IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Grandmother Rudolph, individually and on behalf of her minor grandson, Grandson Rudolph (Pseudonyms) c/o The Chandra Law Firm LLC The Chandra Law Building 1265 W. 6th Street, Suite 400 Cleveland, OH 44113-1326 Plaintiffs, v. **Ursuline High School** 750 Wick Avenue Youngstown, Ohio 44505 **Margaret Damore** Assistant Principal, Ursuline High School 6097 Herons Circle Austintown, Ohio 44515 and **Catholic Diocese of Youngstown** c/o Bishop David Bonnar 144 West Wood Street Youngstown, Ohio 44503 Defendants.	Case No. _____-CV-_____ Judge _____ Magistrate _____ **COMPLAINT WITH JURY DEMAND**

COMPLAINT WITH JURY DEMAND

NATURE OF ACTION

1. This is a federal civil-rights action brought by a former Ursuline High School student and his family against the high school and its assistant principal, along with the Catholic Diocese. It alleges violations of Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681 *et seq.* It includes supplemental Ohio state-law civil claims for negligence; negligent supervision; negligent training, supervision, discipline, hiring, and retention.

2. Ursuline High School is a Catholic high school within the Diocese of Youngstown. Rather than act in accordance with its stated values and motto "*Soli Deo Gloria*" (Latin for "*Glory to God alone*"), Ursuline and at least one of its administrators—consistent with Ursuline's *modus operandi*—opted to violate those values and acted solely for the glory of its football team alone.

3. Throughout the 2023-24 school year, several football players harassed, bullied, and ridiculed Grandson, an Ursuline freshman, daily because he is gay. This included them calling him a "f*g" and "f*ggot" during classes and in his teachers' presence. And it included a physical assault.

4. The Ursuline Defendants were aware of the misconduct, but didn't protect Grandson. One teacher even participated in the bullying and proclaimed, "He has on more makeup than me."

5. The Ursuline Defendants' intentional failures persisted even after Grandson himself *repeatedly* reported to school officials the football players' ongoing harassment and bullying.

6. Grandmother, Grandson's legal guardian, also reported the harassment and bullying to school officials and the head football coach, all of whom failed to stop or address the misconduct.

7. The Ursuline Defendants' failures weren't just negligent. They were reckless and intentional, because they sought to protect their football players—at any cost.

8. And they just didn't care about Grandson. What mattered was their false idol of football.

9. Grandmother had to transfer Grandson to another school to protect him.

10. Ursuline's culture of ignoring misconduct by its football players has existed for many years—due, in part, to the school's negligent and reckless hiring, training, supervision, and retention of administrators, coaches, and teachers; and the School's willingness to turn a blind eye to the victimization of students it is entrusted to protect—all because the School elevates the glory of the football team above basic humanity and decency.

11. The victim has endured permanent and lasting harm, degradation, humiliation, intimidation, and retaliation. Ursuline and its administrators could and should have prevented all of this.

12. Now, because of the actions detailed in this Complaint, Defendants must be held accountable.

PARTIES

13. Plaintiff Grandmother Rudolph ("Grandmother") is the grandmother and legal guardian of the victim, Grandson Rudolph. They both reside in Mahoning County, Ohio. She is filing suit on behalf of her minor grandson.

14. Plaintiff Grandson ("Grandson"), a minor at the time of filing, was a freshman at Ursuline, but has since transferred to another high school. Grandson is an openly gay male, who endured daily harassment, bullying, and ridicule because of his sexual preference, affect, and sex stereotyping. He resides with Grandmother in Mahoning County, Ohio.

15. Defendant Ursuline High School ("Ursuline") is a Catholic school under the Catholic Diocese of Youngstown ("Diocese"). Ursuline (with the Diocese's approval) is responsible for its employees' hiring, retention, training, supervision, and termination. That includes its

administrators, coaches, and teachers. Father Richard Murphy is Ursuline's president. Ursuline is in Mahoning County, Ohio.

16. Ursuline, at all relevant times, received and receives federal financial assistance as contemplated by Title IX, 20 U.S.C. §§ 1681 *et seq*. Based on public records obtained from the Youngstown Board of Education, which dispenses the federal financial assistance, some of the assistance Ursuline received is summarized in the chart below:

School Year	Contractual Amount
2019–20	$55,225.47
2020–21	$64,945.00
2021–22	$66,960.00
2022–23	$55,165.00
2023–24	$83,388.00
2024–25	$142,428.00
2025–26	$184,548.00

17. Ursuline is responsible for ensuring that its employees are properly trained and supervised and that its students, including Grandson Rudolph when he went there, are safe. This responsibility extends beyond the four walls of the school.

18. Defendant Margaret Damore is Ursuline's assistant principal. She resides in Mahoning County, Ohio.

19. Defendant Catholic Diocese of Youngstown ("Diocese") is led by the Bishop, currently Bishop David Bonnar, who owns the Diocesan property and is the final decisionmaker for the Diocese and all entities within it, including Ursuline. The Diocese is headquartered in Mahoning County, Ohio. The Diocese is responsible for the negligent training, supervision,

discipline, hiring, and retention of Defendant Damore and Coach Daniel Reardon.

OTHER NON-PARTY INDIVIDUALS

20. Ursuline Player Ta.W., a minor, is an Ursuline junior football player.

21. Ursuline Player A.B., a minor, is an Ursuline junior football player.

22. Daniel Reardon is Ursuline's head football coach. He resides in Mahoning County, Ohio.

23. Nannette Jacobs is an Ursuline teacher in the religious education department.

24. Staci Raab is an Ursuline teacher in the science, health, and physical education department.

INCORPORATION BY REFERENCE

25. Plaintiffs incorporate by reference the operative complaints captioned

(a) *Doe, et al., v. Ursuline High Sch., et al.*, filed in the Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822 ("Ursuline-hazing Complaint");

(b) *Chef, et al. v. Ursuline High Sch., et al.*, filed in the Northern District of Ohio, East Division, Case No. 4:25-cv-01895 (Ursuline-dragging Complaint"); and

(c) all their successor complaints.

The current operative complaints are filed concurrently with and incorporated as **Ex. 1** and **Ex. 2**, respectively.

26. Defendants Ursuline High School, Assistant Principal Margaret Damore, and the Diocese are among the named defendants in the Ursuline-hazing Complaint.

27. Ursuline Players Ta.W. and A.B. (and their guardians/parents) are also named defendants in the Ursuline-hazing Complaint.

28. Defendants Ursuline High School, Assistant Principal Margaret Damore, and the

Diocese are named defendants in the Ursuline-dragging Complaint.

JURISDICTION AND VENUE

29. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331, 1343, and 2201, for federal claims under Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681 *et seq.*, which provide for attorney and expert fees. This Court has supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367.

30. This Court has personal jurisdiction over the Defendants, who reside in and conduct business in this District.

31. Venue is proper under 28 U.S.C. § 1391, because the substantial events giving rise to several of the claims took place within this District.

FACTUAL BACKGROUND

Plaintiff Grandson Rudolph experienced hardship and loss from a young age.

32. Grandmother and Grandson's mother have shared custody of Grandson, but Grandson has lived with his Grandmother his entire life.

33. Grandmother is a hard-working and loving caregiver, sacrificing for Grandson's betterment.

34. In March 2022, Grandson's father was murdered in Mercer County, Pennsylvania. The killer was never captured.

35. Grandmother and Grandson moved to Youngstown, Ohio, from Pennsylvania to escape violence and danger.

36. Grandmother sent Grandson to a private, Catholic grade school because she wanted him to be educated in a religious environment and surrounded by good people.

37. Grandmother's sacrifice continued when she sent Grandson to Ursuline High School in

the hope of continuing his education in a religious environment surrounded by good people—but the school crushed her hopes.

In fall 2023, Plaintiff Grandson Rudolph entered his freshman year at Ursuline High School and was immediately and continuously harassed, bullied, and ridiculed because he is gay and because of sex stereotyping.

38. In or around August 2023, Plaintiff Grandson Rudolph entered his freshman year at Defendant Ursuline High School.

39. Grandson was only 14 years old and stood 5'4" tall, weighing about 130 pounds. In addition to Grandson's small stature, he is shy and timid in public settings, often keeping to himself.

40. Grandson is an openly gay individual and wore makeup.

41. Almost immediately when the school year began, several football players harassed, bullied, and ridiculed Grandson because he is gay and because of sex stereotyping.

42. Ta.W. was the ringleader and main perpetrator, although other players engaged in the misconduct too.

43. The bullying occurred daily and throughout the school day.

44. The players consistently and repeatedly called Grandson the slur "f*g" or "f*ggot."

45. The players' name-calling occurred so often that Grandson questioned whether the players knew his real name.

46. The players consistently and repeatedly ridiculed Grandson because he wore makeup.

47. The players openly and loudly engaged in name-calling and degradation in the classrooms, while in the presence of teachers, in the hallways, and in the cafeteria.

48. In the classroom, Grandson openly cried on multiple occasions when the players would harass him.

49. On rare occasions, a teacher would tell them to "knock it off," but acted no further to protect Grandson or right the injustices perpetrated on him.

50. In the cafeteria, Grandson sat with his one or two friends off to the side in the hope of avoiding the players. But the players still walked over to Grandson's table and persisted in the bullying and name-calling—again, almost every day—even throwing food at him.

Soon, Plaintiff Grandson Rudolph reported the misconduct to Ursuline High School administrators.

51. Within the first couple weeks of school, as the bullying continued, Grandson went to Defendant Ursuline High School administrators and reported the player's abuse.

52. Grandson reported the bullying directly to Assistant Principal Margaret Damore, who assured Grandson she would look into the matter.

53. Grandson teared up during his meeting with Damore as he explained to her the daily and constant harassment, abuse, and bullying.

54. Despite Grandson providing the names of the football players to Damore, as was her professional habit where football-player misconduct is concerned, she did nothing—and the bullying continued.

55. Weeks later, Damore went on maternity leave for the remainder of the first semester.

56. Following his initial meeting with Damore, Grandson went to Ursuline's front office staff many more times throughout the first semester and made additional reports about the players' harassment and bullying.

57. But the Ursuline staff gave the same response as Damore—that they would look into the matter, but then nothing happened.

58. The bullying continued and got worse.

59. When Damore returned from maternity leave, Grandson again reported the harassment and bullying. And again, Damore took no action against the players.

Sadly, the ridicule of Grandson wasn't just limited to the football players, but also included an Ursuline teacher.

60. In 2024, during the second semester of the school year, while in the hallways, Grandson overheard Ursuline High School teacher Nannette Jacobs say to another teacher, loud enough for Grandson to hear, "He has more makeup on than me."

61. Another teacher, Staci Raab tried to defend Grandson and said to Jacobs, "Don't say that. It's not cool."

62. Unfortunately, the damage was done.

63. Grandson ran to the bathroom and sobbed.

64. Grandson immediately reported Jacobs's insensitive and hurtful comment to the front office staff at Ursuline, who assured Grandson that they would inform Damore.

65. But Damore never spoke to Grandson about the Jacobs incident.

66. Again, Ursuline took no action to protect Grandson or his rights.

67. Jacobs remains an Ursuline teacher—in the ***religious*** education department no less.

As the school year progressed, Plaintiff Grandson Rudolph endured physical abuse and feelings of hopelessness and despair.

68. Because of the constant bullying, coupled with Defendant Ursuline's failure to address the matter, Grandson experienced overwhelming hopelessness and despair.

69. Grandson, knowing and appreciating how much Grandmother sacrificed to send him to Ursuline, did not want to tell her of the daily abuse he suffered.

70. Grandson suffered in silence, alone—not wanting to crush Grandmother's hopes of having him enrolled in a religious school environment.

71. In or around February 2024, when Grandmother picked up Grandson and his cousin from school, Grandson had a red mark/welt on his face.

72. Grandmother asked Grandson what happened, but again not wanting to let her down, he refused to tell her.

73. Finally, the cousin told Grandmother that a football player threw food at Grandson's face during lunch, causing the injury.

74. On February 6, 2024, Grandmother sent a text message to another cousin ("Cousin") seeking advice and consolation, "Good morning big cousin, I know it's early but I really need a prayer that breaks generational curses. It's of the most urgency. Please send me one Asap! Please big cousin. Please."



75. Cousin is an Ursuline graduate and former football player respected and well-known in the Ursuline community.

76. To try to protect himself from the constant barrage of being called a "f*g" and "f*ggot," being ridiculed by the football players and even a teacher, being assaulted with such force that it left a mark visible hours later, and Ursuline's failures to protect him, Grandson tried to block the painful incidents from his memory—a common occurrence with victims of such bullying and abuse.

77. Throughout the year, Grandmother noticed Grandson becoming more and more distant. Their close and loving relationship became strained and tense.

78. When Grandson complained, "I hate that school. Why did you send me there?" Grandmother could not understand why Grandson was saying such things.

79. Grandson's grades continued to drop throughout the year.

80. When Grandson decided not to run track, Grandmother could not understand why—because Grandson used to love running track.

81. Grandmother soon learned why Grandson was acting this way.

Plaintiffs Grandmother and Grandson Rudolph were harassed by several football players.

82. After paying private school tuition and living expenses, Grandmother didn't have much money left to spoil Grandson.

83. But she made it a point to take Grandson to the movies on Tuesday nights. On Tuesdays, the movie theater had special reduced prices—$6.50 per ticket.

84. Grandmother and Grandson had enjoyed the Tuesday-night-movie tradition since Grandson was a youngster. It was their special time together.

85. In or around early March 2024, Grandmother and Grandson stopped at the McDonald's on Belmont Avenue in Liberty Township for dinner before the movie.

86. When they arrived, Grandson stayed in the car, which was unusual. But Grandmother did not want to push the issue.

87. Grandmother went inside and, as she waited for their food, four Ursuline football players were waiting behind her.

88. A.B. was one of the football players.

89. Grandmother immediately recognized them as Ursuline football players because they were wearing Ursuline football t-shirts.

90. Grandmother asked the players if they knew her grandson.

91. The players asked what was her grandson's name.

92. As soon as Grandmother said Grandson's name, the players busted out laughing.

93. When Grandmother asked why they were laughing, they just kept laughing and did not say why.

94. Grandmother got her food and went back outside to her car.

95. When she got to the car, Grandson was ducking down inside trying to hide.

96. The players walked out and, seeing Grandson, stared at him and laughed.

97. Grandmother and Grandson could hear the players saying Grandson's name as they laughed and made jokes about him.

98. Grandmother opened the car door and said, "Excuse me, young man; I can hear you."

99. One player responded, "Ahh, fuck her," and they continued laughing.

100. Grandson begged Grandmother to close the door and leave.

101. Grandmother, sensing an escalation occurring, closed the car door and sped off.

102. As they escaped, Grandson broke down in tears and told Grandmother everything about the football players' ongoing and persistent harassment, bullying, and ridicule. He told her about

how football players would throw food at him at lunch.

103. The once-special, Tuesday-night-movie tradition was ruined.

Plaintiffs Grandmother Rudolph reported the harassment to the Ursuline Defendants.

104. The next day, Grandmother called Ursuline's front office and reported the McDonald's incident with the football players.

105. The receptionist told Grandmother she would convey the message to the principal and assistant principal, and that someone would call her back.

106. Yet no one from Ursuline called back.

107. The next day, Grandmother went to Ursuline and spoke to Assistant Principal Damore, who assured Grandmother she would look into the matter and contact Grandmother.

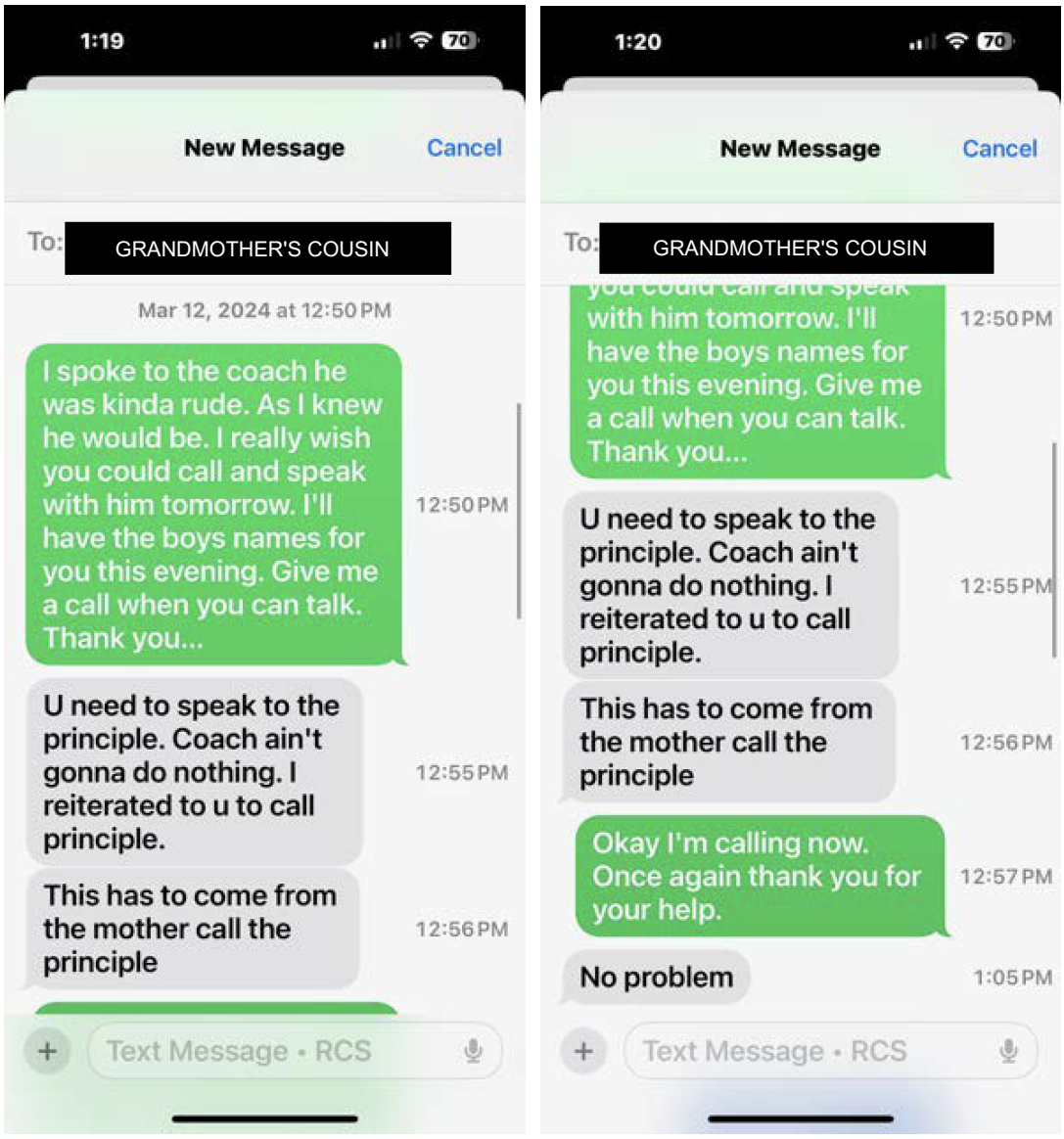
108. When Grandmother did not hear back from Damore, she called the school and asked to speak to the "head football coach."

109. Daniel Reardon was Ursuline's head football coach at the time and was also a teacher at the school.

110. When the call was connected to the "head football coach," Grandmother informed him of the players' harassment and bullying of Grandson.

111. The head coach was rude to Grandmother and offered no help.

112. On March 12, 2024, Grandmother again texted Cousin for help:



113. Grandmother went to Ursuline for the second time.

114. When she arrived, Grandmother spoke to the receptionist and secretary in the front office—she again told them about the McDonald's incident and the ongoing harassment of Grandson and asked to speak to the principal.

115. Neither Principal Matthew Sammartino, nor Assistant Principal Damore, came out to speak with Grandmother.

116. Because Grandmother had to get to work, she could wait no longer and had to leave.

117. Before Grandmother could give the front office staff her name, they told her that they know who she was and had her phone number already—even though she had not yet given either.

118. The front office staff assured Grandmother, "We will look into it."

119. No one from Ursuline contacted Grandmother.

120. Nor did anyone from Ursuline speak to Grandson about the McDonald's incident.

For the next 11 weeks, Grandmother Rudolph continued to call Ursuline seeking answers to her complaints.

121. For the next 11 weeks, Grandmother called Ursuline seeking answers to her and Grandson's complaint—none came.

122. According to Grandmother's cellphone records, she called Ursuline on the following dates and times:

a. March 19, 2024, at 8:11 AM (duration: 1 minute).

i. March 22, 2024 at 9:41 AM (duration: 2 minutes): *Incoming* call from Ursuline.

ii. March 22, 2024 at 2:30 PM (duration: 1 minute): *Incoming* call from Ursuline.

b. March 27, 2024, at 7:32 AM (duration: 1 minute).

c. April 18, 2024, at 8:50 AM (duration: 1 minute).

d. April 18, 2024, at 9:08 AM (duration: 1 minute).

e. April 24, 2024, at 8:18 AM (duration: 1 minute).

f. April 24, 2024, at 8:28 AM (duration: 2 minutes).

g. April 26, 2024, at 7:43 AM (duration: 1 minute).

iii. May 2, 2024 at 9:12 AM (duration: 2 minutes): *Incoming* call from Ursuline.

h. May 7, 2024, at 8:46 AM (duration: 1 minute).

i. May 9, 2024, at 8:39 AM (duration: 1 minute).

j. May 13, 2024, at 7:46 AM (duration: 1 minute).

k. May 13, 2024, at 9:04 AM (duration: 1 minute).

l. May 15, 2024, at 9:13 AM (duration: 4 minutes).

m. May 21, 2024, at 2:30 PM (duration: 2 minutes).

n. May 22, 2024, at 1:01 PM (duration: 2 minutes).

o. May 22, 2024, at 1:19 AM (duration: 8 minutes).

p. May 22, 2024, at 3:38 PM (duration: 3 minutes).

q. May 28, 2024, at 1:18 PM (duration: 1 minute).

r. May 29, 2024, at 9:14 AM (duration: 1 minute).

s. May 30, 2024, at 9:17 AM (duration: 4 minutes).

t. May 31, 2024, at 12:55 PM (duration: 1 minute).

123. Ursuline never addressed the players' harassment and bullying of Grandson.

124. The harassment continued.

125. The players were not punished.

The Ursuline Defendants failed to follow the Ursuline High School Student Handbook and the Code of Conduct.

126. Despite Grandmother and Grandson's ongoing and multiple reports to the school and its staff, Ursuline and its administrators, staff, and football coach failed to follow the school's *Code of Conduct* in handling the matter and no action was taken against the players.

127. The *Ursuline High School Student Handbook* contains the *Code of Conduct*, which sets forth the following "STUDENT RESPONSIBILITIES":

> All Ursuline High School students are expected:
> . To conduct themselves in a manner that will guarantee their own well-being and the well-being of others. Their behavior should reflect positively on Ursuline High School, their families, and the community as a whole;
> . To treat administrators, teachers, staff members, parents, guests and other students and third parties with courtesy and respect;
> . To know and adhere to the rules and regulations established by their teachers and school administrators;
> . To strive for academic excellence;
> . To refrain from libelous/slanderous remarks and obscene/vulgar language in written and/or verbal expression;
> . To adhere to policies relating to chemical/alcohol abuse;
> . To be punctual in attending school and class;
> . To refrain from misbehavior that disrupts the educational process for themselves and others;
> . To respect the reasonable and necessary exercise of authority by school administrators and staff to maintain discipline at school and at school-sponsored activities.

128. The *Code of Conduct* specifically sets forth provisions addressing "Anti-Bullying, Harassment, and Intimidation," "Sexual Harassment and Sexual Violence," and "Student Threats." Committing any of these acts violates the Code *of Conduct*.

129. By the *Code of Conduct's* own definitions, the players engaged in each of these acts and violated the *Code of Conduct*.

130. The *Code of Conduct's* "EXCLUSION FROM SCHOOL" provision provides, in relevant part, "The administration may exclude a student for any other reason deemed sufficiently serious."

131. Ursuline excluded no players from school.

132. The *Code of Conduct's* "SUSPENSION" provision provides, in relevant part:

> A student may be suspended from Ursuline High School when he/she seriously violates the Code of Conduct or for any reason deemed sufficiently serious by the Administrative Team.
> …

> Students on suspension may not participate in or attend any school functions or extra-curricular activities, including practice. Students given an out of school suspension are not permitted to be on school grounds during the time of the suspension.
> …
> Students on in-school suspension may not participate in or attend any school functions or extra-curricular activities, including practice.

133. Despite the players seriously violating the *Code of Conduct*, the Ursuline Defendants suspended no players as discipline.

134. The *Code of Conduct's* "EXPULSION" provision provides, in relevant part:

> Expulsion may be used as the most serious and final disciplinary action for serious misbehavior, when public immorality affects school morale, when public misbehavior results in court proceedings, or when the student fails to respond to regular and routine disciplinary measures and remains incorrigible, and/or for any other reason deemed sufficiently serious by the Principal.
> …
> The following are grounds for expulsion in all diocesan schools:
> …
> 8. Other disruptive behaviors and/or for any other reason deemed sufficiently serious by the Principal, in consultation with the Superintendent, to warrant the student's permanent removal from the school.

135. Despite the players engaging in this repeated misconduct and these violations, including bullying and sex-based harassment, the Ursuline Defendants expelled no players from school.

136. And up until the cancellation of the 2025 football season, Ta.W., A.B., and the other football players, whose names are known to Damore, all played football for Ursuline.

Plaintiff Grandson Rudolph escaped Ursuline and transferred to another high school.

137. Following the 2023–24 school year, Grandson transferred to another high school.

138. Grandmother's hopes of Grandson attending a private school with a religious environment surrounded by good people were crushed.

139. Although Grandson feels a huge weight has been lifted off his chest following the transfer, the injury and harm persists.

140. Grandson is terrified of retaliation.

141. Grandson attends weekly counseling and is expected to need future counseling for years to come.

142. In describing his experience at Ursuline, Grandson said, "They made my life a living hell."

Defendants Catholic Diocese of Youngstown and Ursuline failed to train, supervise, and discipline Defendant Damore and Coach Reardon on how to handle bullying and harassment (including sex-based harassment) and protect students—that is, how not to treat football and football players as more important than everything.

143. Defendant Catholic Diocese of Youngstown, whose Bishop signs contracts with its personnel, and Ursuline High School failed to train, supervise, and discipline Defendant Damore and Coach Reardon (and his fellow coaches) about how to properly address and investigate allegations of student

(a) bullying,

(b) sex-based harassment,

(c) sex-based stereotyping,

(d) Title IX violations, and

(e) all the other misconduct described above.

144. And despite receiving federal funding, Defendant Ursuline High School had no Title IX coordinator. Defendant Catholic Diocese of Youngstown, which oversees the high school, did not ensure it did, or that its administrators like Defendant Damore designated one.

CLAIMS

Although all claims below for Plaintiff Grandson Rudolph, are through Grandmother Rudolph, Grandmother Rudolph's name is omitted for simplicity's sake.

CLAIM 1
VIOLATION OF TITLE IX OF THE CIVIL RIGHTS ACT
(EDUCATION AMENDMENTS OF 1972), 20 U.S.C. § 1681 *ET SEQ.*

(BY PLAINTIFF GRANDSON RUDOLPH AGAINST DEFENDANT URSULINE HIGH SCHOOL)

145. Plaintiffs incorporate all previous allegations.

146. Ursuline High School, as a recipient of federal funding, is subject to Title IX, which prohibits discrimination based on sex in educational programs and activities, as well as retaliation for engaging in protected activity complaining of discrimination. 20 U.S.C. §§ 1681 *et seq.*

147. Religious schools that receive federal funding are only excluded from Title IX's requirements "if the application of [the requirements] would not be consistent with the religious tenets of such organization." 20 U.S.C. § 1681(a)(3).

148. These religious exemptions are commonly known to include the exclusion from sports teams based on gender identity, the ability to expel pregnant students, and to have policies denying LGBTQ+ rights.

149. Ursuline and Catholic Diocese may try to claim that the bullying and assault of Grandson, and the failure to address them, all relate to denial of his LGBTQ+ rights and are thus somehow legally justified. But courts have not extended the religious-exemption policies to bullying. Instead, courts have allowed religious institutions to claim LGBTQ+–related Title IX exemptions regarding enforcing gender-specific dress codes, using facilities corresponding with a student's biological sex, and refusing to affirm gender identities inconsistent with the school's religious teachings.

150. Ursuline has not requested Title IX–exemption regarding the sex-based-stereotyping-bullying and harassment and assault of students on the basis that preventing such harassment and

assaults would conflict with its religious tenets.

151. Nor would it—unless it wants people to believe that Catholic teaching embraces sex-based-stereotyping harassment, bigoted language, and physical violence.

152. The sex-based-stereotyping harassment Grandson endured from football players was severe, pervasive, objectively offensive, and deprived him of access to educational opportunities and benefits.

153. Ursuline, through its administrators, including Defendant Damore and Coach Daniel Reardon had actual knowledge of the severe, pervasive, and objectively offensive harassment Grandson suffered.

154. Despite this knowledge, Ursuline maintained a policy and practice of responding with deliberate indifference to misconduct by football players. This habit included the hazing detailed in the operative Ursuline-hazing Complaint and the violence and harassment detailed in the operative Ursuline-dragging Complaint.

155. Ursuline's deliberate indifference is further evidenced by its failure to train Damore, Reardon, and fellow administrators and coaches on recognizing and preventing sexual harassment, and sex-based-stereotyping harassment and bullying and violence.

156. Under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a), Ursuline created, tolerated, and subjected Grandson to a hostile educational environment because he was treated disparately based on sex-based stereotyping and sexual orientation; suffered sexual harassment, assault, and other harassment.

157. And Ursuline lacked adequate policies, training, and procedures and deliberately failed to take appropriate preventive or remedial measures.

158. Because of Ursuline's discriminatory policy and practice, Grandson was denied equal

access to the School's educational opportunities, forced to endure a hostile environment, and ultimately forced to transfer schools to escape the harassment and retaliation.

159. As a direct and proximate result of Ursuline's failures, Grandson suffered and will continue to suffer economic and non-economic damages including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 2
OHIO COMMON-LAW NEGLIGENCE AND RECKLESSNESS

(BY PLAINTIFF GRANDSON RUDOLPH AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND MARGARET DAMORE)

160. Plaintiffs incorporate all previous allegations.

161. The named Defendants failed to exercise the care that a reasonably prudent person would exercise in a similar situation, resulting in injury.

162. Defendant Damore was an agent and employee of Defendant Ursuline High School acting on its behalf and within the scope of her office or employment. Ursuline High School is vicariously liable.

163. As a school and school officials, named Defendants owed a duty of care owed to Grandson, who was entrusted to their care at school.

164. They breached that duty.

165. As a direct and proximate result of these actions, Grandson has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

166. Defendants' acts were in conscious disregard for Grandson's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial

sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 3
OHIO COMMON-LAW NEGLIGENT SUPERVISION AND RECKLESS SUPERVISION

(BY PLAINTIFF GRANDSON RUDOLPH AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND MARGARET DAMORE)

167. Plaintiffs incorporate all previous allegations.

168. Defendants had a duty to provide reasonable supervision of students.

169. The named Defendants left Ta.W., A.B., and other football players unsupervised, leading to Grandson's injuries.

170. The school ignored repeated complaints of bullying and harassment.

171. The named Defendants failed to meet the standard of reasonable and prudent educators in supervising the students.

172. Defendant Damore is an agent and employee of Defendant Ursuline High School acting on its behalf and within the scope of her office or employment. Ursuline High School is vicariously liable.

173. As a school and school officials, they owed a duty of care owed to Grandson, who was entrusted to their care at school.

174. They breached that duty.

175. As a direct and proximate result of these actions, Grandson has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

176. Defendants' acts were in conscious disregard for Grandson's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial

sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 4
NEGLIGENT AND RECKLESS TRAINING, SUPERVISION, DISCIPLINE, STAFFING, HIRING, AND RETENTION UNDER OHIO LAW

(BY PLAINTIFF GRANDSON RUDOLPH AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND THE CATHOLIC DIOCESE OF YOUNGSTOWN)

177. Plaintiffs incorporate all previous allegations.

178. The named Defendants failed to exercise due care and acted in both a negligent and reckless manner in training, supervising, disciplining, staffing, hiring, and retaining the individual Defendants—especially Defendant Damore and Coach Reardon.

179. The named Defendants failed to train, supervise, and discipline Defendants Damore and Reardon about how to properly address and investigate allegations of bullying, sexual harassment, sex-based stereotyping and harassment, sexual-orientation harassment and discrimination, and all the conduct described above.

180. The named Defendants failed to train, supervise, and discipline Defendant Damore and Coach Reardon about caring about such allegations more than football.

181. Defendants Ursuline and the Diocese's negligent and reckless conduct in this regard proximately caused Grandson's injuries.

182. As a direct and proximate result of these actions, Grandson has suffered and will continue to suffer damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

183. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

PRAYER FOR RELIEF

For the above reasons, Plaintiff respectfully requests the following relief from the Court:

(a) Declare that Defendants' acts and conduct constitute violations of federal and state law and the United States Constitution;

(b) Enjoin Defendants from retaliating against Grandmother and Grandson Rudolph;

(c) Enter judgment in Grandmother and Grandson Rudolph's favor on all claims for relief;

(d) Award Grandmother and Grandson Rudolph full compensatory damages, economic and non-economic, including, but not limited to, pain and suffering, mental anguish, emotional distress, reputational harm, sense of betrayal, and trauma that they have suffered and are reasonably certain to suffer in the future;

(e) Award Grandmother and Grandson Rudolph punitive damages as appropriate for all intentional and malicious violations of federal and state law and constitutional rights;

(f) Award prejudgment and post-judgment interest at the highest lawful rate;

(g) Award Grandmother and Grandson Rudolph their reasonable attorney fees, expert fees, and all other expenses of this suit;

(h) Award all other relief in law or equity to which Grandmother and Grandson Rudolph is entitled and that the Court deems equitable, just, or proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues within this complaint.

Dated: November 17, 2025

Respectfully submitted,

/s/ Subodh Chandra
Subodh Chandra (0069233)
Alexandra Day Lavelle (0099601)
THE CHANDRA LAW FIRM LLC
The Chandra Law Building
1265 West 6th Street, Suite 400
Cleveland, Ohio 44113
888.500.5025 Phone
Subodh.Chandra@ChandraLaw.com
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Per consent
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P.O. Box 14052
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Mpmd4@hotmail.com

Attorneys for Plaintiffs Grandmother and Grandson Rudolph (Pseudonyms)

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Grandmother Rudolph, individually and on behalf of her minor grandson, Grandson Rudolph

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Subodh Chandra, Alexandra Lavelle, 1265 W. 6TH Street, Ste 400, Cleveland, OH 44113, 888.500.5025; Martin Desmond; PO Box 14052, Youngstown, OH 44514; 330.559.4505

DEFENDANTS

Ursuline High School; Margaret Damore; Catholic Diocese of Youngstown

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☒ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
20 U.S.C §§ 1681 (Title IX)

Brief description of cause:
Plaintiff high-school student was bullied and harassed by several Ursuline High School football players. School and administrators failed to do anythi

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE Judge Benita Y. Pearson DOCKET NUMBER 4:25-cv-01822; 4:25-cv-01895

DATE
November 17, 2025

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

1. ☑ General Civil
2. ☐ Administrative Review/Social Security
3. ☐ Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regardfor the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action: ☑ is **RELATED** to another **PENDING** civil case ☐ is a **REFILED** case ☐ was **PREVIOUSLY REMANDED**

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule **3.8**, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant**. If the defendant resides in a county within this district, please set forth the name of such county

COUNTY: Mahoning County

Corporation **For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.**

(2) **Non-Resident defendant**. If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY:

(3) **Other Cases**. If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section **III**, please check the appropriate division.

EASTERN DIVISION

☐	**AKRON**	**(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)**
☐	**CLEVELAND**	**(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake, Lorain, Medina and Richland)**
☑	**YOUNGSTOWN**	**(Counties: Columbiana, Mahoning and Trumbull)**

WESTERN DIVISION

☐	**TOLEDO**	**(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)**

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below**; NOTE: federal question actions take precedence over diversity cases.**)

III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Jane Doe, individually and on behalf of her minor children, Son Doe and Daughter Doe (Pseudonyms) c/o The Chandra Law Firm LLC The Chandra Law Building 1265 W. 6th Street, Suite 400 Cleveland, Ohio 44113-1326 and **John and Jill Roe, individually and on behalf of their minor son, Son Roe** (Pseudonyms) c/o The Chandra Law Firm LLC The Chandra Law Building 1265 W. 6th Street, Suite 400 Cleveland, Ohio 44113-1326 Plaintiffs, v. **Ursuline High School** 750 Wick Avenue Youngstown, Ohio 44505 **Matthew Sammartino** Principal, Ursuline High School 1163 Red Tail Hawk Court, Unit 2 Boardman, Ohio 44512 **Margaret Damore** Assistant Principal, Ursuline High School 6097 Herons Circle Austintown, Ohio 44515 **John DeSantis** Athletic Director & Assistant Football Coach 6123 Celesta Place	Case No. 4:25-cv-01822-BYP Judge Benita Y. Pearson Magistrate Judge Carmen E. Henderson **SECOND AMENDED AND SUPPLEMENTAL COMPLAINT WITH JURY DEMAND** 

Poland, Ohio 44514 **Daniel Reardon** Head Football Coach, Ursuline High School 2410 Hunters Ridge Youngstown, Ohio 44512 **Timothy McGlynn** Assistant Football Coach, Ursuline High School 6885 Winterpark Avenue Youngstown, Ohio 44515 **Christian Syrianoudis** Assistant Football Coach, Ursuline High School 535 South Hillside Drive Canfield, Ohio 44406 **Catholic Diocese of Youngstown** c/o Bishop David Bonnar 144 West Wood Street Youngstown, Ohio 44503 **D.P.** Ursuline Player and minor child, individually; and **Dale Peterman,** Parent of Ursuline Player D.P., Individually and on behalf of minor child 465 Gypsy Lane, Apt. 28 Youngstown, Ohio 44505; and **LayShawna Garner,** Parent of Ursuline Player D.P., Individually and on behalf of minor child 116 Alburn Drive Youngstown, Ohio 44512 **Ta.W.** Ursuline Player and minor child, individually; and **Raylette Robinson,** Grandparent and Guardian of Ursuline Player Ta.W. Individually and on behalf of minor child	

739 Annawan Lane Boardman, Ohio 44512 **C.C.** Ursuline Player and minor child, individually; and **Christopher & Gina Crilley,** Parent(s) of Ursuline Player C.C., Individually and on behalf of minor child 6584 New Castle Road Lowellville, Ohio 44436 **To.W.** Ursuline Player and minor child, individually; and **Todd White, Jr. & Migdalia Sauceda,** Parent(s) of Ursuline Player To.W., Individually and on behalf of minor child 2641 Cooper Street Youngstown, Ohio 44502 **D.T.** Ursuline Player and minor child, individually; and **Somer Thomas,** Parent of Ursuline Player D.T., Individually and on behalf of minor child 342 Kenmore Avenue SE Warren, Ohio 44483; and Tyler Taylor, Parent of Ursuline Player D.T., Individually and on behalf of minor child 1106 Harvard Avenue Warren, Ohio 44484 **A.B.** Ursuline Player and minor child, individually; and **Kristen Brown & [FNU] [LNU],** Parent(s) of Ursuline Player A.B., Individually and on behalf of minor child 2228 Selma Ave. Youngstown, Ohio 44504	

G.C. Ursuline Player and minor child, individually; and **Anthony Camuso,** Parent of Ursuline Player G.C., Individually and on behalf of minor child 4475 Jannell Court, Canfield, Ohio 44406; and **Rachel Camuso,** Parent of Ursuline Player G.C., Individually and on behalf of minor child 150 Preserve Boulevard Canfield, Ohio 44406 **C.S.** Ursuline Player and minor child, individually; and **Liza Strawn and [FNU] Strawn,** Parent(s) of Ursuline Player C.S. 171 Glenview Road Canfield, Ohio 44406 **B.S.** Ursuline Player and minor child, individually; and **Benjamin Smith and Janell Bankston** Parent(s) of Ursuline Player B.S., Individually and on behalf of minor child 34 South Hartford Avenue Youngstown, Ohio 44509 **T.S.** Ursuline Player minor child, individually; and **Charolette Syrianoudis and [FNU] [LNU],** Parent(s) of Ursuline Player T.S., Individually and on behalf of minor child 535 South Hillside Drive Canfield, Ohio 44406 and **J.B.** Ursuline Player and minor child, individually; and	

David & Gina Brace, Parent(s) of Ursuline Player J.B., Individually and on behalf of minor child 236 Bradford Drive Canfield, Ohio 44406 Defendants.	

SECOND AMENDED AND SUPPLEMENTAL COMPLAINT WITH JURY DEMAND

NATURE OF ACTION

1. This is a federal civil-rights action brought by two high-school football players and their families against a high school, its officials and coaches, the Catholic Diocese of Youngstown, and various football players and their parents. It alleges violations of Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.* and 15 U.S.C. § 6851 (disclosure of intimate images). The action also includes supplemental claims for Ohio, Alabama, Florida, Indiana, Tennessee, and Wisconsin legal violations, including statutes establishing civil liability for criminal acts like hazing, disseminating child porn, tampering with evidence, tampering with records, obstructing justice, culpable negligence, child neglect, and failure to report abuse; and other state-law civil claims for negligent supervision of children; negligent and reckless hiring, training, supervision, and retention; disseminating intimate images, assault; battery; intentional infliction of emotional distress;; and spoliation.

2. Defendant Ursuline High School is a Catholic high school within Defendant Catholic Diocese of Youngstown. Rather than act in accordance with its stated values and motto "*Soli Deo Gloria*" (Latin for "*Glory to God alone*"), Ursuline and several of its administrators, coaches, and students opted to violate those values and acted solely for the glory of its football team alone.

3. **Doe allegations.** In June 2025, during a school-sanctioned football-camp trip, several football players engaged in criminal activity, including hazing, physical and sexual abuse, kidnapping, production and dissemination of child pornography, and theft, all of which the three football coaches who attended the trip knew before, during, and after the incidents.

4. Plaintiff Son Doe was a victim of that misconduct. His claims allege violations of Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.* and 15 U.S.C. § 6851 (disclosure of intimate images); and supplemental claims for Ohio, Alabama, Florida, and Tennessee, and Wisconsin legal violations, including statutes establishing civil liability for criminal acts like hazing, disseminating child porn, tampering with evidence, tampering with records, obstructing justice, culpable negligence, child neglect, and failure to report abuse; and other state-law civil claims for negligent supervision of children; negligent and reckless hiring, training, supervision, and retention; disseminating intimate images, assault; battery; intentional infliction of emotional distress; and spoliation.

5. When, soon after the June 2025 trip, school administrators learned of the misconduct, they engaged in their own misconduct and failed to take the appropriate actions to address the misconduct and protect the victims.

6. Ursuline's culture of hazing has existed for many years—due, in part, to the school's negligent and reckless hiring, training, supervision, and retention of football coaches who engaged in prior misconduct, and the School's willingness to turn a blind eye to the sexual victimization of students it is entrusted to protect—all because the School elevates the glory of the football team above basic values.

7. After the original Complaint's September 2, 2025 filing, multiple victims and witnesses—once silenced because they were afraid and knew that Ursuline would never address

their concerns and protect them from harm—have found the courage to speak up to seek justice and accountability for themselves and the other victims of the Ursuline football team's known "culture of violence" and "tradition" of hazing.

8. **Roe allegations.** This action now includes allegations against Ursuline, its officials, and coaches brought by a second high-school football player and his family—for hazing he endured during the 2024 football-team camp trip. It adds allegations of violations of Title IX of the Education Amendment (20 U.S.C. §§ 1681 *et seq.*); with supplemental claims for Ohio, Indiana, and Wisconsin legal violations, including statutes establishing civil liability for criminal acts like hazing and failure to report abuse; and other state-law civil claims for negligent and reckless hiring, training, supervision, and retention.

9. Several football players who participated in the hazing culture the Ursuline defendants indulged have also stepped forward, expressing regret and remorse for their actions and revealing the actions and inactions of Ursuline officials and coaches. To repent and accept accountability, these players agreed to cooperate and provide truthful information and testimony to support the victims—the same victims whom the other Ursuline defendants have publicly and falsely claimed do not exist. These players have also provided information that the Ursuline "culture of violence" and "tradition" of hazing wasn't an isolated event, but has persisted for years with coaches' knowledge and acquiescence.

10. As detailed below, the tradition of hazing started at least as far back as the Ursuline football team's 2022 camp trip, and continued during the football team's camp trips during 2023, 2024, and 2025.

11. These players also provided videos from the football team's group Snapchat further corroborating that the serial hazing occurred and the allegations are true—and even more

disturbing and grotesque than originally known.

12. Victims, both named and unnamed, have endured permanent and lasting harm, degradation, humiliation, intimidation, and retaliation—all of which Ursuline, its administrators, and its coaches could and should have prevented.

13. Now, because of the actions detailed in this Complaint, the School must be cleansed.[1] And it must be held accountable.

PARTIES

14. Plaintiff Jane Doe ("Mother" or "Mother Doe") is the mother of two of the victims, Son Doe and Daughter Doe. She resides in Trumbull County, Ohio.

15. Plaintiff Son Doe ("Son"), a minor, at the time of filing, was entering his freshman year at Ursuline, but has since transferred to another high school. He resides in Trumbull County, Ohio.

