

1 Mara C. Smith Allard (*pro hac vice*)
Allard Smith APLC
2 5857 Owens Avenue, Suite 300
Carlsbad, CA 92008
3 SBN California 159294
Facsimile: (760) 683-6307
4 Email: mara@allardsmith.com
Telephone: (760) 448-6189

5
6 *Attorney for Plaintiff Sweidy*

7 Kimberly R. Sweidy (*pro hac vice*)
Kimberly R. Sweidy, Attorney at Law
8 3478 Rambow Drive
Palo Alto, CA 94306-3638
9 SBN California 120261
Facsimile: (650) 899-3336
10 Email: krsweidy@yahoo.com
Telephone: (650) 856-8595

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, and
22 Does 1 through 20

23 Defendants.
24

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

**DECLARATION OF
MAISY BROOKS MOREHEAD,
FORMERLY KNOWN AS
MALLORY LECONTE MOREHEAD**

25 I, Maisy Brooks Morehead, formerly known as Mallory LeConte Morehead, under
26 penalty of perjury, hereby declare that I am a former Spring Ridge Academy (“SRA”)
27 student. If called upon to testify as a witness, I would and could competently testify,
28 under penalty of perjury, to the following facts:

1. I am Maisy Brooks Morehead. I attended SRA from March 1, 2015–May 20, 2016. I graduated the therapeutic program as well as the academic program and left in good standing with the school.

2. Prior to attending SRA, I attended Pacific Quest in Hawaii, a Wilderness Program. I was involuntarily and unexpectedly transported to Pacific Quest from Connecticut. This is referred to as “gooning” or being “gooned.”

3. Prior to attending Pacific Quest and SRA, my parents hired educational consultant Jeremy McGeorge from the Bertram Group.

<https://thebertramgroup.com/about-us/meet-our-team/partners/jeremy-mcgeorge>

4. To my knowledge, my parents paid the educational consultant \$5,000. The total cost for my tuition, travel, and expenses at Pacific Quest and SRA was over \$200,000.00.

5. Before my involuntary transportation to Pacific Quest, Jeremy contacted me by text. He said that my mother was concerned about me, and he asked to meet me for coffee to discuss my future. I was skeptical of this stranger and thought his tone was inappropriate. I asked him not to contact me anymore and declined to meet for coffee.

6. I spoke to Jeremy once on the phone while I was at Pacific Quest. The phone call was facilitated by my Pacific Quest therapist, Tom Jameson.

7. Tom and I had a poor relationship. He told me that therapy with me was “like nine rounds with Mike Tyson.” He spent most of our therapy sessions laughing at me and dismissing any concerns I had for my own well-being.

8. Tom once told me that he wanted to diagnose me with Oppositional Defiance Disorder (“ODD”), but that I was too young for the diagnosis. The diagnosis was completely inaccurate, particularly because my “defiance” was a result of situational stress. Additionally, ODD is customarily diagnosed in children (not that I have ODD).

9. While speaking to Jeremy on the phone, I once again found his tone inappropriate. He chastised me for rejecting his previous request to meet. He further chastised me for my “poor behavior” at Pacific Quest.

10. On a later date, Jeremy instructed Pacific Quest staff members to provide me with

1 printed promotional materials for three different schools, one of which was SRA. I don't
2 remember the names of the other two schools.

3 11. I immediately said "no" to SRA because the promotional materials showed the
4 girls all wearing the same plaid skirts/uniforms, and that type of conformity was not
5 appropriate for my personality, gender identity, and values. It was an illusion of choice. I
6 was sent to SRA.

7 12. Before I knew that I was being sent to SRA, Jeremy told me that I was being sent
8 to an aftercare facility because of my behavior at Pacific Quest.

9 13. After the conversation with Jeremy and my time at Pacific Quest, I understood
10 enough about the Troubled Teen Industry to know that I would not be evaluated fairly. In
11 order to progress through the program faster, I behaved poorly at first. I was deliberately
12 rude, argumentative, and obstinate so that when I acted like myself, I would be considered
13 "improved."

14 14. I stopped acting poorly about three months into my stay at SRA. I openly gave
15 credit to SRA for my fake improvements. I disliked behaving manipulatively, but I was
16 desperate to gain the privileges that were reserved for students in Phase 3 and Phase 4.

