CAUSE NO. 25DCV357599

JANE DOE	§	IN THE DISTRICT COURT OF
	§	
	§	BELL COUNTY, TEXAS
v.	§	
	§	146th DISTRICT COURT
	§	
BLAINE MCGRAW	§	JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

NOW COMES Plaintiff Jane Doe, who files this Original Petition, complaining of Defendant Blaine McGraw, and would respectfully show this Court the following:

I. SUMMARY OF THE LAWSUIT

1. This case exposes a shocking betrayal committed within the walls of a United States Army hospital. Army Major Blaine McGraw, an OBGYN at Carl R. Darnall Army Medical Center in Fort Hood, used his position of trust to sexually exploit, manipulate, and secretly record women under his care. What should have been a place of healing became a stage for abuse. Jane Doe sought legitimate medical treatment but instead was subjected to invasive, unnecessary, and degrading touching, voyeurism, and covert filming.

2. The Army knew. Complaints had been made about Defendant McGraw—at Fort Hood, and years earlier at Tripler Army Medical Center in Hawaii—yet leadership dismissed the warnings, laughed off credible allegations, and allowed McGraw to continue practicing. By doing so, the Army gave cover to a predator in uniform.

3. This lawsuit is the first step in shining a light on this misconduct and restoring justice—holding Blaine McGraw personally accountable and ensuring he is not given any more access or opportunity to harm others.

4. But justice does not end with McGraw. In a separate action to follow under the Federal Tort Claims Act, the United States Army itself must answer to these military families—wives and daughters—for the culture of silence and indifference that allowed McGraw's sexual misconduct to thrive behind the shield of its uniform.

II. PARTIES

5. Plaintiff Jane Doe is a military spouse who resides in Texas. Jane Doe's identity is protected for her safety, but she can be served through her undersigned attorneys of record.

6. Defendant Blaine McGraw is an individual residing in Bell County, Texas. Defendant may be served at 36065 Santa Fe Ave, Fort Hood, TX 76544, or wherever he may be found.

III. JURISDICTION AND VENUE

7. This Court has jurisdiction over the lawsuit because the amount in controversy exceeds this Court's minimum jurisdictional requirements. Venue is proper in this County under Texas Civil Practice & Remedies Code § 15.002 because Defendant resides in this county.

IV. BACKGROUND

A. Army Major Blaine McGraw, M.D.

8. This case begins where safety should be unquestioned: an OBGYN exam room at Carl R. Darnall Army Medical Center in Fort Hood, Texas. Jane Doe came seeking medical answers and treatment for pelvic pain, hormone irregularities, and concerns about uterine health—anxious, hopeful, trusting. She arrived as countless military families do, believing the Army hospital that serves soldiers and their loved ones would honor her dignity. Instead, that exam room became a stage for exploitation.

9. Over the course of roughly seven to eight appointments, McGraw groped, touched, and examined Jane Doe in ways that had nothing to do with healing—performing invasive breast and

vaginal examinations in ways that were unnecessary, humiliating, and profoundly violating, and which had nothing to do with the medical issues for which she sought care.

10. Time after time, Defendant McGraw conducted intimate examinations with no chaperone present, sending nurses away or failing to summon one at all. The Army allowed this conduct to occur. Defendant McGraw left Jane Doe exposed—without even the decency of a medical gown—while he performed invasive procedures under the guise of medical necessity. Of her many appointments, Jane Doe recalls only one in which any other person was present.

11. Defendant McGraw further blurred all boundaries of professional conduct by placing unsolicited, after-hours calls to Jane Doe's personal cell phone to discuss topics wholly unrelated to her medical care. These calls were intrusive, uninvited, and intended to cultivate personal familiarity rather than provide treatment.

12. After undergoing a uterine ablation, a procedure performed under sedation, Plaintiff returned for a follow-up appointment. During that visit, Defendant McGraw made an unsettling comment about having seen *all* of her tattoos. Plaintiff's tattoos are primarily located on her upper body in areas that should not have been readily visible during the ablation procedure. The remark immediately left Jane Doe confused, uneasy, and deeply uncomfortable, as it implied that McGraw had observed her body in ways inconsistent with medical necessity.