16. Plaintiff Daughter Doe ("Daughter"), a minor at the time of filing, was entering her senior year at Ursuline, but has since transferred to another high school. She resides in Trumbull County, Ohio.

17. Plaintiffs John Roe ("Father" and "Father Roe") and Jill Roe ("Mother" or "Mother Roe") are the parents of victim Son Roe. They reside in Trumbull County, Ohio.

18. Plaintiff Son Roe ("Son"), a minor at relevant times, was an Ursuline sophomore, but since transferred to another high school. He resides in Trumbull County, Ohio.

19. Defendant Ursuline High School ("Ursuline") is a Catholic school under the Catholic

[1] *See The Holy Bible*, Gospel of Matthew 21:12–13; Gospel of Mark 11:15–17; Gospel of Luke 19:45–46; Gospel of John 2:13–16.

Diocese of Youngstown ("Diocese"). Ursuline (with the Diocese's approval) is a Diocesan agency responsible for its employees' hiring, retention, training, supervising, and termination. That includes its administrators and football coaches. Father Richard Murphy is Ursuline's president. Ursuline is in Mahoning County, Ohio.

20. Ursuline, at all relevant times, received and receives federal financial assistance as contemplated by Title IX, 20 U.S.C. §§ 1681 *et seq*. Based on public records obtained from the Youngstown Board of Education, which dispenses the federal financial assistance, some of the assistance Ursuline received is summarized in the chart below:

School Year	Contractual Amount
2019–20	$55,225.47
2020–21	$64,945.00
2021–22	$66,960.00
2022–23	$55,165.00
2023–24	$83,388.00
2024–25	$142,428.00
2025–26	$184,548.00

21. Ursuline is responsible for ensuring that its employees are properly trained and supervised and that its students, including Son Doe and Son Roe when they went there, are safe. This responsibility extends beyond the four walls of the school to extracurricular activities including school-sponsored, sports-related trips.

22. Defendant Matthew Sammartino is Ursuline's principal. He resides in Mahoning County, Ohio.

23. Defendant Margaret Damore is Ursuline's assistant principal. She resides in Mahoning

County, Ohio.

24. Defendant John DeSantis is Ursuline's athletic director and an assistant football coach. He resides in Mahoning County, Ohio.

25. Defendant Daniel Reardon is Ursuline's head football coach. He resides in Mahoning County, Ohio.

26. Defendant Timothy McGlynn is an Ursuline assistant football coach. He resides in Mahoning County, Ohio.

27. Defendant Christian Syrianoudis is another Ursuline assistant football coach. He resides in Mahoning County, Ohio.

28. Defendant Catholic Diocese of Youngstown ("Diocese") is led by the Bishop, currently Bishop David Bonnar, who owns the Diocesan property and is the final decisionmaker for the Diocese and all entities within it, including Ursuline. His predecessor was the late Bishop George Murry. The Diocese is headquartered in Mahoning County, Ohio.

29. Defendant Ursuline Player D.P., a minor, is an Ursuline junior football player. He resides in Mahoning County, Ohio.

30. Defendants Dale Peterman and LayShawna Garner are D.P.'s parents. They reside in Mahoning County, Ohio.

31. Defendant Ursuline Ta.W., a minor, is an Ursuline junior football player. He resides in Mahoning County, Ohio.

32. Defendant Raylette Robinson is Ta.W's grandparent and guardian. She resides in Mahoning County, Ohio.

33. Defendant Ursuline Player C.C., a minor, is an Ursuline sophomore football player. He resides in Mahoning County, Ohio.

34. Defendant Christopher and Gina Crilley are C.C.'s parents. They reside in Mahoning County, Ohio.

35. Defendant Ursuline Player To.W., a minor, at relevant times, was an Ursuline senior football player. To.W. has since transferred to another high school. He resides in Mahoning County, Ohio.

36. Defendant Todd White, Jr. and Migdalia Sauceda are the parents of To.W. They reside in Mahoning County, Ohio.

37. Defendant Ursuline Player D.T., a minor, is an Ursuline senior football player. D.T. has since transferred from Ursuline. He resides in Trumbull County, Ohio.

38. Defendant Somer Thomas and Tyler Taylor are D.T.'s parents. They reside in Trumbull County, Ohio.

39. Defendant Ursuline Player A.B., a minor, is an Ursuline junior football player. A.B. is believed to have transferred to another high school. He resides in Mahoning County, Ohio.

40. Defendant Kristen Brown is A.B.'s mother. She resides in Mahoning County, Ohio. [FNU][LNU] is A.B.'s father, whose exact identity is unknown, but whose involvement Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs could not discover [FNU][LNU]'s name and identity. Upon identifying [FNU] [LNU], Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending discovery.

41. Defendant Ursuline Player G.C., a minor, is an Ursuline sophomore football player. Based on information and belief, G.C. has since transferred to another high school. He resides in Mahoning County, Ohio.

42. Defendant Anthony and Rachel Camuso are G.C.'s parents. They reside in Mahoning County, Ohio.

43. Defendant Ursuline Player C.S., a minor, was an Ursuline junior football player. C.S. has since transferred to another high school. He resides in Mahoning County, Ohio.

44. Defendant Liza Strawn is C.S.'s mother. She resides in Mahoning County, Ohio. [FNU] Strawn is C.S.'s father, whose exact identity is unknown, but whose involvement is Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs could not discover [FNU] Strawn's name and identity. Upon identifying [FNU] Strawn, Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending discovery.

45. Defendant Ursuline Player B.S., a minor, is an Ursuline sophomore football player. He resides in Mahoning County, Ohio.

46. Defendants Benjamin Smith and Janell Bankston are B.S.'s parents. They reside in Mahoning County, Ohio.

47. Defendant Ursuline Player T.S., a minor, is an Ursuline sophomore football player. T.S. has since transferred to another high school. He resides in Mahoning County, Ohio.

48. Defendant Charolette Syrianoudis is T.S.'s mother. She resides in Mahoning County, Ohio. [FNU][LNU] is the father of T.S., whose exact identity is unknown, but whose involvement Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs could not discover [FNU][LNU]'s name and identity. Upon identifying [FNU][LNU], Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending discovery.

49. Defendant Ursuline Player J.B., a minor, is an Ursuline freshman football player. He resides in Mahoning County, Ohio.

50. Defendants David and Gina Brace are J.B.'s parents. They reside in Mahoning County, Ohio.

OTHER NON-PARTY INVOLVED INDIVIDUALS

51. Victim-1 [pseudonym][2], at relevant times, was an Ursuline student. Victim-1 was sexually harassed by then-Ursuline football A.T. Victim-1 reported the harassment to Ursuline officials—who took no action. Victim-1 later transferred to another high school.

52. Victim-1's mother reported the harassment to the Ursuline principal, who blew it off and laughed, saying, "Oh, that's just how [A.T.] is with all the girls." Ursuline never disciplined or punished A.T.

53. Daughter Chef [pseudonym], at relevant times, was an Ursuline student. She was attacked and dragged across the turf by Ursuline football player R.H. and later harassed by R.H. during the school year. *See Chef, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No. 4:25-cv-01895, attached as Ex. 1 (without exhibits) and incorporated here into this Complaint. Mother and Daughter Chef reported the attack to Assistant Principal Damore and Athletic Director DeSantis that day, but neither Ursuline official took action; nor did they report the matter to children services or law enforcement. Daughter Chef later reported the ongoing harassment to DeSantis, who again failed to take any action. She has since transferred to another high school.

54. Victim-2 [pseudonym], at relevant times, was an Ursuline football player. Several players hazed Victim-2 during the 2022 camp trip, including stomping, kicking, punching, and choking him. During the attack, one of the players said, "Finger him! Finger him, please!" The attack on Victim-2 was videorecorded and posted to the 2022 and 2023 Ursuline football team's group

[2] Plaintiffs' use of pseudonyms for Victim-1, Daughter Chef, Victim-2, Victim-3, and Victim-4 complies with the Court's October 27, 2025 Order for use of pseudonyms for assault victims. Plaintiffs will file under seal and serve an amended pseudonym key soon.

Snapchats. Plaintiffs lawfully possess the video. (*See* Evidence Disclaimer section, below.)

55. Victim-3 [pseudonym], at relevant times, was an Ursuline student. Victim-3 was harassed and bullied by several Ursuline football players on the basis of sex. Victim-3 and his grandmother reported the abuse to Defendant Assistant Principal Margaret Damore, who took no action.

56. Victim-4 [pseudonym], at relevant times, was an Ursuline student. Victim-4's mother alerted Ursuline officials, including Defendant Assistant Principal Margaret Damore, that another student wanted to fight Victim-4. The Ursuline officials failed to prevent the fight. Victim-4 was seriously injured and had to be taken to the hospital.

57. John and Jane Does [multiple] (collectively "Ursuline Media Mob") are individuals whose exact identities are unknown, but whose involvement Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs have not yet identified John and Jane Does' names. After identifying them in discovery, Plaintiffs intend to amend this Complaint to name them individually as defendants.

58. Ursuline Player B.D., a minor (possibly an adult), is an Ursuline senior football player. Aside from witnessing an incident(s), B.D. is not believed to have been involved in the incidents during the 2025 trip.

59. Ursuline Player T.H., a minor, at relevant times, was an Ursuline junior football player. T.H. has since transferred to another high school. Aside from witnessing an incident(s), T.H. is not believed to have been involved in the incidents during the 2025 trip.

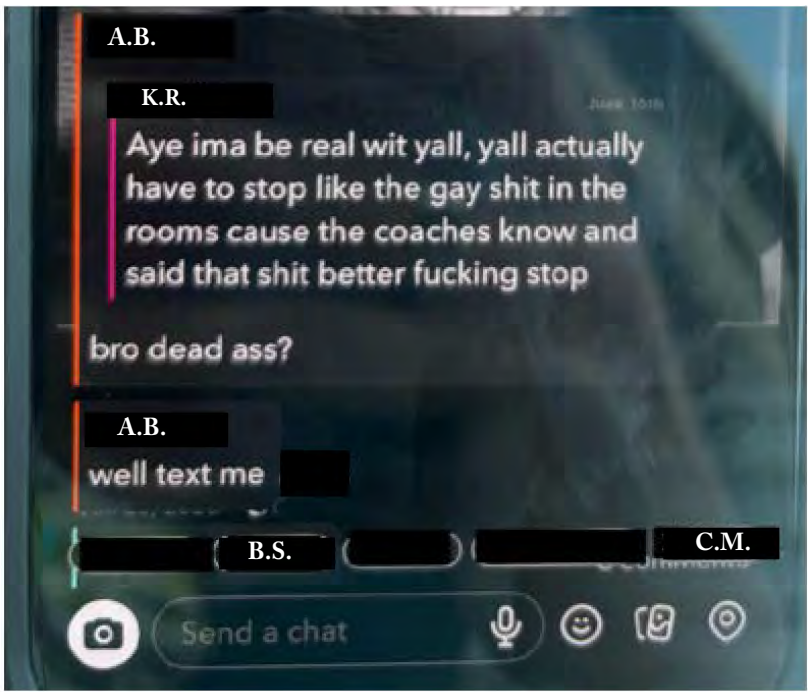
60. Ursuline Player R.H., a minor, at relevant times, was an Ursuline junior football player. R.H. was involved in the incidents during the 2025 trip. Based on information and belief, R.H. has since transferred to another high school.

61. Ursuline Player D.D., a minor, at relevant times, was an Ursuline freshman football

player. D.D. was involved in the incidents during the 2025 trip. Based on information and belief, D.D. has since transferred to another high school.

62. Ursuline Player J.P., a minor, at relevant times, was an Ursuline junior football player. J.P. was involved in the incidents during the 2025 trip. J.P. has since transferred to another high school.

63. Ursuline Player K.R., a minor (possibly an adult), at relevant times, was an Ursuline senior football player. K.R. is not believed to have been involved in the incidents during the 2025 trip. K.R. has since transferred to another high school. During the trip, after several nights of hazing and attacks, K.R. sent the following message to the football team's group Snapchat: "Aye ima be real wit yall, yall actually have to stop like the g*y shit in the rooms cause the coaches know and said that shit better f**king stop." [*Sic.*]



64. Ursuline Player K.B., a minor, is an Ursuline freshman football player. Aside from being a victim, K.B. isn't believed to have been involved in the incidents during the 2025 trip. Based on

information and belief, K.B.'s father is an Ursuline assistant football coach.

65. Ursuline Player W.S., a minor, is an Ursuline junior football player. W.S. is not believed to have been involved in the incidents during the 2025 trip. W.S., on learning of the attacks on Son Doe, told the other players not to harm Son Doe anymore. But players harmed Son Doe again.

66. Ursuline Player A.S., a minor (possibly an adult), at relevant times, was an Ursuline senior football player. A.S. is not believed to have been involved in the incidents during the 2025 trip. A.S. sent a message to the football team's group Snapchat like the message K.R. posted, that the other players must stop the hazing and the coaches know what was happening. Yet even after A.S. sent this message and the coaches knew what was happening, the hazing, attacks, and sexual assaults continued. A.S. has since transferred to another high school.

67. Ursuline Player C.M., a minor, is an Ursuline sophomore football player. C.M. was involved in the incidents during the 2025 trip.

68. Ursuline Player D.S., a minor, is an Ursuline freshman football player. D.S. was involved in the incidents during the 2025 trip.

69. Ursuline Player R.P., a minor, is an Ursuline freshman football player. R.P. is not believed to have been involved in the incidents during the 2025 trip.

70. Ursuline Player R.J., a minor, at relevant times, was an Ursuline junior football player. Aside from witnessing an incident(s), R.J. is not believed to have been involved in the incidents during the 2025 trip. R.J. has since transferred to another high school.

71. Ursuline Player E.S., a minor, is an Ursuline junior football player. Aside from witnessing an incident(s), E.S. is not believed to have been involved in the incidents during the 2025 trip.

72. Ursuline Player A.T., at relevant times, was an Ursuline football player. A.T. sexually

harassed T.C. during the 2007–09 school years.

73. Ursuline Player J.L., at relevant times, was an Ursuline football player. J.L. hazed Plaintiff Son Roe during the 2024 football-camp trip.

74. Ursuline Player T.D., at relevant times, was an Ursuline football player. T.D. hazed Plaintiff Son Roe during the 2024 football-camp trip.

75. Ursuline Player J.F., at relevant times, was an Ursuline football player. J.F. hazed Plaintiff Son Roe during the 2024 football-camp trip.

76. Ursuline Player An.B., at relevant times, was an Ursuline football player. An.B. hazed Plaintiff Son Roe during the 2024 football-camp trip.

EVIDENCE DISCLAIMER

77. Plaintiffs lawfully possess videos, photos, and messages from the football team's group Snapchat, and other documentation supporting the claims. Although these items are incorporated by reference throughout the Complaint, because they contain child pornography, photos and names of minors, and other sensitive materials, they are not attached. These items will be produced during discovery and lodged with the Court or Clerk as needed after the Court enters a protective order.

78. Defendants Sammartino and Damore already possess many of these items, including several of the videos containing child pornography.

79. Although this Complaint provides specific details about each video, here is a summary of each:

(a) **2022 camp video 1**: While the victim was on his knees, players ordered him to repeat "Please don't beat my ass" and "I'll do whatever you need." When the victim refused, players stomped, kicked, and punched the victim repeatedly. One player said, "Finger

him! Finger him, please!" Players wrapped a sheet/towel over the victim's head and throat and proceed to choke and swing him around. Another player then puts his buttocks on the victim's head/face.

(b) **2023 camp video 1**: Two players wrestled on a hotel bed.

(c) **2023 camp video 2**: One player held a victim-player face down on the bus floor while the player humped and ground his penis into the victim's buttocks.

(d) **2023 camp video 3**: Victim was on the floor with no pants or underwear. Victim was covering his genitals with his hands while another player said, "So much for that fucking orgy that you wanted, bitch!"

(e) **2023 camp video 4**: Players and victim appear to be in a tug-of-war over clothing. The video has a meme caption saying, "get you drawls [sic] back [victim]."

(f) **2023 camp video 5**: Player held up a pair of ripped underwear saying, "I'm the ma f**king WWE champ n***a. What you talking about. Got this shit on me. F**k you talking about."

(g) **2023 camp video 6**: Player held up a pair of ripped pants and underwear, and said, "Man. I got this n***a's drawers and his phone."

(h) **2023 camp video 7**: Player picked up the victim by the throat and slammed him onto the hotel bed, then ripped off the victim's pants and underwear exposing the victim's naked body; the victim tried covering his genitals with his hands. Other players stood around watching, laughing, and cheering. The player recording the attack walked over and stood over the naked victim while recording.

(i) **2023 camp video 8**: One player was held face down on a hotel bed while a second player humped and ground his penis into the first player's buttocks. A third player

humped and ground the second player. Then a fourth player joined in and humped and ground the third player, and then a fifth player joined in and humped and ground the fourth player. All players were clothed.

(j) **2023 camp video 9**: Three shirtless players stood in the hotel hallway wearing only shorts. One player grabbed the second player and ripped off his shorts and underwear, exposing the second player's genitals and buttocks, while the third player laughed.

(k) **2025 camp video 1**: Multiple players held down the victim and ripped off his pants and underwear exposing the victim's genitals.

(l) **2025 camp video 2**: Two players held victim down on the bed. One player then lifted the victim's legs over his head, but did not hump the victim. When the first player jumped off the bed, the second player grabbed and held the victim's leg over his head in a similar manner and humped and ground his penis into the victim's buttocks. The players were clothed.

(m) **2025 camp videos (multiple)**: These videos show the attack and hazing of Plaintiff Son Doe, in which multiple players held Son Doe down and ripped off his pants and underwear, exposing his genitals and buttocks. One player slapped Son Doe's bare buttocks; another player threw Son Doe to the ground after the attack, and another player slapped Son Doe's head/face.

JURISDICTION AND VENUE

80. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331, 1343, and 2201, for federal claims under Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.*, which provide for attorney and expert fees; and for a federal civil action relating

to disclosure of intimate images, as codified under 15 U.S.C. § 6851. This Court has supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367.

81. This Court has personal jurisdiction over the Defendants, who reside in and conduct business in this District.

82. Venue is proper under 28 U.S.C. § 1391, because the substantial events giving rise to several of the claims took place within this District.

FACTS

In 2011, Defendant Daniel Reardon resigned as Ursuline's head football coach under a cloud of negativity, only to be rehired in 2019.

83. In 2004, Ursuline hired Defendant Daniel Reardon as its head football coach. After eight years at the helm, including several successful seasons and three state titles, Reardon resigned under a cloud.

84. The cloud was based on Reardon's recruitment of players who engaged in conduct that reflected poorly on the school, its academics, and its reputation, coupled with Reardon's willingness to turn a blind eye to his football players' misconduct.

85. For instance, according to at least one former Ursuline assistant football coach, within days of the 2008 state-championship game, then-Ursuline football player Defendant Dale Peterman (now Ursuline player D.P.'s father) got into a fight with another student/teammate during school.

86. Normally, both Peterman and the other player would have been immediately punished and suspended from school—including the football team and state championship game—for fighting.

87. But because both players were needed to play in the state-championship game, days later,

Reardon and other Ursuline administrators ignored and covered up the fight.

88. Neither Peterman nor the other player were suspended—both played in the state championship game, in which Ursuline prevailed.

89. Winning football games as all costs blossomed under Reardon's reign at Ursuline.

90. In another case, former Ursuline student Victim-1 entered her freshman year at Ursuline in 2007.

91. Victim-1 was a classmate of A.T., another freshman and highly talented Ursuline football player.

92. Almost immediately and persistently, A.T. began sexually harassing Victim-1

93. The first incident occurred during Victim-1's freshman year, when A.T. picked up Victim-1 and turned her upside down so he could gaze at her underwear.

94. Victim-1 resisted, but A.T. was too strong.

95. A.T.'s sexual harassment escalated during their freshman and sophomore years.

96. A.T. inappropriately touched and stroked Victim-1's buttocks, arms, and legs regularly in the hallways and classrooms.

97. Victim-1 resisted, but A.T.'s misconduct was constant.

98. Victim-1 was a small, quiet, introverted, innocent girl; she didn't know what to do, especially when A.T. was a *beloved* football player.

99. Throughout her freshman and sophomore years, Victim-1 was scared to report A.T.'s sexual misconduct; she knew all too well from her Ursuline experience that Ursuline—especially Coach Reardon—protected its football players.

100. Ursuline and Coach Reardon idolized the football players likes gods on earth.

101. Victim-1 knew no one at Ursuline would have protected her, so she suffered quietly and

alone.

102. Toward the end of their sophomore year, A.T. grabbed Victim-1, held her up against a locker, and ground his body on hers.

103. Victim-1 was mortified, but she just wanted to finish her sophomore year with hopes that junior year would be better—that is, A.T.'s sexual harassment would stop.

104. Unfortunately, when junior year started in August 2009, A.T.'s sexual harassment of Victim-1 ramped up.

105. A.T. tried repeatedly to kiss Victim-1 in the hallways and classrooms, but she refused.

106. After being rebuked, A.T. repeatedly approached Victim-1 from behind and non-consensually tried to kiss and lick her neck and ears.

107. Victim-1 had finally had enough.

108. Victim-1 met with then-assistant principal (now Principal) Matthew Sammartino.

109. Victim-1 explained in detail A.T.'s years long sexual harassment of her to Sammartino.

110. But Sammartino did nothing—he offered no help, no support, no compassion.

111. Sammartino dismissed Victim-1 from his office with neither guidance nor suggestion that he was going to address A.T.'s escalating sexual aggression.

112. He didn't care. After all, there was a football player to be protected.

113. Victim-1 went home and told her mother about what had been happening and her useless meeting with Sammartino.

114. The next day, Victim-1's mother called then-principal Patricia Fleming and told her about A.T.'s sexual harassment of Victim-1—and that it had been going on since freshman year and was escalating.

115. Fleming, too, blew it off, laughing, "Oh, that's just how [A.T.] is with all the girls."

116. Fleming was admitting that she knew A.T. engaged in such sexual misconduct and does so with "all the girls"—which somehow made it okay in Ursuline's perpetually football-first world.

117. Fleming offered no help and refused to reprimand, discipline, or punish A.T. in any way.

118. Coach Reardon likewise ignored and turned a blind eye to A.T.'s misconduct—A.T. was needed to win football games.

119. A.T. was a star football player on Ursuline's state championship teams—Ursuline was not going to punish him.

120. Hearing from other students that A.T. forced himself on other girls in the school, Victim-1 was terrified she was next.

121. She wanted to stay home from school for two weeks to let things settle down, but Fleming refused and insisted she return to school.

122. Victim-1's mother contacted the Diocesan superintendent to see if Victim-1 could attend school from home, but the superintendent told her the Diocese had no such option available.

123. Afraid for her daughter's safety because of A.T.'s mounting sexual aggression and Ursuline's refusal to take any protective measures, Victim-1's mother withdrew her from Ursuline, moved to another city, and transferred her to another high school.

124. But because of Ursuline's obsession with winning football games, it was willing to overlook Reardon and his players' transgressions.

125. After Reardon's departure, Ursuline hired a new coach, Larry Kempe, hoping to maintain a winning program without the negativity. Kempe was an assistant coach under Reardon.

126. To try to restore order, Ursuline curtailed Kempe's ability to recruit and bring in students who didn't meet the school's traditional standards and could not handle its curriculum—unlike

Reardon who was permitted to recruit such players.

127. Under Kempe, Ursuline tightened the scholastic requirements—something not done under Reardon.

128. Although Kempe had some successful years, he didn't enjoy the same winning success as Reardon. In 2018, after three consecutive losing seasons, Ursuline did not renew Kempe's contract.

129. In 2019, despite knowing of the issues with Reardon's first tenure as head coach, Ursuline wanted to rehire Reardon to try to return to a winning program—even knowing the risk and likelihood that the dangers associated with Reardon would return.

130. Ursuline forwarded Reardon's name to the Diocese and recommended he be hired.

131. At the time, the Diocese had such decision-making authority, with the Bishop (then-Bishop George Murry (now deceased) and current-Bishop David Bonnar) having final authority.

132. The Diocesan official(s), whose duties included overseeing the athletic programs and coaches' hiring, retention, and firing, recommended that Reardon **not** be hired because of a history of dishonesty, turning a blind eye to his players' misconduct, and general negativity that followed.

133. Reardon's dishonesty occurred not only during his first Ursuline stint, but while he coached at Canton McKinley and made false allegations about a coach from a rival high school. Reardon made the false allegation to a Diocesan official, who investigated the matter and determined Reardon was untruthful.

134. After the Diocesan official(s) declined Ursuline's efforts to rehire Reardon, Father Richard Murphy, Ursuline's president, met with then-Bishop George Murry (now deceased) and urged him to overrule the Diocesan official(s)' decision and rehire Reardon.

135. The Bishop ultimately sided with Ursuline and Father Murphy, and rehired Reardon as its head football coach, despite his dubious background.

136. Within years of Reardon's hiring, the Ohio High School Athletic Association ("OHSAA") sanctioned Ursuline for violations involving improper recruiting techniques.[3]

137. In other instances, an assistant football coach's son actively tried to recruit players from other schools.

138. In another instance, based on information and belief, a player who was considering transferring to Ursuline was told he would receive money after games if he played for Ursuline.

139. Reardon and Ursuline knew of OHSAA's prohibition on certain forms of recruiting, yet disobeyed and flouted these rules—for the glory of its football team alone.

140. Ursuline, the Diocese, and the Bishop have continued to renew Reardon's coaching and teaching contracts.

In 2020, within days of being repeatedly accused by multiple players of physical abuse, threats, and hazing, Defendant Timothy McGlynn resigned as Champion High School's head football coach—only to have Ursuline embrace and hire him as an assistant football coach.

141. In 2017, Champion High School hired Defendant Timothy McGlynn as its head football coach.[4]

142. In October 2020, midway through the season, Champion High School placed McGlynn on administrative leave while it investigated allegations he engaged in misconduct, including

[3] Dana Balash, *Ursuline, Austintown Fitch & Liberty face penalties from OHSAA*, WFMJ Channel 21 (Sept. 1, 2022, 11:59 AM), https://www.wfmj.com/story/47204688/ursuline-austintown-fitch-and-liberty-face-penalties-from-ohsaa.

[4] Mike Gauntner & J. Breen Mitchell, *Champion football coach resigns amid allegations of threats, abuse*, WFMJ Channel 21 (Oct. 27, 2020, 1:47 PM), https://www.wfmj.com/story/42825039/champion-football-coach-resigns-amid-allegations-of-threats-abuse.

physically abusing and threatening players, and misusing booster funds.[5]

143. On October 21, 2020, Champion's superintendent wrote McGlynn a letter placing him on administrative leave for the remainder of the season and directing him to have no contact with the team.

144. The letter said, "The nature of these allegations has required an extensive and thorough investigation to protect the students and staff that are involved"[6]—and reported that other students had corroborated the allegations.

[5] *Id.*

[6] *Id.*

Champion Local School District

BOARD OF EDUCATION
5976 Mahoning Ave. NW
Suite B
Warren, Ohio 44483
(330) 847-2330
FAX: (330) 847-2336

SUPERINTENDENT
(330) 847-2338
FAX: (330) 847-2336

TREASURER
(330) 847-2335
FAX: (330) 847-2336

TRANSPORTATION/ MAINTENANCE SUPERVISOR
(330) 847-2332
FAX: (330) 847-2336

EMIS COORDINATOR
(330) 847-2399
FAX: (330) 847-2336

FOOD SERVICE SUPERVISOR
(330) 847-2333
FAX: (330) 847-2336

HIGH SCHOOL
5976 Mahoning Ave NW
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(330) 847-2305
FAX: (330) 847-2353
Attendance
(330) 847-2300
Athletic Director
(330) 847-2314
Guidance Department
(330) 847-2307

MIDDLE SCHOOL
5976 Mahoning Ave. NW
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Warren, Ohio 44483
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FAX: (330) 847-2355
Attendance
(330) 847-2340
Guidance Department
(330) 847-2343

CENTRAL ELEMENTARY
5976 Mahoning Ave. NW
Suite C
Warren, Ohio 44483
Office
(330) 847-2315
FAX: (330) 847-2322
Attendance
(330) 847-2324
Guidance Department
(330) 847-2327

10/21/2020

Coach Tim McGlynn,

As you have been made aware, athletes in your football program presented allegations of misconduct and possible emotional abuse to the high school administration. Also, the Football Boosters presented separate allegations of possible misuse of booster funds.

Mrs. Herrholtz and Mr. Barson, the Champion High School principals, have interviewed several students, coaches and others close to the football program. I spoke to several members of the football booster organization to hear their allegations. Yesterday, you were given the opportunity to respond to the allegations before Mrs. Herrholtz, Mr. Barson, and myself.

The nature of these allegations has required an extensive and thorough investigation to protect the students and staff that are involved.

Through the investigative process, several of the allegations from the original complaints have been corroborated by other students, and other adults employed by the district. The amount of physicality in your coaching practices, and emotionally charged language are not acceptable in this District and counterproductive to the athletic experience Champion seeks to provide its student athletes.

This letter will serve as notice to you that we will be placing you on paid administrative leave for the remainder of the football season as we finalize our investigation into any wrong doing. You are not to have any further contact with the team during this time.

The district will appoint a coach to finish the season.

Sincerely,

John J. Grabowski
Superintendent
Champion Local Schools

145. McGlynn's leave was prompted by allegations from several players, coaches, and boosters, including that McGlynn threatened to "kill another coach" and "firebomb" someone's house.[7]

146. According to one player, "In the Summer I messed up a jet sweep play and Coach **McGlynn told me he would 'f**king kill me.'** Some time [sic] after the first game he **told [another player] he would slit his throat**…. This type of stuff has **gone on for the last 3 years**. Every day since freshman year I have felt emotional anxiety coming to practice every day. The way he degrades me and makes me hate the game I love and borderline makes me want to quit football." (Emphases added.)

[7] *Id.*

2.

CHAMPION HIGH SCHOOL

Student Statement/Incident Report

Your Name: _____ Grade: 11

Today's Date: 10/15/20

Date(s) Incident(s) occurred: Course of Season Time(s) Incident(s) occurred: Course of the Seaso

Write **WHAT** happened and **WHO** was involved. Be specific, detailed, and descriptive.

In the Summer I messed up a let sweep play and Coach McGlynn told me He would "Fucking Kill me!"

Some time after the first game he told me I would slit his throat.

After the Southeast loss on his birthday He hit very hard in the back of head while he was in the huddle bent over because thats how linemen stand in the huddle

This type of stuff has gone on for the last 3 years. Every day since Freshmen year I have felt emotional anxiety coming to practice everyday. The way he degrades me and I makes me hate the game I love and borderline makes me wanna to quit football.

My incident

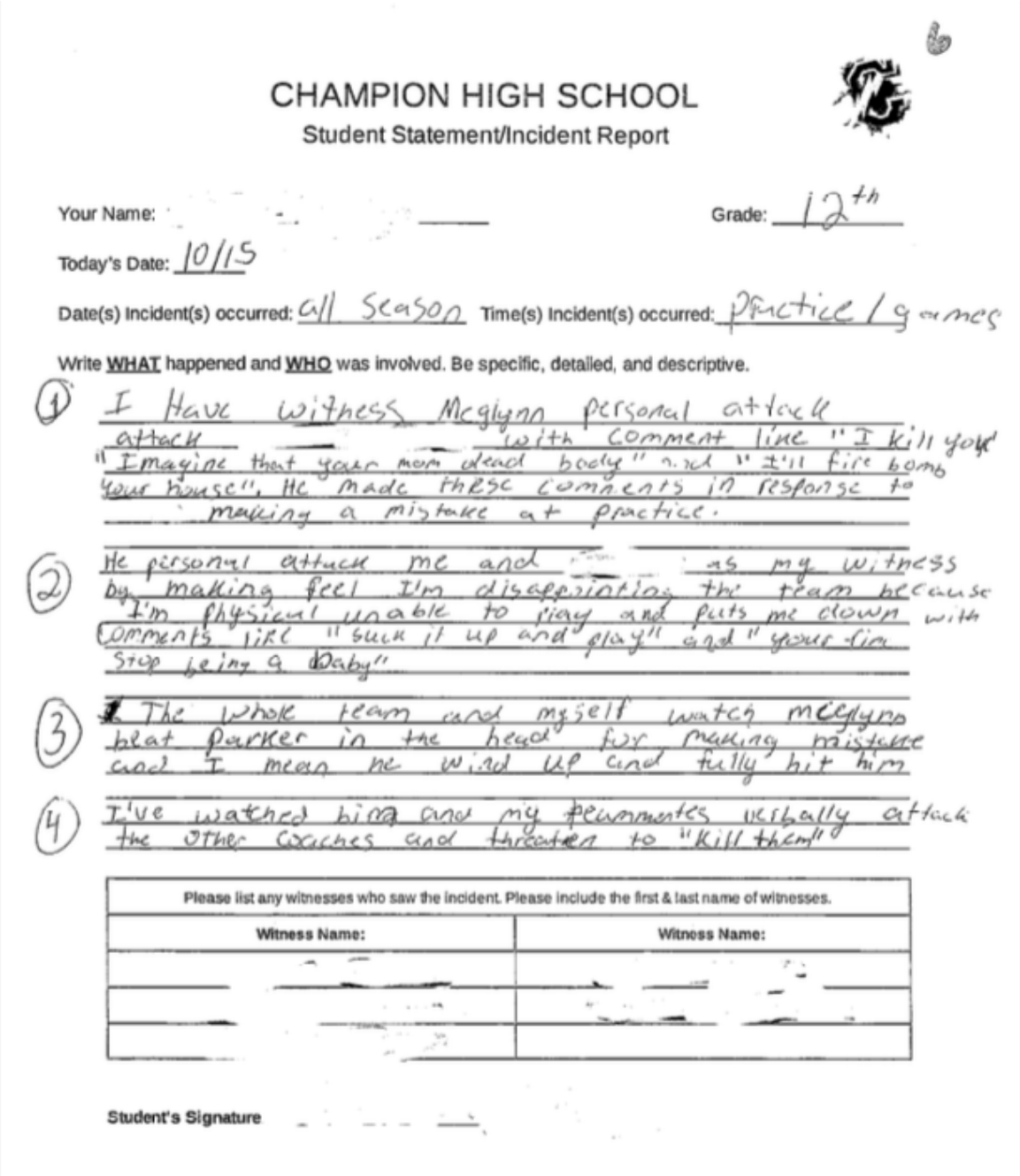
Please list any witnesses who saw the incident. Please include the first & last name of witnesses.

Witness Name:	Witness Name:
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

Student's Signature: [redacted]

147. Another player said, "I have witness [*sic*] McGlynn personal [*sic*] attack [on another player] with comment [*sic*] like **'I will kill you,' 'Imagine your mom dead body,' and 'I'll fire bomb your house.'** He made these comments in response to [a player] making a mistake at practice…. The whole team and myself watch [*sic*] **McGlynn beat [player] in the head for**

making mistake and I mean he wind [*sic*] up and fully hit him…" (Emphases added.)



CHAMPION HIGH SCHOOL

Student Statement/Incident Report

Your Name: _____ Grade: 12th

Today's Date: 10/15

Date(s) Incident(s) occurred: all season Time(s) Incident(s) occurred: Practice / games

Write **WHAT** happened and **WHO** was involved. Be specific, detailed, and descriptive.

(1) I Have witness Mcglynn personal attack attack with comment like "I kill you" "Imagine that your mom dead body" and "I'll fire bomb your house", He made these comments in response to making a mistake at practice.

(2) He personal attack me and as my witness by making feel I'm disappointing the team because I'm physical unable to play and puts me down with comments like "suck it up and play" and "your fin Stop being a Baby"

(3) The whole team and myself watch mcglynn beat parker in the head for making mistake and I mean he wind up and fully hit him

(4) I've watched him and my teammates verbally attack the other coaches and threaten to "kill them"

Please list any witnesses who saw the incident. Please include the first & last name of witnesses.	
Witness Name:	Witness Name:

Student's Signature

148. And another player said, "I've been both cussed at and hit by McGlynn. The most common phrase he's said to me is, **'I will f**king kill you.'** He's **hit me multiple times by punching me in the helmet and in the chest**, saying that if I want I can 'tell my mom about it.'

There was also one time when he got angry at me for messing up a play in practice, his response was to **make me get into a stance and then kick me over**…" (Emphases added.)

16

CHAMPION HIGH SCHOOL

Student Statement/Incident Report

Your Name: [redacted] Grade: 12th

Today's Date: 10/15/20

Date(s) Incident(s) occurred: June – ~~Sept~~ Oct. Time(s) Incident(s) occurred:

Write **WHAT** happened and **WHO** was involved. Be specific, detailed, and descriptive.

I've been both cussed at and hit by McGlynn. The most common phrase he's said to me is "I will fucking kill you." He's hit me multiple times by punching me in the helmet and in the chest, saying that if I want I can "tell my mom about it." There was also one time when he got angry at me for messing up a play in practice, and his response was to make me get down in a stance and then kick me over. He's done the same things to others, mostly linemen, which include [redacted] and [redacted]. In the beginning of October, after [redacted] got injured in our Liberty game, McGlynn told him that since he's trying to walk without crutches during practice, why doesn't he just play? He also curses out and yells at his assistant coaches whenever they make a mistake, such as Coach Burthick and Coach Jim. He's also tried to get Coach Conrad fired. Finally, he has had huge issues with the boosters, which my parents are in, claiming he "doesn't need their money" and that "he can do all this stuff by himself." He's also claimed that he plans to get rid of the boosters by next year, which he can't even do.

Please list any witnesses who saw the incident. Please include the first & last name of witnesses.	
Witness Name:	**Witness Name:**

Student's Signature: [redacted]

149. A fourth player said, "There are many instances when he has threatened to kill me or my family. If I would make a simple mistake he would call me 'f**king stupid.'"

23

CHAMPION HIGH SCHOOL

Student Statement/Incident Report

Your Name: _____ Grade: 12

Today's Date: 10/16/20

Date(s) Incident(s) occurred: _____ Time(s) Incident(s) occurred: _____

Write **WHAT** happened and **WHO** was involved. Be specific, detailed, and descriptive.

1 I have been called a disappointment, a failure, and a sorry excuse for a player very frequently, probably a few times a day.
2 I have been told to "Shut the fuck up" when trying to asks a question.
3 There are many instances when he has threatened to kill me or my family.
4 If I would make a simple mistake he would call me "fucking stupid."
5 He has blamed me and said it was all my fault we lost against SouthEast.
6 He has hit me and other players like [redacted] and pretty hard in the helmet and has even shoved [redacted] to the ground.
7 The last day he was at practice he said that "he doesn't care about us winning" that he will "be here for 10 more years getting a [redacted] paycheck"
8 Also on that day the last thing he said was "you disgust me and make me sick."

Please list any witnesses who saw the incident. Please include the first & last name of witnesses.	
Witness Name:	**Witness Name:**
1, 3, 4, 5, 6, 7, 8	1, 2, 3, 4, 6, 7, 8
1, 3, 5, 6, 7, 8	1, 4, 6, 7, 8
1, 2, 4, 5, 6, 7, 8	1, 4, 5, 6, 7, 8

Student's Signature _____

150. These are just a handful of the statements from the 37 football players interviewed as a part of the investigation. The common thread through each of the statements was McGlynn's willingness to issue threats and engage in physical violence against his players.

151. Rather than challenge the allegations or wait for the investigation's results, McGlynn resigned on October 27, 2020.

152. That same day, Champion Local Schools Superintendent John Grabowski contacted the Ohio Department of Education about a "situation involving the head football coach who is a teacher in another district." Email from John Grabowski to Ohio Board of Education's Educator Conduct account (Oct. 27, 2020, 2:13 PM) (obtained through public-records request).

153. This email initiated the Ohio Board of Education's investigation and eventual disciplinary action against McGlynn.

154. And that very same day, October 27, 2020, local media published a story about McGlynn being booted over the allegations of physical abuse and threats.[8]

155. Despite the plethora of publicly available allegations of misconduct—from which McGlynn choose to resign rather than face an investigation—Ursuline readily hired him in 2021 as an assistant football coach to be the defensive coordinator.

156. The information that should have made McGlynn radioactive for any school was open and notorious in published reports for Ursuline's leadership to see. And if they did a cursory background check, public-records request for his personnel file, or Google search they would have seen it.

[8] Mike Gaunter, *Champion football coach resigns amid allegations of threats, abuse*, WFMJ Channel 21 (Oct. 27, 2025, 1:47 PM), https://www.wfmj.com/story/42825039/champion-football-coach-resigns-amid-allegations-of-threats-abuse.

157. The did see it.

158. Ursuline should have conducted a background check on McGlynn before hiring him, but it did not.

159. Ursuline didn't even submit a public-records request to Champion Local Schools for McGlynn's file. Champion Local Schools Superintendent John Grabowski can identify no request from Ursuline to Champion Local Schools for McGlynn's file. In fact, there was no communication at all between the schools:

> In response to your public records request on 10/23/25:
>
> **Item 1. Any correspondence between Champion Local Schools and Ursuline High School regarding Timothy McGlynn.**
>
> **District Response:** There are no record(s) responsive to this request.
>
> **Item 2. Any records showing that documents were requested or shared between the two schools about Mr. McGlynn or his employment.**
>
> **District Response:** There are no record(s) responsive to this request.
>
> Please feel free to reach out if you have any further questions.

160. Still, everyone in a position to weigh in on McGlynn's hiring at Ursuline knew about the circumstances of his abrupt departure from Champion. It was hardly a secret.

161. Ursuline should not have hired someone with such a background—but it did.

162. In any case, Ursuline didn't care about the danger McGlynn presented to students and hired him anyway.

163. Ursuline's duty to protect its student-athletes took a backseat to its lust for winning football games.

164. In fact, by the time the Ohio State Board of Education's investigation into McGlynn concluded—and notified Ursuline—he was already an Ursuline employee. Ursuline cannot feign

ignorance about the misconduct its employee perpetuated against the children entrusted to him.

165. On May 8, 2023, while employed by Ursuline, McGlynn signed a Consent Agreement with the State Board of Education related to the Board's determination that McGlynn had committed "conduct unbecoming." The Board determined that "On or about October 2020, [McGlynn] engaged in conduct unbecoming to the teaching profession when he spoke inappropriately to the student."

166. The terms of the Consent Agreement required McGlynn to do the following within 90 days of its execution: complete an anger-management class, complete eight hours of training on professionalism, and complete eight hours of sensitivity training. The Board required that proof

of completion be sent on the letterhead of the training body.

Terms:

A. Issue License

Respondent's application for a three-year pupil activity permit will be issued.

B. Anger Management

Respondent shall be required to enroll in and complete an anger management class, and confirmation of successful completion shall be provided from the facility to the Office of Professional Conduct within ninety (90) days from the date of full execution of this Consent Agreement. The anger management class shall be approved in advance by the Ohio Department of Education, Office of Professional Conduct. Respondent is responsible for all costs and expenses associated with the class.

C. Training

Respondent is required to and shall successfully complete eight (8) clock hours of training on professionalism and provide verification of completion within ninety (90) days from the date of full execution of this Consent Agreement. The training shall be relevant to the teaching profession and pre-approved by the Ohio Department of Education, Office of Professional Conduct prior to Respondent enrolling in and completing the training. Respondent is

responsible for all costs and expenses associated with the training.

D. Additional Training

Respondent is required to and shall successfully complete eight (8) clock hours of training on sensitivity and provide verification of completion within ninety (90) days from the date of full execution of this Consent Agreement. The training shall be relevant to the teaching profession and pre-approved by the Ohio Department of Education, Office of Professional Conduct prior to Respondent enrolling in and completing the training. Respondent is responsible for all costs and expenses associated with the training.

E. Correspondence

All notifications, verifications, and reports required by the terms of this Consent Agreement shall be presented on official letterhead of the aforementioned professionals and sent to: Ohio Department of Education, Office of Professional Conduct, Attn: Amruta P. Dixit, Paralegal, 25 South Front Street, Mail Stop 104, Columbus, OH 43215. To obtain pre-approval of any community service, training, mentoring, class, counseling, treatment, assessment, or evaluation that may be required under the terms of this Consent Agreement, please contact Amruta P. Dixit at Amruta.Dixit@education.ohio.gov or (614) 466-5638.

167. McGlynn's Consent Agreement ended with an acknowledgment that a copy would be sent to his employer. That employer was then Ursuline.

168. Ursuline knew of the danger McGlynn presented—and the Agreement he had been forced to enter following the investigation—yet did nothing to protect its players from him. It didn't just hire him, but retained and further failed to train and supervise him.

169. So, predictably, McGlynn's physical abuse of players didn't end when he was jettisoned from Champion but continued at Ursuline.

170. As recently as the 2024 season, McGlynn orally and physically abused at least one Ursuline football player, which Reardon and Ursuline administrators knew—yet still did nothing.

171. According to judicial factfinding in a decision by a Mahoning County Common Pleas Court magistrate in a recent case involving a student who transferred from Ursuline:

> L.K. relayed one outburst by Coach McGlynn when McGlynn told him to return to Canfield and wrestle with his "f**got Canfield friends". According to L.K., McGlynn called him "retarded", "stupid", a "f***ing retard" and "f***ing stupid". He also related one incident in which McGlynn became physically aggressive, grabbing him on the sideline after he returned from the field after a disappointing play. L.K. related that this incident was significant enough as to require another member of the coaching staff to pull McGlynn off of the young man.[9]

172. Before long, McGlynn began engaging in his own recruiting violations, too—following in Reardon's footsteps and blueprint.