17 15. In my many interactions with Jeannie Courtney, it was obvious that she had a
18 strong preference for certain students. Her "favorites" were typically compliant with the
19 program and were close to 18 years of age. Her "punching bags" were usually between 14
20 to 15, and Jeannie subjected them to the most brutal and baseless "feedback."

21 Additionally, Jeannie tended to ask them to leave trainings more often, which resulted in
22 longer stays at SRA. I suspect that Jeannie elevated the older students in order to get
23 younger students to try to aspire to them to leave sooner, but the younger students were
24 rarely allowed to graduate as quickly.

25 16. For almost five months, Brandon Courtney was my therapist. He was completely
26 unqualified to be anyone's therapist. We did a lot of "Group Therapy" with Leslie
27 Filsinger's caseload. This was how Leslie could pretend to "supervise" Brandon, who
28 was unlicensed (and, I understand, without a degree of any kind in psychology).

1 17. Brandon established common ground with me by talking about music. I was open
2 to more meaningful discussions in therapy with Brandon, but other topics tended to
3 frustrate both of us. Nothing productive happened with Brandon Courtney in “therapy.”

4 18. In therapy, I struggled to articulate and Brandon struggled to understand my
5 relationship with my parents. He was always trying to convince me that I was the
6 problem, even though both my parents were verbally and emotionally abusive, as well as
7 occasionally physically abusive. Brandon talked about his wife and kids all the time.
8 That always happened, every single therapy session I had with him. It was his only
9 attempt to relate to me.

10 19. During one therapy session, sometime in late March 2015, Brandon started one of
11 his anecdotes about his family. It was a particularly inappropriate anecdote about how he
12 wants to cheat on his wife, and only doesn’t succumb to his worst impulses out of familial
13 obligation. He argued that this is relevant to my duty to preserve my relationship with my
14 parents by respecting them despite their abuse. I pushed back at his example, but he
15 doubled down on it and insisted that we discuss, for at least 10 minutes, how cheating on
16 Suzie would impact their marriage, children, and careers. I was disturbed to know such
17 intimate details about someone who was supposed to act as a therapist to me (and because
18 I saw and spoke to Suzie Courtney almost daily).

19 20. “Therapy” with Brandon consisted of the following:

- 20 1) Listening to anecdotes about his mother (Jeannie Courtney), wife (Suzanne
21 Courtney), and/or his five children, all of whom I had met. He and Suzanne
22 brought their kids on campus five or six times while I was there. Brandon told me
23 the story of when he found out they were having triplets. He was so worried about
24 how they would handle triplets. Then they found out that one might not make it.
25 It was such a relief that all three pulled through. He never worried again about
26 having triplets; and
27 2) Obsessing over the plot or messages of the book *Anatomy of Peace*; and
28 3) Talking about “The Box” metaphor. “The Box” is when you put someone in a

1 box—seeing them as an object, an obstacle, or a vehicle, rather than a human
2 being.

3 21. These 3 “modes” were all Brandon had to offer, and he rarely, if ever, deviated
4 from them. This is not an original thought of mine, but a joke that someone else in
5 Brandon’s caseload made to me sometime in late March 2015. After that point, I actively
6 searched for different therapeutic methods that he employed in the individual therapy
7 setting, but I never identified one.

8 22. “Therapy” with Brandon had no value. He diverted every discussion about my
9 struggles and feelings into a discussion about himself. I often tried to argue with his
10 personal anecdotes, but he would respond to that by talking about himself more to clarify
11 the point he was trying to make. It was frustrating, unproductive, and exhausting.

12 23. My time at SRA forced me to confront how messy the lives of adults could be.
13 Before SRA, I had never interacted with adults who treated me as such a direct result of
14 their own life experiences and baggage. The whole program was built on the Courtney
15 family’s values. I didn’t share their values.

16 24. During my second individual therapy session with Brandon, I told him that one
17 reason I hated SRA is that I didn’t have access to music that I like. Students could only
18 play SRA-approved songs from the SRA iTunes account. Brandon told me that he would
19 let me choose one song at the beginning of each therapy session, and he would play it on
20 YouTube for me. I interpreted this gesture as an attempt to establish a positive
21 association with therapy or to establish trust. The following week, I put on a song of my
22 choice. When it was over, Brandon insulted the song and told me he was surprised that
23 my taste in music was so generic. I never asked him to put on a song after that.

