

CAUSE NO. _____

JANE DOE,

Plaintiff,

v.

GEORGE COOK and
FRONTIER LOGISTICS L.P.,

Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

_____ JUDICIAL DISTRICT

JURY TRIAL DEMANDED

PLAINTIFF’S ORIGINAL PETITION

Plaintiff Jane Doe files this Original Petition against Defendants George Cook (hereinafter “Cook”) and the Frontier Logistics L.P. (hereinafter “Frontier”) (collectively hereinafter “Defendants”) and, in support, she respectfully shows this Honorable Court the following:

I. SUMMARY OF THE CASE

Throughout history, unscrupulous men in power have attempted to improperly use that power to coerce those with less power to get what they want, in this case a sexual relationship. In this matter, the prime perpetrator used his vaunted and respected status to engage in a sexual relationship with a younger woman by offering incentives available to him by virtue of his position and through his company. When issues arose during their quid-pro-quo relationship he coerced, begged, harassed, and ultimately violently assaulted her multiple times.

The relationship at issue in this case was characterized by a distinct power imbalance from its inception, as Plaintiff was an Air Force veteran and single mother navigating a career transition while Cook held a lofty leadership position at Frontier. Cook exploited Plaintiff's financial vulnerability and subordinate status, specifically targeting her because of her precarious situation.

He initially presented himself as a mentor, using his role as CEO to entice her with discussions regarding potential employment opportunities at Frontier.

This dynamic evolved into a quid-pro-quo arrangement where Cook offered career assistance at Frontier in exchange for a romantic or sexual relationship. While Plaintiff was eventually granted a job interview, the process was a deceptive tactic designed to solidify her connection to Cook rather than a legitimate career move. Ultimately, Plaintiff left her previous job to assist Cook and Frontier more directly, which led to her being issued a company badge that granted her unrestricted office access. Although she was never formally employed by the company, she was given a badge for access and performed various supportive tasks such as running corporate errands, providing meals for the staff, and travelling with Cook on business trips.

After becoming financially dependent on Cook, Plaintiff quickly discovered he was physically and emotionally abusive. The first instance of physical violence occurred in September 2023 when Cook pushed Plaintiff in a parking garage during a business trip on behalf of Frontier. This assault caused a back injury that required Plaintiff to seek chiropractic treatment.

In October 2023, Cook punched Plaintiff in the throat and attempted to buy her silence with a \$200,000 check. The abuse escalated in November when Cook slammed his face into Plaintiff's and pulled her hair so hard that it fell out the next day. Plaintiff felt terrified and trapped because she was a single mother whose only income came from Cook's company. In many instances, Plaintiff sought medical treatment for the injuries, bruises, and lacerations Cook caused.

By December 2023, Cook's violence included strangulation and pushing Plaintiff into a vehicle after a birthday party. Plaintiff sought medical care for her injuries but initially lied to the doctor about the cause to protect Cook. In early 2024, Cook punched Plaintiff in the mouth and choked her again, leaving visible bruising on her neck.

He punched her in the eye in February of 2024. The punch left Plaintiff with a permanent scar and facial bruising. During another incident, Plaintiff activated an audio recording that captured Cook screaming at her in a fit of rage. Even when Plaintiff was ill, Cook struck her in the face without warning, causing injuries to her nose and lip. Cook would not stop.

Cook's destructive behavior also included smashing Plaintiff's phone and tearing a household door off its hinges during a fit of rage. He continued to target her face and hair, leading Plaintiff to visit a plastic surgeon to check for permanent damage. These repeated physical traumas were often followed by inconsistent apologies and "sweet" behavior from Cook.

The systematic abuse continued into 2025 until Plaintiff finally left Cook's residence after being slapped in the face. Plaintiff continues to suffer from severe mental anguish, emotional trauma, and a total loss of trust. She remains fearful of Cook and believes she may never be able to enjoy a healthy relationship again.