173. In February 2025, Ursuline was desperately trying to recruit a player from another school.

174. McGlynn contacted Mother Doe, who was friendly with this other player's family, and asked Mother Doe to help recruit the player to attend Ursuline.

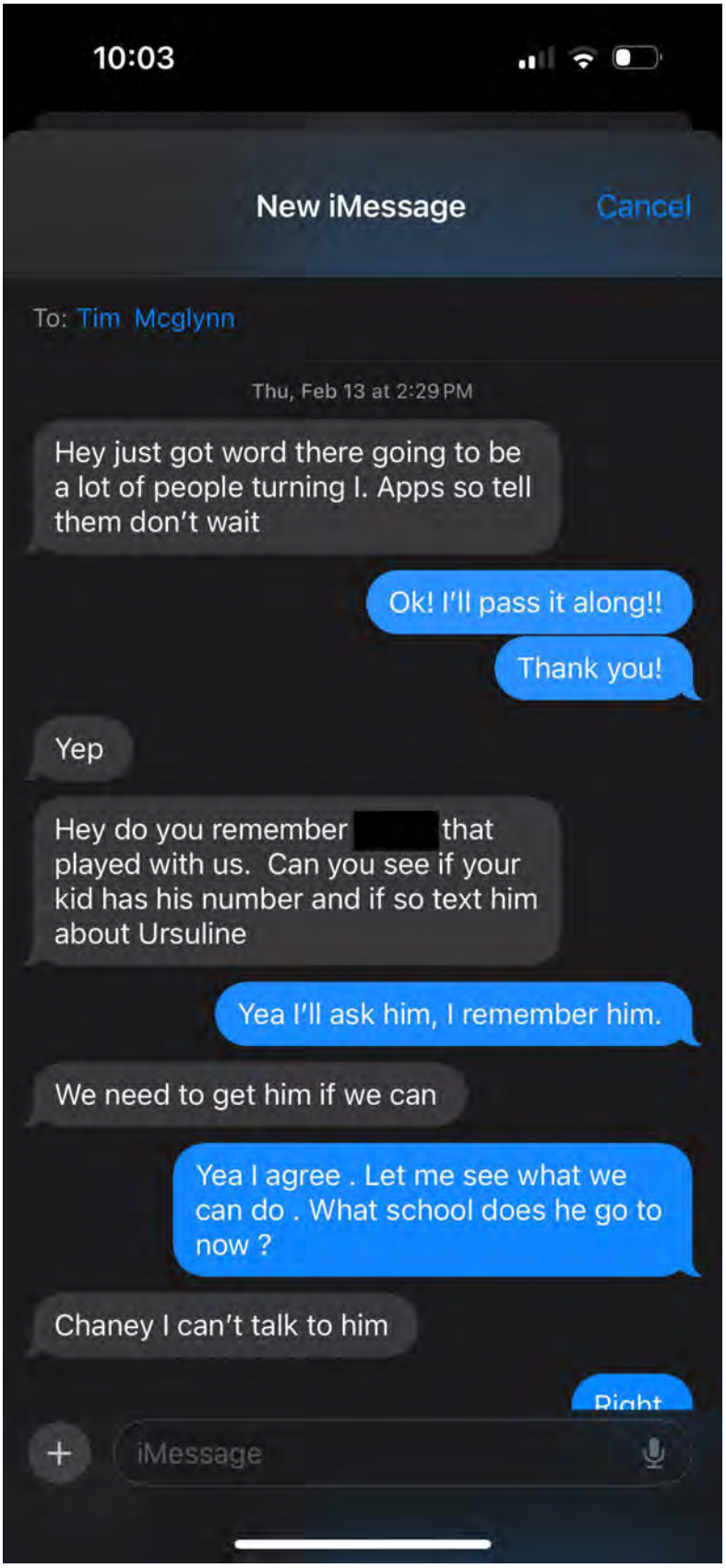
175. McGlynn texted Mother Doe the following:

(a) "Hey do you remember [player's nickname] that played with us. Can you see if your kid has his number and if so text him about Ursuline."

(b) "We need to get him if we can."

[9] *Kollar, et al. v. Ohio High School Athletic Association, et al.*, Mahoning County Common Pleas Court, Case No. 2025-CV-2716, *Magistrate Decision Findings of Fact and Conclusions of Law and Interim Order of the Trial Court* (Nov. 4, 2025) at 3, attached as Ex. 2.

(c) "Chaney I can't talk to him." Texted in response to Mother Doe asking what school this other player was currently attending. McGlynn further acknowledged the recruiting violation by admitting, "I can't talk to him."


10:03
New iMessage
Cancel
To: Tim Mcglynn
Thu, Feb 13 at 2:29 PM
Hey just got word there going to be a lot of people turning I. Apps so tell them don't wait
Ok! I'll pass it along!!
Thank you!
Yep
Hey do you remember [redacted] that played with us. Can you see if your kid has his number and if so text him about Ursuline
Yea I'll ask him, I remember him.
We need to get him if we can
Yea I agree . Let me see what we can do . What school does he go to now ?
Chaney I can't talk to him
Right
iMessage

176. McGlynn then texted Mother Doe the other player's actual name and his mother's social-media accounts.

177. Mother Doe felt pressured to please McGlynn, who made it clear this was how Ursuline operated, and who would be Son Doe's coach in the upcoming years; so Mother Doe acquiesced to McGlynn's mounting pressure and tried to recruit the player to Ursuline.

178. In response, McGlynn texted Mother Doe the following:

(a) "Hehe yes go get him girl you will get a night out on us."

(b) "Not joking." In response to Mother Doe texting "Hahahah."

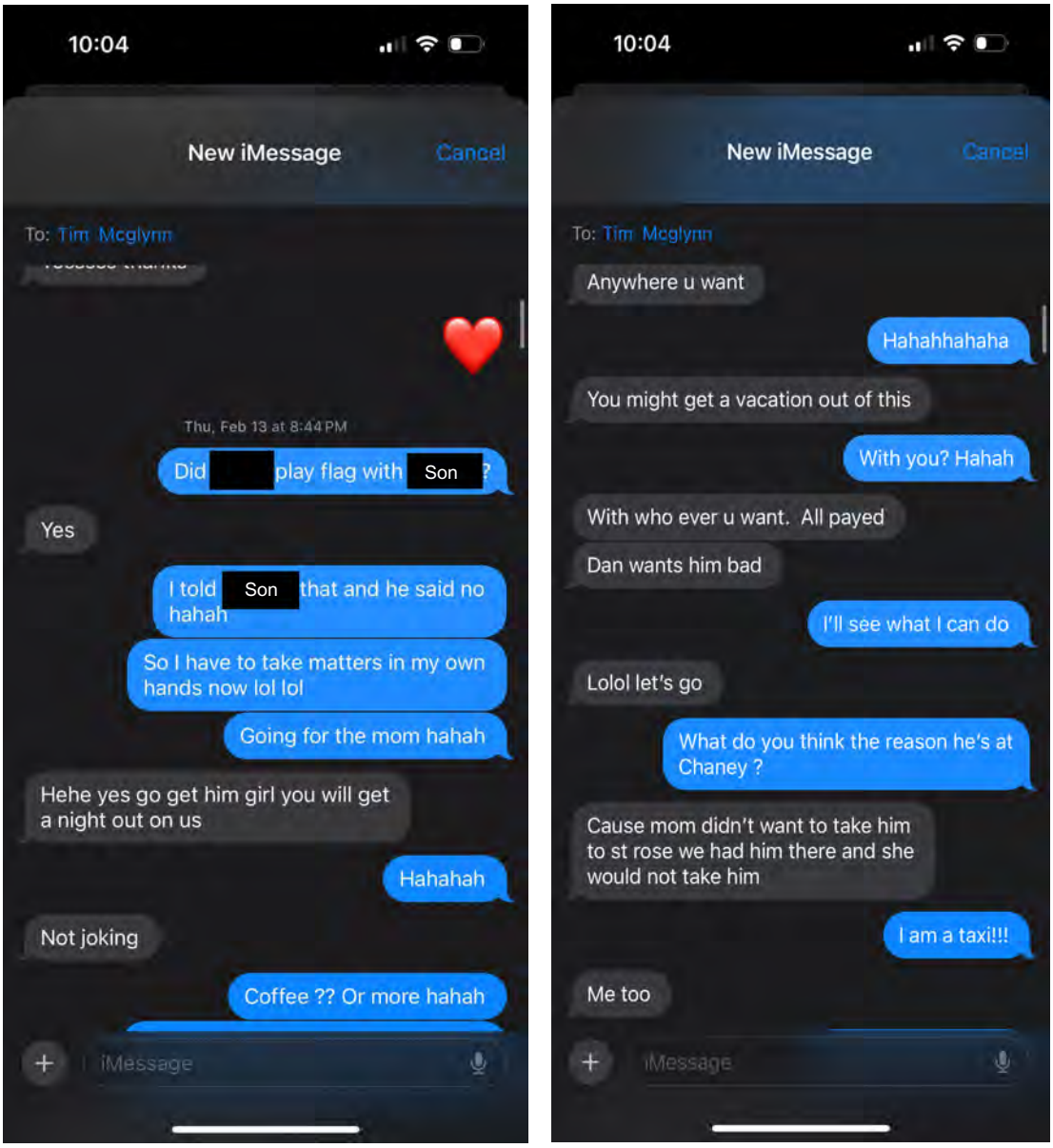
(c) "Anywhere u want."

(d) "You might get a vacation out of this."

(e) With who ever u want. All payed." [*Sic.*]

(f) "Dan [Reardon] wants him bad."

(g) "We will get him there tell her [other player's mother]."

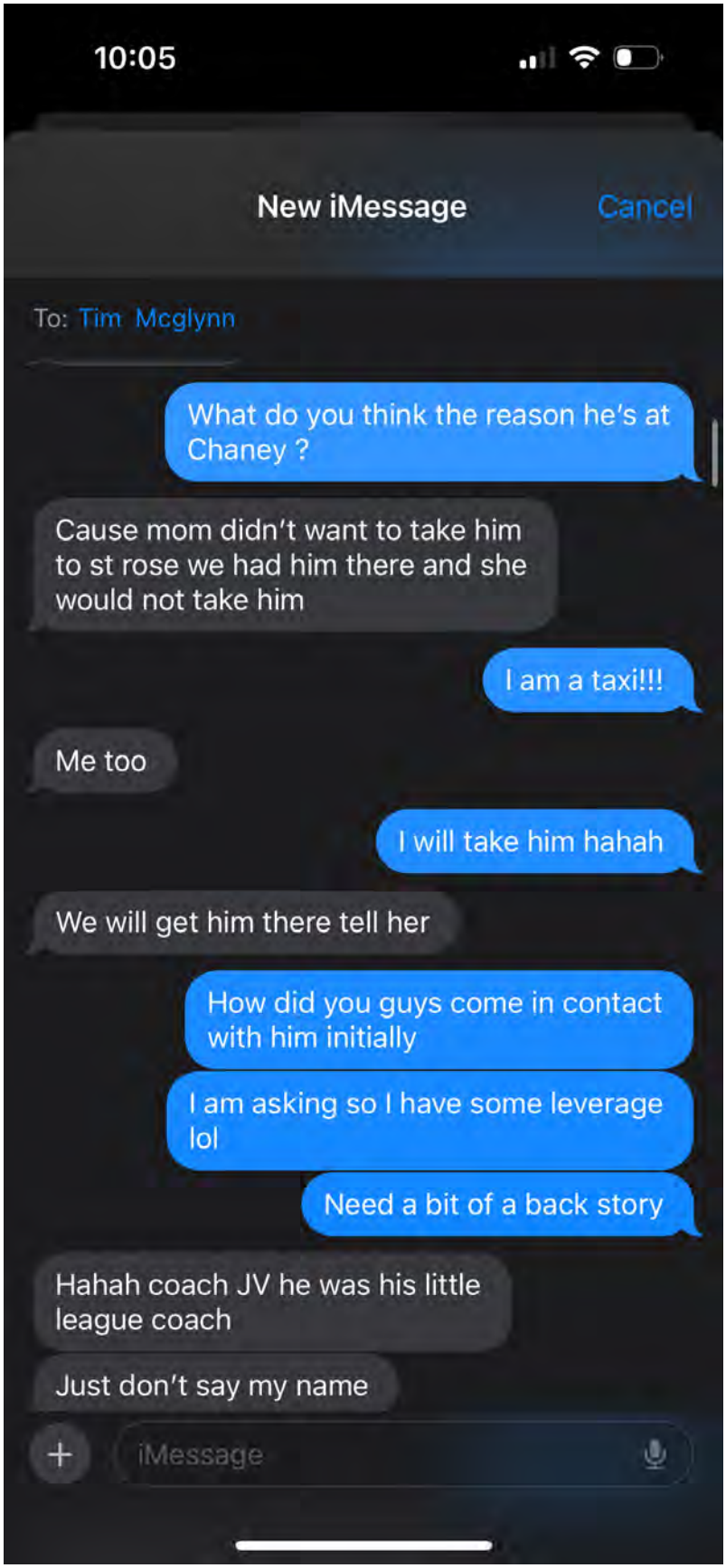


179. When Mother Doe asked McGlynn for some information on this other player and how Ursuline came into contact with him, McGlynn texted back:

(a) "Hahah coach JV he was his little league coach."

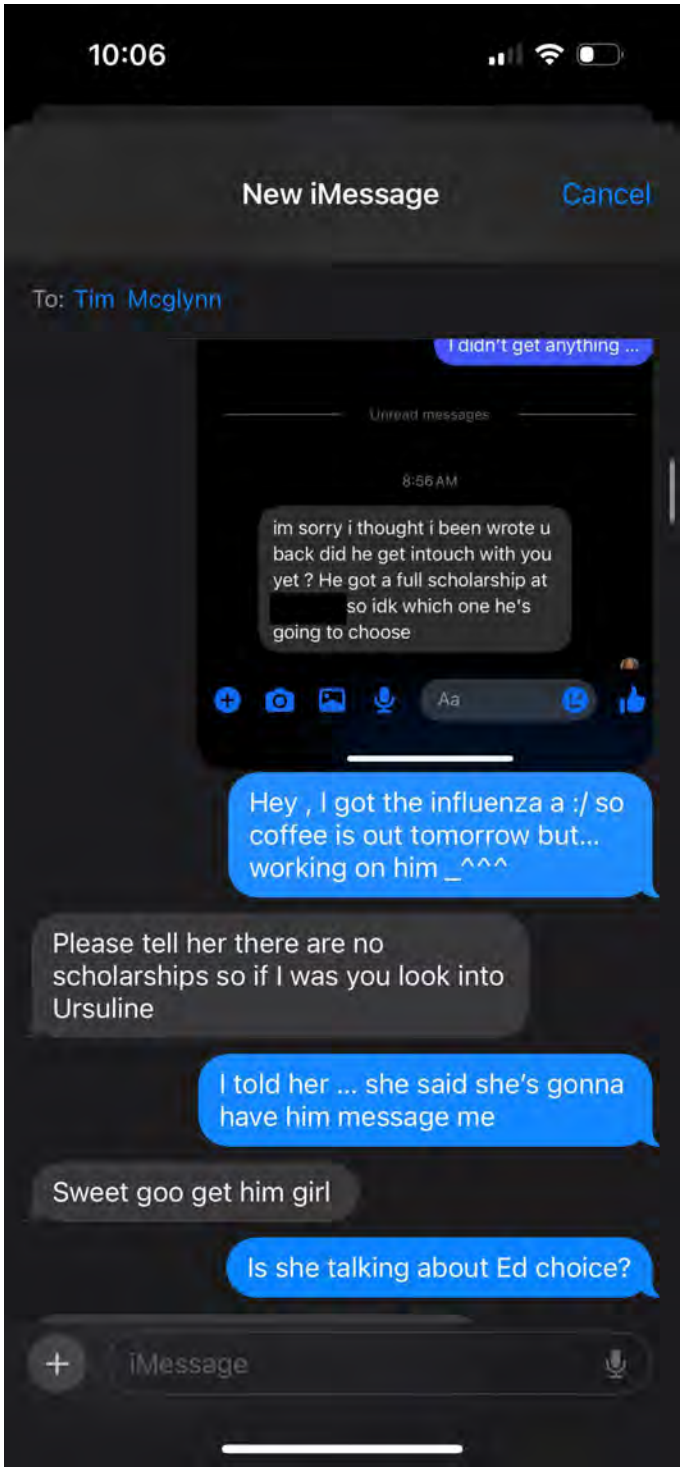
(b) "Just don't say my name."

180. That is, McGlynn, again, acknowledged the recruiting violation.


10:05
New iMessage
Cancel
To: Tim Mcglynn
What do you think the reason he's at Chaney ?
Cause mom didn't want to take him to st rose we had him there and she would not take him
I am a taxi!!!
Me too
I will take him hahah
We will get him there tell her
How did you guys come in contact with him initially
I am asking so I have some leverage lol
Need a bit of a back story
Hahah coach JV he was his little league coach
Just don't say my name
iMessage

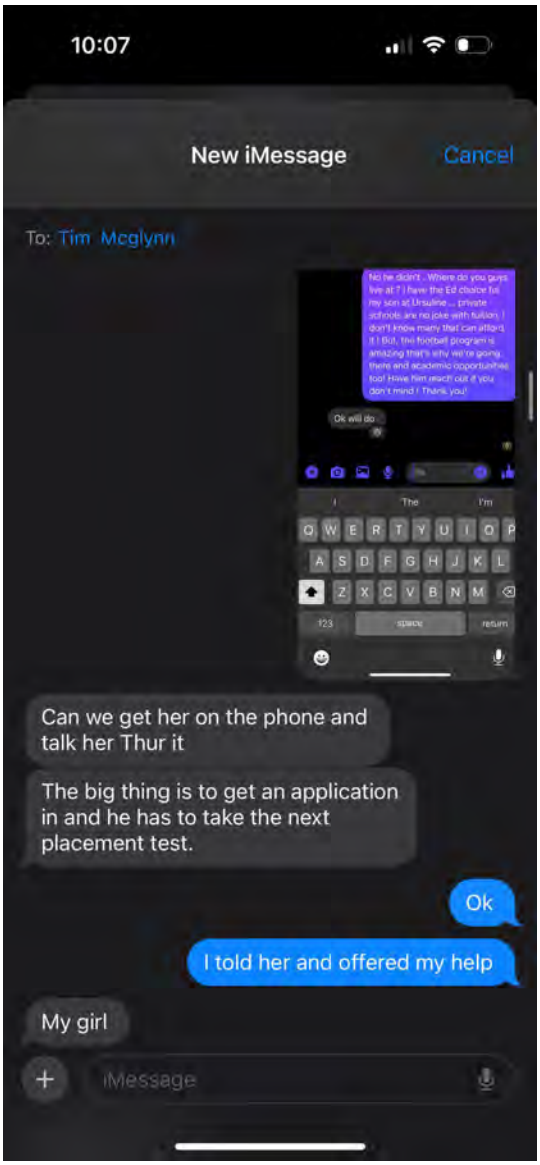
181. Mother Doe was able to contact the other player's mother, but the mother informed Mother Doe that her son received a full scholarship to attend a rival high school.

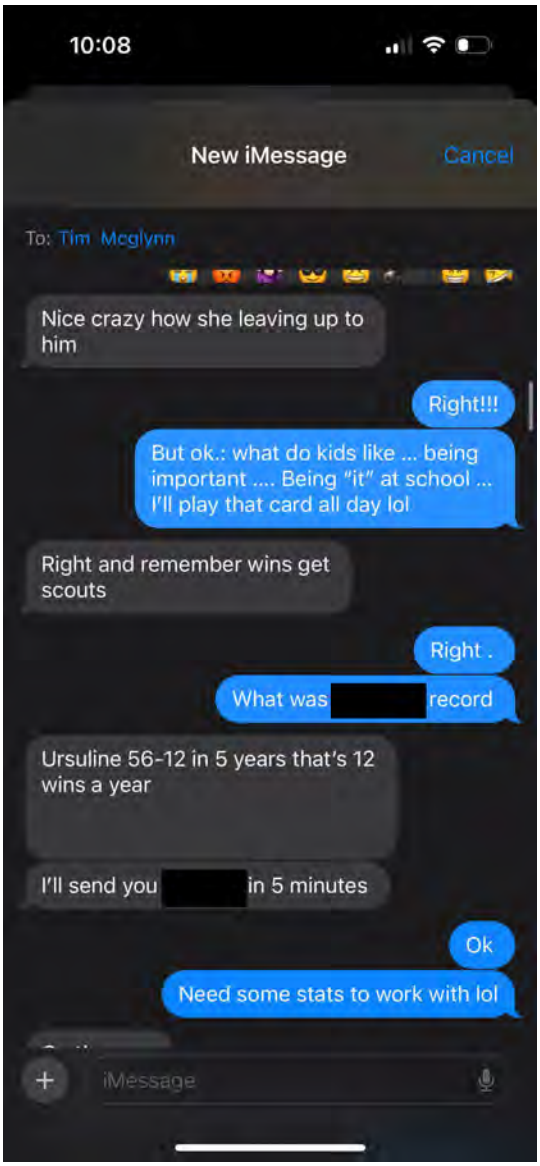
182. When Mother Doe informed McGlynn, McGlynn became even more aggressive in the illegal recruitment and instructed Mother Doe to *lie* to the other player's mother, "Please tell her there are no scholarships [at the rival high school] so if I was you look into Ursuline."



183. McGlynn then texted Mother Doe further instructions, "Can we get her on the phone and talk her Thur it." [*Sic.*] Not wanting the other player to attend a rival high school, McGlynn opted to now speak directly to the mother.

184. To further entice the other player's mother to send him to Ursuline, McGlynn texted Mother Doe, "Right and remember wins get scouts"—meaning college football scouts will look at him. McGlynn then texted Mother Doe Ursuline's record for the past five years.





185. McGlynn violated OHSAA's Bylaw 4-9-1 by engaging in such illegal recruiting tactics. Bylaw 4-9-1 provides, in part, "Any attempt to recruit a prospective student-athlete for athletic purposes shall be strictly prohibited." None of OHSAA's exceptions to the recruiting requirements apply here.

186. These texts also show Reardon, too, was involved in the scheme.

187. Despite being sanctioned only a few years earlier, McGlynn and Ursuline—again—disregarded OHSAA's rules and regulations and engaged in further illegal recruiting tactics—for the glory of its football team alone.

During the summers of 2022, 2023, 2024, and 2025, Ursuline's football team attends multi-day, out-of-state school-sponsored camp trips, taking many players under coaches' purported supervision.

188. Since at least 2022, Ursuline coordinated out-of-state, summer trips for the football team. On these trips, the team visited multiple universities and attended various football camps.

189. Parents paid Ursuline directly for their children's participation in the trips.

190. Ursuline, through its football coaches, is responsible for registering the team's participation in the football camps and booking reservations for the hotel rooms in the various cities.

191. Throughout these entire trips, the players remained under Ursuline football coaches' supervision and control.

192. Ursuline must ensure that its employees are properly trained and supervised and that its students, including Son Doe and Son Roe when they went to the school, are safe. This responsibility extends beyond the four walls of the school to extracurricular activities including school-sponsored, sports-related trips.

193. Coaches like Defendants head football coach Daniel Reardon, assistant coach Timothy McGlynn, and assistant coach Christian Syrianoudis—attending the trips, had the actual authority to prevent and respond to hazing, assaults, and any sexual abuse.

During summer 2022, Ursuline's football team attends multi-day, out-of-state school-sponsored camp trip taking many players under only three coaches' supervision.

194. In 2020, Victim-2 [pseudonym][10] entered his freshman year at Ursuline and was a football player.

195. During his freshman and sophomore years, many of the other football players ostracized Victim-2 from team activities and made him feel unwelcome.

196. On the rare occasion that a player added Victim-2 to the football team's group Snapchat, another player would almost immediately remove him from the group.

197. It was obvious to Victim-2 that he was banned from the football team's group Snapchat.

198. Because he loved football, Victim-2 tried to endure the alienation from his teammates.

199. In the summer of 2022—to try to have teammates accept him—Victim-2 went on the Ursuline football team's camp trip.

200. Defendant Coaches Daniel Reardon, Brian Frasco, and possibly one other coach were the only adults on the multi-day trip and were responsible for supervising the players.

201. Victim-2 himself was a victim and witnessed other non-consensual "jumping-in," wrestling, and fighting by players during the trip.

202. Victim-2 also believes the non-consensual stripping, humping, and grinding of other players may have occurred on the 2022 trip, too.

203. During the trip, in the middle of the night as Victim-2 was sleeping, about 10 players busted into his hotel room.

204. The players forced Victim-2 to kneel beside the bed.

[10] In accordance with the Court's October 17, 2025 Order [Doc. #19], Plaintiffs are using a pseudonym "Victim-2" for the 2022 victim, even though Victim-2 is not a named plaintiff.

205. One player ordered Victim-2 to say, "Please don't beat my ass."

206. Victim-2 complied and said, "Please don't beat my ass."

207. Victim-2 knew the players were going to attack him and wanted to get it over with because he knew he couldn't fight back against all the players.

208. The player then ordered Victim-1 to say, "I'll do whatever you need."

209. When Victim-2 refused, two of the players attacked, punched, kicked, and stomped on Victim-2 as he lay on the ground.

210. Several other players stood around laughing and cheering during the beating.

211. Victim-2 screamed during the attack.

212. One of the players then grabbed a sheet or towel and wrapped it around Victim-2's head.

213. Victim-2 screamed even louder.

214. The player, still holding the sheet/towel around Victim-2's head, began swinging Victim-2 around on the ground.

215. One of the other players said, "Finger him! Finger him, please!"

216. The player then threw Victim-2's head toward the floor.

217. As Victim-2 was lying on the ground, another player squatted and put his clothed buttocks on Victim-2's head.

218. The attack was videorecorded and posted on the football team's group Snapchat.[11] Affidavit of D.T. ¶ 22, attached as Ex. 3.

219. After the attack, Victim-2 lay on the ground in shock for about 20 minutes and kept

[11] Plaintiffs lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

asking himself, "What just happened?"

220. The players' intentionally used the sexually and physically exploitive attack and hazing of Victim-2 to diminish Victim-2's masculinity or male identity and to establish their own dominance and control over Victim-2.

221. The incident caused Victim-2 extreme distress. The next day, he called his parents and told them what happened.

222. The parents contacted Defendant Ursuline Athletic Director John DeSantis and told him about Victim-2 being attacked.

223. Based on information and belief, DeSantis told Reardon.

224. But DeSantis and Reardon did not report the incident to law enforcement or children's services.

225. As the team was exiting the bus following one of the camps, Reardon told the players to stop "recording" whatever they were doing and the "roughhousing."

226. The attack on Victim-2 was not "roughhousing"—it was a planned and orchestrated attack on one his players who was stomped on, strangled with a sheet/towel, and threatened to be sexually violated by other players.

227. Reardon's response showed his willingness to downplay and ignore his players' misconduct.

228. Despite knowing what happened, Reardon never spoke to Victim-2 about the attack.

229. Reardon never spoke to Victim-2's parents about the attack.

230. Reardon never questioned any of the players.

231. Reardon conducted no investigation into the attack.

232. Reardon never reported the attack to law enforcement or children's services.

233. Reardon neither punished nor disciplined any players for the attack.

234. And the players knew Reardon wasn't going to do anything to them.

235. The players didn't take Reardon seriously when he said to stop what they were doing, because Reardon never followed through on holding players accountable.

236. Victim-2 believes that if Reardon ever actually held players accountable for their misconduct, then the misconduct would have stopped. But Reardon never did.

237. And the non-consensual attacks of other players continued during the trip.

238. For the remainder of the trip, throughout summer practices, and during the season, the players called Victim-2 a "snitch," and after one of the games, one player told him, "Why don't you just kill yourself."

239. Again, based on information and belief, neither Reardon, DeSantis, nor anyone from Ursuline reported the attack to children's services or law enforcement—despite being mandatory reporters. Neither law enforcement nor children's services ever contacted Victim-2 or his parents.

240. After Reardon and Victim-2 returned from the trip, neither Reardon nor DeSantis contacted Victim-2 or his parents about the attack.

241. Neither did anyone else from Ursuline.

242. Victim-2 quit the Ursuline football team during the season and transferred to another high school.

In the summer of 2023, many Ursuline's football team players attend a a multi-day, out-of-state, school-sponsored camp trip under the supervision of only three coaches.

243. In the summer of 2023, Ursuline's football team attended another multi-day, out-of-state school-sponsored camp trip under the supervision of only three coaches.

244. Defendants head coach Daniel Reardon, assistant coach Timothy McGlynn, and assistant coach Christian Syrianoudis were the only adults on the trip and were responsible for supervising the football players in attendance. D.T. Aff. ¶ 25.

245. Ursuline, through Defendants Reardon, McGlynn, and Syrianoudis, have the actual authority to prevent and respond to hazing, assaults, and their players' Title IX violations.

246. Before the trip, Defendant D.T. was added to the 2023 football team's group Snapchat. *Id.* ¶ 26.

247. During the trip, several players were hazed, which included non-consensual wrestling, humping, and "taking butts." *Id.* ¶¶ 26–27.

248. "Taking butts" means the hazing activity of grabbing and holding down players; ripping off their pants and underwear; and then humping them with the genitals. *Id.* ¶ 28.

249. The players' intentionally used the sexually and physically exploitive attack and hazing of their victims to diminish the victims' masculinity or male identity and to establish their own dominance and control over the victims.

250. In the hotel, the players openly discussed the hazing activities in front of Coaches Reardon, McGlynn, and Syrianoudis. *Id.* ¶ 32.

251. Not one told the players to stop the hazing. *Id.* ¶ 33.

252. Several of the hazing activities were videorecorded and posted on the 2023 football team's group Snapchat. *Id.* ¶ 30.

253. In one video recorded by player "[B.]," two players were wrestling on a hotel bed.

254. The first video was uploaded to the 2023 football team's group Snapchat.[12] *Id.* ¶ 35.

255. In a second video recorded by "[A.S.]," one player was holding a victim-player face down on the floor of the bus while the player humped and ground his penis into the victim's buttocks. Both players were clothed.

256. The second video was uploaded to the 2023 football team's group Snapchat.[13] *Id.* ¶ 38.

257. In a third video recorded by "[T.]," the victim-player was on the floor wearing only a t-shirt, but no pants or underwear.

258. The victim was covering his genitals with his hands while another player said, "So much for that fucking orgy that you wanted, bitch!"

259. The third video was uploaded to the 2023 football team's group Snapchat.[14] *Id.* ¶ 42.

260. In a fourth video recorded by "[B.]," the players engaged in a tug-of-war using clothes through a closed hotel-room door. The players on one side of the door pulled on clothing through a closed hotel door; while it looked like a player on the other side of the closed door tried to pull the clothes through the closed door.

261. The video has a meme caption saying, "get you drawls [sic] back [victim]."

262. The victim in the third and fourth video is the same player. *Id.* ¶ 46.

263. The fourth video was uploaded to the 2023 football team's group Snapchat.[15] *Id.* ¶ 47.

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[12] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

[13] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

[14] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

[15] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

264. In a fifth video recorded by "[T.]," a player held up a pair of ripped underwear saying, "I'm the ma f**king WWE champ n***a. What you talking about. Got this shit on me. F**k you talking about."

265. The fifth video was uploaded to the 2023 football team's group Snapchat.[16] *Id.* ¶ 50.

266. In a sixth video recorded by "[T.]," a player held up a pair of ripped pants and underwear, and said, "Man. I got this n***a's drawers and his phone."

267. The sixth video was uploaded to the 2023 football team's group Snapchat.[17] *Id.* ¶ 53.

268. In a seventh video recorded by "[B.]," a player picked up another player-victim by the throat and slammed him onto the hotel bed. The player then ripped off the victim's pants and underwear exposing the victim's naked body; the victim tried covering his genitals with his hands.

269. Several other players were standing around watching, laughing, and cheering.

270. The player recording the attack walked over and stood over the naked victim while video recording.

271. The seventh video was uploaded to the 2023 football team's group Snapchat.[18] *Id.* ¶ 58.

272. In the eighth video recorded by "[D.T.]," one player was held face down on a hotel bed while a second player humped and ground his penis into the first player's buttocks. A third player humped and ground the second player. Then a fourth player joined in and humped and ground

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the third player, and then a fifth player joined in and humped and ground the fourth player. All players were clothed.

273. The eighth video was uploaded to the 2023 football team's group Snapchat.[19] *Id.* ¶ 61.

274. In the ninth video recorded by an unknown player, three shirtless players stood in the hotel hallway wearing only shorts. One player grabbed the second player and ripped off his shorts and underwear, exposing the second player's genitals and buttocks.

275. The third player laughed.

276. The ninth video was uploaded to the 2023 football team's group Snapchat.[20] *Id.* ¶ 65.

277. Players hazed the third player in the ninth video another time. He was held down and stripped. But, based on information and belief, a video of that attack doesn't exist. *Id.* ¶ 67.

278. For the second camp trip in a row, Ursuline football players hazed other players. This was openly discussed in the presence of Coaches Reardon, McGlynn, and Syrianoudis, who did nothing to stop the hazing despite their knowing about the ongoing hazing activities.

In June 2024, Ursuline's football team attends eight-day, out-of-state school-sponsored camp trip taking many players under the supervision of only three coaches.

279. Plaintiff Son Roe started his freshman year at Ursuline in August 2023.

280. In early summer of 2023, Son Roe joined the Ursuline football team, started attending practices, and was added to the 2023 football team's group Snapchat.

281. Although Son Roe didn't attend the team's 2023 football camp, he did see hazing videos from that camp, which were posted on the team's group Snapchat.

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[19] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

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282. Son Roe saw one video in which one player held down the victim-player and forcibly ripped off the victim's pants and underwear; on the video, the victim was visibly naked but tried to conceal himself.

283. When the team returned from the trip, they talked about the hazing that occurred during the 2023 trip.

284. Son Roe heard about other players being hazed during the 2023 trip, but didn't view those videos.

285. By 2024, hazing had become the "culture" and "tradition" of Ursuline's football team.

286. Most of the team discussed the hazing and did not try to keep it a secret—it was well known.

287. By then, Coaches Reardon, McGlynn, and Syrianoudis were aware of the ongoing hazing traditions of their players; yet, they did nothing to stop it.

288. In summer 2024, Plaintiffs John and Jill Roe paid $1,600 to Ursuline for their high-school student son and football player Son Roe to attend the 2024 football camp trip.

289. Before the trip, Son Roe was added to the 2024 football team's group Snapchat.

290. Before the trip, Son Roe knew about the Ursuline football team's tradition and culture of hazing and was wary, but he felt pressured to attend the camp trip to earn playing time and because the coaches encouraged players to attend the trip.

291. Ursuline's football team attended the eight-day bus trip in June 2024. The trip included visits to the University of Toledo, the University of Notre Dame, the University of Wisconsin, the University of Iowa, Iowa State University, Indiana University, and Bowling Green State University.

292. Defendants head coach Reardon, assistant coach McGlynn, and assistant coach Christian Syrianoudis were the only adults on the trip and were responsible for supervising the football players in attendance. D.T. Aff. ¶ 69.

293. Ursuline, through those coaches among others, have the actual authority to prevent and respond to hazing, assaults, and their players' Title IX violations.

294. Defendants' failures to properly plan for and supervise were contributing factors in the harm caused to Son Roe (and the other victims) on the trip.

Day 1 (June 2024: University of Travel camp and travel day to the State of Indiana)
Son Roe is threatened with being hazed.

295. On Day 1 (June 2024, Ohio and Indiana), the team bus traveled from Ursuline to the University of Toledo football camp, and later to Indiana.

296. Coaches Reardon, McGlynn, and Syrianoudis traveled on the bus with the players.

297. The football team's hazing activities from 2022 and 2023 continued during the 2024 trip. *Id.* ¶ 70.

298. The players' intentionally used the sexually and physically exploitive attack and hazing of the victims, including Son Roe, to diminish the victims', including Son Roe's, masculinity or male identity and to establish their own dominance and control over the victims, including Son Roe.

299. On the bus while heading from Toledo to Indiana, Ursuline player J.L. threw a water bottle and hit Son Roe.

300. Son Roe yelled at J.L., who responded, "Oh, yeah, wait until we get to the hotel. I got something for you."

301. Son Roe knew from experience that J.L. was threatening to haze him because the hazing was so common on the team and the trips. So Son Roe expected J.L. to try to rip off his clothes as had been done to other players.

302. Daily throughout the trip, the players openly discussed their hazing escapades in the presence of Coaches Reardon, McGlynn, and Syrianoudis. D.T. Aff. ¶ 32.

303. The coaches never addressed the hazing with the players and did nothing to stop it from occurring repeatedly. *Id.* ¶ 33.

304. After checking into the hotel in Indiana that night, several players came to Son Roe's room to haze him, but Son Roe hid and the players left.

305. Later that night, the players came back again, but Son Roe locked himself in the room and the player left.

306. The players, including J.L., T.D., and D.T., came back a third time and stood over Son Roe's bed.

307. The players told Son Roe they were going to "spare" him from being hazed that night, but that they be back the next night.

308. Later, D.T. and T.D then made a concoction of leftover food and liquid from Chick-Fil-A and threw it on Son Roe as he slept.

Day 2 (June 2024: University of Notre Dame camp and travel day to Wisconsin)
Several Ursuline football players haze Son Roe.

309. On Day 2 (June 2024, Indiana and Wisconsin), the team attended a football camp at the University of Notre Dame and, then traveled to the State of Wisconsin.

310. After checking into the hotel in Wisconsin that night, Son Roe went to another player's room to play Xbox.

311. When Son Roe entered the room, Ursuline football players J.L., T.D., D.T., and J.F. said, "jump him," and proceeded to attack Son Roe.

312. As the players tried to forcibly rip off Son Roe's pants and underwear, Son Roe held his pants and underwear and punched at the other players with his other hand in self-defense. D.T. Aff. ¶ 71.

313. When the players realized that Son Roe was wearing the clothes he was supposed to wear for the next day's camp (the team coordinated outfits for each camp), they agreed not to rip the outfit Son Roe was wearing.

314. The players agreed to let Son Roe go back to his hotel room and get changed before they continued with the hazing.

315. J.L. and D.T. escorted Son Roe to his room.

316. Son Roe left them to another room—not his actual room—and pretended to look for new clothing. He then fled the room.

317. J.L. and D.T. chased after Son Roe and yelled at him in the hallways.

318. Another hotel patron heard the commotion and yelled at J.L., who yelled back at the unknown patron.

319. Son Roe was able to escape safely to his own room.

Day 3 (June 2024: University of Wisconsin camp and travel day to the State of Iowa)
Two other players are hazed by Ursuline football players.

320. On Day 3 (June 2024, Wisconsin and Iowa), the team attended a football camp at the University of Wisconsin and, then traveled to Iowa.

321. Later that day, after the team checked into a hotel in Iowa, several Ursuline football players hazed C.C.

322. The players gave C.C. two degrading options—he could have his clothes forcibly ripped off, or he could strip himself naked and apologize into the camera.

323. C.C. choose to strip himself naked, which he did.

324. The players then gave C.C. a hand towel to cover himself and then forced him to apologize, which he did.

325. One of the players videorecorded the hazing of C.C. and posted it to the 2024 football team's group Snapchat.

326. Later that same night, J.L. and D.T. hazed G.C.

327. J.L. and D.T. degradingly ripped off G.C's pants and forced him to apologize into the camera.

328. Another player videorecorded the hazing of G.C. and posted it to the 2024 football team's group Snapchat.

Days 4, 5, and 6 (June 2024: Iowa State University camp and University of Iowa tour; and travel days to the State of Iowa and Missouri)

The players openly discuss the hazing in the presence of the coaches.

329. On Day 4 (June 2024, Iowa), the team attended a football camp at Iowa State University and stayed in the same hotel as the night before.

330. On Day 5 (June 2024, Iowa), the team traveled to the University of Iowa for a tour and stayed in a different hotel that night.

331. On Day 6 (June 2024, Missouri), the team traveled to St. Louis, stopped at the Arch, ate dinner in a restaurant, and stayed in a St. Louis-area hotel.

332. Because of the hazing he had endured and the threats of more hazing, Son Roe avoided the other players.

333. The players still discussed their hazing activities openly and in the presence of Coaches Reardon, McGlynn, and Syrianouis.

Day 7 (June 2024: Indiana University camp and travel day to Indiana)
Son Roe is hazed a second time by several Ursuline football players.

334. On Day 7 (June 2024, Indiana), the team traveled to Indiana and attended a football camp at Indiana University.

335. That night, the team stayed in an airport hotel in Indiana.

336. The coaches asked the players to be quiet because there were other travelers in the airport hotel. But they didn't instruct the players not to engage in their traditional hazing activities.

337. That night, as Son Roe was showering, his roommate told him the other players were on their way to attack Son Roe.

338. Son Roe got out of the shower and hid in an armoire.

339. Ursuline football players J.L., T.D., D.T. J.F., K.R., and An.B. entered Son Roe's room and began looking for him.

340. Son Roe thought they left and looked out from the armoire, but the players were waiting for him.

341. The players grabbed Son Roe and began forcibly trying to rip off his pants and underwear. *Id.* ¶ 71.

342. Son Roe fought back.

343. J.F. and K.R. said, "This is gay," and left.

344. J.L., T.D., D.T., and An.B continued trying to strip Son Roe.

345. As Son Roe fought back, he kicked the TV, which crashed into the wall.

346. The players all ran.

347. Another player videorecorded the attack on Son Roe and posted it to the 2024 football team's group Snapchat.

Day 8 (June 2024: Bowling Green State University tour and travel day back to Ohio)
After several days of hazing, the Ursuline football team returns home.

348. On Day 8 (June 2024, Ohio), the team returned to Ohio and went on a tour of Bowling Green State University.

349. After the tour, the team returned home.

Son Roe finished out the 2024 football season and the remainder of the school year before transferring to another high school, to escape Ursuline's "toxic" and violent environment.

350. Son Roe remained on the football team for the 2024 season despite being subjected to more violence by teammates and witnessing fights between other players.

351. Throughout the year, Son Roe witnessed other teammates get into fights both on the field and in the locker room.

352. The coaches didn't put a stop to the violence and never disciplined anyone for it, which increased the culture of violence on the team.

353. During an inter-team scrimmage, Son Roe and G.C. were placed on opposing teams.

354. During the scrimmage, G.C. talked trash, took cheap shots at other players, and acted in a generally unsportsmanlike manner.

355. During one of the breaks, Son Roe told Coach McGlynn to do something about G.C. or Son Roe would.

356. McGlynn dismissively told Son Roe, "Ahh, relax" and refused to address G.C.'s detrimental behavior.

357. On the last play of the game, G.C. and two other players tackled Son Roe preventing him from scoring a touchdown.

358. After the play was over, G.C. lay on top of Son Roe, taunted him, and wouldn't let him get up off the ground.

359. Son Roe eventually forced G.C. off and proceeded to punch G.C. under the facemask.

360. The fight was broken up, but the coaches disciplined no players.

361. Coach Reardon even told Son Roe that he saw G.C. "messing" with him the entire scrimmage—but did nothing about it.

362. Son Roe was upset that Reardon saw G.C.'s behavior and did nothing to address it.

363. Reardon wasn't mad about G.C.'s behavior or the fight—no one was punished.

364. Later that day, Son Roe's father John Roe saw Coach McGlynn at another event.

365. McGlynn told John Roe that he thought the fight was "great" and "that's football."

366. John Roe was disgusted by McGlynn's attitude supporting violence on the team and among the players.

367. Throughout the school year, Son Roe witnessed several fights between classmates during school hours and even had to defend himself twice against another football player who wanted to fight him.

368. Son Roe had enough.

369. Son Roe wanted to escape Ursuline's "toxic" environment—and the even "more toxic" environment of its football team.

370. In the spring of 2025, Son Roe's younger brother, who was still in eighth grade, started attending off-season workouts and practices with the team.

371. Fearful of the escalating violence at Ursuline and on the football team, Son Roe did not want his younger brother exposed to that culture and the hazing.

372. Son Roe started shadowing other high schools with plans to transfer.

373. Learning of Son Roe's desire to transfer schools, Coach Reardon and Athletic Director John DeSantis met with Son Roe.

374. During the meeting, Son Roe expressed his displeasure with how the coaches ran the team and, more importantly, Son Roe expressed his displeasure with the "toxic" and violent environment in the school and on the team.

375. Reardon and DeSantis feigned an apology for Son Roe's concerns, but never offered to address or correct any of the issues.

376. By this point in 2024, Reardon and DeSantis knew that the football players engaged in hazing other players, beginning at least as early as 2022.

377. Reardon and DeSantis tried to convince Son Roe to stay at Ursuline, but Son Roe had already made up his mind to transfer—he had to protect his younger brother and himself.

378. In June 2025 (before the football team's next camp trip), Son Roe transferred to another high school.

In June 2025, 41 Ursuline football players attend a nine-day, out-of-state school-sponsored camp trip under only three coaches' supervision.

379. Ursuline's football team attended the nine-day bus trip from June 12 to June 20, 2025. The trip included visits to Auburn University, the University of Alabama, Florida State University, the University of Florida, Disney Springs and water park, the University of South Florida, and the University of Tennessee.

380. Mother Doe paid $2,000 cash directly to McGlynn for Son Doe to attend the trip.

381. Defendants head coach Reardon, assistant coach McGlynn, and assistant coach Christian Syrianoudis were the only adults on the trip and were responsible for supervising the 41 football players in attendance.

