

CAUSE NO. 471-07748-2025

**BRITTANY HALLEY, Individually and as
Next Friend of J.C., a Minor,**

Plaintiffs,

v.

**G.R.E.A.T. KIDS W/ADHD dba GREAT
LAKES ACADEMY, MATTHEW JASON
CAMPBELL, and JACOB ALLRED,**

Defendants.

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IN THE DISTRICT COURT

_____ JUDICIAL DISTRICT

COLLIN COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

COME NOW, Plaintiff BRITTANY HALLEY, Individually, and as next friend of J.C., a Minor, and file this Original Petition (the "Petition") against Defendants G.R.E.A.T. KIDS W/ADHD dba GREAT LAKES ACADEMY, MATTHEW JASON CAMPBELL, and JACOB ALLRED (collectively referred to herein as "Defendants").

From August 2023 through December 2023, Plaintiff Brittany Halley's daughter, J.C., was enrolled at GREAT LAKES ACADEMY ("Defendant GLA" or "GLA"). GLA is a private school specializing in educating students with learning disabilities. J.C. was enrolled at GLA due to her educational needs related to ADHD.

At first, things seemed normal. J.C. was carefree and eager to make new friends at her new school. But before long, Plaintiff Brittany Halley began to notice troubling changes in her daughter's behavior. J.C. started bickering with classmates at school and snapping at family

members at home. She seemed constantly on edge. She also began to make an excuse to avoid going to school altogether. Although confused and concerned about this dramatic behavior change, the Plaintiff initially dismissed it as typical teenage angst. She would soon learn, however, that the cause was far more serious—and far from normal.

Things came to a head just after the New Year, when J.C. asked her mom if they could talk. What happened next is every parent's greatest fear. J.C. described how a GLA employee, Defendant Jacob Allred ("Defendant Allred" or "Allred"), was making sexual advances toward her.

Plaintiff Brittany Halley learned that GLA's Principal, Defendant Matthew Jason Campbell ("Defendant Campbell" or "Principal Campbell"), knew that Allred had made sexual advances on students before and failed to terminate Allred for such predatory behaviors. Teachers and school administration are entrusted to care for and protect our children. Plaintiff Brittany Halley put her trust in the GLA and the employees of GLA to help and care for her daughter. However, GLA betrayed that trust by allowing her daughter to be groomed by a 32-year-old predator.

Former Plano teacher sentenced to 20 years for grooming student



I. DISCOVERY CONTROL PLAN LEVEL

Plaintiffs intend to conduct discovery under Level 3 of TEXAS RULE OF CIVIL PROCEDURE 190.4.

Because plaintiffs in Texas civil court matters are required to plead a level of damages in accordance with the Texas Rules of Civil Procedure, Plaintiffs hereby plead that they seek monetary relief aggregating more than \$1,000,000. Plaintiffs reserve the right to amend their claim for relief should it become necessary at some time in the future. Plaintiffs implicitly trust the judgment of the good and fair jury as the representatives of the Collin County community.

II. PARTIES AND SERVICE

Plaintiff **BRITTANY HALLEY** (“Mrs. Halley” or “Plaintiff Halley”) is a resident of Grayson County, Texas. Pursuant to §30.014 of the TEXAS CIVIL PRACTICE AND REMEDIES CODE, Plaintiff is an individual with the following identifying numbers: TXDL (xxxxx909) and SSN (xxx-xx-x446).

Defendant **G.R.E.A.T. KIDS W/ADHD** is a non-profit company doing business in the State of Texas as **GREAT LAKES ACADEMY**. Defendant GLA may be served by delivering a citation and copy of this petition to its registered agent, Marjolein J. Borsten, 6000 Custer Road, Building 7, Plano, Texas 75023, or wherever Defendant GLA may be found.

Defendant **MATTHEW JASON CAMPBELL** is an individual resident of McKinney, Collin County, Texas, and may be served with process by serving citation and a copy of the Petition upon him at his home address of 8312 Latigo Trail, McKinney, Texas 75070 or wherever he may be found. The last three digits of Mr. Campbell’s Texas driver’s license are unknown. The last three digits of Mr. Campbell’s Social Security number are unknown.