24 25. When Brandon was my therapist, his caseload combined with Leslie’s caseload
25 into one big group. During these groups, Leslie would often take the reins and contradict
26 Brandon. I don’t think it was her intention to undermine his authority, but it made his
27 ineptitude as a “therapist” more apparent than ever. I did not respect Brandon as a
28 therapist, and the other members of his caseload expressed similar sentiments.

26. One of the frequent tactics utilized by most SRA therapists was called a “Feelings Reduction.” This was a “guided meditation” of one student, while others in the group observed. The lights were turned off. The target student sat with their eyes closed, facing an empty chair. The therapist spoke in low tones and instructed observers to face away from the student and position one shoulder towards them. This position was supposed to prevent us from “absorbing the negativity.” The therapist told us to limit our emotional outbursts and to comfort one another, if necessary, by placing a hand on another student’s shoulder until it felt warm to the touch.

27. We were told that therapy in Arizona is confidential according to HIPAA. We were warned to remember that everything that happens in these groups is confidential if we were ever to discuss or write about this after leaving SRA.

28. An example of “Feelings Reduction” exercise is the student discussing an ex-boyfriend. The student pretends that the ex-boyfriend is sitting in the empty chair facing the student.

29. The student describes what the student thinks or feels are the problems in the relationship to the ex-boyfriend for ten or so minutes. The therapist would continue to prompt the student. The topic had clearly already been discussed in individual therapy.

30. After this monologue, the therapist prompts the student to engage a verbal ritual.

31. Therapist: “I’m angry.” Student repeats: “I’m angry.” Therapist: “I have a right to be angry.” Student repeats: “I have a right to be angry.” Therapist: “You shamed me.”

Student repeats: “You shamed me.” Therapist: “And I give you back your shame.”

Student repeats: “And I give you back your shame.”

32. Brandon, in particular, would repeat the last line over and over again.

33. Often there was no evidence of how or if the target had shamed the person. This was simply a bizarre ritual with no reference to reality or facts.

34. Oddly, we were repeatedly advised in communications, including therapy, to only use “I” statements. This “Shame Litany” clearly contradicted the “I Rule.”

35. I remember one instance of “group therapy” with Kim Campbell that involved four

caseloads or nearly half of the entire student body. Only one student was engaged in their own “feelings reduction,” while the rest of the students faced away and listened. It was many instances where “group therapy” wasn't really “group therapy,” but instead just a waste of time.

36. We were forced to participate in “Intensives.” Intensives lasted two and a half to three days every few months. These involved every student and every therapist. One was about “Love Addiction.” One was about “Sex Education.” The Sex Education Intensive was rife with misinformation. While claiming this was “intensive therapy,” it was not. The students were just sitting and listening (while missing school, which was canceled). There was no therapy, just lecturing on topics that were useless or misinformed. I think this was simply SRA’s way of alleging that there was way more “therapy” being provided than was actually true.

37. Sex Education curriculum was never offered/provided at SRA, outside of the one Sex Education intensive.

38. Here is an example of how Sexually Transmitted Diseases (“STDs”) were “taught” in “group therapy.” It was announced that one student has an STD. All the students went around shaking hands. By the end of the exercise, it was announced that “Everyone now has the STD.” The entire exercise was shame based. This is particularly bizarre considering the above-described Feelings Reduction exercise that involves giving various people (none of whom is present) in your life “back their shame.”

39. Kara Nealon was a past SRA student who became a Community Life Director (“CLD”). In that way, she mirrors Kate Deily. Kara was a prolific abuser during my time at Spring Ridge; she seemed to enjoy leveraging power over me and other members of her caseload. Kara Nealon admitted to having addiction problems. Kara Nealon would call us “brats” and “nightmares.” Kara also said that, “In sending students to SRA, every parent agrees that if you pull yourselves at 18, your parents will not let you live with them or give you any financial support.” I later learned from my parents that this was a lie.

40. Kara once threatened to drop a student for supporting a football team she didn’t

1 like.

2 41. A common exercise was “Hot Seat” groups, where one or more students sat in the
3 middle of the others, received scathing “feedback” from the facilitator, and then received
4 “feedback” from the rest of the students in attendance. Kara and Jeannie Courtney started
5 them frequently. Jeannie's “Hot Seat” groups typically involved the entire student body,
6 whereas Kara’s “Hot Seat” groups were sometimes just her caseload.