382. Ursuline, through Defendants Reardon, McGlynn, and Syrianoudis, have the actual authority to prevent and respond to hazing, assaults, and their players' Title IX violations.

383. Defendants' failures to properly plan for and supervise were contributing factors in the harm caused to Son Doe (and the other victims) on the trip.

384. As part of some claimed "comradery"-building idea, Reardon had the players room with different players each night, including housing freshmen, sophomores, juniors, and seniors in the same hotel rooms.

385. Although Reardon's son, a freshman, was on the trip, he didn't participate in the "comradery"–building rooming arrangement. Instead he roomed with his father most nights, if not every, night. Because Reardon's son stayed with him at night, his son managed to escape the hazing, physical and sexual abuse, and humiliation to which other players were soon subjected and that Reardon and other coaches had been indulging.

386. The hazing of players continued during the 2025 trip. D.T. Aff. ¶ 76.

387. Hazing had become the tradition and culture of the Ursuline football team. *Id.* ¶ 77.

388. Players' non-consensual hazing, wrestling, humping, and "taking butts" happened regularly. *Id.* ¶ 78.

389. By 2025, because the hazing had happened for so many years and the players and coaches knew about it, the players openly talked about the hazing in front of the coaches on the bus, at the hotel, and during camps. *Id.* ¶ 80.

390. Throughout the years, the discussions about hazing happened constantly during the trips and even when the team returned home and went to school. *Id.* ¶ 81.

391. During the hazing discussions, the players openly played and replayed the videos of the hazing activities during the trip and in front of the coaches. *Id.* ¶ 82.

392. None of the players tried to hide that they were hazing other players. *Id.* ¶ 83.

393. Coaches Reardon, McGlynn, and Syrianoudis never told the players to stop, never tried to stop it, and never said anything even when the players talked about it in front of them. *Id.* ¶ 84.

394. The players openly posted the hazing activities on all the football team's group Snapchats and shared it with others outside the team, including other Ursuline students and students from other schools. *Id.* ¶ 85.

395. Soon after departing from Ursuline (while still in Ohio)—and throughout the entire trip—several of the upperclassmen players openly discussed the hazing and "initiations" that would take place during the trip, including "taking butts," stripping fellow players, and other forms of abuse.

396. The phrase "taking butts" refers to the stripping, degradation, and humiliation of players.

397. The upperclassmen players also openly discussed, as part of the "initiations," having players fight each other—with the loser "getting his butt taken."

398. This initiation is akin to the "jumping in" initiation criminal gangs do, in which other gang members beat and assault prospective members before they may join the gang.

399. During the bus ride to the first destination, D.T. showed multiple hazing videos from prior years' trips to J.P. Affidavit of J.P. at ¶ 10, attached as Ex. 4.

400. The players' discussions of hazing, "initiations," and "taking butts" occurred in the Reardon, McGlynn, and Syrianoudis' presence.

401. Reardon, McGlynn, and Syrianoudis were close enough to the players to hear the hazing conversations. Hazing was discussed openly, regularly, and repeatedly. J.P. Aff. ¶¶ 12–13.

402. While still on the bus to the first destination, Syrianoudis even said, "Don't say that stuff to me, I don't want to hear it." That is, he was hearing it. He just didn't want to get caught ignoring it.

403. Yet the discussions continued throughout the trip and in the coaches' presence.

404. The hazing-initiation-butt-taking talk wasn't just idle puffery—it soon became a reality and for Son Doe and other victims, a nightmare.

405. Despite the hazing-initiation-butt-taking-discussions occurring in the presence of Reardon, McGlynn, and Syrianoudis, who heard and knew what was about to occur, the coaches failed to take any appropriate steps to stop or prevent the hazing and violent attacks on the victims.

406. As the trip continued, it became even more obvious that the hazing, degradation, humiliation, and abuse wasn't a random or one-time ordeal, but a years-long culture of the Ursuline football program—a culture Defendants knew well and accepted.

407. As recounted by one player, "It was obvious to me that hazing was the 'culture' of the Ursuline football team because the players and coaches knew about it and accepted it; it had been happening for several years, and no one was punished for it. *Id.* ¶ 15.

408. The football team's hazing activities from 2022, 2023, and 2024 continued during the 2025 trip.

409. "During the trip, the hazing happened every day." *Id.* ¶ 16.

410. The players intentionally used the sexually and physically exploitive attack and hazing of the victims, including Son Doe, to diminish the victims', including Son Doe's, masculinity or male identity and to establish their own dominance and control over the victims, including Son Doe.

411. The hazing was not limited to the football players, but included obtaining nude photos of female students, posting the photos on the football team's group Snapchat, and "rating" the females, as well as stories of female students being sexually assaulted.

412. In addition to the illegal recruiting, hazing, and creation and dissemination of child pornography, it is also known throughout the school that Ursuline "pays" its players to attend the school and play football.

413. The school itself has also become rotten with violence and drugs.

414. According to at least one former Ursuline student, assaults and fighting are regular occurrences, often resulting in serious injuries; yet Ursuline administrators rarely held the combating students appropriately accountable, with most, if not all, of them returning to school within days at most. (Some of these fights were recorded by Ursuline students and shared on social media.)

415. According to at least one former Ursuline student, the selling and use of drugs, especially marijuana, were rampant throughout the school. Students regularly smoked marijuana in the bathrooms and other secreted locations during school hours, and openly in the parking lots and around the outside of the school. Yet, Ursuline failed to take appropriate measures to limit and prevent the drug use.

416. Ursuline routinely and regularly covered up the misconduct to keep a clean image, knowing the devastating effects if the public knew what really happened within its doors.

417. Yet over the past few years, Ursuline has promulgated the nickname "the U."

418. "The U" was a nickname given to the University of Miami back in the 1980s–'90s, when Miami football players engaged in flamboyant behavior and misconduct, and even criminal behavior.[21]

Day 1 (June 12, 2025: Travel day to Alabama)
Son Doe learns that Ursuline football has a years-long history of hazing as part of its initiation onto the team or for players who talk smack—thus establishing its hazing culture.

419. When the bus arrived at its destination on Day 1 (June 12, 2025, Alabama), the coaches assigned players to their rooms for the night.

420. Son Doe roomed with D.P., B.D., and T.H. on Day 1. R.J. was also in the room.

421. D.P. told Son Doe that, during the football camp trips, the football players did "initiations" on the freshmen and any other player who "talks smack."

422. D.P. then showed Son Doe three to four videos from prior years. The videos showed Ursuline football players stripping, choking, slamming, and assaulting other players as part of the "initiations."

423. The videos were saved to the Ursuline football team's group Snapchat from which all the members of the group could view, download, and share. Only players were members of the team's group Snapchat, not coaches.

424. Son Doe was later added to team's group Snapchat. Because he was added later, Son Doe lacked access to videos, photos, and messages posted before his inclusion in the team's group Snapchat.

[21] "The U" and the backstory led to the creation of the "Catholic vs Convicts" shirt produced by University of Notre Dame students for Notre Dame's (Catholics) game against Miami (Convicts) in 1988, in which Notre Dame prevailed 31-30 leading to them winning the national title. This era of Miami football inspired the production of two ESPN *30 for 30* shows, "*The U*" (documentary 2009) and "*Catholic vs Convicts*" (2016).

425. D.P. told Son Doe that he was lucky last year's seniors were not still there because they were "a lot worse" than this year's seniors.

426. Based on these videos and D.P. comments, it was obvious that the hazing, degradation, humiliation, and abuse were not a one-time occurrence, but was the culture of the Ursuline football team—a culture that Defendants knew and failed to rectify, prevent, or stop.

427. Later that night, Ta.W. and C.C. came to Son Doe's room for his "initiation."

428. Terrified of the abuse that was about to occur, Son Doe hid in a closet.

429. C.C. opened the closet, grabbed Son Doe by the throat, and pulled him out of the closet.

430. Ta.W. grabbed Son Doe and threw him on the bed face up; then, Ta.W. grabbed Son Doe's shorts and tried to pull them off.

431. Son Doe grabbed his shorts to prevent Ta.W. from pulling them off. While Son Doe was on his back, Ta.W. lifted Son Doe's legs in the air.

432. With his penis erect and visible through his clothes, Ta.W., with a repeated thrusting motion, ground into and "humped" Son Doe's buttocks over Son Doe's shorts.

433. To his horror, Son Doe could feel Ta.W.'s penis.

434. D.P. videorecorded the attack and posted it onto the team's group Snapchat, causing an interstate wiring and communication.

435. Ta.W. and C.C. left the room following the attack.

Day 2 (June 13, 2025: Alabama)
Son Doe is ridiculed by several players for attack and video.

436. On Day 2 (June 13, 2025, Alabama), the team attended a 7-on-7 football camp at Auburn University.

437. Throughout the day, in front of Defendant-Coaches Reardon, McGlynn, and Syrianoudis, several players ridiculed Son Doe for the prior night's attack and the video.

438. On the bus, in front of Defendant-Coaches Reardon, McGlynn, and Syrianoudis, Ta.W. stuck his hands down his pants and then proceeded to rub his hands on Son Doe's face and mouth. The incident was videorecorded and uploaded to the 2025 football teams' group Snapchat. (Son Doe was resting during this incident and didn't learn about it until later.)

439. Several other players repeatedly hit Son Doe in the head and told him that he was "going to get his butt took" again that night back at the hotel. This phrase meant that Son Doe was going to be stripped naked, assaulted, and videorecorded, with the video being posted on the team's group Snapchat.

440. That night, Son Doe lay in bed in terror. But that night, at least, he was not targeted for another attack.

441. Based on information and belief, other players were also attacked that night.

442. That night, Ta.W. and D.T. hazed another player-victim. D.T. Aff. ¶ 90.

443. Ta.W. held the victim down on a hotel bed; while D.T. picked up the victim's legs and pinned them up by his head, but D.T. didn't hump him. The players were clothed. *Id.* ¶ 91.

444. But after D.T. jumped off the bed, Ta.W. continued holding the victim down, then jumped over onto the victim. *Id.* ¶ 92.

445. Ta.W. then picked up the victim's legs and pinned them up by his head; and then humped and ground his penis into the victim's buttocks. *Id.* ¶ 93.

446. Other players stood around the hotel room waiting for their turns. *Id.* ¶ 94.

447. Another player videorecorded the hazing of the victim and posted to the 2025 football team's group Snapchat. *Id.* ¶ 95.

448. That night, Ta.W. posted videos to the team's group Snapchat of To.W. issuing a warning and instructing several other players in the hotel room, "You know what happens when [inaudible] talk shit. Do not."

449. At 11:44 PM that night, Reardon sent the following text message to the "2025 Camp Trip" group message (that is, the players and coaches on the trip):

> The manager of the hotel just told me that he got a complaint of too much noise. This is the ONLY warning you will get. The whole team will be punished if I get another complaint.
>
> The specific complaint came from the 3rd floor.



450. Lights-out was supposed to be 10:00 PM.

451. Reardon never went and personally checked on the disturbances or complaint.

452. Nor did McGlynn or Syrianoudis.

453. While at the Auburn University camp, several players also stole clothing and accessories from the camp.

454. The players openly discussed the thefts and showed the items.

Day 3 (June 14, 2025: Alabama)
Son Doe is again ridiculed by several other players.

455. On Day 3 (June 14, 2025, Alabama), the team attended a football camp at the University of Alabama.

456. Throughout the day, as with the prior day, several players continued to ridicule Son Doe, hit him in the head, and threaten him that he was "going to get his butt took" that night back at the hotel.

457. Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet did nothing.

458. Fortunately, Son Doe was not targeted that night for another attack. But C.C. was.

459. R.H., W.S., and C.S. held down C.C. and "ripped" off C.C.'s clothes. D.T. Aff. ¶ 86.

460. C.C.'s was stripped naked and his genitals were exposed. J.P. Aff. ¶ 20.

461. Son Doe started videorecording, but when he realized what was happening, he "abandoned" (Snapchat lingo for not saving a video) and did not post it to the team's group Snapchat.

462. But several other players videorecorded the attack on C.C. and posted it to the team's group Snapchat.[22] *Id.* ¶¶ 18–19.

[22] Plaintiffs' counsel lawfully possess these videos, which are incorporated but not attached. *See* Evidence Disclaimer above.

Day 4 (June 15, 2025: Travel day to Florida)
Son Doe is attacked, assaulted, and stripped by several other players.

463. On Day 4 (June 15, 2025, Florida), the team travelled from Alabama to Florida to attend a football camp at Florida State University.

464. Throughout the day, as in the previous days, several players continued to talk about the prior attacks and their plans to "take butts" that night. Again, Reardon, McGlynn, and Syrianoudis were present and heard the discussion and threats yet did nothing.

465. While Son Doe was in his hotel room with D.D., To.W. came in.

466. To.W. wanted to haze D.T., but Son Doe and D.D. wouldn't participate in the hazing of D.T. D.T. Aff. ¶ 97.

467. To.W. took Son Doe's cellphone from him and sent out Son Doe's room number on the team's group Snapchat to alert the players to Son Doe's location.

468. Son Doe, knowing he was about to attacked again, locked himself in the bathroom.

469. When several other players arrived at Son Doe's hotel room, they forced open the bathroom door, injuring Son Doe's foot in the process. (The injury to Son Doe's foot was still visible days later when he returned home.)

470. To.W., D.T., J.P., and A.B. pulled Son Doe out of the bathroom.

471. D.T. forcibly lifted Son Doe off the ground by his shirt and arms, while To.W., J.P., and A.B. forcibly tried to strip Son Doe's pants and underwear off him.

472. Son Doe shook his head and pleaded, "No!" while holding the sides of his pants. Son Doe, who tried to appear strong, wanly smiled in an obvious effort to hold back his tears.

473. This portion of the attack was videorecorded and posted to the team's group Snapchat.[23]

474. Before To.W., D.T., J.P., and A.B. could completely remove Son Doe's pants and underwear, someone yelled "the coaches are in the hallway" prompting them to run away.

475. G.C., who was present for the attack, stayed in Son Doe's room when the other players ran off.

476. G.C. told Son Doe that he could go to G.C.'s room to avoid the other players coming back because they knew Son Doe's room number.

477. Son Doe went with G.C. to his room thinking G.C. was trying to protect him.

478. But G.C. was not trying to protect Son Doe. G.C. had lied to Son Doe and lured him into another attack.

479. When G.C. led Son Doe into his room, Ta.W., To.W., D.T., J.P., A.B., and C.S. were waiting for Son Doe. E.S. was also in the room.

480. Son Doe said, "Heck no, I'm leaving," and tried to leave the room.

481. But G.C. stood in the doorway to prevent Son Doe from leaving and said, "You're not leaving now."

482. G.C. blocked the door and prevented Son Doe from leaving. D.T. Aff. ¶ 102.

483. Son Doe protested and tried to leave, but G.C. prevented him and said, "It's too late, you're not leaving."

484. To.W., D.T., J.P., and A.B. immediately attacked Son Doe, carried him into the bedroom, and slammed him onto the bed.

[23] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference, but they are not attached. *See* Evidence Disclaimer above.

485. G.C. stood guard in the other room and watched.

486. J.P. forcibly grabbed and restrained Son Doe's left arm and covered Son Doe's mouth to prevent him from screaming for help.

487. At the same time, A.B. forcibly grabbed and restrained Son Doe's right arm; D.T. forcibly grabbed and restrained Son Doe's left leg; and To.W. forcibly grabbed Son Doe's right leg.

488. C.S. forcibly grabbed and restrained Son Doe's right leg, as To.W. grabbed Son Doe's pants.

489. To.W., D.T., J.P., A.B., and C.S. tried to strip off Son Doe's clothes, but as Son Doe was trying to defend himself, he fell off the bed.

490. While Son Doe was on the ground, To.W., D.T., J.P., A.B., and C.S. continued to assault him and eventually pulled off Son Doe's pants and underwear revealing his nude buttocks and genitals.

491. Son Doe covered his now-exposed genitals with his hands, but the Players pulled Son Doe's arms to fully expose him for the videorecording.

492. As J.P. grabbed and held Son Doe's arm, exposing Son Doe's nude buttocks and genitals, D.T. smacked Son Doe's bare buttocks twice.

493. As Son Doe stood up, To.W. threw Son Doe back on the ground.

494. Son Doe crawled to the corner and covered his genitals with his hands.

495. One of the Players threw a washcloth at Son Doe to cover himself, while A.B. smacked him in the head/face.

496. As with the earlier attack, Son Doe was pleading "No!" while trying to fend off the attack. Son Doe tried to appear to be strong but was holding back his tears.

497. Ta.W. videorecorded the attack and posted the videos to the team's group Snapchat.[24] D.T. Aff. ¶ 109.

498. G.C., B.S., and J.B. saved and transferred the videos in Snapchat.

499. The videos were disseminated over state lines to other Ursuline football players and students in Ohio.

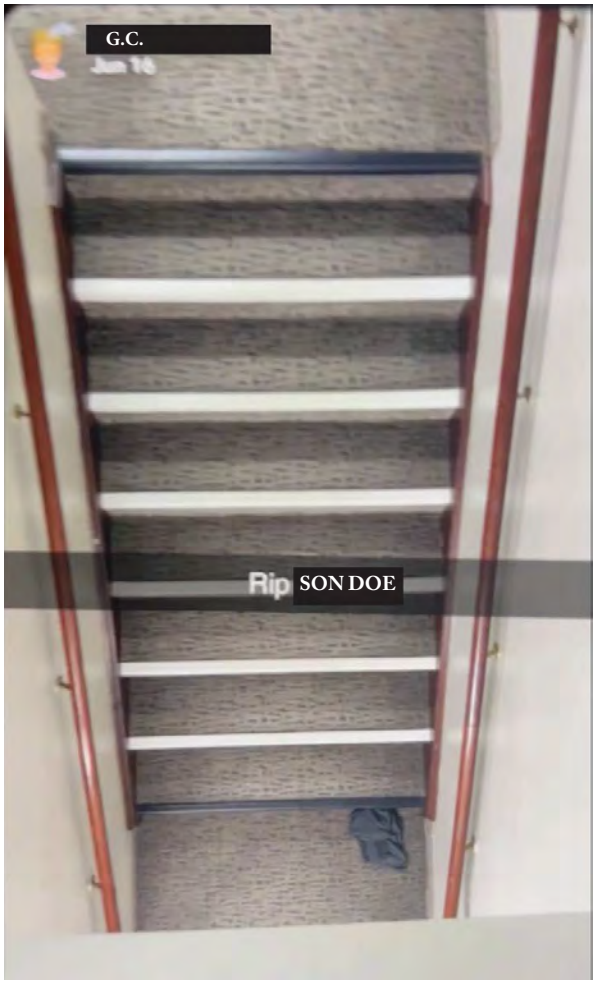
500. The videos were further disseminated throughout the surrounding community.

501. A.B. took Son Doe's underwear and said they were keeping as a "trophy."

502. Criminals, like serial killers and serial rapists, commonly take trophies to commemorate and remind them of their criminal achievements.

503. One of the players threw Son Doe's underwear down a stairwell. G.C. (the one who lured Son Doe into the attack) posted a photo of Son Doe's underwear on the team's group Snapchat with the message "Rip [Son Doe]" (meaning "rest in peace").

[24] Plaintiffs lawfully possess these videos, which are incorporated but not attached. *See* Evidence Disclaimer above.



504. Son Doe stayed in the room shaking, terrified, and humiliated.

505. Within minutes, several other players, who had seen the video posted on the team's Snapchat, entered the room and ridiculed Son Doe. Son Doe fled to his room in humiliation.

Day 5 (June 16, 2025: Florida)
Son Doe informs Mother Jane Doe of the attacks; Mother informs Defendant-Assistant Coach Timothy McGlynn.

506. On Day 5 (June 16, 2025, Florida), the team attended a football camp at the University of Florida.

507. Throughout the day, in front of Defendant-Coaches Reardon, McGlynn, and Syrianoudis, several other players ridiculed Son Doe for the prior night's attacks and videos.

508. Reardon, McGlynn, and Syrianoudis, again, did nothing to rectify, prevent, or stop the attacks and hazing.

509. Around 5:33 PM, Son Doe texted Mother Doe about the attacks, but, frightened, pleaded with her not to say anything to anyone.

510. Mother Doe told Son Doe to tell McGlynn, but Son Doe refused and pleaded with Mother Doe not to tell anyone.

511. Son Doe knew and legitimately feared that, if Mother Doe told the coaches, the other players would find out that Son Doe talked about what happened and would retaliate against him and attack him even more viciously than before.

512. Given the warnings other players had given, his fears were well founded.

513. Later, Son Doe and another player went to Target to get away and hide from the other players.

514. Around 8:34 PM, McGlynn called Mother Doe because he could not get in touch with Son Doe.

515. At 8:45 PM, Mother Doe called McGlynn back.

516. During the call, Mother Doe informed McGlynn of the hazing, assault, and attack on Son Doe.

517. McGlynn expressed neither surprise nor dismay that hazing was happening. And he expressed no sympathy or remorse.

518. Rather, he tried to *downplay* what occurred and made excuses, like there being 41 players on the trip and only three coaches.

519. This did not excuse Defendants' failures and what occurred.

520. McGlynn even went so far as pronounce, "It's just boys being boys." So in McGlynn's

view, multiple players assaulting, holding down, and stripping another player naked, while another player videorecords the attack and posts it to the team's group Snapchat (production and dissemination of child pornography) is normal and just "boys being boys."

521. In McGlynn's view, multiple players threatening to "take butts" and then "taking butts" of fellow male players is just "boys being boys."

522. In McGlynn's view, compelled fighting by multiple players is just "boys being boys."

523. In McGlynn's view, multiple players "humping" each other over their clothes is just "boys being boys."

524. While betraying the thought process of a man who, for so long, had himself engaged in and indulged violence toward students, McGlynn's pronouncement was wrong.

525. And his claim was absurd.[25]

526. This is the same McGlynn who thought it was normal to physically abuse his players, threaten to kill another coach, and threaten to firebomb someone's house when he was head coach at Champion High School.

527. He was wrong there and then, and he was wrong here and now.

528. Mother Doe responded to McGlynn's obtuse "boys being boys" comment, "Need I remind you that hazing is highly illegal and dangerous."

529. McGlynn responded angrily that they do not condone hazing—a false statement because the hazing has been occurring for years and is still occurring with the coaches being fully aware, yet failing to rectify, prevent, or stop it.

[25] Hari Kondabolu, "Boys will be boys," Mainstream American Comic, https://youtu.be/TgAKR-zna-8.

530. McGlynn then claimed (falsely) that he would take care of it.

531. Mother Doe said that, when she would go to the school to pick Son Doe up from the returning bus, she was going to confront the players that hazed and attacked Son Doe. And she was going to report what happened to school leadership.

532. McGlynn retorted that Mother Doe going to the school was "crazy" and that "they'll just tell her to go back to where she's from."

533. In McGlynn's world, a mother protecting her child is somehow crazy.

534. But his statement displayed his and Ursuline's conscious disregard for wrongdoing by its players. McGlynn knew that the school's leadership wouldn't *care*.

535. (He was right.)

536. McGlynn's statements confirmed that going and reporting to Ursuline would accomplish nothing.

537. McGlynn was speaking from his Ursuline experience—in contrast to Champion High School, which takes hazing and abuse seriously.

538. After the conversation, in a failed effort to calm down Mother Doe, to encourage her not to report what occurred to the school, and to cover for his offensive and arrogant remarks, McGlynn texted Mother Doe the following:

(a) "I'm not saying anything." (8:55 PM).

(b) "My issues is your brought it to my attention so I have to address it some how." [*Sic.*] (9:05 PM).

(c) "I am but it happens behind close doors there 41 kids on 3 different floors." [*Sic.*] (9:07 PM). (This did not just happen behind closed doors. The players openly talked

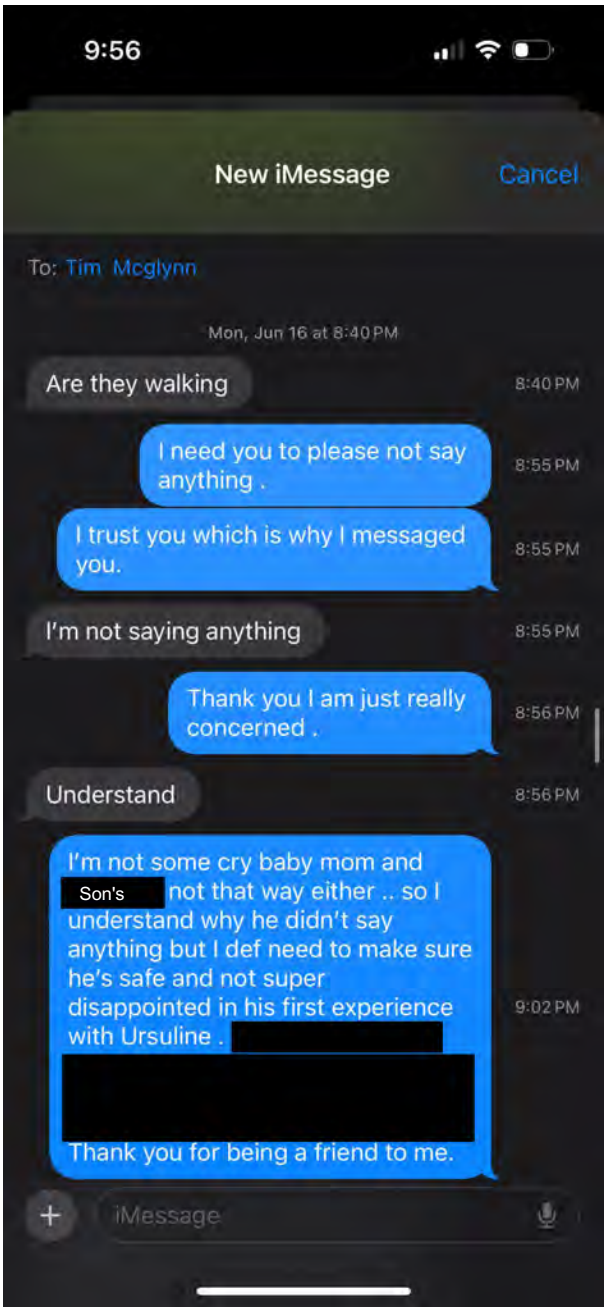
about it front of the coaches on the bus and throughout the camps. The players posted in social media for all to see.)

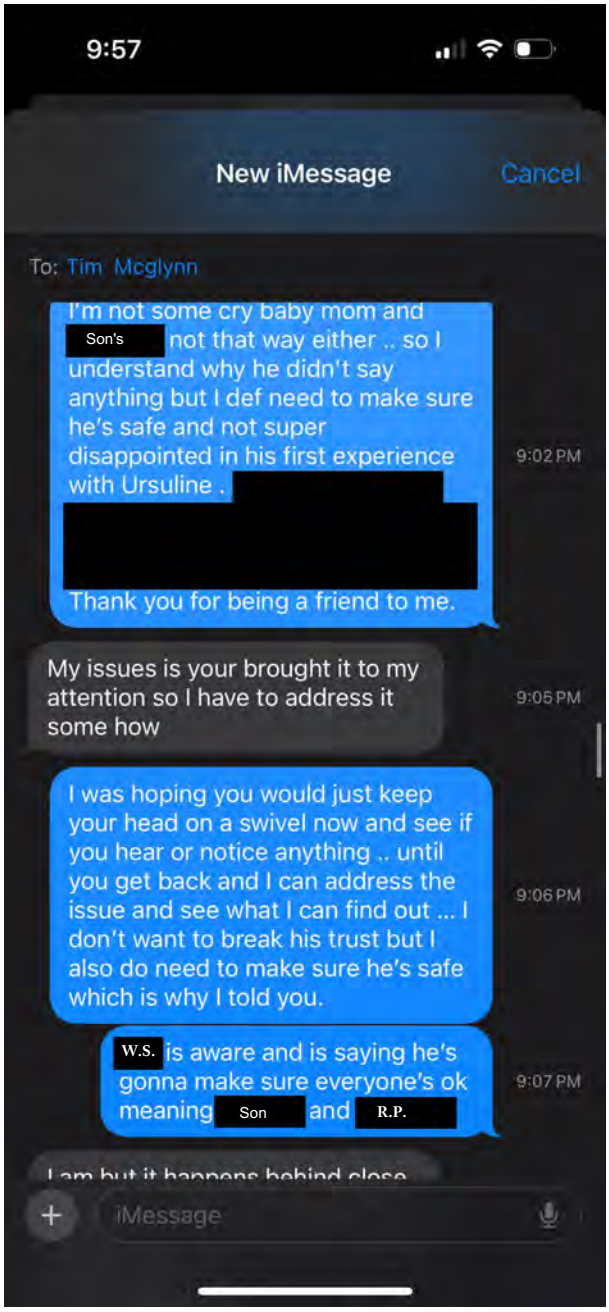
(d) "Yes thanks you I'll be on it don't worry." [*Sic.*] (9:10 PM). (McGlynn and the other coaches were not on it. They were aware both before, during, and after, yet failed to rectify, prevent, or stop the hazing and attacks, which continued.)

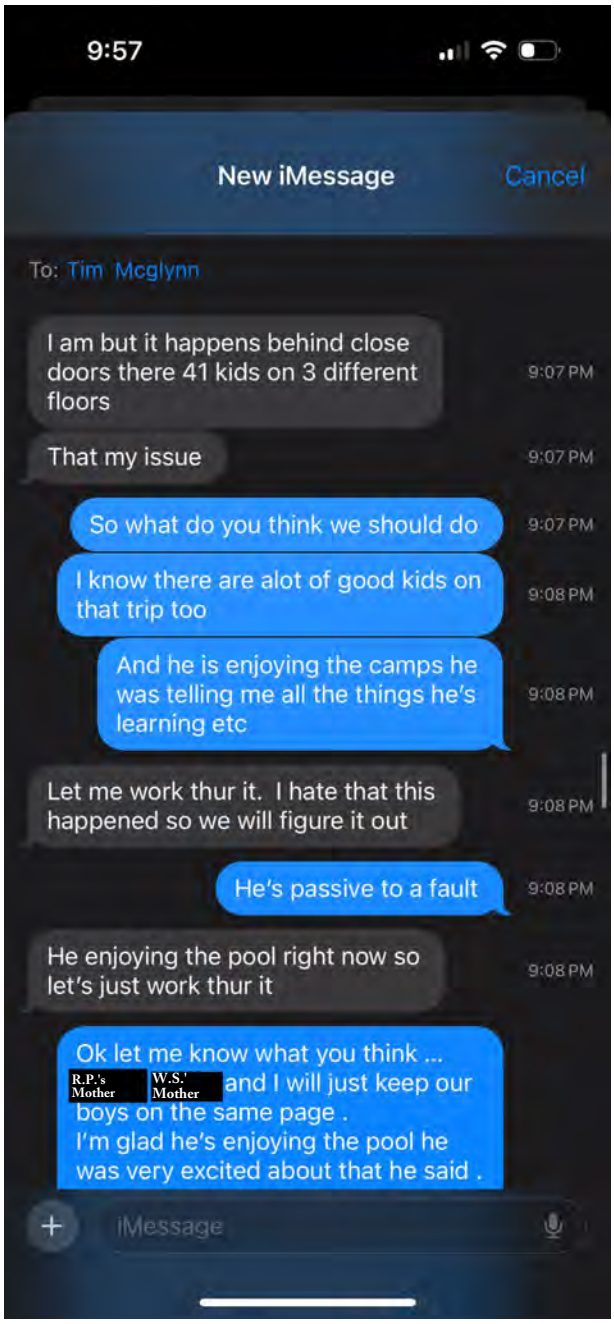
(e) "No body else just from you everything is handled should not happen again if it does please let me know. [*Sic.*] (10:25 PM). (It did happen again—many more times. And it is not Mother's responsibility to let the coaches know when it happened—it is the coaches' duty and responsibility—which they failed.)

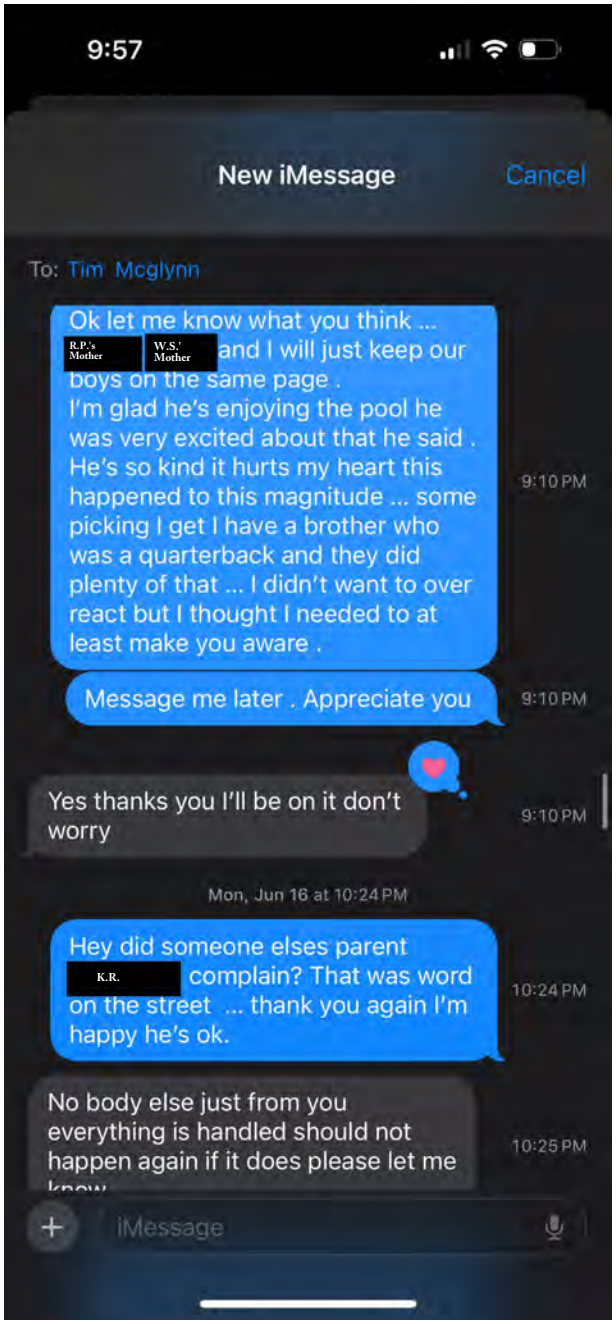
(f) "I put word out that it will be me and a ticket back to Ohio on a bus if it continues." [*Sic.*] (10:28 PM). (It did continue, and no one was given a ticket back to Ohio—nor were they later held accountable.)

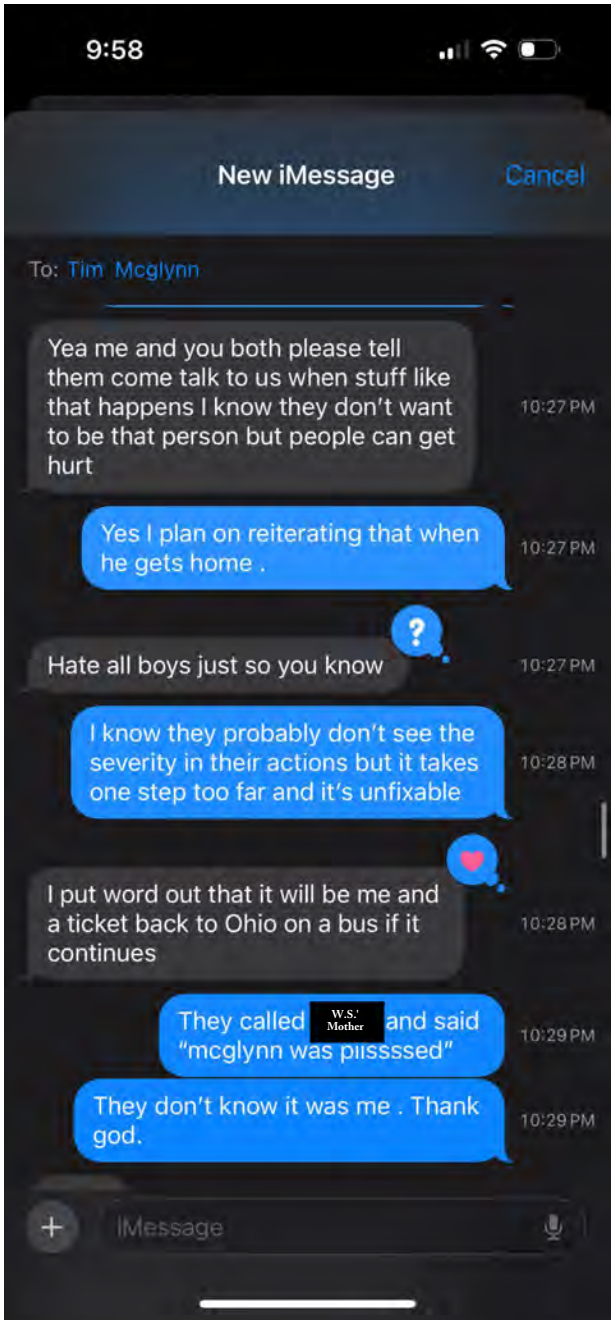
(g) "Just so you know I have to tell the head coach cause if something does happen I can get in big trouble." (10:30 PM). (So Reardon knew—beyond him being present on the bus and during the camps when the players openly talked about the hazing and attacks. And something did happen and continued to happen.)

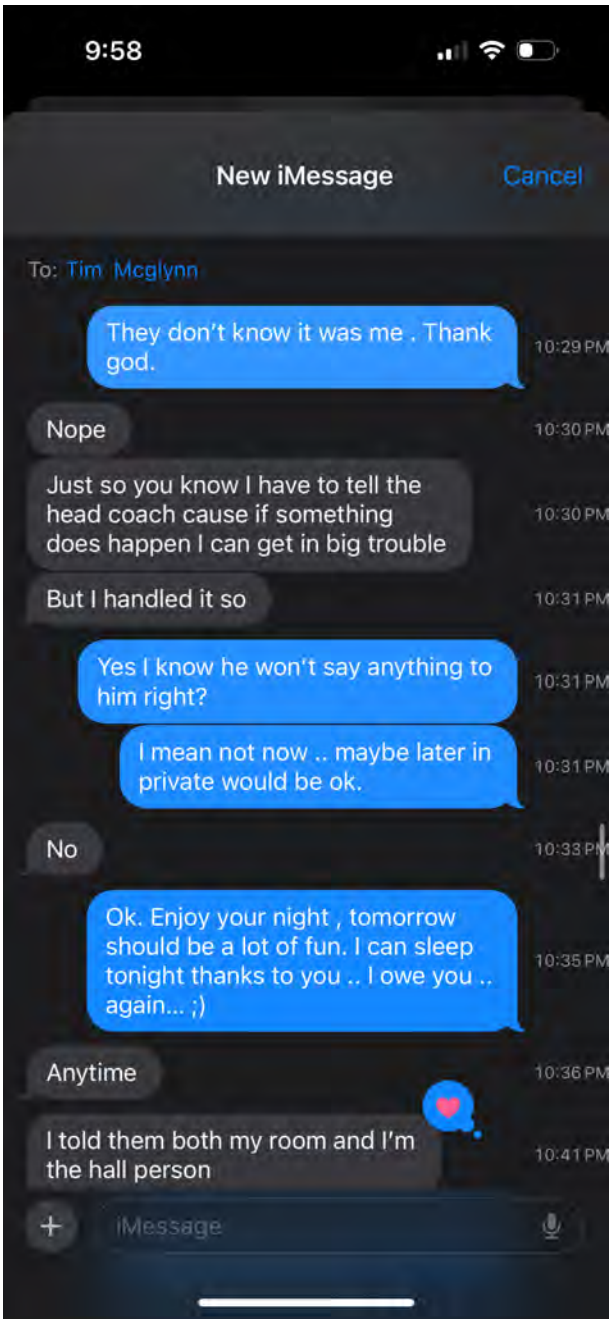

9:56
New iMessage
Cancel
To: Tim Mcglynn
Mon, Jun 16 at 8:40 PM
Are they walking
8:40 PM
I need you to please not say anything .
8:55 PM
I trust you which is why I messaged you.
8:55 PM
I'm not saying anything
8:55 PM
Thank you I am just really concerned .
8:56 PM
Understand
8:56 PM
I'm not some cry baby mom and Son's not that way either .. so I understand why he didn't say anything but I def need to make sure he's safe and not super disappointed in his first experience with Ursuline . [redacted]
9:02 PM
Thank you for being a friend to me.
iMessage


9:57
New iMessage
Cancel
To: Tim Mcglynn
I'm not some cry baby mom and Son's not that way either .. so I understand why he didn't say anything but I def need to make sure he's safe and not super disappointed in his first experience with Ursuline . [redacted]
9:02 PM
Thank you for being a friend to me.
My issues is your brought it to my attention so I have to address it some how
9:05 PM
I was hoping you would just keep your head on a swivel now and see if you hear or notice anything .. until you get back and I can address the issue and see what I can find out ... I don't want to break his trust but I also do need to make sure he's safe which is why I told you.
9:06 PM
W.S. is aware and is saying he's gonna make sure everyone's ok meaning Son and R.P.
9:07 PM
iMessage


9:57
New iMessage
Cancel
To: Tim Mcglynn
I am but it happens behind close doors there 41 kids on 3 different floors
9:07 PM
That my issue
9:07 PM
So what do you think we should do
9:07 PM
I know there are alot of good kids on that trip too
9:08 PM
And he is enjoying the camps he was telling me all the things he's learning etc
9:08 PM
Let me work thur it. I hate that this happened so we will figure it out
9:08 PM
He's passive to a fault
9:08 PM
He enjoying the pool right now so let's just work thur it
9:08 PM
Ok let me know what you think ... R.P.'s Mother W.S.' Mother and I will just keep our boys on the same page .
I'm glad he's enjoying the pool he was very excited about that he said .
iMessage


9:57
New iMessage
Cancel
To: Tim Mcglynn
Ok let me know what you think ... R.P.'s Mother W.S.' Mother and I will just keep our boys on the same page .
I'm glad he's enjoying the pool he was very excited about that he said .
He's so kind it hurts my heart this happened to this magnitude ... some picking I get I have a brother who was a quarterback and they did plenty of that ... I didn't want to over react but I thought I needed to at least make you aware .
9:10 PM
Message me later . Appreciate you
9:10 PM
Yes thanks you I'll be on it don't worry
9:10 PM
Mon, Jun 16 at 10:24 PM
Hey did someone elses parent K.R. complain? That was word on the street ... thank you again I'm happy he's ok.
10:24 PM
No body else just from you everything is handled should not happen again if it does please let me know
10:25 PM
iMessage





539. That night, the team went swimming until around 8:30–9:00 PM and, afterward, Coach McGlynn spoke to J.P. privately. J.P. Aff. ¶ 36.

540. McGlynn told J.P., "We know what you guys have been doing" and "It's better if you guys stop that stuff because it's gonna hurt your future." *Id.* ¶ 37.

541. McGlynn never ordered J.P to "stop" the hazing; he only said it would be "better" for J.P.'s "future" if they stopped—J.P. understood McGlynn was not referring to hurting his "future" at Ursuline or the team because the school and coaches were not going to punish the students. Rather, J.P. understood Coach McGlynn to be referring to some other third party possibly hurting his future. *Id.* ¶¶ 38–40.

542. Coaches Reardon and Syrianoudis never said anything to J.P. about the hazing, even though they, too, knew it was going on. And none of the Ursuline coaches punished any of the players for the hazing activities, or even investigated or inquired about them. *Id.* ¶¶ 41–42.

543. Coaches Reardon, McGlynn, and Syrianoudis never ordered J.P. to stop the hazing, never threatened to punish him if they kept hazing, and never punished or disciplined him for the hazing. *Id.* ¶ 43.

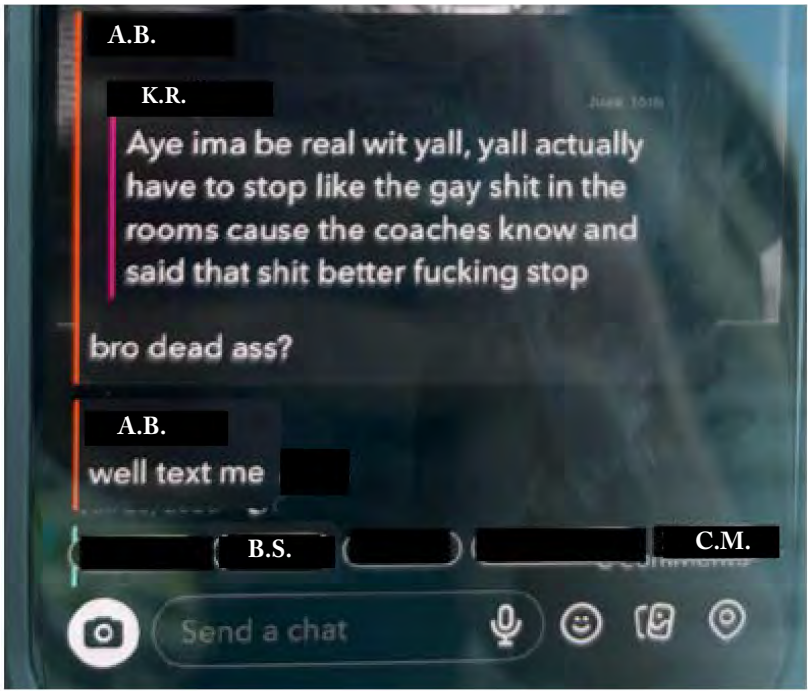
544. So the players kept hazing other players. *Id.* ¶ 45.