Defendant **JACOB ALLRED** is an individual resident of Blue Ridge, Collin County, Texas, and may be served with process by serving citation and a copy of the Petition upon him at his current address of 4300 Community Avenue, McKinney, Texas 75071 or wherever he may be found. The last three digits of Mr. Allred’s Texas driver’s license are unknown. The last three digits of Mr. Allred’s Social Security number are unknown.

III. JURISDICTION AND VENUE

The Court has subject matter jurisdiction over this lawsuit because the Court has personal jurisdiction over each party and the amount in controversy exceeds this Court's minimum jurisdictional requirements.

Venue is proper in Collin County, Texas, under Texas Civil Practice & Remedies Code Section 15.002 because the incident giving rise to this lawsuit occurred in Collin County.

IV. FACTS

From August 2023 to December 2023, Plaintiff's daughter, J.C., was a student at Great Lakes Academy, a private school specializing in educating students with learning disabilities. GLA employed Defendant Jacob Allred as a teacher for over four years and was J.C.'s ninth-grade teacher during the 2023-2024 school year. Beginning in August 2023, when J.C. was only 15 years old, Allred began grooming her. Allred was 32 years old at the time. In October 2023, Allred pulled J.C. into the school library and admitted to having romantic feelings for her. Shortly thereafter, Allred added J.C. on the messaging application Discord, where he sent sexually explicit messages, including inquiries about the color of her underwear, expressions of his sexual desires, and instructions on what she should wear. Allred also asked her multiple times if "she would date him."

By November 2023, Allred's conduct escalated to physical contact with J.C. The physical contact included touching J.C. under her desk, rubbing her over her clothes, and touching her inner

thighs and buttocks. J.C. disclosed Allred's conduct to her mom, who immediately reported it to the Plano Police Department. J.C. provided graphic screenshots of Allred's communications to law enforcement. Police investigations confirmed Allred's inappropriate communications and discovered he had been in contact with other students on Discord, suggesting potential additional victims. Allred has since pled guilty and was sentenced to 20 years in TDCJ-ID for Improper Relationship Between Educator and Student, and two counts of Sexual Performance by a Child.

Allred was not the only adult who failed the children under his care. Before August of 2023, Defendant Matthew Jason Campbell, the principal of Great Lakes Academy and a mandatory reporter under Texas law, became aware that Defendant Allred, a teacher employed by the school, was engaging in inappropriate and potentially unlawful conduct. Specifically, Principal Campbell was made aware of previous instances where Allred attempted to groom children under his care. Despite the seriousness of this misconduct, Principal Campbell's response was limited to a verbal confrontation and a written reprimand. At no point did Principal Campbell report the abuse to law enforcement, the Texas Department of Family and Protective Services (DFPS), or any other appropriate authority, despite his legal obligation to do so under Texas Family Code § 261.101, which requires that any professional suspecting child abuse **immediately** make a report.

Principal Campbell also failed to take steps to remove Allred from his teaching duties, leaving Allred in a position of access to students. Principal Campbell's inaction allowed for Allred's deplorable behavior to remain unchecked for an extended period. As a result of Principal Campbell's failure to act, Allred remained in his position at the school, continued to communicate inappropriately with students, and caused J.C. psychological and emotional harm. Principal

Campbell's conscious failure to fulfill his mandatory reporting duty and his refusal to take meaningful protective action directly contributed to the continuation of the abuse and the resulting injury to J.C.

V. CAUSES OF ACTION

A.) NEGLIGENCE AS TO DEFENDANT GLA

Defendant GLA had a duty to exercise ordinary care in supervising and treating the children in its care and supervising the teachers, directors, and staff who directly and indirectly interacted with those children and provided for their safety. Defendant GLA acting through its employees and representatives, including, but not limited to, Defendant Matthew Jason Campbell breached its duty of care in one or more of the following ways:

1. Failing to supervise its employees properly and allowing J.C. and other children under its care to be groomed;
2. Failing to adequately supervise the children under its care;
3. Failing to properly hire, train, and control its employees, directors, and staff;
4. Failing to monitor the children under its care properly and subjecting J.C. and other children to grooming;
5. Failing to disclose and report grooming incidents to avoid investigation or liability;
6. Failing to properly investigate and report grooming by one of its employees to J.C. and other children under its care as required under Texas Family Code § 261.101;
7. Failing to respond appropriately to internal whistleblower complaints regarding Allred's conduct;
8. Failing to implement or enforce clear policies and procedures for identifying, reporting, and preventing the grooming of children in its care;
9. Engaging in conduct or omissions that potentially violated state licensing regulations;