7 42. My first exposure to Jeannie Courtney was when she ran a “Hot Seat” group
8 targeting the students in Susanne Costello’s caseload. It made a particular impression on
9 me because I was supposed to join Susanne’s caseload in June of 2015, but that plan was
10 later abandoned.

11 43. Jeannie claimed that there were a whole bunch of vague accusations about the
12 students being “negative” and “a mess.” Jeannie asked the rest of the students to give
13 feedback to the members of Susanne's caseload about their behavior.

14 44. A few students raised their hands and made statements such as, “You’re so
15 negative” and “You’re not approachable” and “You’re not ‘out there in the community.’”

16 45. Jeannie got increasingly frustrated at each student who gave feedback that was not
17 specific. It seemed like no one had anything concrete that these students had done, and
18 Jeannie’s anger towards Susanne’s caseload grew into anger towards the entire
19 community for not “giving good feedback.” In the end, Jeannie still admonished
20 Susanne’s caseload despite a complete lack of evidence. They were assigned indefinite
21 “caseload bonding,” which means they were forbidden from speaking to any student who
22 is not in their caseload. The caseload bonding lasted for about six weeks.

23 46. Jeannie’s first “Hot Seat” group after I arrived at SRA made me realize that
24 students were expected to publicly berate and betray other students and that an absence of
25 evidence would not necessarily yield an absence of punishment. These groups were
26 entirely shame-based, and students who gave particularly scathing feedback were often
27 praised and rewarded. They were a frequent occurrence in Kara’s caseload.

28 47. One at least three occasions, the campus had Hot Seat groups for students who had

1 run away from SRA.

2 48. On one occasion, Kara held a campus-wide Hot Seat group for students who had
3 given themselves stick-and-poke tattoos with a stolen thumbtack. This one was
4 particularly embarrassing for the students involved because Kara announced the type and
5 location of the students' tattoos, including a poorly-drawn dollar sign on one student's
6 butt cheek. Kara also shouted at the students that they would all be getting tested for HIV
7 and Hepatitis and referred to them, several times, as disgusting and filthy. It felt
8 unnecessary that the entire student body found out about this.

9 49. On one occasion, three empty bags of chocolate chips were found in a trashcan.
10 The entire campus was threatened with punishment if no one came forward. No one
11 came forward, and the entire student body was put on "dessert restriction" indefinitely. It
12 lasted for six weeks.

13 50. Another punishment was "Caseload Bonding" and "Upper Phase Bonding." This
14 limited the people that a student could speak to: either the student's caseload or the Upper
15 Phase students (when the student was usually in Phase One).

16 51. On one occasion, eight students were dropped to Phase One and put on Phase Four
17 Bonding. This meant that they could only speak to students on Phase Four, including me.
18 There were only seven students on Phase Four at the time, which meant that the others
19 and I were burdened with being the only social outlet for these students. It was a lot of
20 work, and we had to neglect our other friendships to keep them company.

21 52. The students on Phase Four hated this as much as the students being punished, but
22 SRA's culture was very demanding of students on Phase Four. There was immense
23 pressure to put the community's needs above our own to avoid being dropped or
24 punished.

25 53. The punishments were arbitrary. If a student was perceived as independent, the
26 student might be blindfolded and led around by other students to force the student to ask
27 for help. This was called the "Ask For Help" assignment, which fostered learned
28 helplessness. One student received a "Sit Like A Lady" assignment, because she was

1 “trashy” (according to Kara Nealon).

2 54. Upon arriving at SRA, Phase One students were not allowed to speak to each
3 other. I couldn’t speak to my roommate when I arrived at SRA because we were both on
4 Phase One. When I complained about this to Brandon Courtney, he just laughed and said,
5 “Guess you’re going to need to get to Phase Two.”

6 55. During workshops, I was subjected to the Lifeboat Exercise, where we must
7 choose who lives and who dies. We must also argue for why we should live. I was
8 subjected to the Trust Exercise, where we are forced to walk up to people, including
9 people we don’t know, and state whether or not we trust them.

10 56. During the “Action” workshop, a “Stretch” was when students would dress up, put
11 on makeup, and dance to two songs assigned by Jeannie. Observers were expected to sit
12 down until they believed the student was being “authentic” in their Stretch. There were
13 no guidelines for authenticity, but standing up was essentially a vote of approval.