545. If Coaches Reardon, McGlynn, and Syrianoudis had ordered to J.P. stop the hazing and threatened to punish or discipline him, he would have stopped. *Id.* ¶ 46.

546. McGlynn, Reardon, nor Syrianoudis each took no further steps to ensure that the players deleted the videos. The players did not delete the videos or the team's group Snapchat at that time; instead, the players continued to disseminate the videos containing child pornography even across state lines.

547. Neither McGlynn, Reardon, nor Syrianoudis contacted law enforcement or children services to report the attacks, even though they were required to make such a report under Florida Statute Title V Chapter 39.201, Alabama Code § 26-14-3, and Ohio Rev. Code § 2151.421.

548. That night, K.R. posted the following message on the team's group Snapchat, "Aye ima be real wit yall, yall actually have to stop like the g*y shit in the rooms cause the coaches know and said that shit better fucking stop."



549. Despite K.R.'s attempt to stop the attacks, the other players disrespected him and continued their illicit behavior. Reardon, McGlynn, and Syrianoudis failed to act and stop the attacks themselves.

550. Around 10:06 PM, Son Doe texted Mother Doe, "Somebody on the team was up next to get hazed basically and told his brother and his brother told his dad and his dad told the coach."

551. The player that Son Doe was referring to in the text message was K.B., whose father is an Ursuline assistant football coach who wasn't on the trip.

552. While at the University of Florida camp, several players also stole clothing and accessories from the camp. The players openly discussed the thefts and showed the items.

Day 6 (June 17, 2025: Florida)
Despite Defendant Coaches Reardon, McGlynn, and Syrianoudis being fully aware of the hazing and assaults, the attacks continue.

553. On Day 6 (June 17, 2025, Florida), the team went to a water park.

554. While at the waterpark, Coach McGlynn pulled D.T. aside and said, "Knock it off. We know what's been going on" and told D.T. to delete the videos from his phone. D.T. Aff. ¶ 110.

555. Coach McGlynn didn't seem angry and didn't say the players were in any trouble, and that led D.T. to believe that McGlynn was referring to the videorecording of the hazing because McGlynn told D.T. to delete the videos and didn't specifically order D.T. to stop the hazing. *Id.* ¶ 111.

556. D.T. felt Coach McGlynn was warning him because he didn't want D.T. to get in trouble in the future. *Id.* ¶ 112.

557. Coaches Reardon and Syrianoudis never said anything to D.T. about the hazing, even though they, too, knew it was going on. *Id.* ¶ 113.

558. Coaches Reardon, McGlynn, and Syrianoudis never ordered D.T. to stop the hazing, never threatened to punish D.T. if they kept hazing, and never punished or disciplined D.T. for the hazing. *Id.* ¶ 114.

559. The hazing had been going on for years and the players and coached knew it, so D.T., at the time, didn't think it was a problem. *Id.* ¶ 115.

560. So the players kept hazing other players even after Coach McGlynn spoke to D.T. *Id.* ¶ 116.

561. If Coaches Reardon, McGlynn, and Syrianoudis had ordered D.T. to stop the hazing and threatened to punish or discipline me, D.T. would have stopped. *Id.* ¶ 117.

562. Even after McGlynn spoke to D.T., throughout the rest of the day, as with the earlier days, several players continued to issue threats that they were "going to take butts" that night. *Id.* ¶ 124.

563. Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet did nothing. *Id.* ¶ 124.

564. Son Doe, again, was one of the intended targets. Several players threatened Son Doe—in front of coaches Reardon, McGlynn, and Syrianoudis—that "tonight, your hoodie comes off too" (meaning they were going to forcibly strip Son Doe completely naked unlike the earlier attack when they were only able to rip off Son Doe's pants and underwear but not his hoodie).

565. Fortunately, W.S. told the other players that Son Doe was with him (meaning he and Son Doe were friends) and that they were not to touch Son Doe anymore.

566. That night, A.S. posted a message to the team's group Snapchat—like K.R.'s message the previous night—that the other players had to stop the hazing because the coaches knew what was happening.

567. But the other players ignored A.S.'s admonition and attempt to stop the attacks.

568. Later that night, other players attacked and stripped K.B. in retaliation for "talking smack." K.B. is the player who, the night before, told his brother (also a player), who told his father (an assistant Ursuline football coach), who told the coaches about the hazing.

569. "K.B. was hazed in the same way as Son Doe—held down and stripped naked." J.P. Aff. ¶ 48.

570. K.B. came into the room wearing extra underwear because he knew he was going to be hazed, but thought he would be able to fight the players off, but he wasn't able to fight the players off. D.T. Aff. ¶ 119.

571. K.B.'s father is an Ursuline assistant football coach. *Id.* ¶ 120.

572. D.T. and other players held K.B. down and ripped off his pants and underwear, just like they did with the other players. *Id.* ¶ 121.

573. Another player videorecorded the hazing of K.B. and posted it to 2025 football team's group Snapchat. *Id.* ¶ 122.

574. Another player also posted a photo of K.B.'s ripped underwear on the 2025 football team's group Snapchat. *Id.* ¶ 123.

575. Throughout the night, several players went to different hotel rooms and **humped** each other over their clothes.

576. Also that night, McGlynn texted Mother the following:

(a) "I think he is fine." (8:17 PM). (Son Doe was not fine—he was terrified of being hazed and attacked again.)

(b) "Just had ice cream with him he good to go." [*Sic.*] (10:02 PM). (McGlynn lied to Mother Doe. He did *not* have ice cream with Son Doe. McGlynn did tell Son Doe that he knew what happened and, if it happens again, Son Doe should tell him. But McGlynn took no other rectifying or preventive measures.)

577. At 11:34 PM, Reardon sent the following text message to the "2025 Camp Trip" group message:

> Warning for the team;
>
> If [To.W.'s] girlfriend (or anyone else's) is in our hotel tonight, the entire team will be running tomorrow.
>
> If [To.W.] (or anyone else) leaves the hotel tonight, the entire team will be running tomorrow.



578. Reardon, again, failed to physically check on the players, despite being fully aware of what was occurring at the hotel each night.

Day 7 (June 18, 2025: Florida)
Despite Defendant Coaches Reardon, McGlynn, and Syrianoudis knowing about the hazing and assaults, the attacks continue.

579. On Day 7 (June 18, 2025, Florida), the team attended a football camp at the University of South Florida and went to Disney Springs later that day.

580. As had been occurring throughout the trip and as part of the hazing and initiation, several players forced other players, typically underclassmen, to fight each other—with the loser

"getting his butt taken," as they yelled during the fights.

581. The players openly discussed the fighting in front of Reardon, McGlynn, and Syrianoudis.

582. But no coach did anything to prevent or stop it.

583. The prior night, D.D. accidentally clogged the toilet in a hotel room but, when it was discovered that morning, D.D. denied doing so even though he had just been in the bathroom.

584. Son Doe also denied clogging the toilet and pointed out that he had not even gone into the bathroom.

585. C.M. and D.S.—the other two hotel-room occupants—compelled Son Doe and D.D. to follow them to B.S.'s room.

586. C.M., D.S., and B.S. told Son Doe and D.D. that the dispute over the clogged toilet would be settled with a push-up contest—with the loser "getting his butt taken."

587. Son Doe and D.D. started doing push-ups and did not stop.

588. Finally, B.S. announced that Son Doe and D.D. would have to "fight" it out.

589. D.D. immediately tackled Son Doe and they started fighting.

590. Son Doe was able to put D.D. in a headlock and just held him, refusing to let go.

591. Eventually, the other players stopped the fight.

592. Neither Son Doe nor D.D. had their "butt taken" that night.

593. One of the players videorecorded the fight and posted it on the team's group Snapchat.[26]

[26] Plaintiffs' counsel lawfully possess these videos, which are incorporated by reference but not attached. *See* Evidence Disclaimer above.

594. McGlynn's preteen son, who was present on the trip, was in the room during the fight. Based on information and belief, McGlynn's son was present at other times when the hazing occurred.

595. While at the University of South Florida camp, several players also stole clothing and accessories from the camp. The players openly discussed the thefts and showed the items.

Day 8 (June 19, 2025: Travel day to Tennessee)
A player lied about Son Doe, causing several other players to hunt for him to harm him.

596. On Day 8 (June 19, 2025, Tennessee), the team travelled from Florida to Tennessee and attended a football camp at the University of Tennessee.

597. Throughout the day, as with the prior days, several players continued to openly discuss the prior hazing and issued threats that they were "going to take butts" that night.

598. Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet did nothing.

599. During the day, T.S. lied and falsely accused Son Doe of making a negative comment about another player.

600. Son Doe denied making the negative comment, but T.S. persisted with his lies.

601. T.S. is Defendant Coach Syrianoudis's nephew and, based on information and belief, lied about Son Doe in retaliation and to try to unjustly smear Son Doe.

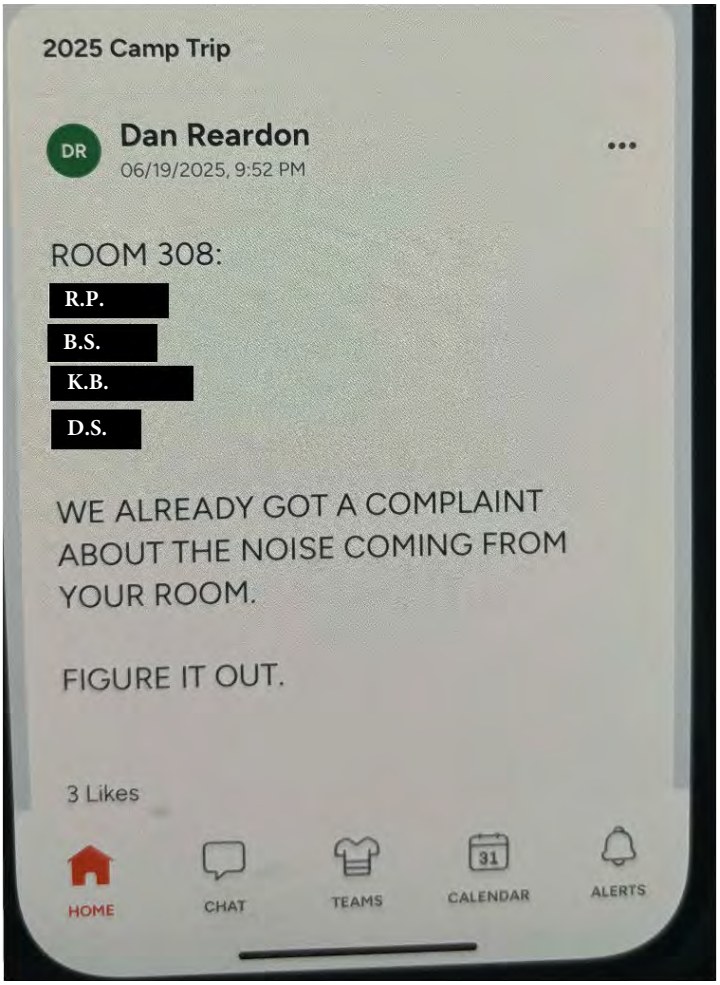
602. Because of T.S.'s lies, several other players went looking for Son Doe that night to hurt and haze him for "talking smack."

603. Son Doe hid for the entire night in his room with the door double-locked and deadbolted to avoid getting attacked and assaulted—again. Son Doe refused to leave his room the entire night fearful that he would be unjustly and viciously attacked—again.

604. Meanwhile, the assailant-players enjoyed the final night of the trip without fear of any repercussions or discipline.

605. At 9:52 PM, Reardon sent the following text message to the "2025 Camp Trip" group message:

> ROOM 318:
> [R.P.]
> [B.S.]
> [K.B.]
> [D.S.]
>
> WE ALREADY GOT A COMPLAINT ABOUT THE NOISE COMING FROM YOUR ROOM.
>
> FIGURE IT OUT.



606. Reardon, again, failed to check physically on the players, despite knowing what was occurring at the hotel each night.

Day 9 (June 20, 2025: Travel day back home to Ohio)
Son Doe's nine-day trip from hell was finally over.

607. On Day 9 (June 20, 2025, Ohio), the team travelled back home from Tennessee to Ohio.

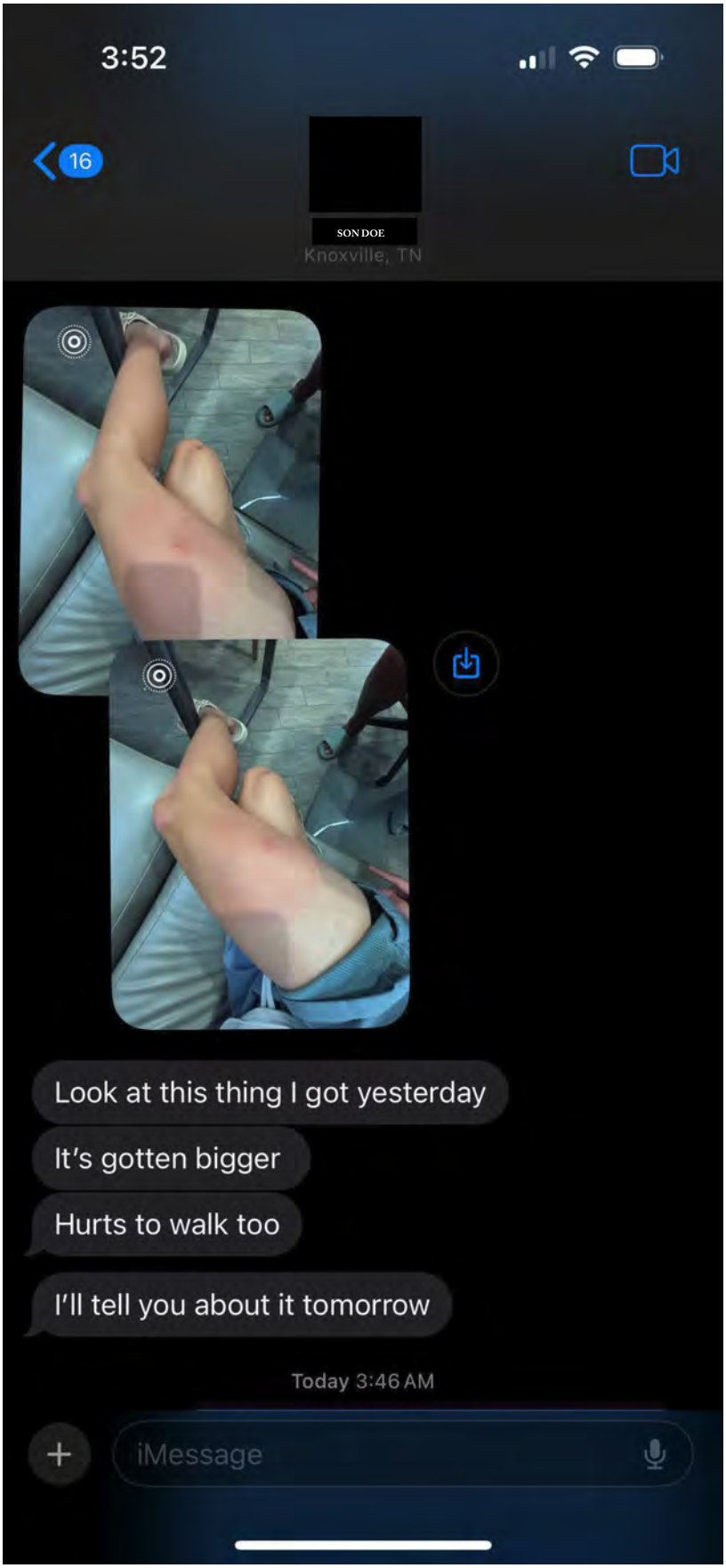
608. On the bus trip home, Son Doe got sick and was puking.

609. Earlier in the camp, Son Doe's leg swelled up.

610. When Mother told McGlynn about Son Doe's swollen leg days earlier, McGlynn blew it off as a bug bite, claiming that it was the "south" and they have a lot of bugs "down there."

611. McGlynn is not a medical doctor or trained medical professional.

612. Rather than take Son Doe for medical treatment, McGlynn gave Son Doe itch-cream to put on his swollen leg, even though Son Doe's leg continued to swell up and cause him pain.


3:52
16
[redacted]
SON DOE
Knoxville, TN
Look at this thing I got yesterday
It's gotten bigger
Hurts to walk too
I'll tell you about it tomorrow
Today 3:46 AM
iMessage

After enduring several days of abuse, Son Doe finally returns home.

613. After getting home that night, Son Doe broke down and told Mother Doe everything that happened on the trip. He showed her all the team's group Snapchat videos, photos, and messages.

614. Mother Doe recorded many of the videos from the team's group Snapchat to preserve them as evidence.

615. The next day, June 21, Mother Doe took Son Doe to urgent care for his swollen leg, where he was diagnosed as having a staph infection and prescribed an antibiotic. Because Son Doe was forced to sleep on the floor several nights, it is believed that he contracted the staph infection from the dirty floors.



616. Son Doe's condition worsened over the next few hours, so Mother Doe took him to the hospital emergency room. ER doctors had to lance Son Doe's leg to remove the infection.

Mother Doe meets with Principal Sammartino and Assistant Principal Margaret Damore and tells them what happened during the trip.

617. On June 22 at about 10:39 PM, Mother Doe emailed Ursuline's Principal, Defendant Matthew Sammartino, requesting an immediate meeting.[27]

1 / 1

Subject: Request for Immediate Meeting Regarding Serious Football Trip Concerns

Dear Mr. Sammartino,

I am writing to request an immediate meeting regarding serious incidents that occurred during a recent football trip that my son, SON DOE attended with the team. I have become aware of multiple deeply concerning events that took place during this trip, involving issues of student safety, bullying, and inappropriate behaviors.

While I will provide the full details in person, I want to emphasize that I have substantial evidence, including recorded material, and I am fully prepared to escalate this to the Diocese and legal counsel if necessary. However, I believe it is appropriate to first address this directly with you to ensure that immediate and appropriate action is taken.

Due to the severity of this matter, I am requesting to meet with you as soon as possible. My son will not be attending practice or any football activities until this issue is properly addressed.

Please let me know your earliest availability for this meeting.

Thank you for your urgent attention to this matter.

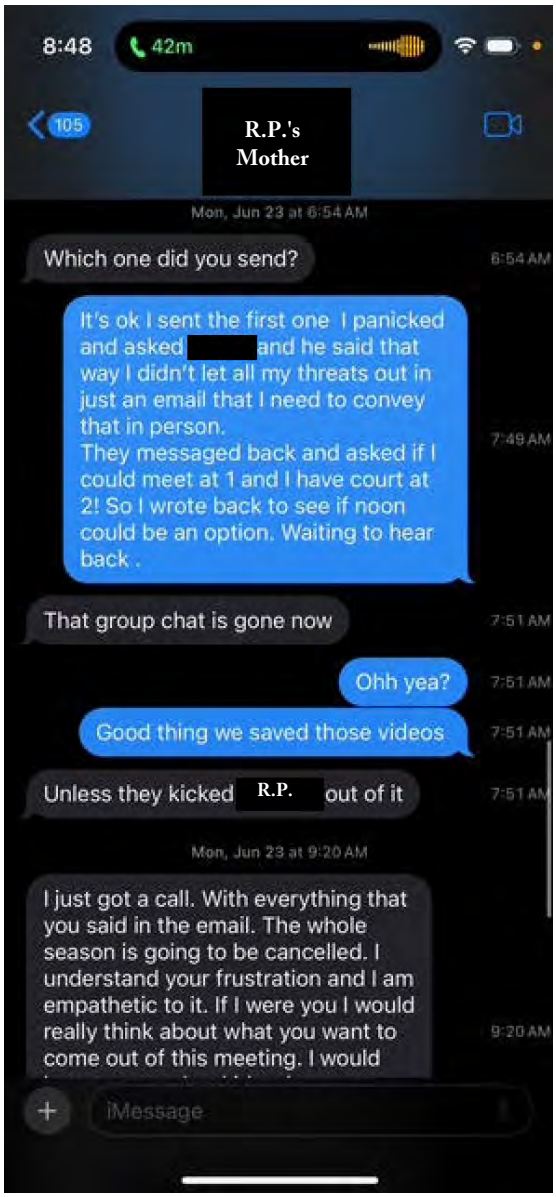
Sincerely,
MOTHER DOE
(XXX) XXX-XXXX

[27] Plaintiffs' counsel lawfully possess the email, which is incorporated but not attached. *See* Evidence Disclaimer above.

618. On June 23, at about 7:46 AM, Sammartino responded and set up a meeting for that day at 12:00 PM.

619. At about 7:51 AM, R.P.'s mother texted Mother Doe that the team's group Snapchat was deleted, or that maybe her son was removed from the list. (The team's group Snapchat was not deleted at this time.)

620. At about 9:20 AM (before Mother Doe met with the administrators), R.P.'s mother sent another text to Mother Doe:



621. So even before Mother Doe met with Sammartino and Damore, Defendants contacted parents and issued their warnings about suspending the season—even though Defendants never took any such action.

622. Mother Doe and her youngest son's father ("Stepfather") met with Ursuline Principal Matthew Sammartino and Assistant Principal Margaret Damore.

623. Mother Doe never went to the school before to complaint about anything and, although she had previously met both Sammartino and Damore, this was the first time she actually had a conversation with them.

624. Until that point, Sammartino and Damore claimed not to know what had happened on the trip because Reardon, McGlynn, and Syrianoudis did not tell them what occurred—even though the coaches knew and had a duty to report such things.

625. During the meeting, Mother Doe provided explicit details of the hazing, degradation, humiliation, and abuse that several players inflicted on Son Doe.

626. Mother Doe questioned why freshmen roomed with seniors, juniors, and sophomores, to which Sammartino retorted, "That's how we've always done it."

627. Mother Doe explained to Sammartino and Damore that she has the videos, photos, and messages from the team's group Snapchat depicting the hazing, abuse, assaults, and child pornography.

628. Sammartino and Damore never asked to see the messages; nor did they ask to see the videos and photos.

629. Sammartino and Damore just sat there and listened showing no regret, remorse, or compassion, and offering no sympathy.

630. Mother Doe, sensing Sammartino and Damore's disinterest in the matter, finally said,

"Do you want to see the videos?"

631. Sammartino said she should just email the videos to him.

632. She tried. When the emails wouldn't transmit to Sammartino's emails, Mother Doe said, "How about if I just show you."

633. Mother Doe had Son Doe's cellphone with her during the meeting. Mother Doe opened the actual team's group Snapchat on Son Doe's cellphone and scrolled through the entire team group Snapchat.

634. When Mother Doe started scrolling through the team's group Snapchat, and played the videos, Damore got out of her chair and walked over to get a better view; Sammartino just sat in his chair, uninterested and uncaring.

635. The assailant-players' faces are easily recognizable on the videos, photos, and messages—Sammartino and Damore knew who they were.

636. Mother Doe said, "These are your top players who represent your school. Doesn't that bother you?"

637. Sammartino continued to just sit there and said nothing; showing no interest in the matter.

638. Stepfather said to Sammartino, "Aren't you going to say something or are you just going to sit there?" Sammartino responded, "I'm just listening."

639. In reaction to seeing the videos, photos, and messages, Sammartino and Damore sat quietly, again showing no compassion or sympathy.

640. Stepfather, sensing Sammartino and Damore's disinterest, said, "Don't you have anything to say about this? What if this were your child?"

641. Damore, finally showing some emotion, confessed and acknowledged, "**this is bad**."

642. Damore videorecorded the entire team group Snapchat, including the videos, photos, and messages, on her own personal cellphone.

643. Other football-team players downloaded and shared the team's group Snapchat videos, photos, and messages beyond the football team.

644. From the videos, photos, and messages, Sammartino and Damore knew full well which players were involved and exactly what they did. The players' identities and actions were clearly visible on the videos, photos, and messages.

645. Sammartino and Damore also knew what Reardon, McGlynn, and Syrianoudis knew and about their failure to rectify, prevent, and stop the hazing, abuse, assaults, and creation and dissemination of child pornography.

646. Mother Doe asked, "So where do we go from here?"

647. Damore said that the football team had practice that night, so they would have to wait and see.

648. Stepfather, astonished that nothing was going to be done, questioned why the football team was still going to practice.

649. Principal Sammartino finally spoke and told Mother Doe that he was going to suspend all football activities and investigate the matter.

650. Sammartino told Mother Doe that he would tell the Diocese and law enforcement.

651. Sammartino, later, notified children services, which in turn notified Youngstown Police. But merely notifying children services of Mother Doe's complaint did not free Ursuline of its obligation to conduct an internal investigation into the hazing, abuse, assaults, and child pornography suffered by the children it must protect.

652. On becoming aware of the hazing, attacks, assaults, and child pornography Son Doe

suffered, Sammartino and Damore, as Ursuline administrators, had the authority to prevent and respond to these Title IX and other violations.

653. Damore wanted to interview Son Doe the following day, but Mother Doe declined to meet with Damore—it was obvious that Ursuline, Sammartino, and Damore were not interested in conducting a real investigation and handing out any real discipline.

654. Mother Doe instead took Son Doe to the Youngstown Police Department to be interviewed.

655. Based on information and belief, Sammartino refused to turn over the team's group Snapchat videos, photos, and messages to Youngstown Police without first being served with a subpoena.

656. Based on information and belief, foot-dragging Principal Sammartino has yet to provide the videos, photos, and messages to law enforcement.

657. At about 3:20 PM, on returning from the meeting, Mother Doe took additional videos and photos of the team's group Snapchat to preserve as evidence.

The football team learns that the season may be suspended because of Mother Doe's reporting of the illicit activities on the trip.

658. When the players arrived for practice that afternoon (June 23, 2025), they were informed that the non-mandatory conditioning session that night was cancelled because of the heat. D.T. Aff. ¶ 127.

659. That day, the coaches told the players the season could be suspended because of what happened on the trip. *Id.* ¶ 128; *see also* J.P. Aff. ¶ 52.

660. When the players arrived for non-mandatory practice on June 25, 2025, Reardon instructed several players that they had to meet with Sammartino, Damore, and DeSantis.

661. When the players met with Sammartino, Damore, and DeSantis, they were told that there was an ongoing investigation.

662. Sammartino, Damore, and DeSantis further instructed the players not to talk to anyone about what occurred.

663. Sammartino, Damore, and DeSantis, despite having an opportunity right then and there to interview the players and investigate the matter, did nothing.

664. After informing the players of the investigation and directing them not to talk about what occurred without anyone, Sammartino, Damore, and DeSantis sent them on their way and let them rejoin the team shortly after.

665. These assailant-players were many of Ursuline's top players. Their absence from the team would have crippled the team's chances at success and been publicly known. Ursuline could not and would not let that happen—despite the players being an ongoing threat to other players and students.

666. A few of the players were suspended for the next week's non-mandatory sessions, but once they were needed back on the field to win football games, Ursuline allowed these players to fully participate with the football team.

667. Weeks later, To.W. transferred from Ursuline to another school.

Ursuline Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis meet with Ursuline Player D.T.

668. On June 25, 2025, Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis met with D.T.. D.T. Aff. ¶ 134.

669. When the administrators told D.T. why he was there, D.T. immediately admitted his involvement in the hazing activities. *Id.* ¶ 135.

670. Assistant Principal Damore said they knew he was "involved" in the hazing. *Id.* ¶ 136.

671. Principal Sammartino said D.T. was "suspended indefinitely" during the investigation. *Id.* ¶ 137.

672. The administrators never asked D.T. if he had the videos or any other evidence. *Id.* ¶ 138.

673. The administrators never asked D.T. any follow-up questions either. *Id.* ¶ 139.

674. There was no investigation; there were no questions, and there were no follow-up interviews.

675. Athletic Director DeSantis said, "You should be better than that" and "You should be a leader." *Id.* ¶ 140.

676. Principal Sammartino asked D.T. why he did it, and D.T. told them "**it has been going on for years**" and it is a "**tradition**." *Id.* ¶ 141.

677. DeSantis knew the "tradition" of hazing by football players had been occurring for years—in fact, as early as 2022.

678. Principal Sammartino told D.T. there was an "ongoing investigation" and that law enforcement was investigating. *Id.* ¶ 142.

679. Principal Sammartino instructed or ordered D.T. to "lay low" and "don't talk about it" to anyone. He didn't say "except for police." So D.T. assumed that included law enforcement, too. *Id.* ¶ 143.

680. Later that day, J.P.'s mother received an email from Assistant Principal Damore, with an attached letter that stated:

> Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room.

> Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

Affidavit of Somer Thomas at ¶ 19, attached as Ex. 5.

681. Damore's email/letter made clear that the suspension wasn't a punishment or discipline: "Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, ***including possible consequences***." (Emphasis added.)

682. No one from Ursuline contacted D.T. to be interviewed as part of the investigation; nor did anyone from Ursuline interview D.T. after the initial meeting. *Id.* ¶ 21; *see also* D.T. Aff. ¶ 145.

683. Ursuline officials didn't punish or discipline D.T., even though he admitted his involvement in the hazing. *Id.* 27; *see also* D.T. Aff. ¶ 144.

684. No one from Ursuline provided D.T. or his mother any other updates or information. D.T. Aff. ¶ 146.

685. No coaches were suspended, even though they knew about the hazing. *Id.* ¶ 147.

686. While D.T. was suspended, Ursuline assistant football coach James Campana texted him that everything was going to be okay; to trust the coaches; and it was going to pass over. *Id.* ¶ 148.

687. Campana is a parole officer with the Ohio Adult Parole Authority and knew better than to contact a suspect in an ongoing criminal investigation in this manner.

688. There was no practice the following week of June 30, 2025 because that was the week of July 4 Independence Day. *Id.* ¶ 149.

689. During the weeks of July 7 and July 14, the team only had non-mandatory practices scheduled. *Id.* ¶ 150.

690. Around July 15, D.T. and his father met with Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis. *Id.* ¶ 151.

691. Principal Sammartino told D.T. that, even though the investigation was still ongoing, he was permitted to return to the football team and practice. *Id.* ¶ 152.

692. The Ursuline administrators had D.T. and his father sign paperwork that stated:

> Ursuline High School continues to cooperate with the civil authorities regarding the football camp trip. Beginning July 15, 2025, your football team suspension is lifted and you may return to the team. Ursuline High School reserves the right to impose a punishment for the incident during the football camp trip as the investigation reveals facts/information..

Id. ¶ 153.

693. This paperwork made clear that the suspension was neither a punishment nor discipline, but was only done (if that) to take into account the alleged ongoing investigation. Despite the fact that the alleged investigation was still ongoing, the players were still permitted to return to the field to win football games.

694. Ursuline permitted D.T. to return to practice with no punishment or discipline. Affidavit of Somer Thomas at ¶ 25.

695. The administrators again never asked D.T. any questions as part of the still ongoing investigation. D.T. Aff. ¶ 155.

696. Instead, Principal Sammartino again instructed or ordered D.T. to "lay low" and "don't talk about it" to anyone. He didn't say "except for police." *Id.* ¶ 156.

697. D.T. missed no mandatory practices during his suspension. *Id.* ¶ 157.

698. Ursuline officials still gave D.T. no punishment or discipline, even though he admitted his involvement in the hazing. *Id.* ¶ 158.

699. No one from Ursuline talked to D.T. again about the hazing until after the *Jane Doe, et al.* lawsuit was filed. *Id.* ¶ 159.

700. Even after the *Jane Doe, et al.* lawsuit was filed, the Ursuline administrators and coaches did not punish or discipline D.T. for the hazing. *Id.* ¶ 160.

701. Soon after the *Jane Doe, et al.* lawsuit was filed, D.T.'s mother withdrew him from Ursuline. *Id.* ¶ 161.

702. No one from Ursuline contacted D.T. or his mother after the *Jane Doe, et al.* lawsuit's filing. *Id.* ¶ 162; *see also* Affidavit of Somer Thomas at ¶ 28.

703. D.T. believes his involvement in the hazing is out of character for him—he knows better and should not have been involved, but the culture of hazing on the Ursuline football team was so overbearing that he felt compelled to join in. *Id.* ¶ 163.

704. Also, because the coaches knew for years about the hazing, never told D.T. and the players to stop it, and never punished or disciplined them for the hazing, D.T. felt like they were giving him permission to continue the tradition of the Ursuline-football hazing. *Id.* ¶ 164.

705. Also, because the administrators knew about the hazing in June 2025, but never punished or disciplined D.T. or the other players for the hazing, they made D.T. feel like they were going to cover everything up and it would go away. *Id.* ¶ 165.

706. If the Ursuline administrators or coaches had trained or educated D.T. and the other players not to haze and had taken a hard line ordering them not to haze, D.T. knows he would have complied. And from knowing his teammates, D.T. believes they would have complied, too. But because the administrators and coaches never did, and the coaches seemed to support the hazing culture by saying nothing, even though they knew there was a strong culture of hazing, the hazing continued for years. *Id.* ¶ 166.

707. And when Coach Campana texted that everything was going to be okay, to trust the coaches, and it was going to pass, D.T. felt that the Ursuline administrators and coaches were going to cover up everything. And they did cover it up until the *Jane Doe, et al.* lawsuit was filed and everything became public. *Id.* ¶ 167.

Ursuline Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis meet with Ursuline Player J.P.

708. On June 25, 2025, Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis met with J.P. J.P. Aff. ¶ 54.

709. The administrators told J.P. that they saw the hazing videos, knew what happened, and asked what happened. *Id.* ¶ 55.

710. J.P. admitted to the administrators his involvement in the hazing activities, didn't deny it, and said, "You've seen the videos, you know what happened." *Id.* ¶¶ 56–57.

711. They didn't deny that.

712. Principal Sammartino told J.P. that he was "indefinitely suspended" pending the "ongoing investigation." *Id.* ¶ 58.

713. The administrators never said the suspension was a punishment or discipline, only that there was an "ongoing investigation." And J.P. did not interpret the suspension during the ongoing investigation as a punishment at all. *Id.* ¶ 59.

714. Principal Sammartino instructed and ordered J.P., "If there's anything on your phone, it's best to delete it." *Id.* ¶ 61. That is, Sammartino ordered J.P. to delete the evidence even though he knew there was an ongoing investigation. That's obstruction of justice and causing tampering with evidence.

715. Principal Sammartino further instructed and ordered J.P., "Don't say anything to anyone about this." *Id.* ¶ 62. That is, Sammartino ordered J.P. to obstruct justice.

716. Later that day, J.P.'s mother received an email from Assistant Principal Damore, with an attached letter, saying:

> Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room. Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

Affidavit of Jazhmine Phillips at ¶ 14, attached as Ex. 6.

717. Damore's email/letter made clear that the suspension wasn't a punishment or discipline because she said, "Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, ***including possible consequences***." (Emphasis added.)

718. No one from Ursuline contacted J.P. to be interviewed as part of the investigation. Nor was he interviewed after the initial meeting. And no one asked him anything about the conduct of other players. *Id.* ¶ 19; *see also* J.P. Aff. ¶ 63.

719. No one from Ursuline provided J.P. or his mother any other updates or information. J.P. Aff. ¶ 64.

720. Aside from the Damore email/letter, J.P.'s mother never received any other paperwork from Ursuline about this hazing matter and no one asked them to sign anything. Phillips Aff. at ¶ 21.

721. Ursuline administrators and coaches did not discipline J.P. despite knowing about his involvement in the activities related to the football team camp trip. *See id.* ¶ 20.

722. While J.P. was on suspension, he learned that an assistant coach reached out to D.T. and A.B., but no coaches reached out to him, which made him think that Ursuline was going to protect certain players. J.P. Aff. ¶ 65.

723. Because of the "culture" of hazing and concerns that Ursuline was going to protect certain players, J.P. felt neither safe nor comfortable staying at the school and on the team. *Id.* ¶ 66.

724. J.P. transferred to another high school during the week of June 30, 2025 and officially withdrew from Ursuline on July 9. *Id.* ¶ 67.

725. After J.P. transferred, his concerns that Ursuline was going to protect certain players were confirmed—he learned that Ursuline supporters and players' parents were falsely accusing him on social media of being one of the ringleaders of the hazing. *Id.* ¶ 68.

726. J.P. was not one of the ringleaders of the hazing activities—the Ursuline football team's hazing had been occurring for years—long before he transferred there in 2025. *Id.* ¶¶ 69–70.

727. Because of the culture of hazing and the players and coaches knowing about it, J.P. felt he had to join in on the Ursuline football team's hazing traditions. *Id.* ¶ 71.

728. J.P. would not have engaged in any hazing if it wasn't part of the Ursuline football's tradition. *Id.* ¶ 72.

729. If Ursuline's coaches and administrators had ordered J.P. and the other players not to engage in the assaults and hazing, trained them, warned them, and held them accountable, J.P. wouldn't have engaged in the hazing and he is sure the other players wouldn't have engaged in the conduct either; but the coaches and administrators left them unsupervised. *Id.* ¶ 75.

The Ursuline Defendants continue their cover-up of the football team's hazing activities.

730. By June 25, 2025, Ursuline, Sammartino, Damore, and DeSantis had many of the hazing videos, photos, and messages from the 2025 football team's group Snapchat.

731. They also had confessions from several players.

732. Yet Ursuline, Sammartino, Damore, and DeSantis—having had all this information for over two months—still failed to take meaningful steps to address and rectify the atrocities.

733. Within days of the June 25 meeting with the players, the Ursuline Defendants claimed they notified children services and law enforcement, and handed the investigation over to them.

734. Despite their duty to continue to investigate the matter, Ursuline, Sammartino, and Damore, by their own admissions, let law enforcement handle the investigation.

735. There was no investigation by the Ursuline Defendants.

736. Nor did the Ursuline Defendants provide all the information they possessed to children services and law enforcement.

737. The Ursuline Defendants never informed children services and law enforcement that the football players "tradition" of hazing had been occurring "for years."

738. The Ursuline Defendants never informed children services and law enforcement that several players, including D.T. and J.P., confessed to participating in the hazing.

739. DeSantis, Reardon, McGlynn, and Syrianoudis never even reported the hazing to children services and law enforcement, despite being mandatory reporters and required to make such a report.

740. Even before Mother Doe informed Sammartino and Damore of what occurred during the trip, Reardon, McGlynn, and/or Syrianoudis notified the football team that the season was in jeopardy and may be suspended.

741. The players learned that Son Doe had told Mother Doe what occurred and that she told Sammartino and Damore.

742. Defendants and the players were also aware that a criminal investigation was occurring or about to occur.

743. Within hours of Mother Doe meeting with Sammartino and Damore, several players posted on the team's group Snapchat that Son Doe was a "snitch" and "rat." The players then removed Son Doe from the team's group Snapchat at 8:45 PM on June 23. This retaliation was a reasonable and foreseeable consequence of the Defendants' actions, failures to act, and attempts to cover up the illicit activities.

744. McGlynn, also previously, ordered the players to delete the videos and the team's group Snapchat.

745. Knowing that Sammartino, Damore, and DeSantis were aware of what occurred during the trip, coupled with the threat of losing their season, and knowledge of the looming criminal investigation, the players deleted the team's group Snapchat that day (June 23) as well. D.T. Aff. ¶ 131. That caused the destruction of evidence—another reasonable and foreseeable consequence of the Defendants' actions, failures to act, and attempts to cover up the illicit activities.

746. Ursuline, Sammartino, Damore, and DeSantis likewise removed videos, photos, and posts from Ursuline's Facebook page and deleted other Ursuline football social-media accounts, all of which contained valuable evidence for the criminal investigation, resulting in even more evidence destruction.

747. After destroying evidence of the crimes and instructing the players not to talk to anyone about what occurred, Sammartino, Damore, and DeSantis took no further action. They did not suspend the football season. They did not investigate. They did not interview all the players on the trip. They did not suspend Reardon, McGlynn, or Syrianoudis even though they were on the trip; were aware of what was going to occur and what did occur; failed to rectify, prevent, or stop

the hazing, attacks, assaults, and child pornography—all of which are criminal acts—and then failed to report it to Sammartino, Damore, DeSantis or any other appropriate person.

748. Reardon, McGlynn, or Syrianoudis likewise failed to take any appropriate steps to address and rectify the situation.

749. Similarly, the Diocese has failed to take any appropriate action against Ursuline, the football players, the coaches, or the football team.

750. (By contrast, Champion's superintendent, on hearing allegations of abuse by then-head football coach McGlynn, immediately placed on McGlynn on administrative leave and ordered him to have no contact with the players or the team. The superintendent then started his own investigation.)

751. Defendants' simple referral of the matter to children services or law enforcement, and doing nothing more, is insufficient—they were required to conduct their own investigation and issue the appropriate correction measures, but they did not.

752. Defendants' inaction permitted Reardon, McGlynn, and Syrianoudis, as well as the assailant-players, to have full and unfettered access to the victims and other innocent players. What type of leadership allows the accused to have such access to the victims and witnesses? What type of leadership allows the jackals to have such access to the sheep? Defendants were acting for the glory of the Ursuline football alone—**not the child victims who they are dutybound to protect**.

753. Based on information and belief, one or more Defendants warned the players that the football season was in jeopardy of being suspended/cancelled and instructed them not to say anything to anyone about what had occurred, effectively obstructing the matter's investigation.

754. Based on information and belief, because of Defendants' actions, law enforcement has

been inhibited in its investigation of the matter, including multiple players (and their parents), even the innocent ones, refusing to speak to law enforcement for fear of the football team being suspended and the season halted. This was another reasonable and foreseeable consequence of the Defendants' actions, failures to act, and attempts to cover up the illicit activities.

Defendants Ursuline, Principal Matthew Sammartino, Assistant Principal Margaret Damore, and Athletic Director John DeSantis failed to follow Ursuline's Code of Conduct in handling this matter.

755. Despite the overwhelming evidence of misconduct by the football players, who were easily identified in the team's group Snapchat, Ursuline, Sammartino, Damore, and DeSantis failed to follow the school's Code of Conduct in handling the matter.

756. The *Ursuline High School Student Handbook* contains the *Code of Conduct*, which sets forth the following "STUDENT RESPONSIBILITIES":

> All Ursuline High School students are expected:
> - To conduct themselves in a manner that will guarantee their own well-being and the well-being of others. Their behavior should reflect positively on Ursuline High School, their families, and the community as a whole;
> - To treat administrators, teachers, staff members, parents, guests and other students and third parties with courtesy and respect;
> - To know and adhere to the rules and regulations established by their teachers and school administrators;
> - To strive for academic excellence;
> - To refrain from libelous/slanderous remarks and obscene/vulgar language in written and/or verbal expression;
> - To adhere to policies relating to chemical/alcohol abuse;
> - To be punctual in attending school and class;
> - To refrain from misbehavior that disrupts the educational process for themselves and others;
> - To respect the reasonable and necessary exercise of authority by school administrators and staff to maintain discipline at school and at school-sponsored activities.

757. The *Code of Conduct* specifically sets forth provisions addressing "Fighting," "Anti-Bullying, Harassment, and Intimidation," "Hazing," "Sexual Harassment and Sexual Violence,"

and "Student Threats." Commission of any of these acts is a violation of the *Code of Conduct*.

758. By the *Code of Conduct's* own definitions, the assailant players engaged in each of these acts and violated the *Code of Conduct*.

759. The *Code of Conduct's* "EXCLUSION FROM SCHOOL" provision provides, in relevant part:

> Exclusion from school means that a student cannot attend school until further notice for one of the following reasons.
> …
> 4. During the investigation of a disciplinary matter
>
> The administration may exclude a student for any other reason deemed sufficiently serious.

760. Despite the ongoing investigation of a disciplinary matter, here, Ursuline, Sammartino, and Damore only excluded the players from non-mandatory practices.

761. But when the players were needed back on the field to win football games, despite the fact that the purported investigation remained ongoing, Sammartino lifted the "indefinite suspension," permitted the players to return to the team, and issued no discipline.

762. The *Code of Conduct's* "SUSPENSION" provision provides, in relevant part:

> A student may be suspended from Ursuline High School when he/she seriously violates the Code of Conduct or for any reason deemed sufficiently serious by the Administrative Team.
> …
> Students on suspension may not participate in or attend any school functions or extra-curricular activities, including practice. Students given an out of school suspension are not permitted to be on school grounds during the time of the suspension.
> …
> Students on in-school suspension may not participate in or attend any school functions or extra-curricular activities, including practice.

763. Despite the players seriously violating the Code of Conduct, Ursuline, Sammartino, and Damore suspended no players as discipline.

764. The "indefinite suspension" was not a discipline, but was part of the purported "ongoing investigation," which was lifted when the players were needed back on the field to win football games.

765. The Code of Conduct's "EXPULSION" provision provides, in relevant part:

> Expulsion may be used as the most serious and final disciplinary action for serious misbehavior, when public immorality affects school morale, when public misbehavior results in court proceedings, or when the student fails to respond to regular and routine disciplinary measures and remains incorrigible, and/or for any other reason deemed sufficiently serious by the Principal.
> ***
> The following are grounds for expulsion in all diocesan schools:
> ***
> 2. The use of physical violence, force, threat, coercion, or other aggressive behavior that threatens the safety and well-being of others at school or at a school-related activity.
> ***
> 5. Involvement in an asserted felonious act or other criminal behavior that causes public scandal and/or adversely affects the reputation of the school, the morale and/or safety of the students and staff.
> ***
> 8. Other disruptive behaviors and/or for any other reason deemed sufficiently serious by the Principal, in consultation with the Superintendent, to warrant the student's permanent removal from the school.

766. Despite the players engaging in all this conduct and these violations, including sexual assault, the Superintendent, Ursuline, Sammartino, Damore, and DeSantis expelled no players from school.