Plaintiff brings this case to put an end to the abusive conduct described in this case, not only with regard to herself, but to other unsuspecting females who would otherwise suffer at Cook's hands. **Plaintiff seeks compensatory and punitive damages in an amount that will exceed \$25 million.**

II. PARTIES

Plaintiff Jane Doe is a Texas resident.

Defendant George Cook is an individual residing in Texas. Upon information and belief, Cook is serving as Owner and Chief Executive Officer of Frontier Logistics L.P. He may be served at his residence, 15820 Bohemian Hall Rd., Crosby, TX 77532. Cook acted in both his corporate and individual capacity at various times. He used his corporate capacity to lure Plaintiff into a destructive relationship.

Defendant Frontier Logistics L.P. is a foreign for-profit limited partnership with one or more partners residing in Harris County, Texas. Additionally, Defendant Frontier is headquartered at 1806 S 16th St., La Porte, TX 77571. Frontier may be served through its registered agent, FLP CANDLE GP, INC. at 1806 S 16th St., La Porte, TX 77571.

III. DISCOVERY CONTROL PLAN

Discovery in this matter will be conducted pursuant to Level 2.

IV. CLAIM OF RELIEF

The damages sought are within the jurisdictional limits of this court. Plaintiff seeks monetary relief in excess of \$1,000,000 including damages of any kind, penalty, costs, expenses, punitive damages, pre-judgment interest, and attorney's fees.

V. JURISDICTION AND VENUE

Venue is proper in Harris County because it is the county in which all or a substantial part of the events or omissions giving rise to the claim occurred. Further, venue is proper because at least one defendant resides in Harris County, Texas.

This Court has personal jurisdiction over Defendants because both Defendants reside in Texas. Further, the causes of action herein arose from Defendants' specific and systematic purposeful contacts with this forum state.

This Court has subject matter jurisdiction over this cause of action because it involves an amount in excess of the minimum jurisdictional limits of this Court. This case is not removable pursuant to 28 U.S.C. 1331 or rule 1332.

VI. FACTUAL BACKGROUND

Plaintiff was first introduced to George Cook in May 2019 at Gordon Westergren's ranch. At that time, Plaintiff was working as Westergren's personal assistant. At that stage in her life, Plaintiff was an Air Force veteran and single mother of four navigating a difficult career transition. A clear power imbalance was evident between her and Cook. He was the leader of Frontier, while she was a single mother of four trying to make ends meet in a subordinate role to a minority shareholder. Cook obviously recognized Plaintiff's vulnerability, and planned to take advantage.

Later, Plaintiff reached out to Cook specifically for moral support and guidance regarding Westergren's behavior. A romantic relationship between Cook and Plaintiff began shortly after Cook began discussing career opportunities with her. Cook knew that Plaintiff was struggling financially. He knew she was looking for work. As the CEO of Frontier, Cook repeatedly enticed Plaintiff with the idea of Frontier employment.

In February of 2023, Plaintiff met Cook, at his insistence, at a restaurant to discuss potential business and opportunities at Frontier for her. At that meeting, Cook deceived Plaintiff into thinking that he cared about her career and that work at Frontier was on the table. Unfortunately, talks about her career were short lived. Cook instead steered the conversation in a different direction. Cook soon began coming onto and kissing Plaintiff. This encounter established what Cook was actually seeking: a clear quid-pro-quo arrangement, to wit, in return for sexual or romantic involvement, Cook would potentially provide Plaintiff with employment or employment assistance at Frontier.

This imbalanced quid-pro-quo was confirmed when Plaintiff obtained an interview for a position with Frontier just days after the initial sexual encounter. Plaintiff didn't get that job. Upon information and belief, the interview was just part of Cook's plan to cement a relationship with Plaintiff. He never had any intention of her actually being formerly employed by Frontier, because

a formal employment relationship would interfere with his plans for her.