13. On another encounter, while performing what was supposed to be a routine breast examination, Defendant McGraw made an equally inappropriate comment, telling Plaintiff, "*Your surgeon did a great job—your breasts look great.*" The remark was sexual, objectifying, and profoundly unprofessional. In that moment, what should have been a clinical examination became an act of humiliation, confirming that McGraw's attention was not medical—it was predatory.

14. On October 14, 2025, Plaintiff entered what she believed would be a routine pelvic examination. While in the exam room, Defendant McGraw pretended to receive a call from a nurse, lifting his phone and speaking briefly as though engaged in medical coordination. When McGraw finished his performance, he slipped the phone into his breast pocket—camera facing outward and recording. McGraw then resumed the examination and asked Jane Doe to remove her pants so that he could examine her pelvic area—even as his phone captured every private, intimate moment and organ without Jane Doe's knowledge. McGraw then suggested a breast exam, despite Jane Doe protesting that she wasn't having any breast-related concerns. McGraw did not ask for consent to record—because he knew she would never give it. That day, inside a federal military hospital, Jane Doe's most private boundaries were breached, her dignity stripped away, and her sense of safety shattered.

15. On or about October 17, 2025, Jane Doe received an unexpected call from the Department of the Army Criminal Investigation Division ("CID"). The agents asked her to come to their headquarters for an interview, whereby they informed her that Defendant McGraw had been secretly filming multiple female patients during their medical appointments. During her subsequent interview, CID investigators presented a series of still photographs recovered from McGraw's phone—images that unmistakably depicted Jane Doe's body during the October 14 examination. Despite Jane Doe's request to view the videos themselves, CID declined, allowing her to see only the still images extracted from the recordings. Even so, the reality was unmistakable. Jane Doe confirmed that she was the individual in the photographs.

16. CID further informed Jane Doe that Defendant McGraw's misconduct was even more invasive than she had been shown—that he had recorded nearly the entirety of her final appointment, including both the breast and pelvic examinations, without her knowledge or

consent. CID confirmed that McGraw had multiple devices that contained images and videos of his female patients. Even more concerning, however, CID could not confirm to Jane Doe whether McGraw may have disseminated such photographs and videos or posted them on the internet.

17. Once the interview was over, CID investigators gave Jane Doe a pamphlet containing the telephone phone numbers of various Army departments.

18. Jane Doe left the CID interview disoriented and disarrayed. She sat in her parked car and cried. Her sense of safety had been shattered. She felt vulnerable and exposed.

B. McGraw's Pattern and Practice of Sexual Misconduct

19. Defendant McGraw's misconduct was neither isolated to Jane Doe nor confined to his tenure at Fort Hood. Upon information and belief, investigators recovered thousands of photographs and videos from his phone, taken over the course of multiple years, depicting scores of female patients, many of whom remain unidentified. The scope of this invasion of privacy is staggering, with the potential to affect hundreds of women in at least two major military installations who placed their trust in McGraw as their physician.

20. Defendant McGraw's predatory behavior did not begin in Texas. His conduct at Fort Hood was, by all indications, a continuation of recording practices he had already established years earlier while stationed at Tripler Army Medical Center in Hawaii, beginning in 2019. During that tour, at least one female patient filed a complaint alleging that McGraw had improperly recorded her pelvic examination on his cell phone—the same type of exam during which he later filmed Jane Doe. Rather than investigate or remove him from patient care, McGraw's chain of command dismissed the complaint, laughed it off, and allowed him to

continue practicing medicine. That institutional indifference was not just negligent—it was a license for a predator to continue violating women under the protection of a U.S. Army uniform.

21. Defendant McGraw's sexual misconduct toward patients was not limited to unwanted recordings. His disregard for patient autonomy extended to the most intimate and life-altering decisions. On at least one occasion, Defendant McGraw induced the labor of a pregnant patient against her explicit wishes. The patient had clearly stated that she wanted to wait and deliver her child on Valentine's Day, a date that held deep personal significance for her. There was no medical necessity for an early induction. Nevertheless, Defendant McGraw proceeded—forcing labor without medical justification and in direct defiance of the patient's express refusal**.** In doing so, he stripped her of the fundamental right to make decisions about her own body, once again prioritizing his own control and convenience over the humanity of the women entrusted to his care.