767. The Ursuline Defendants failed to follow the Code of Conduct and issued no discipline to all the liable players.

Defendants Ursuline High School, Assistant Principal Margaret Damore, and Athletic Director John DeSantis have a long history of ignoring football players' misconduct and jeopardizing students' safety.

768. Beginning in June 2023, Ursuline Player R.H.—a six-foot-tall, star Ursuline High School football player—began sexually harassing fellow student Daughter Chef (pseudonym),

asking this petite, under five-foot-tall freshman for sex and nude photos.

769. Uninterested, and still childlike in her growth stage, Daughter Chef refused R.H.'s overtures.

770. Unable to accept her rejection, R.H.'s bullying and harassment escalated into a physical attack at school. During summer gym, R.H. picked Daughter Chef up, dropped her on the ground, and then dragged her across the turf, causing Daughter Chef serious physical injuries.

771. Mother Chef and Daughter Chef reported the attack that day to Defendant Assistant Principal Margaret Damore and Athletic Director John DeSantis.

772. Despite Mother Chef and Daughter Chef reporting the attack that day, Defendant Damore—on Defendant Ursuline High School's behalf—"strongly advise[d]" them not to report the attack to police and falsely assured Mother Chef the school would handle the matter. Both Defendants Damore and DeSantis, after learning about the attack and injury, failed to report the matter to children's services or law enforcement—as required by law. By Ohio criminal statute, they are mandated reporters.

773. For the next two years, even after R.H. continued to harass, stalk, menace, ogle, and intimidate Daughter Chef, Damore and DeSantis did not act to protect Daughter Chef. Their failures continued even after Daughter Chef's elder brother—an Ursuline graduate once close to DeSantis—voiced frustration and disappointment about Ursuline officials' persistent failures to protect his little sister, and pressed DeSantis to act.

774. DeSantis refused to act and simply wanted Daughter Chef to get over it.

775. The Ursuline Defendants' intentional failures persisted even after Daughter Chef herself repeatedly reported to school officials R.H.'s ongoing predatory behavior.

776. The Ursuline Defendants' failures weren't just negligent. They were reckless and

intentional, because they sought to protect their venerated star football player—at any cost.

777. And they just didn't care about Daughter Chef. What mattered was the false idol of football.

778. Mother Chef had to sell her home and move so she could transfer Daughter Chef to another school and protect her child.

779. On September 10, 2025, Mother Chef on behalf of herself and Daughter Chef filed a lawsuit captioned *Chef, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No, 4:25-cv-01895, which is incorporated into this Complaint.

780. In a separate matter, throughout the 2023–24 school year, several football players harassed, bullied, and ridiculed Victim-3, an Ursuline freshman, daily because he is gay. This included them calling him a "f*g" and "f*ggot" during classes and in his teachers' presence. And it included a physical assault.

781. Victim-3 reported the harassment and bullying to Assistant Principal Damore, who did not act to protect Victim-3 and failed to take any corrective measures against the football players.

782. One Ursuline teacher even participated in the bullying and proclaimed, "He has on more makeup than me."

783. Victim-3's grandmother also reported the harassment and bullying to school officials and the head football coach after the football players harassed her and Victim-3 at a local McDonald's.

784. None of the Ursuline officials did anything to stop or address the misconduct. Nor did they report the behavior to children's services or law enforcement.

785. The Ursuline Defendants' failures weren't just negligent. They were reckless and intentional, because they sought to protect their football players—at any cost. And they just

didn't care about Victim-3. What mattered was their false idol of football.

786. Victim-3's grandmother had to transfer him to another school to protect him.

787. In yet another matter from 2024, Victim-4's mother alerted Ursuline officials, including Defendant Damore, that a fight was planned for the following day during lunch.

788. Another student also alerted Ursuline officials, who informed Damore, of the planned fight.

789. Damore and the other Ursuline officials failed to prevent the planned fight.

790. The fight ensued and Victim-4 was seriously injured.

791. Damore never contacted victim's mother following the fight, nor did Ursuline administer any medical attention to Victim-4.

792. Victim-4's friend called her mother, who went directly to the school.

793. When she arrived, she found her daughter in a room by herself with obvious injuries. Victim-4's mother immediately transported her to the hospital.

794. Damore never reported the attack to children services or law enforcement; rather, she issued a five-day suspension for Victim-4.

795. Damore issued a five-day suspension to Victim-4 for being involved in a fight and seriously injured—yet she issued no such discipline to the football players involved in the hazing of Son Doe; to the football player involved in the harassment and bullying of Victim-4; and the football player who seriously injured Daughter Chef.

796. The Ursuline Defendants' *modus operandi* to protect its football players, even in the face of overwhelming evidence of misconduct, has persisted for years with no end in sight.

When Ursuline could no longer cover up the illicit and grotesque incidents from the June 2025 trip and the public became aware of what occurred, Defendants Ursuline and Principal Matthew Sammartino issued a false and fraudulent public statement to corrupt the investigation's outcome.

797. Despite Defendants' attempts to cover up the illicit and grotesque incidents from public view, the public soon learned of what happened on the fateful trip.

798. On June 30, 2025—over a week after learning of what happened on the trip—Ursuline and Sammartino finally emailed a statement to "Ursuline Parents" and, possibly, the media.

799. Ursuline and Sammartino's statement contained false and fraudulent statements.

800. Further, the statement wasn't issued to alert the parents of what occurred and to show concern for the victims and other students. Rather, it was issued in response to the public becoming aware of attacks and demanding answers and accountability.

801. The statement was issued because Defendants' attempt to cover up the illicit and grotesque behavior was now known, and Defendants desperately needed to downplay the facts and deflect the truth from its parents and the public.

802. The false and fraudulent statement also served a further purpose of threatening and intimidating witnesses from speaking out about what occurred to corrupt the outcome of the criminal investigation.

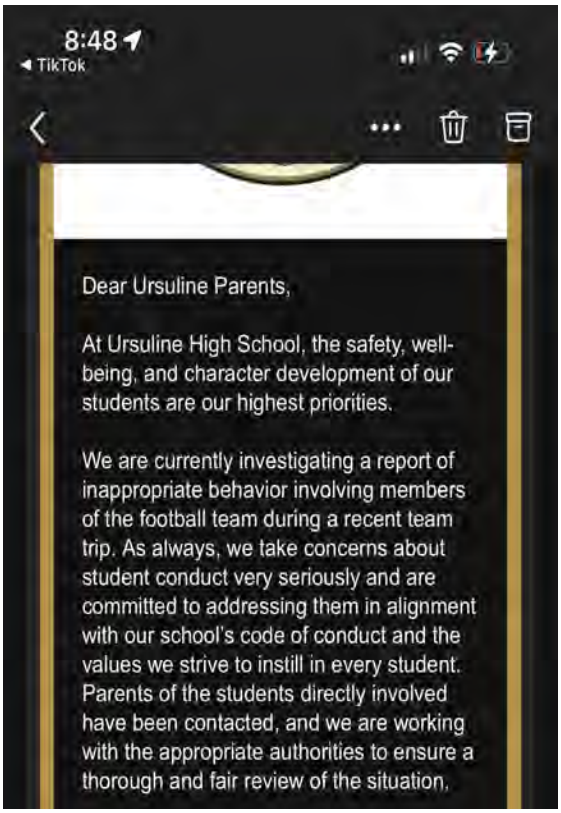
803. The false and fraudulent statement read:

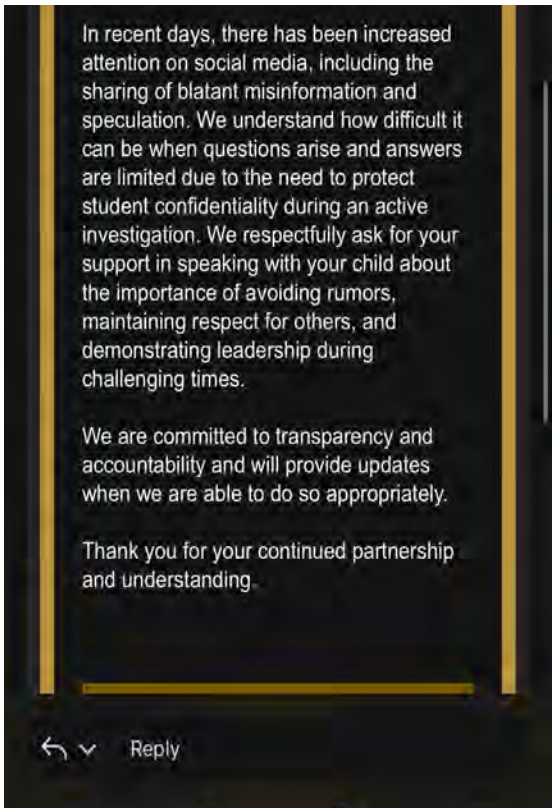
> At Ursuline High School, the safety, well-being, and character development of our students are our highest priorities.
>
> We are currently investigating a report of inappropriate behavior involving members of the football team during a recent team trip. As always, we take concerns about student conduct very seriously and are committed to addressing them in alignment with our school's code of conduct and the values we strive to instill in every student. Parents of the students directly involved have been contacted, and we are working with the appropriate authorities to ensure a thorough and fair review of the situation.

In recent days, there has been increased attention on social media, including the sharing of blatant misinformation and speculation. We understand how difficult it can be when questions arise and answers are limited due to the need to protect student confidentiality during an active investigation. We respectfully ask for your support in speaking with your child about the importance of avoiding rumors, maintaining the respect for others, and demonstrating leadership during challenging times.

We are committed to transparency and accountability and will provide updates when we are able to do so appropriately.

Thank you for your continued partnership and understanding.





804. Examples of the false and fraudulent statements include, but are not limited to, the following:

(a) "At Ursuline High School, the safety… of our students are our highest priorities." [*Sic.*] If the safety of its students was its highest priority, Ursuline would not have hired Reardon and McGlynn as football coaches.

(b) "At Ursuline High School, the … well-being… of our students are our highest priorities." If students' well-being were among its highest priorities, Ursuline would

have acted immediately upon learning of the attacks; Reardon, McGlynn, and Syrianoudis would have rectified, prevented, and stopped the attacks. Indeed, the attacks would have never happened.

(c) "At Ursuline High School, the … character development of our students are our highest priorities." [*Sic.*] If student character development were among its highest priorities, Ursuline would not have allowed the hazing culture to develop, exist, and flourish over several years; Ursuline would not itself covered up its coaches' and players' illegal activities; It also wouldn't have turned its back on the victims and ignored their pleas for help.

(d) "We are currently investigating a report of inappropriate behavior involving members of the football team during a recent team trip." Ursuline conducted no appropriate investigation.

(e) "As always, we take concerns about student conduct very seriously and are committed to addressing them in alignment with our school's code of conduct and the values we strive to instill in every student." Ursuline failed to hold any of the assailant-players accountable. Ursuline had also failed to hold those students accountable for prior incidents.

(f) "… we are working with the appropriate authorities to ensure a thorough and fair review of the situation." Sammartino refused to turn over the videos to Youngstown Police without a subpoena even though the video contained child pornography. Sammartino disciplined no coaches during the so-called investigation, thus allowing the accused to have unfettered access to the victims and witnesses. Nor did Sammartino discipline the assailant-players. Sammartino never informed law enforcement that the football team's "tradition" of hazing had been occurring for years.

(g) "In recent days, there has been increased attention on social media, including the sharing of blatant misinformation and speculation." There was no blatant misinformation—the videos are damning evidence of illegal and grotesque behavior. Videos are not speculative—they are fact. Ursuline is trying to downplay and deflect the truth to try to protect itself and its precious football team. There is no speculation as to what happened and who is responsible—there are videos, photos, messages, and victims' statements.

(h) "We understand how difficult it can be when questions arise and answers are limited due to the need to protect student confidentiality during an active investigation." Ursuline did not care to protect student confidentiality—the child-pornography videos had already been disseminated by the football team and throughout the school and the community at-large. And Ursuline was not conducting an appropriate investigation.

(i) "We respectfully ask for your support in speaking with your child about the importance of avoiding rumors…" In other words, Ursuline was instructing the parents to tell their kids to keep their mouths shut and not talk about what happened. Ursuline did not want the truth to come out. Again, these were not rumors, these were truths—confirmed by the video, photos, messages, and victims' statements.

(j) "We respectfully ask for your support in speaking with your child about the importance of … maintaining the respect for others…" Ursuline's purported insistence on respect for others doesn't apply to the assailant-players and coaches Reardon, McGlynn, and Syrianoudis.

(k) "We are committed to transparency…" Ursuline is not committed to transparency, it has covered up and lied throughout.

(l) "We are committed to … accountability…" Ursuline is not committed to accountability. Nor has it shown such commitment previously.

(m) "We …will provide updates when we are able to do so appropriately." Ursuline has provided no updates—except on the upcoming football season.

While Ursuline, Sammartino, Damore, and the Diocese have failed to investigate, rectify and address the wrongdoing, and hold those responsible for the illegal criminal behavior, Ursuline's football program has proceeded as if nothing happened—nor will happen—because its coaches and players have never been held accountable.

805. Despite overwhelming evidence of criminal wrongdoing by Reardon, McGlynn, Syrianoudis, and many of its players, Ursuline, Sammartino, Damore, and the Diocese have turned a blind eye to the misconduct and ignored the victims.

806. So the football team continued onward toward and launched its fall 2025 season with no repercussions.

807. The football team has even participated in several media stories and a "media day," both of which highlighted and spotlighted several of the assailant players.

808. Ursuline proceeds for the glory of the football team alone.

After the media and public questioned why nothing has been done, Defendants Ursuline and Principal Matthew Sammartino issued *another* false and fraudulent public statement to corrupt the investigation's outcome

809. On Monday, August 18, 2025, local news channel WFMJ ran a story questioning why there have been no answers regarding any investigation of Ursuline's football team, even though the investigation supposedly has been ongoing for two months.[28]

810. The WFMJ article notes that Ursuline deleted from its Facebook page posts about the trip.[29]

811. According to the WFMJ article, "the Catholic Diocese of Youngstown confirmed the school was investigating the allegations."[30]

812. This was false. Ursuline itself was not investigating.

813. According to the WFMJ article, "At that time, a diocesan spokesperson said no employees were placed on leave while the review was underway."[31] Of course, Ursuline was not going to place Reardon, McGlynn, and Syrianoudis on leave—football season was nearing and Ursuline just wanted to win football games.

814. The WFMJ article sparked further public outrage and Defendants needed to cover up their cover up.

815. On Friday, August 22, 2025, Ursuline and Sammartino finally emailed to "Ursuline Parents" a statement and, moments later, released the statement to the media.

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[28] Madison Tromler, *Two months after alleged Ursuline football incident, investigation remains active*, WFMJ Channel 21 (Aug. 18, 2025, 7:05 PM), https://www.wfmj.com/story/53013085/two-months-after-alleged-ursuline-football-incident-investigation-remains-active.

[29] *Id.*

[30] *Id.*

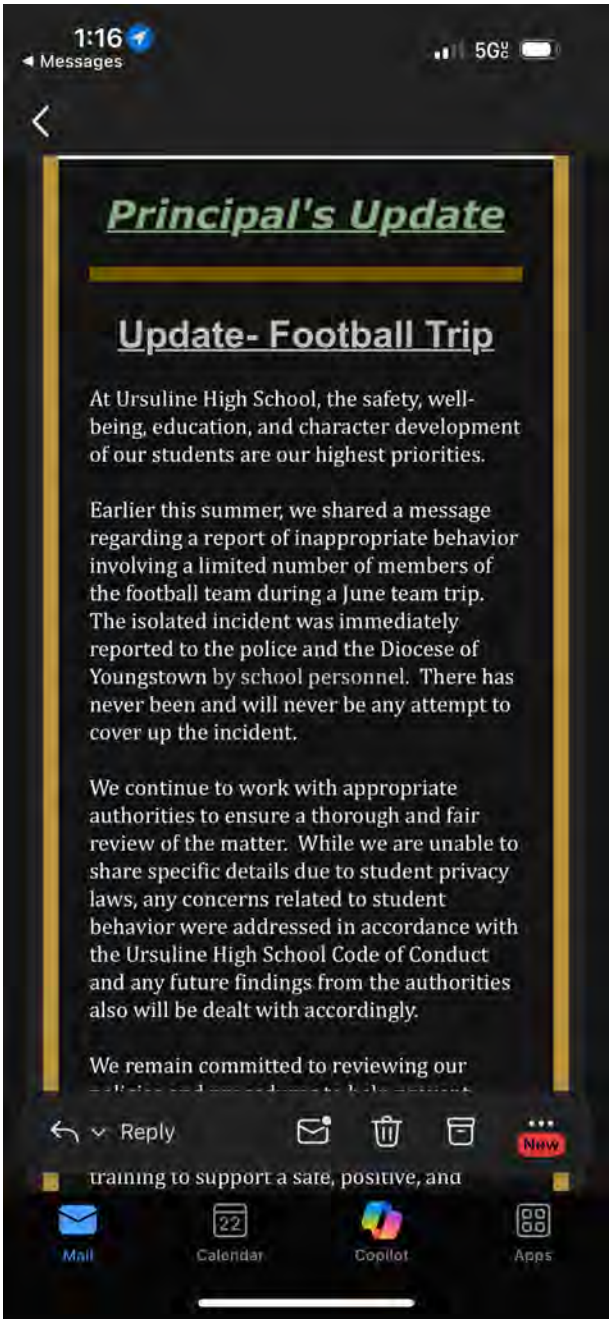
[31] *Id.*

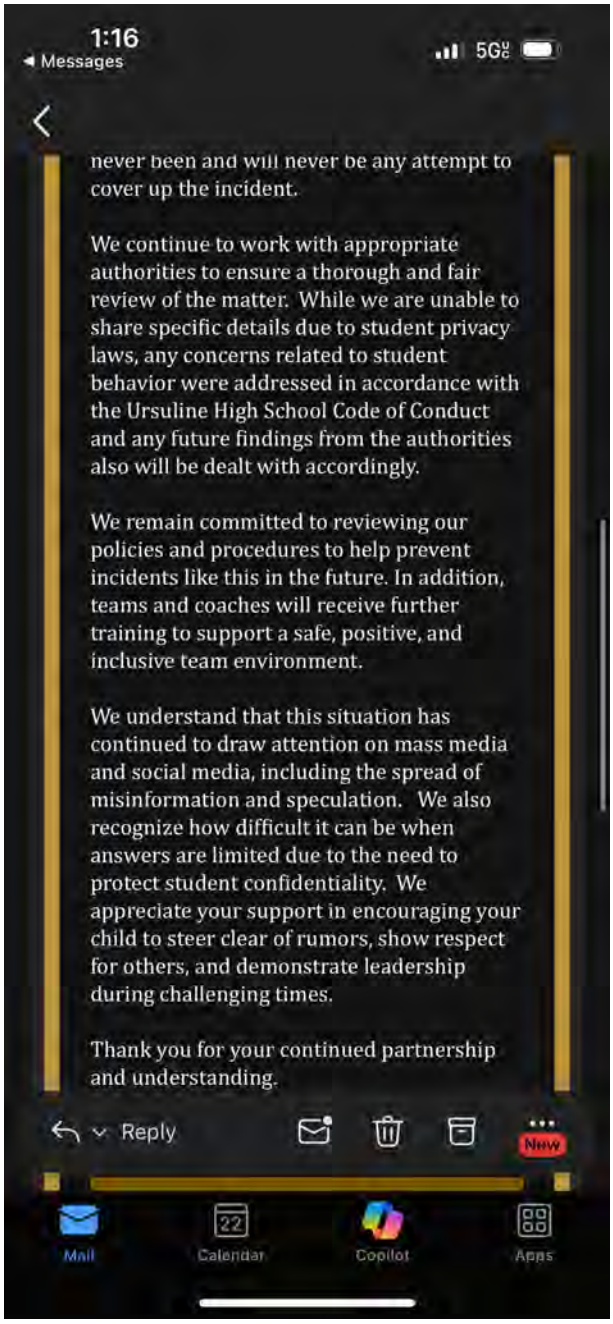
816. Just like their first statement, Ursuline and Sammartino's newest statement contained false and fraudulent statements.

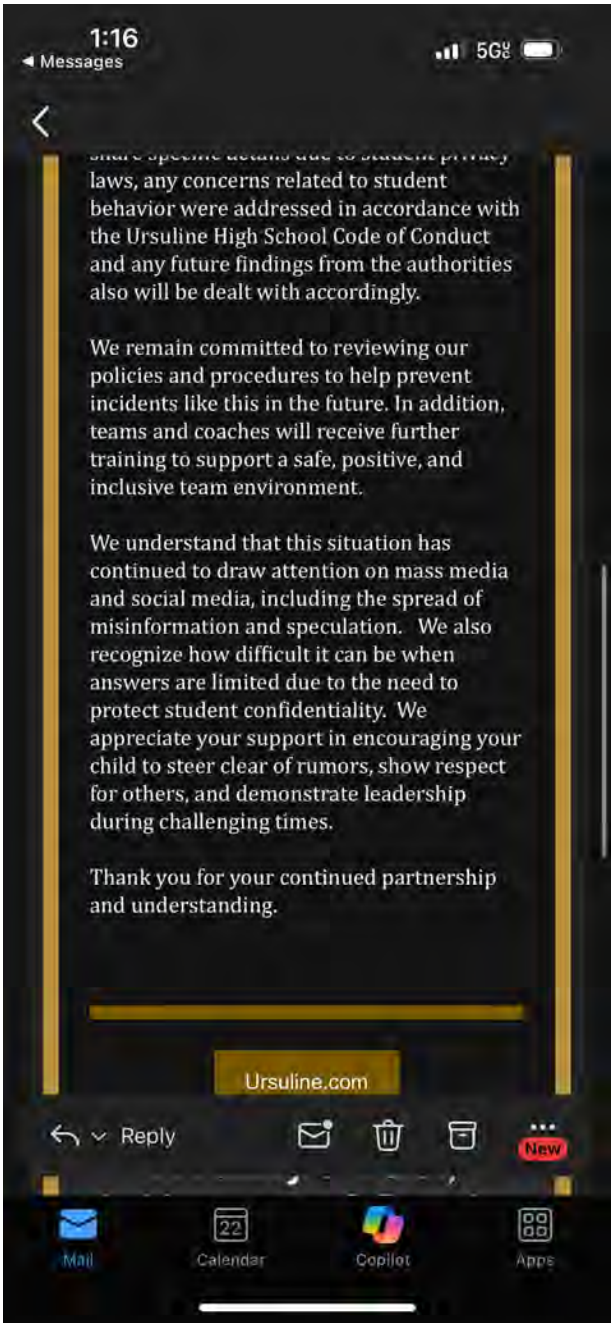
817. And the statement was not issued to update anyone because nothing new was disclosed—there was no update.

818. Just like the first false and fraudulent statement, the second false and fraudulent statement served the additional purpose of threatening and intimidating witnesses from speaking out about what occurred, to corrupt the criminal investigation's outcome.

819. The false and fraudulent statement is depicted below:


1:16
Messages
5G
Principal's Update
Update- Football Trip
At Ursuline High School, the safety, well-being, education, and character development of our students are our highest priorities.
Earlier this summer, we shared a message regarding a report of inappropriate behavior involving a limited number of members of the football team during a June team trip. The isolated incident was immediately reported to the police and the Diocese of Youngstown by school personnel. There has never been and will never be any attempt to cover up the incident.
We continue to work with appropriate authorities to ensure a thorough and fair review of the matter. While we are unable to share specific details due to student privacy laws, any concerns related to student behavior were addressed in accordance with the Ursuline High School Code of Conduct and any future findings from the authorities also will be dealt with accordingly.
We remain committed to reviewing our
Reply
New
training to support a safe, positive, and
Mail
Calendar
Copilot
Apps


1:16
Messages
5G
never been and will never be any attempt to cover up the incident.
We continue to work with appropriate authorities to ensure a thorough and fair review of the matter. While we are unable to share specific details due to student privacy laws, any concerns related to student behavior were addressed in accordance with the Ursuline High School Code of Conduct and any future findings from the authorities also will be dealt with accordingly.
We remain committed to reviewing our policies and procedures to help prevent incidents like this in the future. In addition, teams and coaches will receive further training to support a safe, positive, and inclusive team environment.
We understand that this situation has continued to draw attention on mass media and social media, including the spread of misinformation and speculation. We also recognize how difficult it can be when answers are limited due to the need to protect student confidentiality. We appreciate your support in encouraging your child to steer clear of rumors, show respect for others, and demonstrate leadership during challenging times.
Thank you for your continued partnership and understanding.
Reply
New
Mail
Calendar
Copilot
Apps



820. Examples of the false and fraudulent statements contained include, but are not limited to, the following:

(a) "At Ursuline High School, the safety… of our students are our highest priorities." [*Sic.*] Were student safety among Ursuline's highest priorities, it would not have hired Reardon and McGlynn as football coaches. This statement was regurgitated from the first statement.

(b) "At Ursuline High School, the … well-being… of our students are our highest priorities." Were student well-being among its highest priorities, Ursuline administrators would have acted immediately on learning of the attacks; and Reardon, McGlynn, and Syrianoudis would have rectified, prevented, and stopped the attacks—indeed, the attacks would have never occurred. This statement is regurgitated from the first statement.

(c) "At Ursuline High School, the … character development of our students are our highest priorities." If character development of its students were among its highest priorities, Ursuline would not have allowed the hazing culture to develop, exist, and flourish over several years; Ursuline would not itself covered up its coaches and players' illegal activities; Ursuline would not have turned its back on the victims and ignored their pleas for help. This statement is regurgitated from the first statement.

(d) "Earlier this summer, we shared a message regarding a report of inappropriate behavior involving a **limited number of members of the football team** during a June team trip." (Emphasis added.) The claim that the inappropriate behavior involved a "limited number of members of the football team" is false and fraudulent. There were at least 21 players involved, victims, or knowledgeable of what occurred—21 is not limited, but expansive. The statement also implies (falsely) that the inappropriate behavior involved only players. This is again false and fraudulent—the three coaches Reardon, McGlynn, and Syrianoudis were likewise involved, but the statement doesn't mention them.

(e) "The **isolated incident**…" (Emphasis added.) This is again grossly false and fraudulent. This was not an isolated incident; but was a series of, at a minimum, at least 12–15 separate incidents, spanning four states, and nine days. And there were many prior hazing incidents in earlier years—which the administrators knew and ignored. (A list of potential criminal charges is listed below, beyond those contained in the ***Claims*** section below.) This was not an isolated incident. There were several acts of hazing during the 2025 trip, and, when Sammartino issued this statement, he knew that the hazing had been occurring for years.

(f) "The isolated incident was **immediately** reported to the police and the Diocese of Youngstown by school personnel." This is false and fraudulent. Reardon, McGlynn, and Syrianoudis knew of the hazing from the initial bus trip and daily during the trip, yet any purported report to the police and Diocese was not made until days after the trip was over—hardly immediate. Again, the Ursuline defendants never reported to the police and Diocese that the hazing had been occurring for years.

(g) "There has never been and will never be an attempt to cover up the incident." Defendants destroyed evidence by deleting the camp posts from the Ursuline Facebook page after knowing that a criminal investigation began or was beginning. Defendant destroyed evidence by deleting the Ursuline football team's social-media accounts. To corrupt the criminal investigation's outcome, Defendants issued the first

false and fraudulent statement, which threatened and intimidated witnesses from speaking out about what occurred. Defendants withheld evidence from law enforcement. Defendants disseminated false information to Ursuline parents and the Ursuline Media Mob, who further disseminated the false information to the public to defend Ursuline. The football players destroyed evidence by deleting the football team's Snapchat account. This shows a cover up. Just because Defendants were inept at cover-up attempts doesn't mean the hazing didn't occur. Defendants' failure to alert the police that the football team's "tradition" of hazing had been occurring "for years" further shows their attempts to cover up the football players' misconduct.

(h) "We continue to work with the appropriate authorities to ensure a thorough and fair review of the situation." Sammartino refused to turn over the videos to Youngstown Police without a subpoena even though the video contained child pornography. Sammartino suspended no coaches during the so-called investigation, thus allowing the accused to have unfettered access to the victims and witnesses. Nor did Sammartino suspend, as discipline, the assailant-players, much less for any meaningful period. This was another regurgitated statement from the first statement. By failing to report that the hazing occurred over several years, Sammartino's claim that they were working with authorities to ensure a thorough and fair review is false—he should have been honest with the police, the public, and the Ursuline parents that the hazing had been occurring for years. Again, Sammartino never informed law enforcement that the football team's "tradition" of hazing had been occurring for years.

(i) "… any concerns related to help prevent to student behavior were addressed in accordance with the Ursuline High School Code of Conduct…" That's false. Ursuline did not follow its own Code of Conduct as stated above.

(j) "We understand that this situation has continued to draw attention on mass media and social media, **including the spread of misinformation and speculation**." (Emphasis added.) The only misinformation being spread is from Defendants and the Ursuline Media Mob. And this is not speculation—this is truth, supported by videos, photos, messages, victims' statements, and witnesses' statements. Ursuline's gaslighting was calculated to harm Plaintiffs' reputations.

(k) "We also recognize how difficult it can be when answers are limited due to the need to protect student confidentiality." Ursuline did not care to protect student confidentiality—football players had already disseminated the child-pornography videos throughout the school and the broader community. Sammartino wanted to keep confidentiality to keep the assailant-players (many of whom Ursuline publicly praised) on the field, winning football games, and the coaches at the helm. This was another regurgitated statement from the first statement.

(l) "We appreciate your support in encouraging your child to steer clear of rumors…" [*Sic.*] That is, Ursuline was thanking parents for telling their kids to keep their

mouths shut and not talk about what happened. Ursuline did not want the truth to come out. Again, these were not *rumors*, these were truths—confirmed by the video, photos, messages, and victims' statements.

(m) "We appreciate your support in encouraging your child to… show respect for others…" Again, Ursuline's purported insistence on respect for others doesn't apply to the assailant-players and coaches Reardon, McGlynn, and Syrianoudis.

821. WFMJ ran an article within minutes of Ursuline releasing the second statement.[32]

822. When the article was initially posted, the article was titled "Diocese releases statement on 'inappropriate behavior' allegations against football team" and the article attributed the statements in the release to the "Diocese" and "Diocesan officials." But within the hour, the title was changed to "Ursuline releases statement on 'inappropriate behavior' allegations against football team" and further attributed the statements to "Ursuline." The Diocese was not a part of Ursuline's release and was not going to be associated with it.

The Ursuline Media Mob spreads disinformation and lies about the hazing and attacks, a foreseeable reputational-harm-exacerbation consequence of Defendants' conduct.

823. The Ursuline Media Mob is a conglomeration of individuals closely associated with Ursuline, whether as employees, students, parents/family/friends of students, alumni, donors, or other supporters. Their fervor for Ursuline's football program is extreme.

824. The Ursuline Media Mob has a history of not only promoting Ursuline with truthful accolades, but, often, with false claims to denigrate its rivals, including fabricating stories about other rival high schools and the rivals' students.

825. One such fabrication involved a cheerleader at one of Ursuline's rivals.

[32] Zach Mosca, *Ursuline releases statement on 'inappropriate behavior' allegations against football team*, WFMJ Channel 21 (Aug. 22, 2025, approx. 1:45 PM), https://www.wfmj.com/story/53024089/ursuline-releases-statement-on-hazing-allegations-against-football-team.

826. The Ursuline Media Mob fabricated a story that this cheerleader was not wearing underwear during the rival's basketball game against Ursuline.

827. According to one of the rival's cheer coaches, based on the type of cheerleader uniform and coach oversight, that could not and did not happen. The allegation was false and wholly manufactured.

828. But truth did not stop the Ursuline Media Mob from retelling the story. One Ursuline Media Mob member, who was an Ursuline student's mother, repeated the story to a group of grade schoolers' mothers to denigrate the rival and humiliate the innocent cheerleader.

829. The incident was coined "Pantygate."

830. When news of the hazing and attacks became more widely known, in keeping with their pattern of conduct, the Ursuline Media Mob took to social media to defend Ursuline.

831. The Ursuline Media Mob posted messages that were fraudulent, false, and humiliating to Son Doe, Daughter Doe, and Mother Doe.

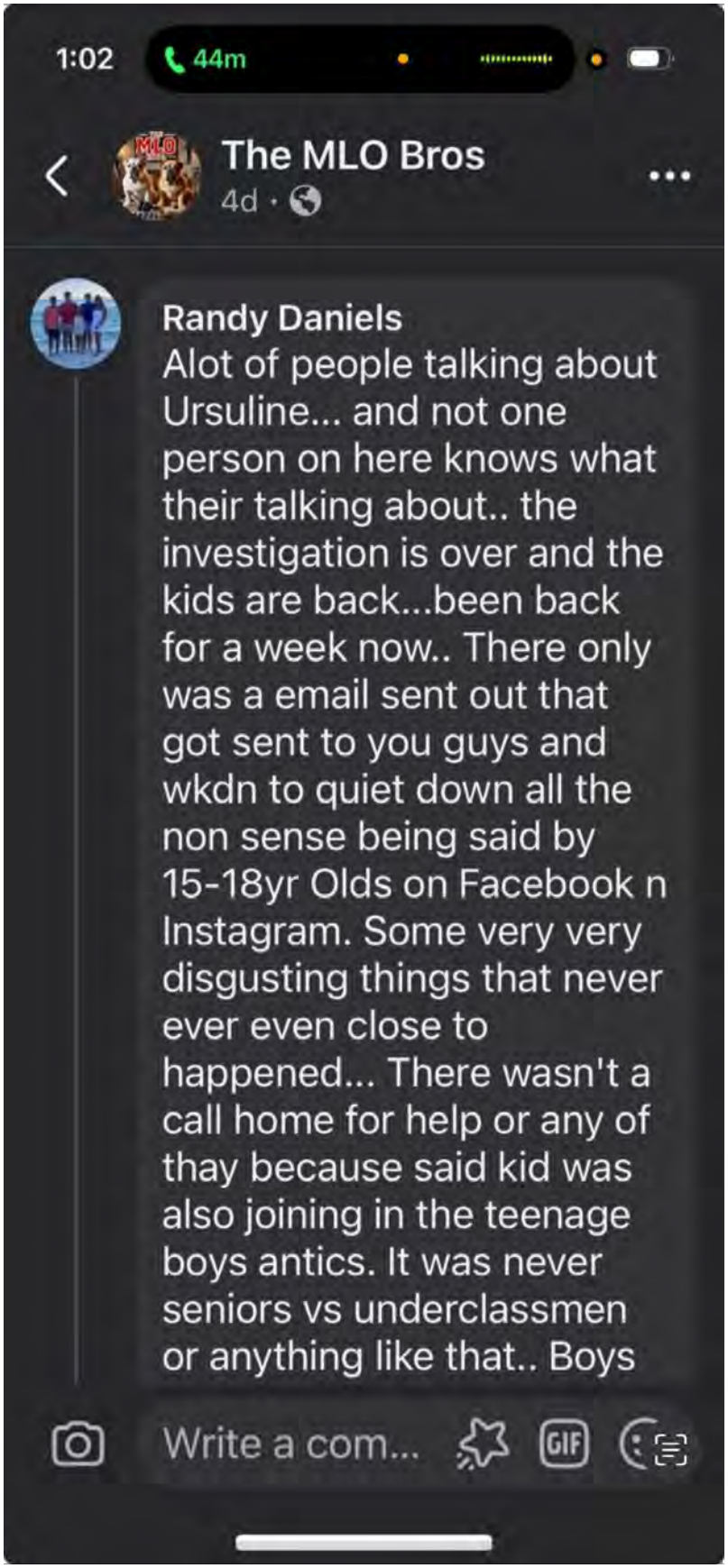
832. Defendants *knew* their inaction and messaging would lead to the Ursuline Media Mob rising to their defense. It was reasonably foreseeable, given the Ursuline Media Mob's previous pattern of zealotry and conduct.

833. Not coincidentally, some of the Ursuline Media Mob's posts contained similar verbiage to Defendants' wording, and contained details only Defendants would have known. That is, the information could have only come, and came, from Defendants.

834. The ignorance the Ursuline Media Mob displayed was dispassionate and downright cruel to Son Doe—the actual victim here.

835. The Ursuline Media Mob adheres to Ursuline's new motto—for the glory of the football team alone.

836. Consider the social-media post of Randy Daniels—a parent of two Ursuline football players (at least one of whom may have been on the trip)—who posted shortly after Ursuline and Sammartino issued its first email to the parents and media:


1:02
44m
The MLO Bros
4d
Randy Daniels
Alot of people talking about Ursuline... and not one person on here knows what their talking about.. the investigation is over and the kids are back...been back for a week now.. There only was a email sent out that got sent to you guys and wkdn to quiet down all the non sense being said by 15-18yr Olds on Facebook n Instagram. Some very very disgusting things that never ever even close to happened... There wasn't a call home for help or any of thay because said kid was also joining in the teenage boys antics. It was never seniors vs underclassmen or anything like that.. Boys
Write a com...
GIF

837. Randy Daniels's post was chock-full of lies and, not coincidentally, reiterates comments Defendants had made. Consider the following statements from Daniels's post:

(a) "…the investigation is over and the kids are back…been back for a week now." This was a lie. Defendants never truly investigated to begin with, but the law-enforcement investigation is ongoing. Mother Doe met with Sammartino and Damore on Monday, June 23; Ursuline and Sammartino issued their false and fraudulent email on Monday, June 30; Daniels posted this message within a couple days. According to Daniels, the so-called investigation was completed the week before, or within a couple of days of the June 23 meeting. Hence, there was no real investigation and the players were already back.

(b) "There only was a [*sic.*] email sent out that got sent to you guys and wkdn to quiet down all the non sense [*sic.*] being said by 15-18yr Olds on Facebook n Instagram. Some very very disgusting things that never ever even close to happened…" [*Sic.*] This was another lie. Ursuline and Sammartino sent the email to try to cover up what occurred, and lied in the process. Also, the information transmitted through social media was accurate—videos confirmed it. Considering Randy Daniels's children play football for Ursuline, they likely were on the team's group Snapchat and saw the videos.

(c) "There wasn't a call home for help or any of thay [*sic*] because said kid was also joining in the teenage boys antics." More lies. First, Son Doe did contact Mother Doe to inform her what happened, and Mother Doe contacted McGlynn—who did nothing to rectify, prevent, or stop the attacks. Second, Son Doe did not join in the attacks—he was the victim. Third, the attacks were not "teenage-boy antics." Forcibly

attacking, assaulting, and restraining a child, while forcibly stripping off his clothes; then smacking and thrusting and grinding a groin against his buttocks, while videotaping the ordeal, posting it to social media, then spreading the child pornography throughout the school and community at-large are **not** teenage-boy antics. Those are criminal actions. Forcing children to fight each other with the loser being forced to endure an attack (that is, "jumping in") is **not** a teenage-boy antic. It is a criminal act like criminal gangs' "jumping in" process. The players' acts of non-consensually "humping" each other are **not** teenage-boy antics—it is criminal assault.

(d) "Boys will be boys is what it boils down to…" More lies. Defendant McGlynn have used that **exact** phrase when trying to downplay to Mother Doe what happened. **Both** Daniels and McGlynn offered the same excuse. This was no coincidence.

(e) "… and there's always especially now soft ass Parents that want to cry about their baby being picked on…this generation of kids and parents are soft period…" More lies. Mother Doe is not being soft—Son Doe was viciously and criminally attacked. The degrading and humiliating video was sent to the entire team, school, and throughout the community. Perhaps Randy Daniels would feel differently if his sons were victims and they appeared in child pornography.

(f) "…nothing got swept any where [*sic.*]…there was never anything to be swept…" More lies. Defendants tried, and failed, to sweep what occurred under the rug. Defendants destroyed evidence by deleting the camp videos, photos, and posts from Ursuline's Facebook page and deleting Ursuline football team's social-media accounts? The football team destroyed evidence by deleting its group Snapchat. Ursuline and Sammartino send out false and fraudulent emails to the Ursuline parents

and media? Videos, photos, and messages confirm what happened. And there a criminal investigation. Because it did happen.

838. When the MLO Bros—local podcasters known for their bold and unfiltered approach to community news—responded to Randy Daniels's post with facts and information, specifically that two Ursuline players had already transferred, Daniels responded, in part, "they left back to home school because they didn't want to miss any football…" If nothing happened and the investigation were over, as Daniels claimed moments earlier in his post, these players would have missed no time.

839. Then, after the MLO Bros hit Randy Daniels with a dose of truth, Daniels decided to take aim and lie about Mother Doe posting, "In a nutshell the mom was looking for a payday and no one will tell.me [*sic.*] different…she ran right to the top."

840. Daniels discussed with more than one Defendant that he was trying to advocate on their behalf. The Ursuline and Sammartino email, which Daniels references, doesn't mention Mother Doe.

841. And Daniels was lying, again, about Mother Doe. Mother Doe did not run "right to the top." She first notified McGlynn, who did nothing. Considering Reardon knew and did nothing, there would be no reason to go to him. So, Mother Doe went to the next people in the chain of command—principal Sammartino and assistant principal Damore, who also did nothing.

842. Similarly, presuming Sammartino and Damore informed the Diocese of what really happened on the trip and showed the Superintendent and Bishop the videos and evidence, the Diocese would have acted, but it did not. So there was no use going to the Diocese (which would be even further on top).

843. Mother Doe was looking for Defendants to do the right thing and hold accountable

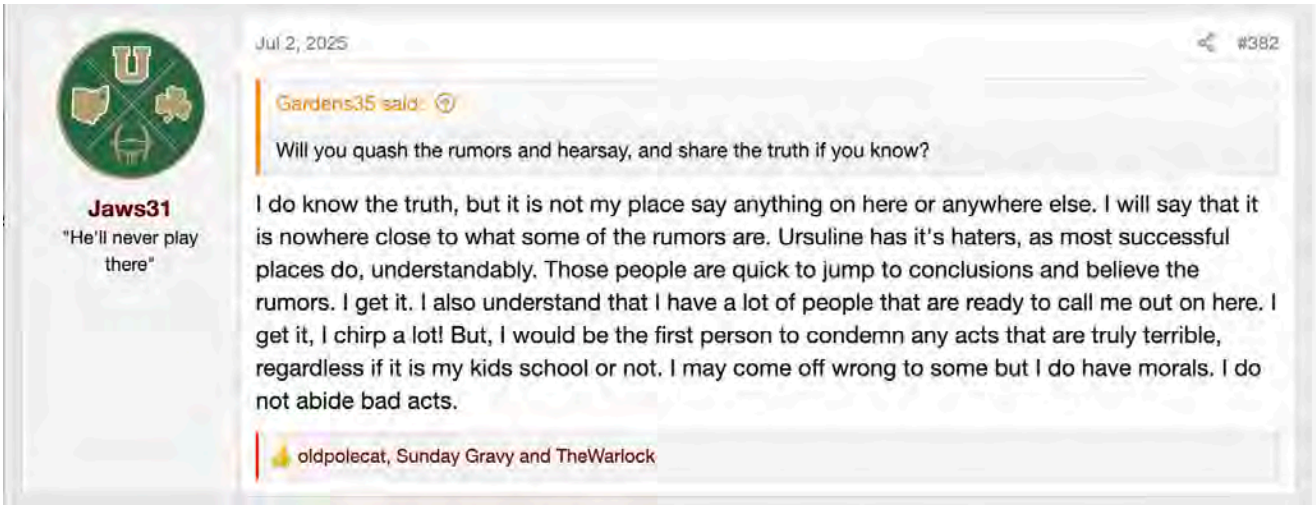
those responsible for the hazing, assaults, and attacks on Son Doe, and their creation and dissemination of the child pornography.

844. Now Mother Doe is forced to take matters into her own hands—legally—to secure justice for Son Doe and accountability for the evildoers, because Defendants aren't going to do so.

845. This is what good parents are supposed to do. Apparently, Randy Daniels is unaware of what responsible parents are supposed to do because his sons were not attacked and victimized.

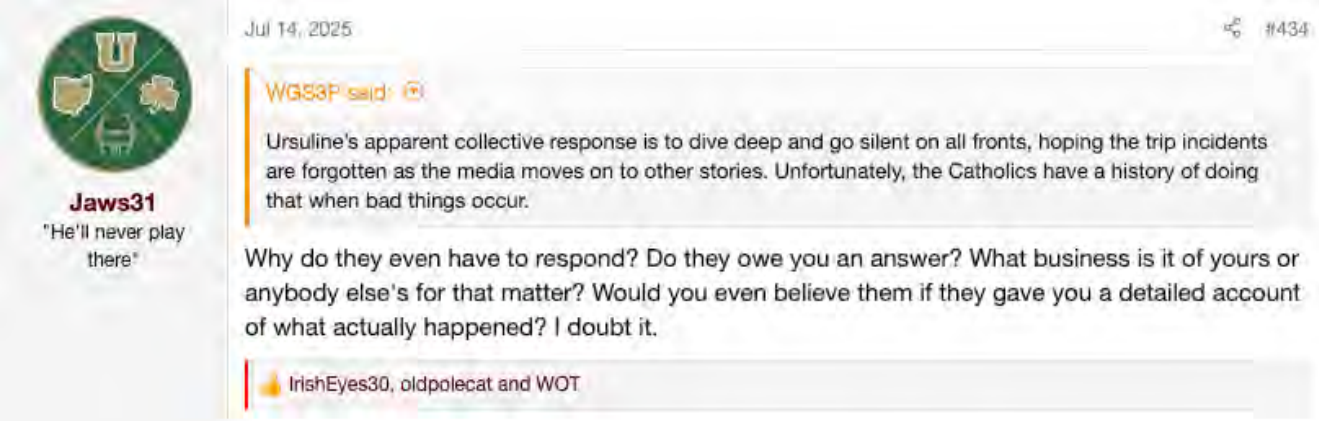
846. Consider also several posts from the Yappi.com chat forum "Ursuline & Cardinal Mooney prospects for 2025" following news of the incidents.