By June 2023, Plaintiff left her previous job to assist Cook and Frontier more directly, further entrenching herself within Cook's professional sphere. At Cook's request, and although she was never formerly employed by Frontier, Plaintiff was issued a Frontier company badge with her name on it. This badge granted her unrestricted access to the office. Plaintiff at Cook's direction took on a supportive role within the business, which included:

- Bringing lunches to Cook and the Frontier staff;
- Running various corporate errands; and
- Accompanying Cook on business trips related to company investigations and operations.

This blurring of personal and professional lines by Cook meant that while Plaintiff was serving Cook with what she believed were company-related tasks, Plaintiff became financially and professionally dependent upon Cook.

Plaintiff quickly and tragically discovered that Cook was physically, emotionally, and mentally abusive. The first signs of physical violence occurred during a Frontier business trip in September of 2023. On that trip was Cook, Plaintiff, and a company lawyer. That night, after an evening of drinks, Cook became violently angry, accusing Plaintiff of being "too friendly" with the company attorney. In the hotel parking garage, Cook violently pushed Plaintiff, causing her to fall onto the pavement and injure her back. She later sought chiropractic care for this injury.

Later, on October 26, 2023, while her children were upstairs, Cook and Plaintiff engaged in an argument at her home. During this encounter, Cook punched Plaintiff in the throat. Afterward, Cook left a \$200,000 check on her dresser for "4 kids school," in an attempt to keep her quiet about the violent attack.

Cook's abusive behavior continued on November 7, 2023, when after meeting at a gym, Cook claimed to smell alcohol on Plaintiff's breath. Enraged, Cook grabbed the back of Plaintiff's head, forcefully slammed his face into hers. He then kissed her harshly all the while screaming at her. Just days later, on November 13, 2023, Cook violently pulled Plaintiff's hair, causing her excruciating pain. The following morning, a noticeable portion of her natural hair came out while she was washing it, which she photographed while still in the bathtub. At this point, Plaintiff was terrified of Cook. She felt stuck. She was a single mother. Frontier was her only source of income. He was violent and unpredictable. Things spiraled with Cook.

In December 2023, following Cook's birthday party, Cook hit Plaintiff's arm while in the car, ostensibly based on a benign comment she made about a co-worker. Once at Cook's home, Cook forcefully and violently pushed Plaintiff into the side of his truck and placed his hands around her neck, ultimately strangling her. Plaintiff sought urgent care the next day for severe back and neck pain. To protect Cook, and because she was terrified of him, she told the doctor that she had been hit by a car door.

On January 23, 2024, during an argument regarding the Life360 app, Cook punched Plaintiff in the mouth, knocking her to the floor. Cook then got on top of her and again choked her neck, this time leaving visible bruises. Two days later, and only after urging, she informed her dentist about the lip injury sustained as a result of Cook.

In February of 2024, Cook punched Plaintiff's arm and then pushed her. In that same incident, Cook punched Plaintiff in the eye and knocked her to the ground. Cook's violent punch resulted in a split of the skin under Plaintiff's left eye which left a permanent scar. Plaintiff has time and date-stamped photos of the worsening bruising as seen below. Just days after he split the skin under her eye with a punch eye, Cook grabbed Plaintiff by the face, causing the injuries on

her face to worsen. She activated an audio recording during this incident that captures Cook screaming at her in a fit of rage. She did so for her own safety.

On or about March 9, 2024, Plaintiff became ill following a party, causing her son to call Cook to her house to help her. Upon entering the home, Cook struck Plaintiff in the face without warning, injuring her nose and lip and knocking her to the ground. As is common with abusers, Cook later sent Zelle memos apologizing for the assault. Unfortunately, her kids have been a witness to his violent and abusive behavior.