22. Defendant McGraw also made overt sexual advances toward his patients during what were supposed to be medical examinations. On at least one occasion, while performing a vaginal examination, McGraw told a patient that her "vagina looks pretty," adding that it was "especially so considering [her] recent delivery." The remark was crude, sexual, and wholly devoid of any medical purpose. During that same visit, McGraw touched the patient's most intimate sexual organs without medical necessity, making sexually suggestive comments as he did so. For example, instead of using proper medical terminology when referencing her clitoris, he referred to it as her "happy spot." McGraw's words and actions transformed what should have been a professional medical encounter into an act of humiliation and sexual exploitation, leaving his patient shocked, violated, and powerless in the face of his authority.

23. The incidents described above represent only a fraction of Defendant McGraw's misconduct. Reports continue to surface of other sexual indiscretions, boundary violations, and acts of exploitation committed under the guise of medical care. The allegations set forth herein are not an exhaustive account of his conduct, but merely the tip of the iceberg in a widening scandal that has left scores of military wives and daughters violated, voiceless, and searching for justice.

C. The Army Officials that Looked the Other Way

24. McGraw's misconduct was not a surprise to Army leadership. Long before Jane Doe's assault, multiple patients complained about his behavior: unchaperoned exams, inappropriate comments, unnecessary touching, and after-hours calls and text messages. At least one victim filed a formal written complaint and was told McGraw would merely "be spoken to." McGraw remained in practice, unsupervised, for months or even years—and went on to commit further acts of abuse.

25. When the whistleblowing husband who exposed Defendant McGraw's filming sought to meet with Army leadership, he was refused meetings at every level. He was told to "send an email." The Army's posture was one of indifference and avoidance, not urgency or accountability. Even after CID confirmed McGraw's confession, the hospital waited weeks before authorizing victim notification.

26. The Army's response has been bureaucratic, callous, and wholly inadequate. No proactive outreach was made to patients. No trauma counseling was offered. Victims learned of their status through social media—not from their healthcare provider. Those who sought help were handed a generic pamphlet listing phone numbers, rather than being offered direct care.

27. Victims were told they could not transfer their care to an off-post provider because Darnall retained "right of first refusal" over off-post care. Women who had been photographed and violated were forced to return to the same facility for prenatal checkups. Darnall sought to gaslight victims by disseminating information that off-post OBGYN appointments had a six-to-nine month wait time, when in fact that information was untrue. This message to victims is unmistakable: the Army valued administrative control more than the psychological safety of its victims.

28. The Army's neglect extends beyond the lives of the individual victims. When military families lose faith in the very hospitals entrusted with their safety, the consequences ripple outward—undermining morale, weakening trust in leadership, and compromising the Army's mission readiness. A force cannot remain strong when its soldiers must worry more about the safety of their families than the fight before them. The Army's silence in the wake of this scandal is not just administrative failure—it is operational failure.

29. The Army has made no meaningful effort to coordinate trauma care or counseling for Jane Doe or for the many other victims left in Defendant McGraw's wake. To this day, aside from the interview initiated by criminal investigators, no one from the Army has reached out to Jane Doe or other victimized Army wives, daughters, and female soldiers to offer support, discuss their experiences, or address the institutional failures that allowed Defendant McGraw's misconduct to persist unchecked. The Army's silence speaks volumes—suggesting that the institution entrusted to protect these women has yet to show even the most basic measure of care or accountability.

D. A Systemic Army Failure — Not an Isolated Incident

30. This case does not exist in a vacuum. It is part of a long, grim pattern of sexual-misconduct failures within the United States Army—failures most starkly revealed in the aftermath of the Vanessa Guillén tragedy. In 2020, Guillén, a twenty-year-old soldier stationed at Fort Hood, was brutally murdered after months of reporting sexual harassment that went unanswered by her chain of command. The investigation that followed uncovered a command climate so permissive of abuse that Congress ordered sweeping reforms to the military justice system. Yet five years later, that same culture of silence and minimization remains entrenched at Fort Hood.

