,

14
15 February 9, 2023

DocuSigned by:
Emma Jasmine Kerrigan
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Emma Jasmine Kerrigan