Later in March of 2024, while yelling and screaming at Plaintiff, Cook squeezed her injured lip and again yanked on her hair. Cook did this in spite the fact that Plaintiff had not yet fully healed from his previous assaults on her. Further, Cook grabbed her phone from her hands, and smashed it on the ground. After smashing her phone, Cook's fit of rage continued, as he tore a door leading into the garage off of its hinges. On or about April 5, 2024, before going to bed, Cook violently twisted Plaintiff's left nipple. On April 10, she visited a plastic surgeon to ensure there was no serious permanent damage to her nose and eye area from Cook's repeated abuse.

The abuse continued throughout 2025, during which the Plaintiff was repeatedly subjected to acts of violence. Specifically, the last time Plaintiff visited Cook's residence, Cook slapped Plaintiff violently in the face.

VII. CAUSES OF ACTION

A. CIVIL ASSAULT: COOK

Plaintiff re-alleges each aforementioned allegation as if fully incorporated below.

Defendant Cook committed civil assault on Plaintiff multiple times, as pleaded above. Specifically, Cook intentionally used physical contact with Plaintiff when Cook knew, or should

have reasonably known, that Plaintiff would regard such contact as offensive.

As a proximate result of the repeated assaults, Plaintiff has suffered damages as described herein. Plaintiff's harm arises as a result of conduct that violates the Texas Penal Code. Specifically, to include section 22.01(a)(3), the penal code for assault.

Thus, in addition to actual damages, Plaintiff seeks punitive damages, and such damages are not subject to capping.

B. NEGLIGENCE AND GROSS NEGLIGENCE: COOK AND FRONTIER

Plaintiff hereby incorporates by reference the paragraphs above as if fully set forth herein.

Plaintiff firmly believes and has pleaded that Defendants Cook and Frontier's conduct as described was intentional. If it is found otherwise, in the alternative, Plaintiff alleges that Cook's conduct, while owning Frontier and during the scope of his employment and as owner of Frontier, was unreasonable and thus negligent and grossly negligent. Defendant Cook, as an agent and owner of Frontier, owed Plaintiff the duty of reasonable care.

Further, in addition to being vicariously liable for Cook's conduct, Defendant Frontier is liable for its own actions and inactions. Defendant Frontier had a duty to Plaintiff and breached that duty. The negligence of Defendant Frontier was a proximate cause of Plaintiff's injuries.

Defendants breached their duty in at least the following ways:

- a. Allowing Frontier to assume and maintain a position of power, influence, and control that he would wield over individuals such as Plaintiff despite clear risks associated with his behavior, and knowledge of his prior behavior and complaints;
- b. Failing to adopt, enforce, or monitor policies designed to prevent harassment, retaliation, and abuse of authority by senior leadership;
- c. Failing to investigate Cook's conduct toward Plaintiff despite clear warning signs;
- d. Allowing Frontier's resources, influence, and authority to be used by Cook for personal sexual coercion;

- e. Failing to protect Plaintiff from foreseeable harm arising from Cook's misuse of his executive position;
- f. Failing to take corrective action once Cook's abusive conduct and intimidation became known;
- g. Creating an environment in which Cook was permitted, or even enabled, to use his position to exploit subordinate professionals;
- h. Failing to prevent Cook from assaulting and harassing Plaintiff;
- i. Negligently hiring, supervising and retaining Cook;
- j. Negligently controlling Cook;
- k. Failing to properly supervise and control Cook;
- l. Failing to address and investigate prior complaints of Cook's inappropriate treatment towards women;
- m. Providing Cook a safe haven so that he could continue his conduct, and/or assisting an environment of abuse.

Defendants' conduct was a proximate and producing cause of damage to Plaintiff. Further, Defendants' conduct was malicious and grossly negligent. Thus, in addition to actual damages, Plaintiff seeks punitive damages.

C. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: COOK

Plaintiff re-alleges each aforementioned allegation as if fully incorporated below.

Cook engaged in conduct towards Plaintiff that is extreme and outrageous so as to exceed the bounds of decency in a civilized society – namely, he caused Plaintiff to experience mental suffering by verbally and physically assaulting her multiple times.