10. Negligently hiring Allred without adequately verifying his qualifications, background, or references;
11. Negligently retaining Allred despite internal complaints or concerns about his behavior toward children;
12. Permitting Allred to have isolated and unsupervised access to J.C. despite staff concerns and behavioral red flags;
13. Failing to implement basic safety measures such as video monitoring, observation protocols, or supervisory checks;
14. Failing to notify J.C.'s parents, law enforcement, or licensing authorities in a timely manner upon learning of grooming;
15. Failing to protect children with disabilities from grooming under its care.

B.) NEGLIGENCE AS TO DEFENDANT CAMPBELL

Defendant MATTHEW JASON CAMPBELL, as the Principal of GLA, had a duty to exercise ordinary care in supervising the children in GLA's care and supervising, training, overseeing, and retaining the employees, directors, and staff who directly and indirectly interacted with vulnerable children and provided for their safety. Defendant MATTHEW JASON CAMPBELL breached his duty of care in one or more of the following ways:

1. Failing to supervise, monitor, and evaluate the employees under his direction properly and allowing J.C. and other children under his care to be groomed;
2. Failing to investigate or respond to internal reports and complaints concerning Allred's predatory behavior;
3. Failing to properly hire, train, and control his employees, directors, and staff;
4. Encouraging a culture of silence or concealment around abuse allegations within his school;
5. Failing to monitor the children under his care properly and subjecting J.C. and other children to grooming;
6. Ignoring, actively concealing, and failing to report the grooming of children under his care as required under Texas Family Code § 261.101;

7. Failing to implement and enforce reasonable policies and procedures to ensure the safety of children under his care; and
8. Failing to protect children with disabilities from sexual predators under his care.

C.) NEGLIGENCE PER SE AS TO DEFENDANT ALLRED

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

Defendant JACOB ALLRED was criminally charged and convicted of two (2) counts of Sexual Performance by a Child in violation of Tex. Penal Code § 43.25(c) and one (1) count of Improper Relationship Between Educator and Student in violation of Tex. Penal Code § 21.12.

These statutes were enacted for the protection of minor children and students, including Plaintiff J.C., and were specifically designed to prevent the type of harm suffered in this instance. Allred's conduct in violating these statutes constitutes negligence per se. By virtue of his criminal convictions, Allred's statutory violations are conclusively established and cannot be excused.

Plaintiff J.C. belongs to the class of persons the statutes were designed to protect, and the injuries suffered by Plaintiffs — including sexual exploitation, emotional trauma, and psychological injury — are the very types of harm the statutes were intended to prevent.

As a direct and proximate result of Allred's statutory violations, Plaintiffs suffered severe and ongoing damages.

D.) NEGLIGENCE PER SE AS TO DEFENDANTS GLA AND CAMPBELL

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

Defendants GLA, Campbell, and all agent and employees of GLA were mandatory reporters as defined by Texas Family Code § 261.101. On information and belief, Defendant Campbell, acting within the course and scope of his employment with Defendant GLA, had notice of Defendant Allred's predatory behavior. Despite such notice, Defendant Campbell failed to report the suspected behavior and abuse as required by statute.

Under Texas Family Code § 261.101(a), a person who has cause to believe that a child has been abused or neglected **shall** make a report immediately to the appropriate authorities, including the Department of Family and Protective Services and/or law enforcement.

Defendant Campbell, and by extension, Defendant GLA, violated Texas Family Code § 261.101 by failing to immediately report suspected child abuse and sexual exploitation. This statutory duty was enacted for the protection of minor children, including Plaintiff J.C. Plaintiff J.C. belongs to the class of persons the statutes were designed to protect, and the injuries suffered by Plaintiffs — including sexual exploitation, emotional trauma, and psychological injury — are the very types of harm the statutes were intended to prevent. Defendants GLA and Campbell had no legally recognized excuse for their failure to comply with Texas Family Code § 261.101. Their omissions constitute negligence per se.

As a direct and proximate result of Defendants GLA and Campbell's statutory violations, Plaintiffs suffered severe and ongoing damages.