14 57. During my stretch, about half of the students didn’t stand up. Jeannie was furious
15 with those students, and she told them that they “must be blind” not to see my
16 genuineness and femininity. She told them that they must be jealous of me. I was
17 humiliated. I didn’t feel “authentic,” but I knew that obtaining Phase Four privileges was
18 predicated on Jeannie’s approval, so I didn’t argue.

19 58. This was not the only occasion when Jeannie verbally attacked students when their
20 perception of “authenticity” did not match hers. During one student’s stretch, everyone
21 stood up to signal approval. When it was over, she called us all foolish and gullible for
22 “buying it.” The student was asked to leave the training, probably prolonging her stay at
23 SRA, despite a near-unanimous vote of confidence.

24 59. These events reinforced the depressing reality that, to graduate SRA, students had
25 to submit to Jeannie’s vague definition of “authenticity.” This meant that students could
26 be held back or progressed forward for seemingly random reasons. There was not a
27 cohesive list of clinical criteria that a student could meet to graduate SRA’s program.

28 60. Dr. Ted Whitworth was my science teacher for one semester in 2015. He did not

1 do very much teaching, and I remember watching House, M.D. for every class for the first
2 month I was enrolled.

3 61. Eventually, Joe Gubbins, the principal before Justin Zych, told Dr. Ted to stop
4 having us just watch TV, and Dr. Ted complained about it to the students for an entire
5 class period (instead of teaching).

6 62. Dr. Ted also told stories of (and complained about) the many times Mr. Gubbins
7 had reprimanded him in writing. Dr. Ted said his file in Mr. Gubbin's drawer was visibly
8 significantly thicker than anyone else's.

9 63. Dr. Ted was very crude to students. I don't remember anything explicitly sexual
10 that he ever said, but he took many jokes way too far. On one occasion, he announced to
11 the class that he was going to leave to use the restroom, and not to "self harm yourselves"
12 with the exacto knives in his cabinet (he thought the redundancy was hilarious). After an
13 awkward pause where he was the only one laughing, he added that it would be a lot of
14 annoying paperwork if one of us committed suicide during his class.

15 64. The class I took with Ted Whitworth was environmental science. For more than
16 half of the semester, we worked on a presentation of "anything that impacts the
17 environment." The class floated many different topics to do their projects on, and Dr.
18 Ted didn't say "no" to anything.

19 65. One student did their environment project on Pit Bulls. Another student did their
20 environment project on Justin Bieber. The assignment was a complete joke and taught us
21 nothing about the environment. However, the project took more than half of the
22 semester.

23 66. Dr. Ted was surprisingly well-liked among the students, including myself. I think
24 most of it was because he was the only person who realized that SRA was stupid, and he
25 was vocal about that.

26 67. Dr. Ted said that addiction problems ruined his career and that's how he ended up
27 at SRA. He wasn't the only SRA staff person who shared with the students about their
28 addiction problems. It was really inappropriate.

68. He bragged that Kelly Rudolf got sober the week after him. Kelly Rudolf was very good friends with Dr. Ted. And Kelly Rudolf was inappropriately close to several students.

69. If a student ran away, self-harmed or was a suicide risk, the student was put “On Safety.” The student had to wear slippers and a uniform at all times. The student had to move their mattress into the library at night and sleep there. The student was watched while using the bathroom and showering. At all times, the student had to be within five feet of a staff member.

70. Some students were “On Safety” for weeks. Kelly Rudolf took this as an opportunity to hang out with my roommate, with whom I was close. Kelly Rudolf was watching my roommate wipe after using the toilet. Kelly Rudolf said to my roommate, “Did you just wipe back to front?” Thereafter, they continued to joke about this. It was a really weird relationship. As I said, Kelly Rudolf had inappropriately close relationships with students.

71. On my last day of SRA, I was allowed to goof off on campus because my parents didn’t get there until right before my graduation ceremony started. I went down to Dr. Ted’s classroom and had lunch alone with him. Every time I was alone with Dr. Ted, we talked shit about everyone and everything pertaining to SRA (rules, students, staff, food, everything you can think of). It started that way on my last day, but slowly grew flirtatious.

72. I can’t remember anything he said that was inappropriate. When he told me that I looked beautiful for my graduation, I remember having almost a fight or flight reaction because he was looking at me almost with longing. I was terrified. I thought I was going to be assaulted. He did not touch me or make a move on me, but I remember feeling frightened and violated. I was relieved that I would never have to see him again.

