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CAUSE NO. 2021542885

JANE DOE, INDIVIDUALLY AND AS	§	IN THE _____ DISTRICT COURT
NEXT FRIEND OF JOHN DOE, A	§	
MINOR CHILD,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	OF
	§	
	§	
JASON PAUL WHITE, DDS	§	
<i>Defendant.</i>	§	LUBBOCK COUNTY, TEXAS

**PLAINTIFFS' ORIGINAL PETITION AND JURY DEMAND**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Jane Doe, Individually and as Next Friend of John Doe, a Minor Child, Plaintiffs, complaining of Jason Paul White, DDS, Defendant, and would respectfully show the Court as follows:

**I. DISCOVERY**

1.01 Pursuant to Rule 190.1 of the Texas Rules of Civil Procedure, Plaintiffs intend to conduct discovery in this case under level 3 (Rule 190.4 Texas Rules of Civil Procedure).

**II. PARTIES**

2.01 Plaintiff Jane Doe is the mother of Plaintiff John Doe, a Minor Child. Plaintiff Jane Doe is a resident of the State of Texas. In accordance with Tex. Civ. Prac. & Rem. Code Ann. §30.013, Plaintiff is pursuing this matter through a pseudonym to protect her and her child's identity. As such, she is not required to provide identifying information as part of this pleading and thus avails herself of this protection. Plaintiff's identity is known to Defendant.

2.02 Plaintiff John Doe, a Minor Child, is a resident of the State of Texas. Plaintiff is pursuing this matter through a pseudonym to protect his identity as a victim of childhood sexual assault in

accordance with Tex. Civ. Prac. & Rem. Code Ann. §30.013. As such, he is not required to provide identifying information as part of this pleading and thus avails himself of this protection. Plaintiff's identity is known to Defendant.

2.03 Jason White (Defendant White) is an individual and resident of Lubbock County, Texas. White may be served with notice in jail, wherever he may be found, or at his last known address: 4402 10<sup>th</sup> Street, Lubbock, Texas 79416.

### **III. VENUE AND JURISDICTION**

3.01 Venue is proper in Lubbock County, Texas, pursuant to TEX. CIV. PRAC. REM. CODE § 15.002(a)(2) because it is the county of Defendant's residence at the time the cause of action accrued.

3.02 The amount of the Plaintiffs' damages is substantial and well in excess of the jurisdictional minimums of this Court. Many elements of damage cannot be determined with mathematical precision. Furthermore, the determination of many of these elements of damage is peculiarly within the province of the jury. Plaintiffs do not at this time seek any certain amount of damages for any particular element of damage, however, Plaintiffs plead that they seek monetary relief in the amount of \$10,000,000.00. Plaintiffs plead that the monetary relief sought falls in the amounts set out in Texas Rule of Civil Procedure 47(c)(5). Plaintiffs also seek judgment for all other relief to which Plaintiffs are entitled.

### **IV. PLAINTIFFS' NARRATIVE**

4.01 Defendant White is a dentist in Lubbock, Texas. While the minor child, John Doe, was only sixteen years old, Defendant White began to groom him into an inappropriate sexual relationship.

4.02 Defendant White took the minor child on a hunting trip where he gave him alcohol. Defendant White bought the child a hair grooming tool, had the child pull down his pants, and used the tool to trim the child's pubic hair. Defendant White told the minor child to send him videos of himself masturbating to repay him for the pubic hair grooming tool.

4.03 On several different occasions, Defendant White told the minor child to send him videos of himself masturbating. Defendant White explained that he could use the videos in his "porn business" and offered to pay the minor child for the videos once he reached seventeen years of age. Defendant White showed the minor child a video of another minor masturbating and showed the minor child a photograph of Defendant White's own genitals.

4.04 Several business partners are involved in the "porn business" that Defendant White described to the minor child. Defendant White has solicited minors to engage in sex acts on video for payment and has likely disseminated the images and videos to prominent individuals.

4.05 Much of Defendant White's salacious behavior occurred at a ranch in Post, Texas. This ranch is co-owned by Defendant White and his business partner(s).

4.06 Defendant White used his position to coerce the minor child into an inappropriate relationship and sexually assaulted John Doe. Defendant White's inexcusable acts have caused severe and permanent emotional distress and trauma to John Doe.

## **V. CAUSES OF ACTION**

### ***Defendant White's Sexual Assault and Battery of a Child and Indecency with a Child***

5.01 Plaintiff John Doe was a minor at all times relevant herein. Defendant White used the trust he gained from Plaintiff Doe to commit acts of sexual assault and sexual battery of Plaintiff Doe. Defendant White also intended to arouse the sexual desire of the child by exposing his genitals to the child, as well as by showing the child a sexually explicit video of another minor child, making

the Defendant guilty of indecency with a child. Defendant White committed these acts intentionally and knowingly.

5.02 As a result of Defendant White's conduct, Plaintiff John Doe has suffered, and continues to suffer, pain of the mind and body, mental anguish, humiliation, disgrace, psychological repercussions, and emotional distress.

***Defendant White's Possession and Promotion of Child Pornography & Display of Harmful Material to Minor***

5.03 Defendant White attempted to procure, manufacture, entice, and/or coerce minor males, including John Doe, to transmit by computer, phone and/or social media, sexually explicit conduct by live visual depiction. Defendant White, therefore, engaged in the possession and/or promotion of child pornography.

5.04 Other unnamed accomplices assisted Defendant White in the promotion of child pornography not only for their own deviant sexual gratification, but also to run a "porn business" that sold images and videos of minors engaged in sexually explicit conduct.

5.05 On numerous occasions, Defendant White knowingly sent and/or showed photographs of his genitals to minor males, including John Doe, thereby distributing patently offensive material that appeals to the prurient interests of a minor in sex, nudity, or excretion that is utterly without redeeming social value for minors.

***Intentional Infliction of Emotional Distress***

5.06 In addition to other counts, Defendant White is liable to Plaintiff John Doe for Intentional Infliction of Emotional Distress. Defendant White adopted the trust of John Doe during a vulnerable time in the child's life. Defendant White used that trust to entice John Doe into an inappropriate relationship that included acts of sexual assault and battery of the child, indecency

with the child, and display of harmful material to the child constitute extreme and outrageous conduct.

5.07 Plaintiff Doe has suffered mental and physical injuries as a direct and proximate result of the Defendant's conduct.

## **VI. DAMAGES**

6.01 Defendant's misconduct resulted in and proximately caused injury to the minor Plaintiff. Plaintiff's damages include, but are not limited to, the following:

- a. Severe psychological pain and mental anguish;
- b. Severe psychological pain and mental anguish that, in reasonable probability, will be sustained in the future;
- c. Emotional distress sustained in the past;
- d. Emotional distress that, in reasonable probability, will be sustained in the future; and
- e. Medical expenses that, in reasonable probability, will be sustained in the future.

## **VII. PRAYER**

7.01 WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request the Defendant be cited to appear and answer and that upon final trial by jury, Plaintiffs recover against Defendant the following:

- a. Actual compensatory damages and punitive damages;
- b. Pre-judgment and post-judgment interest as allowed by law;
- c. Costs of court; and
- d. Such other, further and different relief to which Plaintiffs may be justly entitled.

Respectfully Submitted,

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**JURY DEMAND**

Plaintiffs hereby respectfully demand a trial by jury in this cause and herewith pay the required fee.

/s/ Kevin Glasheen  
Kevin Glasheen