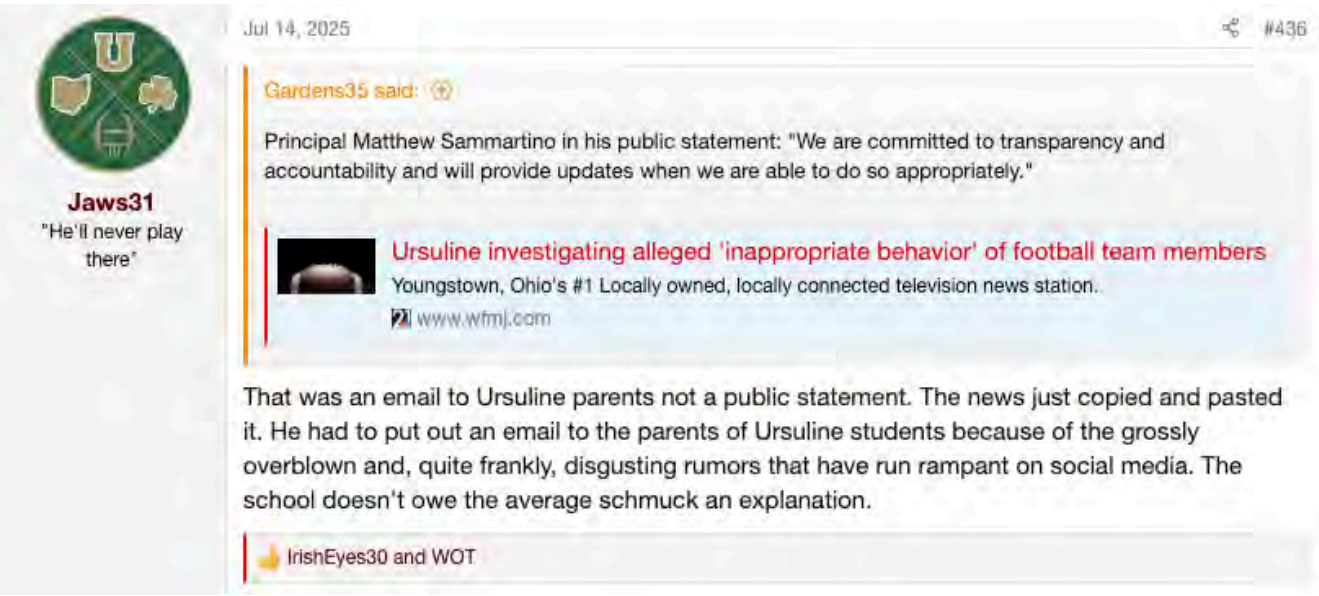
847. On Yappi.com's *Ursuline & Cardinal Mooney prospects for 2025* chat forum, "Jaws31," an obvious Ursuline supporter given his photo is the Ursuline football seal and his claim that "I do know the truth… I will say that it is nowhere close to what some of the rumors are…", as posted on July 2, 2025:[33]



[33] Yappi.com, *Ursuline & Cardinal Mooney prospects for 2025* chat forum (July 2, 2025), https://yappi.com/forum/index.php?threads/ursuline-cardinal-mooney-prospects-for-2025.380395/page-13.

848. "Jaws31" continued his defense of Ursuline in two more posts on the same Yappi.com chat forum on July 14, 2025, when more commenters began questioning what happened:[34]





849. Following Ursuline and Sammartino's second false and fraudulent statement, WFMJ ran a news article and posted it to WJFM's Facebook page. One commenter named "Jerry Sweet" posted "The entire story and situation was fabricated from the start." Sweet's post was in

[34] Yappi.com, *Ursuline & Cardinal Mooney prospects for 2025* chat forum (July 14, 2025), https://yappi.com/forum/index.php?threads/ursuline-cardinal-mooney-prospects-for-2025.380395/page-15.

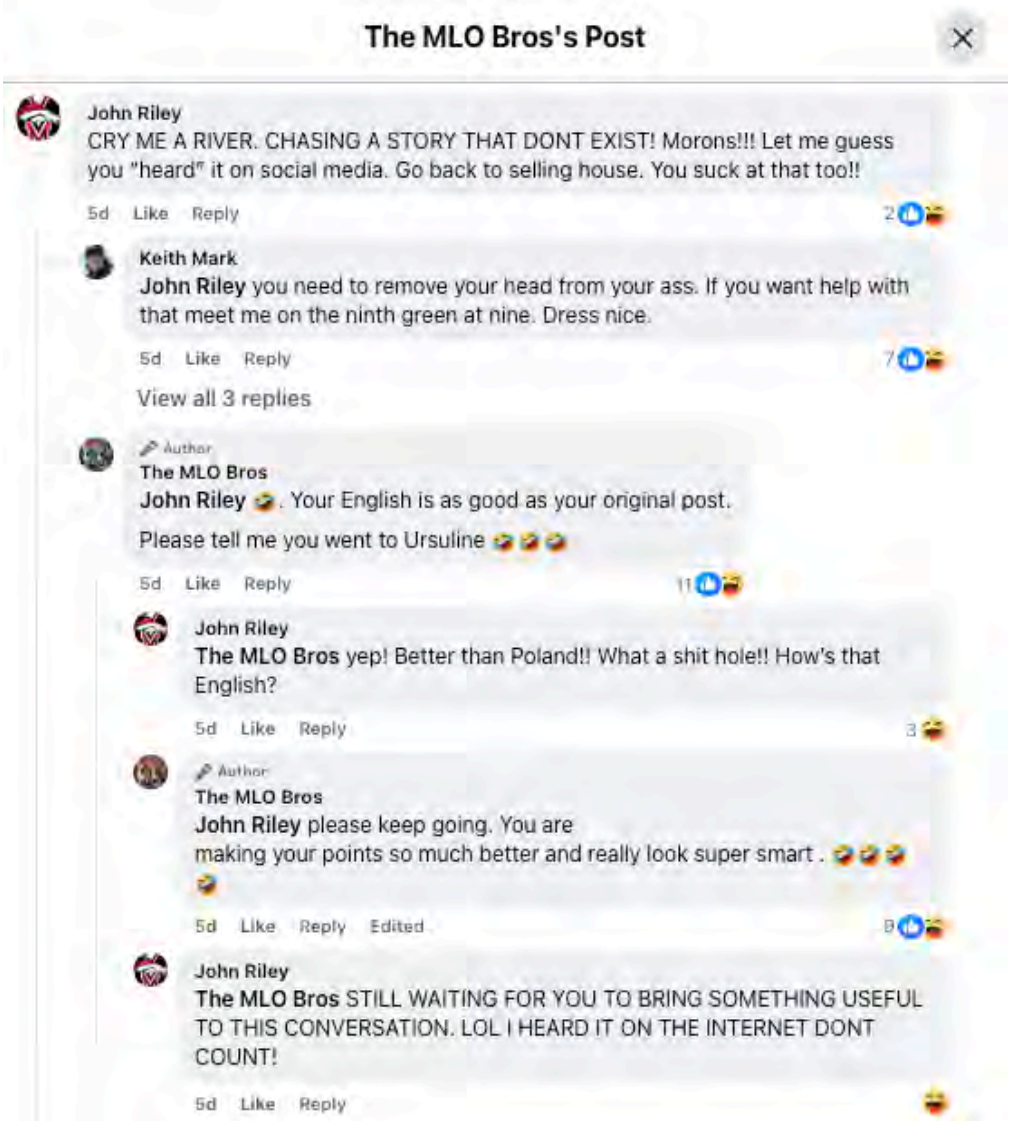
response to the slew of negative comments about Ursuline and mishandling of the situation and cover up.

850. The same night Ursuline and Sammartino issued the second false and fraudulent statement, the Ursuline football team won its season opener.

851. John Riley, an Ursuline supporter, posted on the MLO Bros Facebook page:



852. John Riley's post was met with swift criticism from other commenters, prompting Riley to retort:



853. The foreseeable harm done by the Ursuline Media Mob at Defendants' effective instigation cannot be undone.

854. The social-media attacks on Son Doe and Mother Doe are a reasonable and foreseeable consequence of Defendants' actions, failure to act, and attempts to cover up the illicit activities. And with Randy Daniels and the others, it seems they were acting at Defendants'

encouragement and direction.

The assailant players committed multiple criminal acts, yet Defendants failed to hold them accountable.

855. The evidence of criminal behavior is overwhelming.

856. Sammartino and Damore have had this evidence since June 23, 2025—almost five months—yet have done nothing to hold the players or the coaches accountable (other than suspending coaches pending "investigation" only after suit was filed).

857. Although the civil claims for criminal acts against Ursuline, Sammartino, Damore, Reardon, McGlynn, and Syrianoudis are contained in the **Claims** section below, it is important to state the criminal acts by the players during the 2025 trip, which Defendants permitted, overlooked, and are trying to cover up.

858. The players committed the following criminal acts, among others:

(a) **Multiple players committed Hazing**, in violation of Ohio Rev. Code § 2903.31(B)(1), which provides, "No person shall recklessly participate in the hazing of another."[35] The violation of which is a misdemeanor of the second degree.

(b) **Ta.W., C.C., and R.H. committed Hazing**, in violation of Alabama Code § 16-1-23(b), which provides, "No person shall engage in what is commonly known and recognized as hazing, or encourage, aid, or assist any other person thus offending." Under subsection (c), "No person shall knowingly permit, encourage, aid, or assist

[35] **Hazing**, under Ohio Rev. Code § 2903.31(A)(1), "means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse, as defined in section 3719.0111 of the Revised Code.

any person in committing the offense of hazing, or willfully acquiesce in the commission of such offense, or fail to report promptly his knowledge or any reasonable information within his knowledge of the presence and practice of hazing in this state to the chief executive officer of the appropriate school, college, university, or other educational institution in this state. Any act of omission or commission shall be deemed hazing under the provisions of this section."[36] Hazing is a Class C misdemeanor.

(c) **Ta.W., To.W., D.T., J.P., A.B., G.C., C.S., C.M., D.S., B.S., and D.D. committed Hazing**, in violation of Florida Statute Title XLVIII Chapter 1006.135, which

means any action or situation that endangers the mental or physical health or safety of a student at a school with any of grades 6 through 12 for purposes including, but not limited to, initiation or admission into or affiliation with any organization

[36] Hazing, under Alabama Code Title 16 Chapter 1 § 16-1-23(a), is defined as:

(1) Any willful action taken or situation created, whether on or off any school, college, university, or other educational premises, which recklessly or intentionally endangers the mental or physical health of any student, or

(2) Any willful act on or off any school, college, university, or other educational premises by any person alone or acting with others in striking, beating, bruising, or maiming; or seriously offering, threatening, or attempting to strike, beat, bruise, or maim, or to do or seriously offer, threaten, or attempt to do physical violence to any student of any such educational institution or any assault upon any such students made for the purpose of committing any of the acts, or producing any of the results to such student as defined in this section.

(3) The term hazing as defined in this section does not include customary athletic events or similar contests or competitions, and is limited to those actions taken and situations created in connection with initiation into or affiliation with any organization. The term hazing does not include corporal punishment administered by officials or employees of public schools when in accordance with policies adopted by local boards of education.

operating under the sanction of a school with any of grades 6 through 12. 'Hazing' includes, but is not limited to:

(a) Pressuring, coercing, or forcing a student into:

1. Violating state or federal law;

2. Consuming any food, liquor, or other substance; or

3. Participating in physical activity that could adversely affect the health or safety of the student.

(b) Any brutality of a physical nature, such as whipping, beating, branding, or exposure to the elements. Hazing does not include customary athletic events or other similar contests or competitions or any activity or conduct that furthers a legal and legitimate objective.

Hazing is a misdemeanor of the first degree, but could be elevated to a third-degree felony under certain circumstances.

(d) **T.S. and multiple other players committed Hazing**, in violation of Tennessee Code § 49-2-120, which "means any intentional or reckless act in this state, on or off LEA property, by one (1) student acting alone or with others, that is directed against any other student, that endangers the mental or physical health or safety of that student or that induces or coerces a student to endanger that student's mental or physical health or safety. 'Hazing' does not include customary athletic events or similar contests or competitions and is limited to those actions taken and situations created in connection with initiation into or affiliation with any organization." Hazing may be a criminal offense in Tennessee under certain circumstances.

(e) **Ta.W. and C.C. committed Assault in the third degree**, in violation of Alabama Code § 13A-6-22(a), which provides, in relevant part, "A person commits the

crime of assault in the third degree if: (1) With intent to cause physical injury to another person, he causes physical injury to any person; or (2) He recklessly causes physical injury to another person…" Assault in the third degree is a Class A misdemeanor.

(f) **Ta.W. committed Sexual abuse in the first degree**, in violation of Alabama Code § 13A-6-66(a), which provides, in relevant part, "A person commits the crime of sexual abuse in the first degree if he or she… (1) Subjects another person to sexual contact by forcible compulsion."[37] Sexual abuse in the first degree is a Class C felony.

(g) **Multiple players committed Theft**, in violation of Alabama Code § 13A-8-5(a), which provides, in relevant part, "The theft of property which does not exceed five hundred dollars ($500) in value and which is not taken from the person of another constitutes theft of property in the fourth degree." Theft in the third degree is a Class A misdemeanor, but may be elevated to a felony depending on the value of items stolen and other factors.

(h) **Multiple players committed Theft**, in violation of Florida Statute Title XLVI Chapter 812.014(1)(a), which provides, in relevant part, "A person commits theft if he or she knowingly obtains or uses, or endeavors to obtain or to use, the property of another with intent to, either temporarily or permanently…(a) Deprive the other person of a right to the property or a benefit from the property." Theft is a

[37] Alabama Code § 13A-6-60 defines "sexual contact" as "Any touching of the sexual or other intimate parts of a person done for the purpose of gratifying the sexual desire of either party. The term does not require skin to skin contact."

misdemeanor of the second degree, but may be elevated to a felony depending on the value of items stolen and other factors.

(i) **Ta.W., To.W., D.T., J.P., A.B., G.C., and C.S. committed Kidnapping**, in violation of Florida Statute Title XLVI Chapter 787.01(1)(a), which "means forcibly, secretly, or by threat confining, abducting, or imprisoning another person against her or his will and without lawful authority, with intent to…(2) Commit or facilitate commission of any felony; (3) Inflict bodily harm upon or terrorize the victim of another person." Kidnapping is a felony of first degree.

(j) **Ta.W., To.W., D.T., J.P., A.B., G.C., and C.S. committed False imprisonment**, in violation of Florida Statute Title XLVI Chapter 787.02(1)(a), which "means forcibly, by threat, or secretly confining, abducting, imprisoning, or restraining another person without lawful authority and against her or his will." False imprisonment is a felony of third degree.

(k) **Ta.W., To.W., D.T., J.P., A.B., G.C., and C.S. committed Assault**, in violation of Florida Statute Title XLVI Chapter 784.011(1), which "is an intentional, unlawful threat by word or act to do violence to the person of another, coupled with an apparent ability to do so, and doing some act which creates a well-founded fear in such other person that such violence is imminent." Assault is a misdemeanor of second degree.

(l) **Ta.W., To.W., D.T., J.P., A.B., G.C., and C.S. committed Aggravated assault**, in violation of Florida Statute Title XLVI Chapter 784.021(1), which "is an assault…(b) With intent to commit a felony." Aggravated assault is a felony of third degree.

(m) **Ta.W., To.W., D.T., J.P., A.B., G.C., and C.S. committed Battery**, in violation of Florida Statute Title XLVI Chapter 784.03(1)(a), which "occur when a person: 1. Actually and intentionally touches or strikes another person against the will of the other; or 2. Intentionally causes bodily harm to another person." Battery is a misdemeanor of first degree.

(n) **Ta.W., To.W., D.T., J.P., A.B., G.C., C.S., and multiple other players committed Stalking**, in violation of Florida Statute Title XLVI Chapter 784.048(2), which occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of stalking, a misdemeanor of the first degree." **Stalking**, under Florida Statute Title XVLI Chapter 784.048(3), occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony of the third degree." **Stalking**, under Florida Statute Title XVLI Chapter 784.048(5), occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks a child under 16 years of age commits the offense of aggravated stalking, a felony of the third degree."

(o) **Multiple players committed Sexual cyberharassment**, in violation of Florida Statute Title XLVI Chapter 784.049(3)(a), which occurs when "a person who willfully and maliciously sexually cyberharasses another person commits a misdemeanor of the

first degree."[38]

(p) **Ta.W., To.W., D.T., J.P., A.B., G.C., C.S., and multiple other players committed Mob intimidation**, in violation of Florida Statute Title XLVI Chapter 784.0495, which provides, "It is unlawful for a person, assembled with two or more other persons and acting with a common intent, to use force or threaten to use imminent force, to compel or induce, or attempt to compel or induce, another person to do or refrain from doing any act or to assume, abandon, or maintain a particular viewpoint against his or her will." Mob intimidation is a misdemeanor of first degree.

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[38] Florida Statute XLVI Chapter 784.049 [Sexual cyberharassment] provides:

(2) As used in this section, the term:

(a) "Image" includes, but is not limited to, any photograph, picture, motion picture, film, video, or representation.

(b) "Personal identification information" means any information that identifies an individual, and includes, but is not limited to, any name, postal or electronic mail address, telephone number, social security number, date of birth, or any unique physical representation.

(b) "Sexually cyberharass" means to publish to an Internet website or disseminate through electronic means to another person a sexually explicit image of a person that contains or conveys the personal identification information of the depicted person without the depicted person's consent, contrary to the depicted person's reasonable expectation that the image would remain private, for no legitimate purpose, with the intent of causing substantial emotional distress to the depicted person. Evidence that the depicted person sent a sexually explicit image to another person does not, on its own, remove his or her reasonable expectation of privacy for that image.

(d) "Sexually explicit image" means any image depicting nudity, as defined in s. 847.001, or depicting a person engaging in sexual conduct, as defined in s. 847.001.

(q) **Multiple players committed Child pornography**, in violation of Florida Statute Title XLVI Chapter 827.071(4), which provides, in relevant part, "It is unlawful for any person to possess with the intent to promote any photograph, motion picture, exhibition, show, representation, or other presentation which, in whole or in part, includes child pornography… A person who violates this subsection commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."

(r) **Multiple players committed Child pornography**, in violation of Florida Statute Title XLVI Chapter 827.071(5), which provides, in relevant part, "It is unlawful for any person to knowingly possess, control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation which, in whole or in part, he or she knows to include child pornography… A person who violates this paragraph commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(s) **Multiple players committed Prohibition of certain acts in connection with obscene, lewd, etc., materials**, in violation of Florida Statute Title XLVI Chapter 847.011(1)(a), which provides, "any person who knowingly sells, lends, gives away, distributes, transmits, shows, or transmutes, or offers to sell, lend, give away, distribute, transmit, show, or transmute, or has in his or her possession, custody, or control with intent to sell, lend, give away, distribute, transmit, show, transmute, or advertise in any manner, any obscene book, magazine, periodical, pamphlet, newspaper, comic book, story paper, written or printed story or article, writing, paper, card, picture, drawing, photograph, motion picture film, figure, image,

phonograph record, or wire or tape or other recording, or any written, printed, or recorded matter of any such character which may or may not require mechanical or other means to be transmuted into auditory, visual, or sensory representations of such character, or any article or instrument for obscene use, or purporting to be for obscene use or purpose; or who knowingly designs, copies, draws, photographs, poses for, writes, prints, publishes, or in any manner whatsoever manufactures or prepares any such material, matter, article, or thing of any such character; or who knowingly writes, prints, publishes, or utters, or causes to be written, printed, published, or uttered, any advertisement or notice of any kind, giving information, directly or indirectly, stating, or purporting to state, where, how, of whom, or by what means any, or what purports to be any, such material, matter, article, or thing of any such character can be purchased, obtained, or had; or who in any manner knowingly hires, employs, uses, or permits any person knowingly to do or assist in doing any act or thing mentioned above, commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083."[39] Under subsection

[39] Florida Statute Title XLVI Chapter 847.001 provides:

(12) "Obscene" means the status of material which:

(a) The average person, applying contemporary community standards, would find, taken as a whole, appeals to the prurient interest;

(b) Depicts or describes, in a patently offensive way, sexual conduct as specifically defined herein; and

(c) Taken as a whole, lacks serious literary, artistic, political, or scientific value.

(1)(c), if the violation "is based on materials that depict a minor engaged in any act or conduct that is harmful to minors commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."

(t) **Multiple players committed Prohibition of certain acts in connection with obscene, lewd, etc., materials**, in violation of Florida Statute Title XLVI Chapter 847.011(2), which provides, "a person who knowingly has in his or her possession, custody, or control any obscene book, magazine, periodical, pamphlet, newspaper, comic book, story paper, written or printed story or article, writing, paper, card, picture, drawing, photograph, motion picture film, film, any sticker, decal, emblem or other device attached to a motor vehicle containing obscene descriptions, photographs, or depictions, any figure, image, phonograph record, or wire or tape or other recording, or any written, printed, or recorded matter of any such character which may or may not require mechanical or other means to be transmuted into auditory, visual, or sensory representations of such character, or any article or instrument for obscene use, or purporting to be for obscene use or purpose, without

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A mother's breastfeeding of her baby is not under any circumstance "obscene."

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(19) "Sexual conduct" means actual or simulated sexual intercourse, deviate sexual intercourse, sexual bestiality, masturbation, or sadomasochistic abuse; actual or simulated lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed. A mother's breastfeeding of her baby does not under any circumstance constitute "sexual conduct."

intent to sell, lend, give away, distribute, transmit, show, transmute, or advertise the same, commits a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083." Under subsection (1)(c), if the violation "is based on materials that depict a minor engaged in any act or conduct that is harmful to minors commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[40]

(u) **Multiple players committed Protection of minors; prohibition of certain acts in connection with obscenity**, in violation of Florida Statute Title XLVI Chapter 847.0133(1), which provides, in relevant part, "A person may not knowingly sell, rent, loan, give away, distribute, transmit, or show any obscene material to a minor."[41] Protection of minors; prohibition of certain acts in connection with obscenity is a felony of third degree.

(v) **Multiple players committed Transmission of pornography by electronic device or equipment prohibited**, in violation of Florida Statute Title XLVI Chapter 847.0137(2), which provides, in relevant part, "any person in this state who knew or reasonably should have known that he or she was transmitting child pornography, as defined in s. 847.001, to another person in this state or in another jurisdiction commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[42] Under subsection (1), "the term 'transmit' means the act

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[40] *Id.*

[41] *Id.*

[42] Florida Statute Title XLVI Chapter 874.001 provides:

(3) "Child pornography" means:

of sending and causing to be delivered, including the act of providing access for receiving and causing to be delivered, any image, information, or data over or through any medium, including the Internet or an interconnected network, by use of any electronic equipment or other device."

(w) **Multiple players committed Transmission of material harmful to minors to a minor by electronic device or equipment prohibited**, in violation of Florida Statute Title XLVI Chapter 847.0138(2), which provides, in relevant part, "any person who knew or believed that he or she was transmitting an image, information, or data that is harmful to minors, as defined in s. 847.001, to a specific individual known by the defendant to be a minor commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[43] Transmission of material

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(a) Any image depicting a minor engaged in sexual conduct; or
(b) Any image that has been created, altered, adapted, or modified by electronic, mechanical, or other means, to portray an identifiable minor engaged in sexual conduct.

(19) "Sexual conduct" means actual or simulated sexual intercourse, deviate sexual intercourse, sexual bestiality, masturbation, or sadomasochistic abuse; actual or simulated lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed. A mother's breastfeeding of her baby does not under any circumstance constitute "sexual conduct."

[43] Florida Statute Title XLVI Chapter 874.001 provides:

(7) "Harmful to minors" means any reproduction, imitation, characterization, description, exhibition, presentation, or representation, of whatever kind or form, depicting nudity, sexual conduct, or sexual excitement when it:

(a) Predominantly appeals to a prurient, shameful, or morbid interest;
(b) Is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable material or conduct for minors; and

harmful to minors to a minor by electronic device or equipment prohibited is a misdemeanor of first degree.

(x) **Multiple players committed Sexting**, in violation of Florida Statute Title XLVI Chapter 847.0141(1), which provides, "A minor commits the offense of sexting if he or she knowingly: (a) Uses a computer, or any other device capable of electronic data transmission or distribution, to transmit or distribute to another minor any photograph or video of any person which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001 Uses a computer, or any other device capable of electronic data transmission or distribution, to transmit or distribute to another minor any photograph or video of any person which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001. (b) Possesses a photograph or video of any person that was transmitted or distributed by another minor which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001. A minor does not violate this paragraph if all of the following apply: 1. The minor did not solicit the photograph or video. 2. The minor took reasonable steps to report the photograph or video to the minor's legal guardian or to a school or law enforcement official. 3. The minor

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(c) Taken as a whole, is without serious literary, artistic, political, or scientific value for minors.

A mother's breastfeeding of her baby is not under any circumstance "harmful to minors."

did not transmit or distribute the photograph or video to a third party."[44] Under subsection (3)(a) sexting is a noncriminal violation for a first violation.

(y) **Ta.W., To.W., D.T., J.P., A.B., G.C., C.S., and multiple other players committed Breach of the peace; disorderly conduct**, in violation of Florida Statute Title XLVI Chapter 877.03, which provides, "Whoever commits such acts as are of a nature to corrupt the public morals, or outrage the sense of public decency, or affect the peace and quiet of persons who may witness them, or engages in brawling or fighting, or engages in such conduct as to constitute a breach of the peace or disorderly conduct, shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083."

(z) **T.S. and multiple other players committed Assault**, in violation of Tennessee Code § 39-13-101(a), which provides, in relevant part, "A person commits assault who… (2) Intentionally or knowingly causes another to reasonably fear imminent bodily injury…" Assault is a Class A misdemeanor.

(aa) **Multiple players (and possibly other Ursuline students) committed Illegal use of minor or impaired person in nudity-oriented material or performance**, in violation of Ohio Rev. Code § 2907.323(A), which provides, in relevant part, "No person

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[44] Florida Statute Title XLVI Chapter 874.001 provides:

> (11) "Nudity" means the showing of the human male or female genitals, pubic area, or buttocks with less than a fully opaque covering; or the showing of the female breast with less than a fully opaque covering of any portion thereof below the top of the nipple; or the depiction of covered male genitals in a discernibly turgid state. A mother's breastfeeding of her baby does not under any circumstance constitute "nudity," irrespective of whether or not the nipple is covered during or incidental to feeding.

shall do any of the following: (1) Photograph any minor or impaired person who is not the person's child or ward in a state of nudity, or create, direct, produce, or transfer any material or performance that shows the minor or impaired person in a state of nudity… (3) Possess or view any material or performance that shows a minor or impaired person who is not the person's child or ward in a state of nudity." Illegal use of minor or impaired person in nudity-oriented material or performance, under subsection (1), is a felony of the second degree; and, under subsection (3), a felony of the fifth degree.

(bb) **Multiple players (and possibly other Ursuline students) committed Telecommunications harassment**, in violation of Ohio Rev. Code § 2917.21(B)(1), which provides, "No person shall make or cause to be made a telecommunication, or permit a telecommunication to be made from a telecommunications device under the person's control, with purpose to abuse, threaten, or harass another person." Under subsection (2), "No person shall knowingly post a text or audio statement or an image on an internet web site or web page for the purpose of abusing, threatening, or harassing another person." Telecommunications harassment, under subsection (B), is a misdemeanor of the first degree.

(cc) **D.T. and multiple other players committed Intimidation of attorney, victim or witness in criminal action or delinquent child action proceedings**, in violation of Ohio Rev. Code § 2921.04(A), which provides, "No person shall knowingly attempt to intimidate or hinder the victim of a crime or delinquent act in the filing or prosecution of criminal charges or a delinquent child action or proceeding, and no person shall knowingly attempt to intimidate a witness to a criminal or

delinquent act by reason of the person being a witness to that act." Intimidation of attorney, victim or witness in criminal action or delinquent child action proceedings, as stated in subsection (A) is a misdemeanor of the first degree.

(dd) **Multiple players committed Tampering with evidence**, in violation of Ohio Rev. Code § 2921.12(A), which provides, in relevant part, "No person, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted, shall… (1) Alter, destroy, conceal, or remove any record, document, or thing, with purpose to impair its value or availability as evidence in such proceeding or investigation…" Tampering with evidence is a felony of the third degree.

(ee) **Multiple players committed Obstructing justice**, in violation of Ohio Rev. Code § 2921.32(A), which provides, in relevant part, "No person, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another for crime or to assist another to benefit from the commission of a crime, and no person, with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child, or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, shall… (4) Destroy or conceal physical evidence of the crime or act, or induce any person to withhold testimony or information or to elude legal process summoning the person to testify or supply evidence…" If the crime being obstructed is a misdemeanor, obstructing justice is the same misdemeanor degree as the crime being obstructed. If the crime being obstructed is a felony, obstructing justice is a felony of the fifth degree. If the crime being obstructed is a felony of the first or second degree and the offender knows or

has reason to believe the crime being obstructed is a felony of the first or second degree, obstructing justice is a felony of the third degree.

Defendants and players engaged in a course of conduct, including the commission of conspiracy to commit, attempt to commit, or complicity to commit multiple offenses, that began in Ohio and continued through Alabama, Florida, and Tennessee, and back in Ohio.

859. The years-long culture of hazing and abuse occurred in Ohio.

860. Here, the hazing discussion, planning, and conspiracy began soon after the 2025 bus departed Ursuline and while still in the Ohio, including substantial overt acts. The hazing discussion, planning, and conspiracy from the 2025 trip continued throughout the trip and across Alabama, Florida, and Tennessee.

861. During the 2025 trip, Defendants and players engaged in a course of conduct, including the commission of, conspiracy to commit, attempt to commit, or complicity in the commission of multiple offenses.

862. Defendants and players' course of conduct on that 2025 trip continued through Alabama, Florida, and Tennessee.

863. Even upon returning from the 2025 trip, Defendants and players' course of conduct continued in Ohio.

864. While outside Ohio, Defendants omitted performance of a legal duty imposed by Ohio law, the omission of which affected a legitimate interest of Ohio in protecting, governing, or regulating any person, property, thing, transaction, or activity in Ohio.

865. The players, by means of a computer, computer system, computer network, telecommunication, telecommunications device, telecommunications service, or information service, caused or knowingly permitted any writing, data, image, or other telecommunication to be disseminated or transmitted into Ohio in violation of Ohio law.

866. The course of conduct involved the same victims, including Victim-1, Son Doe, Son Roe, and the other victims; and the offenses were committed by the same offenders in the same capacity or relationship, in furtherance of the same, conspiracy, and involved the same or similar modus operandi.

867. For these reasons, under Ohio Rev. Code §§ 2901.11 and 2901.12, the jurisdiction and venue over all the offenses rests in Ohio, as well as the other states.

868. Also, the Ohio Supreme Court has held that Ohio Rev. Code § 2307.60 "creates a civil cause of action for damages resulting from ***any*** criminal act…"[45] (Emphasis added.) So Ohio Rev. Code § 2307.60 is not limited to only those criminal acts committed in Ohio, but those committed in Alabama, Florida, and Tennessee.

Son Doe has faced continued humiliation, intimidation, retaliation, and reputational harm because of Defendants' actions, failures to act, and attempts to cover up and gaslight over the illicit activities.

869. After returning home, Son Doe has faced continued humiliation, retaliation, and harm.

870. Son Doe has been compelled to transfer from Ursuline to another school. Even at a new school, Son Doe's victimization is well known. But *this* school and its administrators, employees, coaches, players, and parents support Son Doe and his family, even holding private prayer groups for Son Doe. This new school is acting the way a school is supposed to act—a stark contrast from Ursuline and the Defendants, who act for the glory of the football team alone.

871. Son Doe has lost friendships with kids that he has been known since grade school.

872. W.S., C.M., and B.S., saw several of Son Doe's other friends at the Trumbull County Fair recently.

[45] *Jacobson v. Kaforey*, 149 Ohio St.3d 398, ¶ 13, 75 N.E.3d 203, 2016-Ohio-8434.

873. Son Doe was not there.

874. The players told Son Doe's friends to tell him they were "looking for him."

875. The videos containing the hazing, abuse, assaults, and child pornography have been disseminated throughout the community.

876. Son Doe has also been diagnosed with anxiety, necessitating medical attention and prolonged psychiatric treatment, including counseling and medication

877. This was a reasonable and foreseeable consequence of the Defendants' actions, failures to act, and attempts to cover up the illicit activities.

Daughter Doe has faced humiliation, intimidation, retaliation, and harm because of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

878. Daughter Doe has faced continued humiliation, retaliation, and harm because of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

879. Daughter Doe, who was a rising senior at Ursuline, has been compelled to transfer to another school for her senior year.

880. Mother Doe called Daughter Doe the day Son Doe returned from the trip and told her what had happened.

881. Daughter Doe drove straight home to console Son Doe, who broke down and told her everything that happened in explicit detail and showed her the team's group Snapchat with the videos, photos, and messages.

882. The following week, while attending an Ursuline summer-school class, a classmate approached Daughter Doe and blamed Son Doe for what occurred.

883. An Ursuline teacher saw this confrontation. But the teacher did nothing in response.

884. Another classmate told Daughter Doe that the players were forced to give each other oral

sex on the trip.

885. By this time, the videos from the team's group Snapchat had been disseminated throughout the school and the students.

886. In June 2025, Daughter Doe began working nearly every day at a local fast-food establishment—a fact not well-known at the time.

887. In early July 2025, D.T. started appearing at Daughter Doe's work almost every day. Before July, Daughter Doe does not recall ever seeing D.T. at her work.

888. Even Daughter Doe's co-workers noticed D.T. showing up almost every day.

889. Daughter Doe knows D.T. from going to school together, but they are not friends.

890. D.T. would come inside at Daughter Doe's work around 8:30 PM. The inside closed at 9:00 PM and the drive-thru closed at 10:00 PM.

891. Daughter Doe could not see if D.T. ever actually purchased food.

892. D.T. would then go outside and wait in his car but would leave when Daughter Doe did not come out.

893. D.T. went to her work to intimidate her.

894. Sometimes, after the workday ended, Daughter Doe would go to eat with her co-workers to another local fast-food establishment. This other establishment stayed open later.

895. On July 29, D.T. again showed up at Daughter Doe's workplace, came inside, then left.

896. After work, Daughter Doe went to this other fast-food establishment with her co-workers to eat.

897. D.T. showed up at this other establishment and parked right next Daughter Doe's car.

898. D.T. was with several other individuals, who are neither Ursuline students nor known to Daughter Doe.

899. Some of those with D.T. entered the establishment and greeted Daughter Doe, even though she doesn't know them.

900. Another individual with D.T. walked over to the window next to where Daughter Doe was sitting with her co-workers, knocked on the window, and stared at her in an intimidating fashion.

901. Daughter Doe, fearing that D.T. and these individuals were going to damage her car, walked outside with her co-workers and, while looking at D.T., said loudly that D.T. was a "pedophile" and has "no backbone."

902. D.T. and these individuals got into D.T.'s car and left.

903. As they were leaving, one of D.T.'s friends put two of his fingers up to eyes and then pointed at Daughter Doe—meaning they were watching her.

904. D.T. continued showing up at Daughter Doe's work on an almost-daily basis.

905. On August 4, D.T. again showed up at Daughter Doe's work and waited outside in his car for Daughter Doe to leave.

906. Fearful of what would happen, Daughter Doe called Mother Doe.

907. Mother Doe immediately went to Daughter Doe's work to protect her.

908. As soon as Mother Doe arrived, D.T. left.

909. Daughter Doe, fearing her own safety, has now transferred from Ursuline to another school.

910. Intimidation, hazing, and bullying was a reasonably foreseeable consequence of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

Jane (Mother) Doe has faced continued humiliation, retaliation, and harm because of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

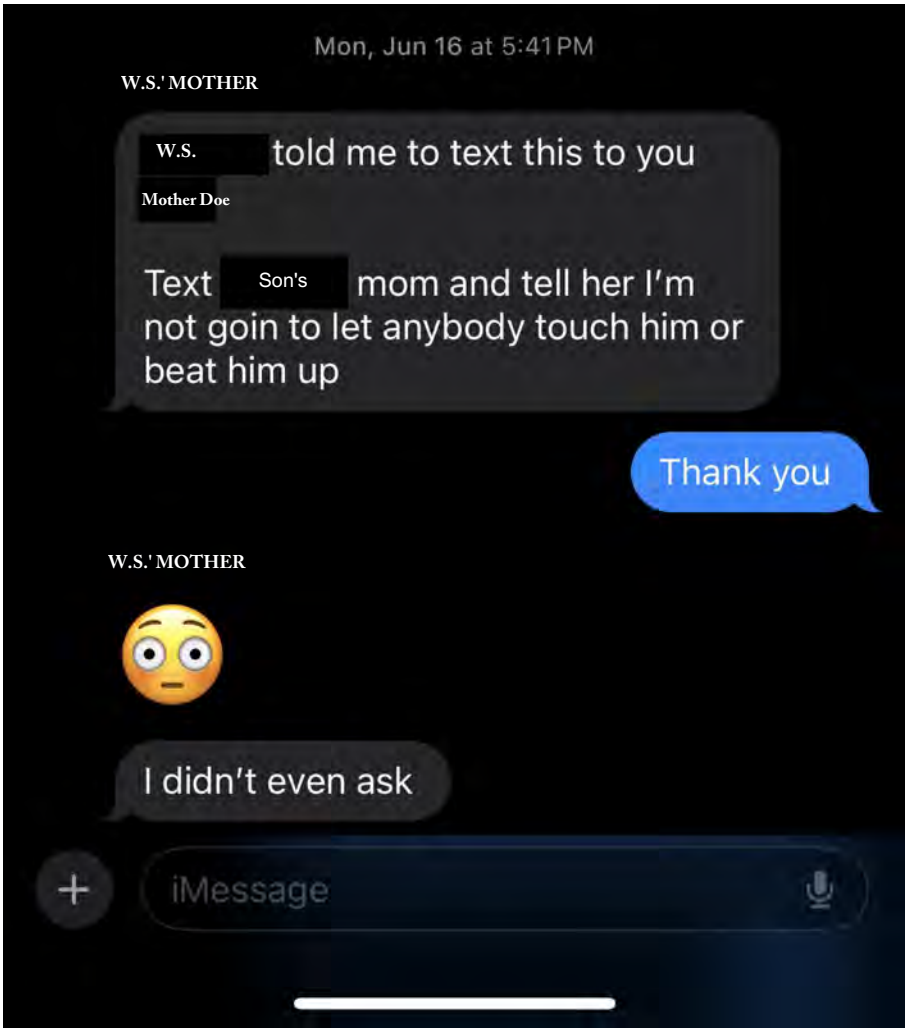
911. In addition to Mother Doe's grief and pain (bystander harm) for the harm inflicted on Son Doe and Daughter Doe, Mother Doe herself has been victimized from this ordeal—a reasonable and foreseeable consequence of the Defendants' actions, failures to act, and attempts to cover up the illicit activities.

912. Mother Doe has faced a backlash from several of her friends, whose sons are Ursuline football players.

913. Their once close relationship has come to a halt resulting in Mother Doe being alienated from those she cared for and trusted.

914. When their sons were still on the trip and they learned of the hazing, humiliation, abuse, and attacks, Mother Doe and two other mothers exchanged several texts and discussed on the phone what was happening.

915. One of the mothers (the mother of W.S.) texted Mother Doe that her son (W.S.) was going to protect Son Doe.



916. Another mother texted Mother Doe the following:

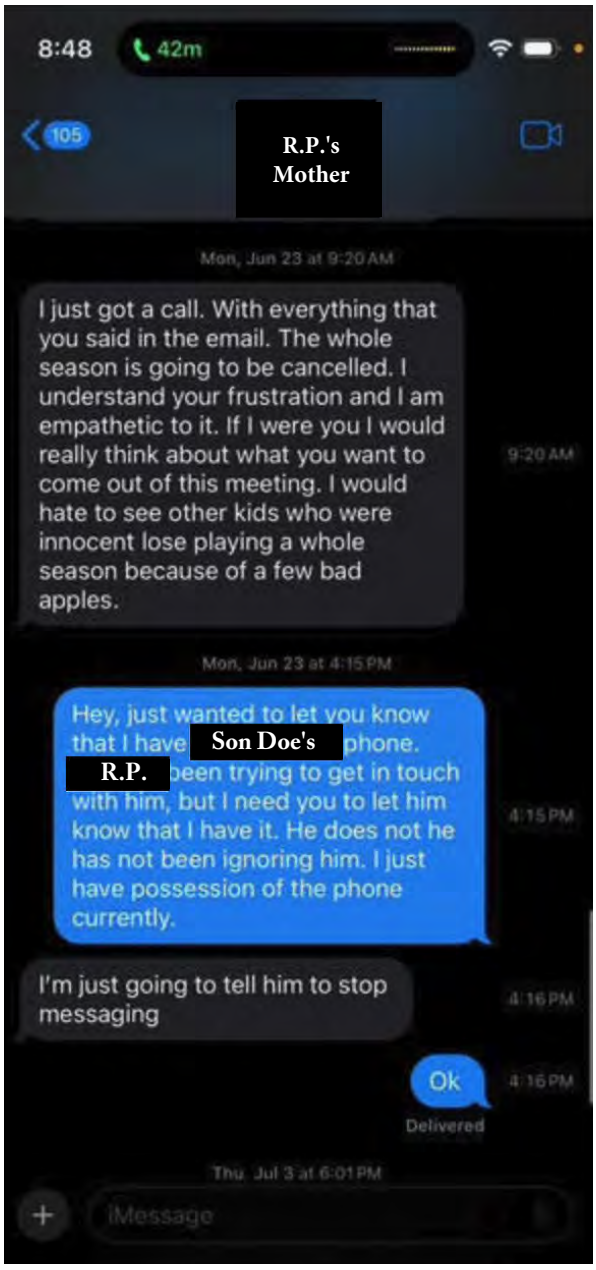
(a) "I wanna know who it is! I'm pissed"

(b) "Ummmm…. We pulling up cause I'm ready!"

(c) "I know [her son's name] can handle his own but please don't make me have his brother pull up on them kids."

917. But after the trip, on learning the football season was in jeopardy, this mother changed her tune. She knew what occurred on the trip because of her discussions with own son and Mother Doe. But she sent a text to Mother Doe feigning empathy for Son Doe, while issuing Mother Doe a threat.

918. The text stated, "I just got a call. With everything that you said in the email. The whole season is going to be cancelled. I understand your frustration and I am empathetic to it. If I were you, I would really think about what you want to come out of this meeting. I would hate to see other kids who were innocent lose playing a whole season because of a few bad apples." Apparently, this mother—like the Defendants—cares more for the glory of the football team than the victims.



919. The ruination and harm from the loss of these friendships was a reasonable and foreseeable consequence of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

920. While Plaintiffs do not want to see innocent players punished, the assailant-players and all Defendants need to be held accountable. Perhaps if Defendants had taken the appropriate actions when they learned of the misconduct back in June, these innocent players would not also be victims of the Defendants' failure to act. Perhaps these innocent players could have transferred schools and had a season (one without hazing, humiliation, abuse, and assaults). Instead, Defendants' actions, failures to act, and attempts to cover up the illicit activities, and deliberately false assurances have victimized the innocent players and jeopardized their futures as well.

921. Beyond the loss of these friendships, Mother Doe has received retaliatory and extortionist threatening texts from a cellphone number unknown to her—"+1 (234) 401-0165." Mother Doe's attempts to verify the owner of the number have revealed that it is a "burner" account.

922. The threatening texts contain photos of Son Doe from the trip, which originated from team's group Snapchat—meaning whoever sent this text was associated with the players and the Defendants.

923. Upon receiving the threatening text, Mother Doe immediately contacted Assistant Principal Damore, advised her of what occurred, and provided her the cellphone number.

924. Damore failed to address the situation.

925. Such retaliatory and extortionist threats are a reasonable and foreseeable consequence of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

D.T. continued to harass and intimidate Son Doe, Daughter Doe, and Mother Doe because of Defendants' actions, failures to act, and attempts to cover up the illicit activities.

926. In the past few weeks, D.T. showed up at several sporting and extracurricular events at Son Doe's new school.

927. D.T. has no legitimate reason to attend these events and, up until this matter arose, did not attend this other school's events.

928. Each time, parents from the new school have told D.T. that he is not welcomed at their events and to leave; yet D.T. continues to show up.

929. On August 28, 2025, Player showed up at Son Doe's football game, even though it was an away game on a school night.

930. Mother Doe approached D.T. and said, "You can either leave or I'm calling the police."

931. D.T. said he would leave and left. D.T. offered no reason why he should not leave or protest about the police.

After the original Complaint was filed, Ursuline Defendants and officials continued to lie and try to cover up their wrongdoing.

932. On September 2, 2025, Plaintiffs Doe filed their original Complaint in the instant matter.

933. Confronted with the truth they sought to conceal, Ursuline Defendants and officials continued to do what they had done in the past—lie and cover up their misconduct to protect the football team and their own misdeeds.

934. Based on information and belief, Ursuline teachers have been telling students that the allegations contained in the Complaint aren't true and are exaggerated—even though many of these students have seen the videos firsthand, spoken to classmates, and know the allegations are true.