E.) BREACH OF FIDUCIARY AND SPECIAL DUTY AS TO DEFENDANT ALLRED

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

As Plaintiff J.C.'s teacher and educator, Defendant JACOB ALLRED owed a duty of trust, loyalty, and care to Plaintiffs. Allred breached this fiduciary and special duty by engaging in grooming, sexual exploitation, and coercion of Plaintiff J.C. Allred's breach of his fiduciary and special duties proximately caused Plaintiffs' injuries and damages.

F.) BREACH OF FIDUCIARY AND SPECIAL DUTY AS TO DEFENDANTS GLA AND CAMPBELL

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

Defendant GLA accepted tuition and enrollment of Plaintiff J.C., a minor, thereby creating a relationship of trust and confidence with Plaintiffs. Plaintiff Brittany Halley relied on Defendant GLA to act *in loco parentis*, to safeguard her child, and to exercise loyalty, fidelity, and honesty in matters affecting Plaintiff J.C.'s health, welfare, and safety. Defendant Campbell, acting as an agent of Defendant GLA, held a position of authority and influence over Plaintiff J.C. as a student.

Unlike a compulsory public school assignment, Plaintiff Brittany Halley voluntarily entrusted Plaintiff J.C. to Defendant GLA. She paid tuition with the expectation that GLA would provide a safe environment free from harm. Defendant GLA, through Defendant Principal Campbell and its staff, held itself out as an institution committed to student safety, thereby strengthening the fiduciary character of the relationship.

In addition to the fiduciary obligations described above, Defendant GLA and Defendant Campbell owed Plaintiff J.C. a special duty of reasonable care and supervision arising from their custodial role over a minor child entrusted to them. Texas law recognizes that schools, by assuming custody and control of children, are obligated to protect those children from foreseeable harm, including abuse and exploitation by school employees.

Despite repeated notice that Defendant Allred was grooming and sexually exploiting Plaintiff J.C., Defendant Campbell failed to take protective action. Defendants GLA and Campbell failed to remove Allred from contact with students, failed to report the abuse to law enforcement or child protective authorities, and failed to notify Plaintiff Brittany Halley. Instead, Defendants chose to remain silent and protect GLA's reputation over the welfare of Plaintiffs.

These acts and omissions constitute breaches of both the fiduciary duties of trust, loyalty, and good faith and the special duty of reasonable care and supervision owed to Plaintiffs. Defendants GLA and Campbell's breaches of duty allowed Defendant Allred's abuse to continue unchecked and were a proximate cause of Plaintiffs' injuries and damages.

G.) ASSAULT AS TO DEFENDANT ALLRED

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

Allred intentionally and knowingly engaged in unlawful sexual conduct toward Plaintiff J.C., a minor child. Allred's conduct included unwanted and offensive physical contact, which constitutes assault under Texas law, regardless of whether penetration occurred. Allred's acts were committed intentionally, knowingly, and without the consent of Plaintiff J.C. As a direct and proximate result of Allred's assaultive conduct, Plaintiffs suffered severe emotional distress, mental anguish, psychological injury, and other damages to be proven at trial.

H.) NEGLIGENT HIRING, SUPERVISION, TRAINING, AND RETENTION AS TO GLA

Plaintiffs incorporate all the allegations set forth in the preceding and subsequent paragraphs hereof as if set forth verbatim herein.

Defendant GLA owed Plaintiffs the duty to use ordinary care in hiring, supervising, training, and retaining its employees. Defendant GLA did not use the degree of care that would be used by a person of ordinary prudence under the same or similar circumstances. Defendant GLA breached its duty of care in the following ways:

1. Failing to properly train, instruct, supervise, and oversee the work of its employees, Defendant Matthew Jason Campbell and Jacob Allred; and
2. In the negligent hiring of Defendant Matthew Jason Campbell and Jacob Allred. The above-mentioned acts and/or omissions, whether taken singularly or in any combination, constitute negligence and a proximate cause of the subject incident and the injuries and damages sustained by Plaintiffs, for which damages Plaintiffs now bring suit.

I.) RESPONDEAT SUPERIOR

At all relevant times, Defendant Matthew Jason Campbell and Jacob Allred were acting in the course and scope of their employment with or as otherwise authorized agents/representatives acting under the control of Defendant GLA. Thus, GLA stands liable for its employees' acts and/or omissions.