31. As Stars and Stripes recently reported in August 2025: "Fort Hood officials chose not to warn the public as a predator attacked female soldiers in their barracks for 18 months." The pattern is unmistakable: when confronted with sexual violence, the institution's reflex is not to protect its soldiers or their families, but to protect itself.

32. The Army promised reforms, yet its response to Defendant McGraw shows those lessons were ignored. Just as in the Army Doctor Michael Stockin sexual-assault case at Joint Base Lewis-McChord, Army medical authorities failed to protect their patients, failed to supervise known offenders, and failed to warn the public. The parallels are unmistakable: systemic neglect, institutional loyalty over human safety, and a refusal to confront sexual misconduct until it becomes a national scandal.

33. The Army's own negligence—its failure to supervise, train, and respond—is not merely moral but legal. Jane Doe intends to pursue claims under the Federal Tort Claims Act against the United States for its independent torts outside of Defendant McGraw's conduct: negligent supervision, screening, retention, training, investigation, and victim care.

V. CAUSES OF ACTION

A. INVASION OF PRIVACY AND INTRUSION ON SECLUSION

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

35. Defendant McGraw intentionally intruded upon the solitude, seclusion, and private affairs of Plaintiff by secretly photographing and recording her during medical examinations without her knowledge or consent. This intrusion would be highly offensive to a reasonable person and constitutes an invasion of privacy under Texas law. As a direct and proximate result, Plaintiff suffered damages including mental anguish, emotional distress, and loss of dignity.

B. SEXUAL ASSAULT, ASSAULT, AND BATTERY

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

37. Defendant McGraw intentionally and knowingly made harmful and offensive physical contact with Plaintiff without her consent, including unnecessary and inappropriate touching of her breasts and genital area during medical examinations. Such conduct constitutes sexual assault, assault, and battery under Texas law. As a direct and proximate result of Defendant's actions, Plaintiff suffered physical and emotional injury, mental anguish, humiliation, and loss of dignity.

C. NEGLIGENCE, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, AND GROSS NEGLIGENCE

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

39. Defendant McGraw intentionally and recklessly engaged in extreme and outrageous conduct that exceeded all bounds of decency by sexually exploiting, recording, and violating

Plaintiff. Such conduct was intended to cause, and did cause, severe emotional distress and mental anguish to Plaintiff. As a direct and proximate result of Defendant's actions, Plaintiff suffered severe emotional pain, humiliation, anxiety, and loss of trust in medical professionals.

VI. DAMAGES

40. Plaintiff seeks damages for pain and suffering in the past and future; mental anguish in the past and future; medical expenses in the past and future, including counseling; costs of suit; and pre-judgment and post-judgment interest at the appropriate rate allowed by law. Plaintiff seeks any other and further relief to which she may be justly entitled.

VII. PUNITIVE DAMAGES

41. Defendant Blaine McGraw's conduct was willful, wanton, malicious, and carried out with a reckless disregard for the rights and safety of others. His actions were not merely negligent but deliberate violations of Plaintiff's bodily integrity and personal dignity. As such, Plaintiff seeks punitive and exemplary damages under Texas Civil Practice and Remedies Code § 41.003(a) to punish Defendant for his egregious misconduct and to deter similar acts in the future.

VIII. DISCOVERY PLAN

42. Plaintiff intends to conduct discovery under level 2 of the Texas Rules of Civil Procedure**.**

IX. JURY DEMAND

43. Plaintiff respectfully demands a jury trial.

X. PRESERVATION NOTICE

44. Plaintiff requests that Defendant preserve any and all related evidence, including any and all photographs and videos, any transmissions of any photographs and/or videos, and communications.

XI. PRAYER

45. Plaintiff asks that Defendant be cited to appear and answer this suit. Plaintiff prays she recovers judgment from Defendant for damages, in an amount over $1,000,000. Plaintiff further seeks pre- and post-judgment interest at the maximum legal rate, costs of court, punitive damages, and any and all other relief to which she may be justly entitled.

<*signatures on following page*>

Respectfully submitted,

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