73. I was not surprised when I saw the screenshots of creepy messages from Dr. Ted that Taylor Graboyes posted on Facebook about two years ago.

74. Leslie Filsinger became my therapist on July 23, 2015. She actually conducted

1 therapy with me. But the bar Brandon set was extremely low, so I'm not certain I was
2 thinking clearly and objectively. I loved Leslie because she wasn't Brandon.

3 75. Heidi Reeves was my Academic Advisor after Justin Zych. She was also the Art
4 Teacher.

5 76. I frequently had lunch with Heidi to discuss academics, but conversations were
6 always derailed by her bizarre fixations. She would ramble on about government
7 conspiracies, including Chemtrails and Fluoride in the water supply. She frequently told
8 me about her dreams and her interpretation of those dreams, which she said were from
9 God. It was nonsensical, and I was frustrated that I didn't have anyone available to me
10 who could sustain a conversation about my academics.

11 77. One of my three roommates was withdrawn and secretive. We couldn't reach her.
12 A campus-wide meeting was called. She was required to disclose in front of everyone
13 that her parents had pulled her from the program. She was leaving in a few days.

14 78. Karen Nealon tore into her. Brandon was present and said nothing. (Ownership of
15 SRA transferred from Jeannie to Brandon and Suzanne while I was enrolled at SRA.)
16 Karen Nealon said to the girl that she (the girl) was going home because she had
17 manipulated and lied and that she wanted to teach others to do that. Karen Nealon went
18 on to say that Karen was going to be watching the girl until she left.

19 79. Despite the fact that Brandon was not qualified to be anyone's therapist, Brandon
20 and I were thick as thieves. I had lunch with him once or twice a week. We would chat
21 and giggle. We would hang out in his office. After Jeannie sold the school to him, he
22 would insult Jeannie to me and criticize her decisions. Years later, I realize just how
23 inappropriate this all was.

24 80. In my last semester at SRA, I had a free period. I usually worked out with the PE
25 teacher, Kyleen Wolfson, but sometimes I would go to Brandon's office and hang out
26 with him instead.

27 81. I did Family Workshops 1 and 2 with Brandon and Leslie. I also did Group
28 Therapy with them.

1 82. Leslie, as Clinical Director, should have taken responsibility for Brandon. She
2 didn't. Leslie used a lot hippie-type "therapy" that didn't connect with me: hypnosis,
3 aromatherapy, TRE. TRE is Trauma Releasing Exercises, created by Dr. David Berceli.
4 This was the most dubious, nonsensical hogwash I've ever encountered. (Jeannie
5 Courtney was also a proponent of TRE.)

6 83. TRE was conducted in the following manner. Students lay on their backs in the
7 All Purpose Room ("APR"). Each student puts their own feet together in a diamond
8 shape. Then the student raises their pelvis off the ground, holding the position until their
9 legs start to shake. Allegedly, the legs shaking is the trauma being released. The student
10 can now put their pelvis back on the ground. People would draw conclusions from the
11 "shaking." Typically, the 14 to 15 year olds were more vulnerable and would ascribe
12 "specific trauma" to the shaking.

13 84. Students needed their therapist's permission to do TRE because, allegedly, if TRE
14 was done on their own, they could re-traumatize themselves. Students did this on a
15 campus-wide basis, not in group therapy.

16 85. Brandon claimed that certain educational consultants would only recommend SRA
17 if the student could be in Susanne Costello's caseload. She tended to have the richest
18 parents. Ms. Sweidy informs me that, according to the Arizona Board of Behavioral
19 Health Examiners, Susanne Costello was not a licensed therapist. Just another way for
20 educational consultants to scam rich people into believing that they are receiving special
21 treatment.

22 86. Susanne and Leslie were sister caseloads, so we did a lot together.

23 87. Jody Gratz, my History Teacher at SRA, loved the students. Her room was nicely
24 decorated and very inviting. She was a safe harbor in the sea of insanity that was SRA.
25 She got fired for "bad boundaries." She bought a student an adorable white sundress
26 because she wanted to encourage the student to dress more appropriately. She bought the
27 sundress as an example of how a person could look classy, modest, and attractive, all at
28 the same time.