Cook engaged in this conduct intentionally, knowingly, and willfully.

Cook's conduct proximately caused injury to Plaintiff. Plaintiff has sustained and will sustain pain and suffering and psychological and emotional distress, mental anguish,

embarrassment, and humiliation.

Accordingly, Plaintiff is entitled to recovery against defendants for the damages proximately caused by Defendant Cook's conduct in an amount to be determined at trial. Further, Plaintiff's harm arises as a result of conduct that violates the Texas Penal Code. Specifically, to include section 22.01(a)(3), the penal code for assault.

Thus, in addition to actual damages, Plaintiff seeks punitive damages, and such damages are not subject to capping.

D. RESPONDEAT SUPERIOR/VICARIOUS LIABILITY: FRONTIER

Plaintiff re-alleges each allegation above as if fully incorporated herein. Defendant Frontier is vicariously liable for Cook's conduct under the doctrine of respondeat superior. Cook committed the actions described herein while acting as:

- CEO/Vice Principal of Frontier;
- While on business trips on behalf of and furthering Frontier's goals;
- An individual authorized to act on behalf of Frontier in matters related to job positions, business partnerships, and giving keycard access.

Cook's role in Frontier placed him in a position of authority, influence, and control directly tied to the business operations and objectives of the Frontier. His conduct which includes harassment, coercion, misuse of power, and physical abuse was enabled by and executed through the authority the Frontier vested in him. As such, Defendant Frontier is liable for Cook's misconduct.

VIII. DAMAGES

As a direct and proximate result of Defendants' acts and omissions described above, Plaintiff has incurred the following damages:

- a. Conscious physical and mental pain and suffering, and anguish, past and future;
- b. Loss of enjoyment of life and peace of mind, past and future;
- c. Reasonable and necessary medical, counseling, psychiatric, therapeutic and related expenses, past and future;
- d. Damage to reputation and credibility within her professional community;
- e. Loss of earning capacity, including diminished future opportunities, reduced visibility in her field, and loss of professional relationships;
- f. Past and future economic loss, including lost business opportunities, diverted funding, and financial harm arising from Defendants' conduct;
- g. Injury and damages to her career and professional standing, including the loss of partnerships, clients, and contracts that Plaintiff reasonably expected to secure; and
- h. Such other damages that will be shown at trial, all of which not less than \$10,000,000.

Plaintiff seeks any and all damages to which she may be entitled. As stated, *Plaintiff also seeks exemplary damages* to deter such conduct going forward, and to make an example of these Defendants.

IX. NOTICE OF INTENT TO USE DISCOVERY AT TRIAL

Pursuant to Texas Rule of Civil Procedure 193.7, Plaintiff hereby gives notice that she intends to use all discovery instruments produced in this case at trial. Such discovery instruments include, but are not limited to, all documents Defendants will produce, or have produced, in response to Plaintiff's written discovery requests or in Defendants' disclosures.

X. REQUEST FOR JURY TRIAL

Plaintiff respectfully demands a jury trial and hereby tenders the appropriate fee.

XI. PRESERVATION OF EVIDENCE

Plaintiff hereby requests and demands that Defendants preserve and maintain all evidence pertaining to any claim or defense related to the incidents made the basis of this lawsuit, including

but not limited to communications, electronic data, cell phone data, bank statements, electronic pay receipts, mapping data, and location data.

XII. PRAYER

By reason of all the above and foregoing, Plaintiff is entitled to recover from Defendants for the damages set forth in this petition, within the jurisdictional limits of this Court. As required by Rule 47, Plaintiff also seeks punitive damages consistent with Tex. R. Civ. Proc. 47(c)(3). Plaintiff also seeks pre and post-judgment interest at the maximum legal rate, costs of court, and any other relief to which Plaintiff may be justly entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

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Filing Code Description: Petition
Filing Description: PLAINTIFF???'S ORIGINAL PETITION
Status as of 1/22/2026 11:18 AM CST

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