J.) GROSS NEGLIGENCE

Defendant GLA's course of conduct shows reckless indifference to consequences without the exertion of any substantial effort to avoid them. Defendant GLA acted willfully, wantonly, and/or with reckless disregard to the consequences to Plaintiffs. Defendant GLA's actions and inactions constituted an extreme risk of harm to the public, including J.C. and other children in its care. Defendant GLA had a subjective awareness of this risk and proceeded in spite of the risk with conscious indifference. Defendant GLA, as a result of its conduct, policies, failure to train, failure to supervise, and other acts and omissions, had a subjective knowledge that hiring and retaining Matthew Jason Campbell and Jacob Allred would involve an unreasonable risk of harm to Plaintiffs and yet hired and retained them in spite of the extreme risk of harm with conscious indifference.

K.) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AS TO ALL DEFENDANTS

1. Defendants' conduct, knowingly allowing a teacher to groom and abuse a minor student sexually, and their failure to take appropriate action after becoming aware of such conduct, was extreme and outrageous.
2. Defendants intended to cause severe emotional distress to Plaintiff J.C., or acted with reckless disregard of the likelihood of causing such distress.

3. As a direct and proximate result of Defendants' conduct, Plaintiff J.C., suffered severe emotional distress.

VI. DAMAGES

As a proximate cause of Defendants' negligent acts and/or omissions, Plaintiffs suffered, and will continue to suffer, damages and injuries that include, but are not limited to:

- a) physical pain suffered in the past;
- b) physical pain which she will, in reasonable medical probability, suffer and sustain in the future;
- c) mental anguish suffered in the past;
- d) mental anguish which they will, in reasonable probability, suffer and sustain in the future;
- e) the reasonable expenses for necessary medical and hospital care which they have received for their injuries;
- f) the reasonable expenses for necessary medical and hospital care, which they will, in reasonable probability, require for future treatment of their injuries; and
- g) Punitive damages in an amount to be determined by the trier of fact.

VI. PRE- AND POST-JUDGMENT INTEREST

Plaintiffs are entitled to recovery of pre-and post-judgment interest in accordance with the law and equity as part of the damages in this matter and hereby sues for recovery of pre-and post-judgment interest under the applicable provision of the laws of the State of Texas.

VII. REQUESTS FOR MANDATORY DISCLOSURE

Pursuant to Texas Rule of Civil Procedure 194, Plaintiffs request that Defendants disclose, within thirty (30) days of service of their Answer, the information or material described in Rule 194.2

IX. RULE 193.7 NOTICE

Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiffs hereby give notice to Defendants that they intend to use all documents exchanged and produced between the parties (including, but not limited to, correspondence, pleadings, records, and discovery responses) during the trial of this matter.

X. CONDITIONS PRECEDENT

Plaintiffs assert that all conditions precedent to the bringing of the causes of action asserted in this pleading have been performed, have occurred, or have been waived.

XI. JURY DEMAND

Plaintiffs demand a jury trial and tender the appropriate fee with the filing of this Petition.

XII. RESERVATION OF RIGHTS AND CLAIMS

Plaintiffs hereby reserve their right to pursue all potential causes of action against Defendants, including any other cause of action that they may have or that may arise in the future.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that the Court issue a citation for Defendants to appear and answer, and that Plaintiffs be awarded a judgment against Defendants for the following:

1. Judgment against Defendants, jointly and severally, for the actual and special damages suffered by Plaintiffs as a result of Defendants' conduct in an amount within the jurisdictional limits of the court;

2. Exemplary damages as to Defendant GLA;
3. Prejudgment and post-judgment interest at the maximum legal rate;
4. Court costs, including discretionary costs; and
5. All other relief, whether at law or in equity, to which Plaintiffs are justly entitled.

Respectfully submitted,

VARGHESE SUMMERSETT PLLC


Ty Stimpson
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ATTORNEYS FOR PLAINTIFFS

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Katie Mast on behalf of Ty Stimpson

Bar No. 24077464

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Envelope ID: 106192636

Filing Code Description: Plaintiff's Original Petition (OCA)

Filing Description: Plaintiff's Original Petition

Status as of 9/30/2025 8:34 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Ty Stimpson		litigation@versusinjury.com	9/29/2025 11:44:03 AM	NOT SENT