1 88. She was summarily fired for “bad boundaries” and escorted off campus. She was
2 not allowed to remove her belongings. They were packed up by other staff members to
3 be sent to her. She was treated like a criminal. The students were traumatized watching
4 this. Ms. Gratz was told that if she ever came back to campus, they would make sure that
5 her teaching license was revoked. Ms. Gratz responded that if they ever attempted to
6 threaten her livelihood again, she would absolutely spill the beans on SRA.

7 89. The entire culture of SRA felt abusive. We had a litany of absurd and complicated
8 rules, often random, hanging over their heads. We were expected to dish out “feedback”
9 that harmed others. We had to be cruel. We had to police other students.

10 90. We endured the boredom and tedium of living at SRA. We feared all these bizarre
11 punishments.

12 91. They told us not to run away. They said, “We will send dogs after you. There are
13 meth heads and rattle snakes out there and you will die.”

14 92. I watched Brandon and Justin kill a rattlesnake with shovels immediately outside
15 the main academic building.

16 93. Brandon kept the skins of snakes that he killed on campus. He had a rattlesnake
17 skin in his desk, and he said that he wanted to turn it into a belt. That was during one of
18 my individual therapy sessions with him.

19 94. Brandon would ask me to keep an eye on other students. I was asked to help with
20 other students, including their psychological problems and academic problems. I couldn’t
21 refuse because I was a Phase Four. The threat of being dropped a phase or having my
22 diploma pulled loomed large.

23 95. I had gone back and forth with Kara Nealon that I would pull myself at 18. Kara
24 threatened to remove me as a staffer of Action, which I needed to do to keep on Jeannie’s
25 good side. And Kara made me promise not to pull myself at 18.

26 96. Leslie was very clever. I was on a home visit when I turned 18. I had four classes
27 left, and I wanted to graduate in May. Leslie agreed to ensure that I would graduate a
28 month before I probably should have, as long as all my work was completed. I was

1 scared those last two months to insure my graduation.

2 97. I had already accepted a seasonal position at Yellowstone National Park to start in
3 July. My father said that they will probably rescind the offer if you don't have a high
4 school diploma. Leslie echoed it.

5 98. When I came back, the first group therapy session we had with Leslie, she was so
6 happy that the majority her caseload had stayed, despite turning 18. That wasn't true for
7 other caseloads. She referenced another student in her caseload who turned 18 months
8 before and had not returned, saying, "See, I'm a good therapist."

9 99. Students were afraid to leave SRA before obtaining their diploma because they did
10 not trust SRA to accurately report credits earned to another school. Some students were
11 able to endure the program's abuse in order to receive their diploma, while others broke
12 from the trauma and abuse and chose to walk away. This is nothing to be proud of. This
13 is not proof that anyone was a "good therapist."

14 100. I was so scared that I thought if I even asked any staff member about getting my
15 diploma, my visit home at 18 would have been pulled and my diploma would have been
16 withheld. SRA and its employees were not safe.

17 101. I graduated in May of 2016.

18 102. I felt fear and anxiety surrounding SRA for a long time. I had a friend enrolled
19 there until December of 2016, and I convinced myself that my fears were around the
20 safety of my friend. However, when my friend finally graduated, my fears did not
21 subside. The 15 months of power and control exerted unfairly by SRA affected my
22 thoughts, actions, and wellbeing for years after leaving.

23 103. I had nightmares, particularly around Jeannie and workshops and Kara Nealon. I
24 was diagnosed with PTSD in 2021. I have never been able to find a therapist that I
25 trusted to approach these experiences with.

26 104. Regarding college, I threw the baby out with the bath water as result of the
27 intensity of Justin, Brandon and my parents. They all insisted that I must attend college.
28 However, I did not trust their advice after they unfairly held me at SRA for so long. I put

1 off college.

2 105. Eventually, I found my way back to higher education. First, I completed
3 Community College and now I'm a Junior at a University.

4 106. Everything about SRA was abusive and toxic: the rigid structure; the fear; the
5 arbitrary punishments; the dampening of individuality; the abuse of power; the pressure to
6 dole out and advocate for the SRA agenda. The entire conception of SRA was the
7 problem.

8 107. It took me years to forgive myself. They used us to police each other and spread
9 their twisted agenda of what to do with teenagers who act out. I still have nightmares.

10
11 Respectfully Submitted,

12
13 February 13, 2023

DocuSigned by:

17167F5C069D482...
Maisy Brooks Morehead