935. Ursuline cancelled its football game against Farrell High School scheduled for September 5, 2025.

936. That night, Ursuline held a parent meeting to discuss the football team's future.

937. Defendants Principal Sammartino and Coach Reardon were present.

938. Reardon addressed the parents attending and lied about the lawsuit' cause.

939. Instead of accepting responsibility, Reardon blamed Cardinal Mooney High School and one of Plaintiff's counsel for the lawsuit.

940. Reardon lied to the parents—Cardinal Mooney had nothing to do with the lawsuit.

941. Reardon lied to the parents—Plaintiffs' counsel are not to blame for the actions giving rise to the lawsuit—Defendants are to blame.

942. Reardon even falsely claimed the videos showing the sexual and physical abuse of Son Doe were altered or manufactured.

943. Reardon then continued to make rude and derogatory statements about Mother Doe.

944. Sammartino sat by and permitted Reardon to lie despite knowing that what Reardon said was false—Sammartino was present when the football players confessed to the hazing activities and saw the videos.

945. Instead of correcting Reardon's lies, Sammartino did nothing.

946. Sammartino wanted the Ursuline Media Mob to defend Ursuline—and knew they would—even though such a defense would be based on lies and defamatory statements.

947. On cue, the enraged parents started yelling and voicing their concerns.

948. One mother falsely accused one of Plaintiff's counsel of "hating" Ursuline and having a "vendetta."

949. Based on information and belief, the mother perpetuating these false hate-vendetta

claims is both an Ursuline employee and an Ursuline football player's mother.

950. Defendant Christopher Crilley, Ursuline player C.C.'s father, echoed these false and defamatory statements blaming Plaintiff's counsel.

951. When the parents tried to ask Sammartino questions, he refused, claiming he couldn't answer any questions because of the pending lawsuit.

952. If Sammartino couldn't answer questions, then what was the purpose of the meeting? It wasn't to tell the parents the truth.

953. The real reason for the meeting was to fire up the Ursuline Media Mob and inflict further harm on Plaintiffs Mother, Son, and Daughter Doe.

954. Sammartino and Reardon, and the other Ursuline Defendants, manipulated the parents. Instead of the parents being angry with the Ursuline Defendants for lying to them and covering up the truth, the parents naively and immaturely displaced their ignorant anger at the victims and their attorneys who sought to expose the truth.

Following the parent meeting, as was foreseeable by Ursuline, the Ursuline Media Mob took to social media to spread the lies and derogatory statements Reardon promulgated and Sammartino accepted.

955. Reardon and Sammartino's plan to incite the Ursuline Media Mob to spread their lies worked.

956. In the weeks that followed, several Ursuline football-player parents, like the hate-vendetta-speech mother at the parent meeting, Chauncey Harris, and Leslie Daniels, advanced these lies on social media.

957. The hate-vendetta-speech mother and Chauncey Harris are also Ursuline employees and Ursuline is responsible for their statements, especially considering that they were echoing the lies

originating from Reardon and Sammartino. Again, Ursuline officials understood that the Ursuline Media Mob including their employees would amplify the public message.

958. Harris is also an assistant Ursuline football coach and father of players on the trip.

959. Ursuline supporter Curtis Burns, believed to be a Youngstown State University teaching assistant, not only advanced Reardon and Sammartino's lies, but also amplified them with his own defamatory lie that Mother Doe was having an affair with Coach McGlynn.

960. Ursuline supporter Dean Corso posted on the MLO Bros Facebook page more lies, including that Son Doe filmed his roommates and posted the videos to the football team's group Snapchat.

961. The venomous blaming of Plaintiff's counsel has even boiled over into threats being levied against Cardinal Mooney by Ursuline parents.

962. For example, another Ursuline parent called a Mooney parent and threatened, "Ursuline is going to retaliate against Mooney" and "the skies are going to turn dark over Mooney."

963. Another Ursuline supporter, Walt Cherry, threatened, "Judgment day is coming."

964. Around the same time as these threats, after class, an Ursuline teacher found an art-class-ruler, which had written on it, "Kill," "shoot up the school," "we're all in this together," and "10/24" (which was the date of the Ursuline-Mooney football game).

965. Despite the obvious threat of violence, Ursuline officials failed to properly report the matter to law enforcement and failed to alert the Ursuline (and Mooney) families of the threat.

966. In this lawsuit's wake, Ursuline wanted no more negative publicity, so, instead of alerting law enforcement and the parents of this mass-shooting threat, kept the threat quiet and endangered the safety of students at both schools.

967. The threat was so real that, after law enforcement eventually learned of it, Youngstown

Police dispatched extra patrols to Ursuline and Mooney on "10/24."

In the wake of the lawsuit's filing and the public outcry against Ursuline, Bishop David Bonnar (who ultimately oversees Ursuline) washed his hands of the situation.

968. On September 8, 2025, Ursuline placed assistant coaches McGlynn and Syrianoudis on administrative leave pending the outcomes of the ongoing investigations and litigation.

969. On that same day, Reardon agreed to take an indeterminate suspension pending the outcomes of the ongoing investigation and litigation.

970. Ursuline offered no explanation why Reardon, McGlynn, and Syrianoudis were suspended on September 8, 2025, as opposed to back in June–July when Ursuline and Diocese first learned and became aware of the June 2025 hazing.

971. If Ursuline had done an investigation as it has falsely stated for months, then there was no reason for Ursuline to wait until only after the lawsuit was filed and the hazing was made public to act against the coaches.

972. On September 15, 2025, in response to media questioning, Bishop Bonnar announced that he was *washing his hands* of the situation and leaving all decisions about the lawsuits to the Ursuline administration and Board of Directors.[46]

973. Bishop Bonnar, the head of the Catholic Diocese of Youngstown, is leaving the decision-making authority in the hands of the Ursuline administration—the same administration that knew on June 25 that the hazing occurred because they saw the videos themselves and heard the confessions from the players, yet did nothing.

974. Bishop Bonnar is also placing decision-making authority in the hands of the Board of

[46] Gerry Ricciutti, "Bishop Bonnar speaks on Ursuline lawsuits," WKBN 27 First News (Sept. 25, 2025), https://www.wkbn.com/news/local-news/youngstown-news/bishop-bonnar-speaks-on-ursuline-lawsuits/.

Directors—the Board in which Father Richard Murphy (the same Murphy who advocated for Reardon's return despite opposition from Diocesan officials) is the president and Sister Regina Rogers (who is Defendant Margaret Damore's aunt) is the chairperson.

975. Despite the Ursuline Defendants and its officials' empty claims that they aren't covering anything up, the Bishop's decision to allow these same Defendants and the obviously conflicted Board of Directors to make all decisions about the lawsuit screams cover-up.

976. Consider the 2025 Autumn issue of the *Ursuline Alumni Quarterly* mailed just days ago on or about November 7, 2025.

977. The *Quarterly* contains a letter from Father Murphy, in which he continued defending the steps taken by the Ursuline Defendants.

978. Yet, nowhere in the *Quarterly*—or any other media release, parent email, etc.—does Father Murphy or any Ursuline official admit that the hazing was a known "tradition" of the football team that had been occurring "for years."

979. Father Murphy also continued to falsely claim that players were disciplined—yet no such discipline ever occurred.

980. The players were "suspended indefinitely" during the "ongoing investigation." Yet, by their own words, the investigation is still ongoing.

981. But when those players were needed back on the field, their suspensions abruptly ended and the players returned to the team—Ursuline imposed no discipline.

982. And if the Ursuline Defendants truly conducted an investigation as Father Murphy claimed, then why was the fact the football teams "years" long "tradition" of hazing never uncovered and reported—after all, D.T. told Sammartino, Damore, and DeSantis on June 25, 2025, that the hazing had been occurring for years, and the videos corroborate this fact.

983. Also, if there was such an investigation, then why were Coaches Reardon, McGlynn, and Syrianoudis suspended only after the lawsuit was filed. Surely, a real investigation would have warranted their suspensions back in June 2025—not in September 2025 and only after the lawsuit was filed.

984. There was no Ursuline or Diocesan investigation.

985. Ursuline and its officials were duty-bound to conduct a true investigation in June 2025. They cannot hand it over to law enforcement and wash their hands of their duty to investigate and protect the students.

986. Father Murphy's letter to the Ursuline alumni is false and is another example of Ursuline's continued cover-up.

CLAIMS

CLAIM 1
VIOLATION OF TITLE IX OF THE CIVIL RIGHTS ACT (EDUCATION AMENDMENTS OF 1972), 20 U.S.C. § 1681, *ET SEQ.*

(BY PLAINTIFF SON DOE AGAINST DEFENDANT URSULINE HIGH SCHOOL)

987. Plaintiffs incorporate all previous allegations.

988. Ursuline High School, as a recipient of federal funding, is subject to Title IX, which prohibits discrimination based on sex in educational programs and activities. 20 U.S.C. §§ 1681, *et seq.*

989. Religious schools that receive federal funding are only excluded from Title IX's requirements "if the application of [the requirements] would not be consistent with the religious tenets of such organization." 20 U.S.C. § 1681(a)(3).

990. These religious exemptions are commonly known to include the exclusion from sports teams based on gender identity, the ability to expel pregnant students, and to have policies denying LGBTQ+ rights.

991. Ursuline has not requested Title IX–exemption regarding the sexual-harassment and assault of athletes on the basis that preventing these assaults would not be consistent with its religious tenets.

992. Nor would it—unless it wants people to believe that Catholic teaching embraces sexual harassment and sexual assaults.

993. The harassment, hazing, and abuse Son Doe endured included:

(a) Threats by upperclassmen football players, in front of Reardon, McGlynn, and Syrianoudis, that Son Doe would have his "butt taken."

(b) Upperclassmen football players forcing younger players to fight each other while threatening that the loser would "get his butt took."

(c) Ta.W. holding Son Doe down on Son Doe's hotel bed, attempting to remove Son Doe's shorts, and when the attempt failed repeatedly thrusting—with an erect penis—against Son Doe's buttocks over his shorts.

(d) D.P. videotaping and disseminating this assault across state lines to other football players and the Ursuline community.

(e) G.C. tricking Son Doe into entering G.C.'s room so To.W., D.T., J.P., A.B., and C.S. could assault Son Doe. This assault included D.T., J.P., A.B., and C.S. each grabbing one of Son Doe's limbs, so he was unable to protect himself. As Son Doe was completely vulnerable and unable to prevent the oncoming assault, the five players forcibly stripped Son Doe of his pants and underwear, then when Son Doe

was finally able to partially cover himself, they pulled Son Doe's arms away from his body to completely expose his genitals while slapping his bare buttocks.

(f) Ta.W. videorecording this assault—creating child pornography in the process—and disseminating it across state lines to other football players and the Ursuline community.

(g) A.B. taking Son Doe's underwear and saying it was being kept as a "trophy" then G.C. sharing images of Son Doe's underwear with the caption "Rip [Son Doe]."

994. These acts targeted Son Doe's male identity, involved sexual misconduct, and were rooted in gendered expectations of masculinity and male identity within the football program.

995. The harassment, hazing, and abuse Son Doe suffered was severe, pervasive, and objectively offensive, and deprived Son Doe of access to educational opportunities or benefits.

996. Ursuline, through its football program and administrators, including Defendants Reardon, McGlynn, Syrianoudis, Sammartino, and Damore, had actual knowledge of the severe, pervasive, and objectively offensive harassment, hazing, and abuse Son Doe suffered.

997. Upon information and belief, Ursuline, through the same defendants, had actual knowledge of the culture of hazing historically involved in the school's football program.

998. Despite this knowledge, Ursuline maintained a policy and practice of responding with deliberate indifference to the hazing of underclassmen football players, including Son Doe. The football program has known of the hazing Son Doe endured since June 16, 2025, when Mother Doe made her first complaint to McGlynn. Yet the program and School failed to take prompt and effective action to investigate, discipline the perpetrators, or remedy the hostile environment.

999. Ursuline's deliberate indifference is further evidenced by its failure to train coaches, including Reardon, McGlynn, and Syrianoudis on recognizing and preventing gender-based

hazing, despite known risks in the football program; implement effective anti-hazing policies, procedures, or oversight mechanisms for the football team; and investigate or sanction the football program despite prior complaints of misconduct.

1000. Under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a), Ursuline created, tolerated, and subjected Son Doe to a hostile educational environment because Son Doe was treated disparately based upon his gender; suffered gender-based hazing, assault, and other harassment; and Ursuline lacked adequate policies, training, and procedures and deliberately failed to take appropriate preventive or remedial measures.

1001. Because of Ursuline's discriminatory policy and practice, Son Doe was denied equal access to the educational and athletic opportunities of the football program and school, forced to endure a hostile environment, and ultimately forced to transfer schools to escape the harassment and retaliation.

1002. As a direct and proximate result of Ursuline's failures, Son Doe suffered and will continue to suffer economic and non-economic damages including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 2
CIVIL LIABILITY FOR HAZING UNDER OHIO REV. CODE § 2307.44

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS, D.P.; AND URSULINE PLAYERS TA.W., C.C., TO.W., D.T., A.B., G.C., C.S., B.S., T.S., AND J.B.)

1003. Ohio Rev. Code § 2307.44 [Hazing civil liability] provides:

> Any person who is subjected to hazing, as defined in division (A) of section 2903.31 of the Revised Code, may commence a civil action for injury or damages, including mental and physical pain and suffering, that result from the hazing. The action may be brought against any participants in the hazing, any

> organization whose local or national directors, trustees, or officers authorized, requested, commanded, or tolerated the hazing, and any local or national director, trustee, or officer of the organization who authorized, requested, commanded, or tolerated the hazing. If the hazing involves students in a primary, secondary, or post-secondary school, university, college, or any other educational institution, an action may also be brought against any administrator, employee, or faculty member of the school, university, college, or other educational institution who knew or reasonably should have known of the hazing and who did not make reasonable attempts to prevent it and against the school, university, college, or other educational institution. If an administrator, employee, or faculty member is found liable in a civil action for hazing, then notwithstanding Chapter 2743. of the Revised Code, the school, university, college, or other educational institution that employed the administrator, employee, or faculty member may also be held liable.

1004. The named player Defendants engaged in hazing against Son Doe, as further detailed above and below.

1005. Officers, administrators, employees, and faculty members of Defendants Ursuline High School and the Catholic Diocese of Youngstown authorized, requested, commanded, or tolerated the hazing, and knew or reasonably should have known of the hazing and did not make reasonable attempts to prevent it.

1006. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline High School and the Diocese acting on their behalf and within the scope of their offices or employment.

1007. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's and the Diocese's administration acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1008. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline High School and the Diocese as defined in Ohio

Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1009. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1010. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 3
CIVIL LIABILITY FOR CRIMINAL ACTS (HAZING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.31

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1011. Plaintiffs incorporate all previous allegations.

1012. Under Ohio Rev. Code § 2903.31(B)(2), "No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other educational institution, public or private, shall recklessly permit the hazing of any person associated with the organization."

1013. Under the relevant part of Ohio Rev. Code § 2903.31(A)(1):

> "'Hazing' means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person…

1014. Under Ohio Rev. Code § 2901.22(C):

> A person acts recklessly when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that the person's conduct is likely to cause a certain result or is likely to be of a certain nature. A person is reckless with respect to circumstances when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that such circumstances are likely to exist.

1015. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.31(B)(2) are criminal acts, indeed misdemeanors, under § 2903.31(D).

1016. Defendants Ursuline High School (organization; private educational institution), principal Sammartino, assistant principal Damore, athletic director John DeSantis, head coach Reardon, assistant coach McGlynn, and assistant coach Syrianoudis (each of whom is at least an administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of Ursuline) recklessly permitted the hazing of Son Doe, a student associated with Ursuline.

1017. The named Defendants' reckless permitting of the hazing included, but were not limited to:

(a) On the bus trip (while still in Ohio), Reardon, McGlynn, and Syrianoudis were present and heard the Ursuline players openly discuss the hazing and "initiations" that would take place during the trip, including "taking butts," stripping fellow players, and other forms of abuse, including having players fight each other—with the loser "getting his butt taken." Syrianoudis even said, "don't say that stuff to me, I don't

want to hear it." Reardon, McGlynn, and Syrianoudis did nothing to prevent the hazing. From the discussions, it was obvious the hazing had occurred in prior years but were never stopped.

(b) Within days of the coaches, players, and team returning home (to Ohio) after the trip, Sammartino, Damore, and DeSantis learned of the hazing and failed to take appropriate steps to prevent further hazing.

(c) The named Defendants recklessly permitted the hazing to continue in Ohio, caused by and including the videos' further dissemination, which depicted the hazing and contained child pornography, all calculated to further cause substantial risk of causing mental harm.

(d) The named Defendants recklessly permitted the present-day hazing to occur because the hazing of other player-students had occurred for years, and they failed to prevent it.

1018. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1019. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1020. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 4
CIVIL LIABILITY FOR CRIMINAL ACTS (HAZING) UNDER OHIO REV. CODE §§ 2307.60 AND ALABAMA § 16-1-23

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1021. Plaintiffs incorporate all previous allegations.

1022. Under Alabama Code § 16-1-23(c):

> No person shall knowingly permit, encourage, aid, or assist any person in committing the offense of hazing, or willfully acquiesce in the commission of such offense, or fail to report promptly his knowledge or any reasonable information within his knowledge of the presence and practice of hazing in this state to the chief executive officer of the appropriate school, college, university, or other educational institution in this state. Any act of omission or commission shall be deemed hazing under the provisions of this section.

1023. Under the relevant part of Alabama Code § 16-1-23(a):

> Hazing is defined as follows: (1) Any willful action taken or situation created, whether on or off any school, college, university, or other educational premises, which recklessly or intentionally endangers the mental or physical health of any student, or (2) Any willful act on or off any school, college, university, or other educational premises by any person alone or acting with others in striking, beating, bruising, or maiming; or seriously offering, threatening, or attempting to strike, beat, bruise, or maim, or to do or seriously offer, threaten, or attempt to do physical violence to any student of any such educational institution or any assault upon any such students made for the purpose of committing any of the acts, or producing any of the results to such student as defined in this section.

1024. Under Alabama Code § 13A-2-2(1), "A person acts intentionally with respect to a result or to conduct described by a statute defining an offense, when his purpose is to cause that result or to engage in that conduct."

1025. Under subsection 2(2), "A person acts knowingly with respect to conduct or to a circumstance described by a statute defining an offense when he is aware that his conduct is of that nature or that the circumstance exists."

1026. Under subsection 2(3):

> A person acts recklessly with respect to a result or to a circumstance described by a statute defining an offense when he is aware of and consciously disregards a substantial and unjustifiable risk that the result will occur or that the circumstance exists. The risk must be of such nature and degree that disregard thereof constitutes a gross deviation from the standard of conduct that a reasonable person would observe in the situation. A person who creates a risk but is unaware thereof solely by reason of voluntary intoxication, as defined in subdivision (e)(2) of Section 13A-3-2, acts recklessly with respect thereto.

1027. Under Alabama Code § 13A-2-1(2), a voluntary act is "An act performed consciously as a result of effort or determination."

1028. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Alabama Code § 16-1-13(b) are criminal acts, indeed misdemeanors, under Alabama Code § 16-1-13(d).

1029. Defendants Ursuline High School (organization; private educational institution), principal Sammartino, assistant principal Damore, athletic director John DeSantis, coach Reardon, assistant coach McGlynn, and assistant coach Syrianoudis (all of whom are an administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of Ursuline) knowingly permitted the hazing of Son Doe; or willfully acquiesced in the hazing of Son Doe; and/or failed to report promptly their knowledge or any reasonable information within their knowledge of the presence and practice of hazing to the Diocese.

1030. The named Defendants actions constituting hazing included, but were not limited to:

(a) On the bus trip (while still in Alabama), Reardon, McGlynn, and Syrianoudis were present and heard the Ursuline players openly discuss the hazing and "initiations" that would take place during the trip, including "taking butts," stripping fellow players, and other forms of abuse, including having players fight each other—with the loser "getting his butt taken." Syrianoudis even said, "don't say that stuff to me, I don't

want to hear it." Reardon, McGlynn, and Syrianoudis did nothing to prevent the hazing. From the discussions, it was obvious the hazing had occurred in prior years but were never stopped.

(b) On Day 2, in the presence of Defendant-Coaches Reardon, McGlynn, and Syrianoudis, several other players ridiculed Son Doe for the prior night's attack and video. Several other players repeatedly hit Son Doe in the head and told him that he was "going to get his butt took" that night back at the hotel. Reardon, McGlynn, and Syrianoudis did not take any appropriate actions to address the prior night's hazing of Son Doe, nor did they take any appropriate steps to prevent the future hazing of Son Doe.

(c) On Day 3, as with the prior day, several players continued to ridicule Son Doe, hit him in the head, and threatened him that he was "going to get his butt took" that night back at the hotel. Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet did not take any appropriate actions to address the prior night's hazing of Son Doe, nor did they take any appropriate steps to prevent the future hazing of Son Doe. Although Son Doe was not hazed that night, another player was hazed.

(d) Reardon, McGlynn, and Syrianoudis failed to report promptly their knowledge or any information within their knowledge of the hazing to Sammartino, Damore, DeSantis, or the Diocese. Based on information and belief, any report by Reardon, McGlynn, and Syrianoudis was false and meant to downplay the severity of what the victims suffered.

(e) Sammartino, Damore, and DeSantis failed to report promptly their knowledge or any

reasonable information within their knowledge of the hazing to the Diocese. Based on information and belief, any report by Sammartino and Damore was false.

(f) The named Defendants permitted the present-day hazing to occur because the hazing of other players-students had occurred for years, and they failed to prevent it.

1031. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1032. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1033. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1034. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1035. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline's administration and Defendant Diocese, acting on behalf of the organization and within the scope of the administrator's office or employment.

1036. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1037. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1038. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 5
CIVIL LIABILITY FOR CRIMINAL ACTS (HAZING) UNDER OHIO REV. CODE §§ 2307.60 AND FLORIDA STATUTE TITLE XLVIII CHAPTER 1006.135

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1039. Plaintiffs incorporate all previous allegations.

1040. Under the relevant part of Florida Statute Title XLVIII Chapter 1006.135(3)(a)(2), applicable to students in any grades 9–12:

> A person who commits an act of hazing upon another person who is a member of or an applicant to any type of student organization commits a misdemeanor of the first degree… if the person knew or should have known the act would create a potential risk of physical injury or death to such other person and the act creates a potential risk of physical injury or death to such other person.

1041. Under Florida Statute Title XLVIII Chapter 1006.135(1):

> 'hazing' means any action or situation that endangers the mental or physical health or safety of a student at a school with any of grades 6 through 12 for purposes including, but not limited to, initiation or admission into or affiliation with any organization operating under the sanction of a school with any of grades 6 through 12. 'Hazing' includes, but is not limited to:
>
> (a) Pressuring, coercing, or forcing a student into:
>
> 1. Violating state or federal law;
> 2. Consuming any food, liquor, drug, or other substance; or
> 3. Participating in physical activity that could adversely affect the health or safety of the student.
>
> (b) Any brutality of a physical nature, such as whipping, beating, branding, or exposure to the elements. Hazing does not include customary athletic events or other similar contests or competitions or any activity or conduct that

furthers a legal and legitimate objective.

1042. Under Florida Statute Title XXXIX Chapter 671.209(2), "'Knowledge' means actual knowledge. 'Knows' has a corresponding meaning."

1043. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Title XLVIII Chapter 1006.135 are criminal acts, indeed misdemeanors, under Chapter 1006.135(2)(a).

1044. Defendants Ursuline High School (organization; private educational institution), principal Sammartino, assistant principal Damore, athletic director DeSantis, coach Reardon, assistant coach McGlynn, and assistant coach Syrianoudis (every one of whom is at least an Ursuline administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer) engaged in actions or situations that endangered the mental or physical health or safety Son Doe, a 9th-grade Ursuline student for purposes including, but not limited to, initiation or admission into or affiliated with the Ursuline football team. Their actions or situations resulted in the hazing of Son Doe, namely: one or more players committed an act of hazing Son Doe, who is a member of the football team in which the player(s) knew or should have known the act would create a potential risk of physical injury to Son Doe and the act created a potential risk of physical injury to Son Doe.

1045. The named Defendants engaged in acts or situations that permitted the hazing that included, but were not limited to:

(a) On Day 4, as with the prior days, several players continued to talk about the prior attacks and their plans to "take butts" that night. Again, Reardon, McGlynn, and Syrianoudis were present and heard the discussion and threats yet took no appropriate actions to address the prior night's hazing, nor did they take any appropriate steps to

prevent the future hazing of Son Doe. Because of this, multiple players engaged in at least two separate acts of hazing against Son Doe.

(b) On Day 5, in the presence of Reardon, McGlynn, and Syrianoudis, several other players ridiculed Son Doe for the prior night's attacks and videos. Reardon, McGlynn, and Syrianoudis were present and heard the discussions, yet took no appropriate actions to address the prior night's hazing; nor did they take any appropriate steps to prevent the future hazing of Son Doe.

(c) On Day 6, as with the prior days, several players continued to issue threats that they were "going to take butts" that night. Son Doe, again, was one of the intended targets. Several players threatened Son Doe—in the presence of coaches Reardon, McGlynn, and Syrianoudis—that "tonight, your hoodie comes off too" (meaning they were going to forcibly trip Son Doe completely naked, as opposed to the earlier attack when they were only able to rip off Son Doe's pants and underwear but not his hoodie). Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet took no appropriate steps to prevent the future hazing of Son Doe. Although Son Doe was not hazed that night, another player was hazed.

(d) On Day 7, as had been occurring throughout the trip, several players forced other players, generally underclassmen, to fight each other—with the loser "getting his butt taken" as they yelled during the fights and then acted upon, as part of the hazing and initiations. The players openly talked about the fighting in the presence of Reardon, McGlynn, and Syrianoudis, yet the coaches took no appropriate steps to prevent the future hazing of Son Doe. That night, Son Doe was hazed again by being forced to fight another player while being threatened that the loser would "get his butt taken."

(e) The named Defendants engaged in acts or situations that permitted the present-day hazing to occur because the hazing of other players-students had occurred for years, and they failed to prevent it.

1046. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1047. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1048. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m)obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1049. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1050. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organization and within the scope of the administrator's office or employment.

1051. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant and Defendant Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1052. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1053. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 6
CIVIL LIABILITY FOR CRIMINAL ACTS (HAZING) UNDER OHIO REV. CODE §§ 2307.60 AND TENNESSEE CODE § 49-2-120

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1054. Plaintiffs incorporate all previous allegations.

1055. Under the relevant part of Tennessee Code § 49-2-120:

> 'hazing' means any intentional or reckless act in this state, on or off LEA property, by one (1) student acting alone or with others, that is directed against any other student, that endangers the mental or physical health or safety of that student or that induces or coerces a student to endanger that student's mental or physical health or safety. 'Hazing' does not include customary athletic events or similar contests or competitions and is limited to those actions taken and situations created in connection with initiation into or affiliation with any organization.

1056. Under Tennessee Code § 39-11-302(a), "'Intentional' refers to a person who acts intentionally with respect to the nature of the conduct or to a result of the conduct when it is the person's conscious objective or desire to engage in the conduct or cause the result."

1057. Under Tennessee Code § 39-11-302(c):

> 'Reckless' refers to a person who acts recklessly with respect to circumstances surrounding the conduct or the result of the conduct when the person is aware of but consciously disregards a substantial and unjustifiable risk that the circumstances exist or the result will occur. The risk must be of such a nature and degree that its disregard constitutes a gross deviation from the standard of care that an ordinary person would exercise under all the circumstances as viewed from the accused person's standpoint.

1058. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Tennessee Code § 49-2-120 may be

deemed criminal acts.

1059. Defendants Ursuline High School (organization; private educational institution), principal Sammartino, assistant principal Damore, athletic director DeSantis, coach Reardon, assistant coach McGlynn, and assistant coach Syrianoudis (each of whom is at least an administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of Ursuline) intentionally or recklessly engaged in acts (actions taken and situations created in connection with initiation into or affiliation with any organization) resulting in the hazing endangering Son Doe's mental or physical health and safety.

1060. The named Defendants' intentional or reckless acts (actions taken and situations created in connection with initiation into or affiliation with any organization) permitting the hazing included, but were not limited to:

(a) On Day 8, as with the prior days, several players continued to discuss the prior hazing and issued threats that they were "going to take butts" that night. Another player falsely accused Son Doe of making a negative comment, which Son Doe adamantly denied. That night, several players went looking for Son Doe to retaliate and haze him. Again, Reardon, McGlynn, and Syrianoudis were present and heard the threats, yet they did took no appropriate steps to prevent the threatened hazing of Son Doe.

(b) The named Defendants recklessly permitted the present-day hazing to occur because the hazing of other student players had happened for years, and they failed to prevent it.

1061. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1062. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1063. The crimes include, but are not limited to, hazing under Ohio Rev. Code § 2901.31;

(a) hazing under Alabama Code § 16-1-23(c);

(b) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(c) hazing under Tennessee Code § 49-2-120;

(d) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(e) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(f) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(g) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(h) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(i) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(j) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(k) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(l) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1064. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1065. Acting with the kind of culpability otherwise required for the commission of the offense,

its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organization and within the scope of the administrator's office or employment.

1066. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1067. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1068. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 7
CIVIL LIABILITY FOR CRIMINAL ACTS (FAILURE TO REPORT CHILD ABUSE, ABANDONMENT, OR NEGLECT) UNDER OHIO REV. CODE §§ 2307.60 AND ALABAMA CODE § 26-14-3

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1069. Plaintiffs incorporate all previous allegations.

1070. Under the relevant part of Alabama Code § 26-14-3(a):

> All… public and private K-12 employees, school teachers and officials… when the child is known or suspected to be a victim of child abuse… shall be required to report orally, either by telephone or direct communication immediately, and shall be followed by a written report, to a duly constituted authority.

1071. Alabama Code § 26-14-1(1) defines "Abuse" as:

> Harm or threatened harm to a child's health or welfare. Harm or threatened harm to a child's health or welfare can occur through nonaccidental physical or mental injury, sexual abuse or attempted sexual abuse, or sexual exploitation or attempted sexual exploitation. Sexual abuse includes the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of the conduct for the purpose of producing any visual depiction of the conduct; or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children as those acts are defined by Alabama law. Sexual exploitation includes allowing, permitting, or encouraging a child to engage in prostitution and allowing, permitting, encouraging, or engaging in the obscene or pornographic photographing, filming, or depicting of a child for commercial purposes.

1072. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Alabama Code § 26-14-3 are criminal acts, indeed misdemeanors, under Alabama Code § 25-14-13.

1073. Defendants Reardon, McGlynn, and Syrianoudis, who are mandatory reporters, failed to report the abuse of Son Doe to the appropriate authorities.

1074. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1075. The conduct complained of above constitutes criminal acts by Defendants Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1076. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1077. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1078. Acting with the kind of culpability otherwise required for the commission of the offense,

its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's and the Diocese's administration acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1079. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1080. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1081. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 8
CIVIL LIABILITY FOR CRIMINAL ACTS (REPORTING OF CHILD ABUSE, ABANDONMENT, OR NEGLECT) UNDER OHIO REV. CODE §§ 2307.60 AND FLORIDA STATUTE TITLE V CHAPTER 39.205

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1082. Plaintiffs incorporate all previous allegations.

1083. Under the relevant part of Florida Statute Title V Chapter 39.201(1)(a)(1)(a), "A person is required to report immediately to the central abuse hotline established in s. 39.101, in writing, through a call to the toll-free telephone number, or through electronic reporting, if he or she knows, or has reasonable cause to suspect, that any of the following has occurred…child abuse…"

1084. Under the relevant part of Florida Statute Title V Chapter 39.201(1)(a)(2), "Any person who knows, or has reasonable cause to suspect, that a child is the victim of sexual abuse or juvenile sexual abuse shall report such knowledge or suspicion to the central abuse hotline…"

1085. Under the relevant part of Florida Statute Title V Chapter 39.201(1)(b)(2)(d), "A person making a report to the central abuse hotline whose occupation is in any of the following categories is required to provide his or her name to the central abuse hotline counselors… School teacher or other school official or personnel…"

1086. Under the relevant part of Florida Statute Title V Chapter 39.201(41), "'Juvenile sexual abuse' means any sexual behavior by a child which occurs without consent, without equality, or as a result of coercion."

1087. Under subsection (41)(a), "'Coercion' means the exploitation of authority or the use of bribes, threats of force, or intimidation to gain cooperation or compliance."

1088. Under subsection 41(b):

> "Consent" means an agreement, including all of the following:
>
> 1. Understanding what is proposed based on age, maturity, developmental level, functioning, and experience.
> 2. Knowledge of societal standards for what is being proposed.
> 3. Awareness of potential consequences and alternatives.
> 4. Assumption that agreement or disagreement will be accepted equally.
> 5. Voluntary decision.
> 6. Mental competence.

1089. Under subsection 41(c), "'Equality' means two participants operating with the same level of power in a relationship, neither being controlled nor coerced by the other."

1090. Under subsection (41), "Juvenile sexual behavior ranges from noncontact sexual behavior such as making obscene phone calls, exhibitionism, voyeurism, and the showing or taking of lewd photographs to varying degrees of direct sexual contact, such as frottage, fondling, digital penetration, rape, fellatio, sodomy, and various other sexually aggressive acts."

1091. Under the relevant part of Florida Statute Title V Chapter 39.205(1), "A person who knowingly and willfully fails to report to the central abuse hotline known or suspected child abuse… commits a felony of the third degree…"

1092. Under the relevant part of Florida Statute Title V Chapter 39.01(2), "'Abuse' means any willful act or threatened act that results in any physical, mental, or sexual abuse, injury, or harm that causes or is likely to cause the child's physical, mental, or emotional health to be significantly impaired…"

1093. Under Florida Statute Title XXXIX Chapter 671.209(2), "'Knowledge' means actual knowledge. 'Knows' has a corresponding meaning."

1094. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Florida Statute Title V Chapter 39.205

are criminal acts, indeed felonies, under Chapter 39.205(1).

1095. Defendants Reardon, McGlynn, and Syrianoudis, who are mandatory reporters, failed to report the abuse of Son Doe to the appropriate authorities.

1096. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1097. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1098. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's and the Diocese's administration acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1099. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1100. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable,

including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1101. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 9
CIVIL LIABILITY FOR CRIMINAL ACTS (CULPABLE NEGLIGENCE) UNDER OHIO REV. CODE §§ 2307.60 AND FLORIDA STATUTE TITLE XLVI CHAPTER 784.05

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1102. Plaintiffs incorporate all previous allegations.

1103. Under the relevant part of Florida Statute Title XLVI Chapter 784.05(1), "Whoever, through culpable negligence, exposes another person to personal injury commits a misdemeanor of the second degree…"

1104. "Culpable negligence" is defined as a course of conduct that demonstrates a wanton or reckless disregard for human life and safety, leading to injury or exposing another person to injury. *State v. Greene*, 348 So.2d 3, 4 (Fla. 1977).

1105. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Title XLVI Chapter 784.05(1) are criminal acts, indeed misdemeanors, under Chapter 784.05(1).

1106. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis committed culpable negligence, which exposed Son Doe to personal injury, by engaging in a course of conduct that demonstrated a

wanton or reckless disregard for human life and safety, leading to injury or exposing Son Doe to injury.

1107. The named Defendants committed culpable negligence that included, but were not limited to:

(a) Throughout the entire trip, several players repeatedly discussed their plans to "initiate," "take butts," force players to fight, and haze their fellow players. Reardon, McGlynn, and Syrianoudis were present and heard these discussions, yet did not take any appropriate actions to prevent the attacks.

(b) Throughout the entire trip, several players repeatedly discussed the prior night(s)'s actual initiations, "taking butts," fights, and hazing of their fellow players. Reardon, McGlynn, and Syrianoudis were present and heard these discussions, yet did not take any appropriate actions to address and rectify these prior the attacks.

(c) Even after Mother Doe alerted McGlynn to the hazing, neither McGlynn, Reardon, nor Syrianoudis took any appropriate actions to rectify, prevent, or stop the attacks.

(d) Even after another father (who was also an assistant football coach) alerted Reardon, McGlynn, and Syrianoudis to the hazing, none of them took any appropriate actions to rectify, prevent, or stop the attacks.

(e) Even after two innocent players alerted the team that the coaches knew about the hazing, McGlynn, Reardon, and Syrianoudis took no appropriate actions to rectify, prevent, or stop the attacks.

(f) When Son Doe's leg swelled up, and the coaches became aware, McGlynn brushed it off as a "bug bite" and gave Son Doe itch-cream. When the itch-cream failed to improve Son Doe's condition, not Reardon, McGlynn, or Syrianoudis ever took Son

Doe for medical treatment. The "bug bite" was actually a very serious staph infection.

(g) The named Defendants engaged in a course of conduct that demonstrated a wanton or reckless disregard for human life and safety, leading to injury or exposing Son Doe to injury because the hazing of other player-students had occurred for years, and they failed to prevent it.

(h) The named Defendants engaged in a course of conduct that demonstrated a wanton or reckless disregard for human life and safety, leading to injury or exposing Son Doe to injury because they sanctioned a nine-day, out-of-state trip for 41 players with only three coaches to supervise. Then, the named Defendants housed the players unattended in rooms on three separate floors and failed to strict enforce the curfew.

1108. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1109. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1110. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1111. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1112. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's and Diocese's administration acting on behalf of the organization and within the scope of the administrators' offices or employment.

1113. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations

by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1114. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1115. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 10
CIVIL LIABILITY FOR CRIMINAL ACTS (NEGLECT OF A CHILD) UNDER OHIO REV. CODE §§ 2307.60 AND FLORIDA STATUTE TITLE XLVI CHAPTER 827.03

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1116. Plaintiffs incorporate all previous allegations.

1117. Under the relevant part of Florida Statute Title XLVI Chapter 827.03(2)(d), "A person who willfully or by culpable negligence neglects a child without causing great bodily harm, permanent disability, or permanent disfigurement to the child commits a felony of the third degree…"

1118. "Culpable negligence" is defined as a course of conduct that demonstrates a wanton or reckless disregard for human life and safety, leading to injury or exposing another person to injury. *State v. Greene*, 348 So.2d 3, 4 (Fla. 1977).

1119. Under the relevant part of Florida Statute Title XLVI Chapter 827.03(1)(e)(2), "'Neglect of a child' means… A caregiver's failure to make a reasonable effort to protect a child from abuse,

neglect, or exploitation by another person…"

1120. Under the relevant part of Florida Statute Title XLVI Chapter 827.01(1), "'Caregiver' means a parent, adult household member, or other person responsible for a child's welfare."

1121. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Title XLVI Chapter 827.03 are criminal acts, indeed felonies, under Chapter 827.03(2)(d).

1122. Defendants Reardon, McGlynn, and Syrianoudis, in the position of caregivers, willfully or by culpable negligence neglected Son Doe by failing to make a reasonable effort to protect Son Doe from abuse, neglect, or exploitation by another person.

1123. The named-Defendants committed culpable negligence that included, but was not limited to:

(a) Throughout the entire trip, several players repeatedly discussed their plans to "initiate," "take butts," force players to fight, and haze their fellow players. Reardon, McGlynn, and Syrianoudis were present and heard these discussions, yet did not take any appropriate actions to prevent the attacks.

(b) Throughout the entire trip, several players repeatedly discussed the prior night(s)'s actual initiations, "taking butts," fights, and hazing of their fellow players. Reardon, McGlynn, and Syrianoudis were present and heard these discussions, yet did not take any appropriate actions to address and rectify these prior the attacks.

(c) Even after Mother Doe alerted McGlynn to the hazing, neither McGlynn, Reardon, nor Syrianoudis took any appropriate actions to rectify, prevent, or stop the attacks.

(d) Even after another father (who was also an assisted football coach) alerted Reardon, McGlynn, and Syrianoudis to the hazing, none of them took any appropriate actions

to rectify, prevent, or stop the attacks.

(e) Even after two innocent players alerted the team that the coaches knew about the hazing, McGlynn, Reardon, and Syrianoudis took no appropriate actions to rectify, prevent, or stop the attacks.

(f) When Son Doe's leg swelled up, and the coaches became aware, McGlynn brushed it off as a "bug bite" and gave Son Doe itch-cream. When the itch-cream failed to improve Son Doe's condition, not Reardon, McGlynn, nor Syrianoudis ever took Son Doe for medical treatment. The "bug bite" was actually a very serious staph infection.

(g) The named Defendants engaged in a course of conduct that demonstrated a wanton or reckless disregard for human life and safety, leading to injury or exposing Son Doe to injury because the hazing of other players-students had occurred for years, and they failed to prevent it.

(h) The named Defendants engaged in a course of conduct that demonstrated a wanton or reckless disregard for human life and safety, leading to injury or exposing Son Doe to injury because they sanctioned a nine-day, out-of-state trip for 41 players with only three coaches to supervise. Then, the named Defendants housed the players unattended in rooms on three separate floors and failed to strictly enforce the curfew.

1124. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1125. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1126. Acting with the kind of culpability otherwise required for the commission of the offense,

its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's and Diocese's administration acting on behalf of the organization and within the scope of the administrators' offices or employment.

1127. Defendants Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1128. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1129. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 11
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH EVIDENCE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.12(A)(1)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1130. Plaintiffs incorporate all previous allegations.

1131. Under Ohio Rev. Code § 2921.12(A)(1), "No person, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted, shall… Alter, destroy, conceal, or remove any record, document, or thing, with purpose to impair its value or availability as evidence in such proceeding or investigation."

1132. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

1133. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1134. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(1) are criminal acts, indeed felonies, under § 2921.12(B).

1135. Defendants Ursuline High School for itself and on the Catholic Diocese of Youngstown's behalf, Sammartino, Damore, and DeSantis, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted (Sammartino reported the matter to children services and Youngstown Police were/about to/likely to investigating the matter), altered, destroyed, concealed, or removed any record, document, or thing (they removed/deleted the posts/photos from the camp trip from the Ursuline Facebook account and other social-media accounts, and deleted the football team's social-media account), with purpose to impair its value or availability as evidence in such proceeding or investigation.

1136. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1137. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1138. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1139. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1140. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organization and within the scope of the administrator's office or employment.

1141. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline High School and the Catholic Diocese of Youngstown as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1142. As a direct and proximate result of these actions, Son Doe has suffered and will continue

to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1143. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 12
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH RECORDS) UNDER OHIO REV. CODE §§ 2307.60 AND 2913.42(A)(1)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1144. Plaintiffs incorporate all previous allegations.

1145. Under Ohio Rev. Code § 2913.42(A)(1), "No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall… Falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record."

1146. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

1147. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's

specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1148. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(1) are criminal acts, indeed felonies, under § 2921.12(B).

1149. Defendants Ursuline High School for itself and on the Diocese's behalf, Sammartino, Damore, and DeSantis, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud (they were covering-up what occurred on the trip), destroyed, removed, concealed, or altered, any writing, computer software, data, or record (they destroyed/removed/concealed/altered the posts/photos from the camp trip from the Ursuline Facebook account and other social media accounts, and deleted the football team's social media account).

1150. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1151. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1152. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1153. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline and Diocese acting on their behalf and within the scope of their offices or employment.

1154. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's administration and the Diocese, acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1155. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct

constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1156. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1157. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 13
CIVIL LIABILITY FOR CRIMINAL ACTS (OBSTRUCTING JUSTICE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.32(A)(4)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1158. Plaintiffs incorporate all previous allegations.

1159. Under Ohio Rev. Code § 2921.32(A)(4), "No person, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another for crime or to assist another to benefit from the commission of a crime, and no person, with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child, or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, shall… Destroy or conceal physical evidence of the crime or act, or induce any person to withhold testimony or information

or to elude legal process summoning the person to testify or supply evidence."

1160. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1161. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.32(A)(4) are criminal acts, indeed misdemeanors and felonies, under § 2921.12(B).

1162. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, Damore, and DeSantis with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another (Reardon, McGlynn, and Syrianoudis) for crime or to assist another to benefit from the commission of a crime, destroyed or concealed physical evidence of the crime or act (they destroyed/concealed the posts/photos from the camp trip from the Ursuline Facebook account and other social-media accounts, and deleted the football team's social-media account).

1163. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, Damore, and DeSantis with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child (football players), or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, destroyed or concealed physical evidence of the crime or act (they destroyed/concealed the posts/photos from the camp trip from the Ursuline Facebook account and other social media accounts, and deleted the football team's social-media account).

1164. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1165. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1166. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1167. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline High School and Diocese acting on their behalf and within the scope of

their offices or employment.

1168. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School and the Diocese's administration acting on behalf of the organizations and within the scope of the administrators' office or employment.

1169. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1170. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1171. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 14
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH EVIDENCE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.12(A)(2)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, AND MATTHEW SAMMARTINO)

1172. Plaintiffs incorporate all previous allegations.

1173. Under Ohio Rev. Code § 2921.12(A)(2), "No person, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted, shall… Make, present, or use any record, document, or thing, knowing it to be false and with purpose to mislead a public official who is or may be engaged in such proceeding or investigation, or with purpose to corrupt the outcome of any such proceeding or investigation."

1174. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

1175. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1176. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(2) are

criminal acts, indeed felonies, under § 2921.12(B).

1177. Defendants Ursuline High School, Catholic Diocese of Youngstown, and Sammartino, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted (Sammartino reported the matter to children services and Youngstown Police were/about to/likely to investigate the matter), made, presented, or used records, documents, or things (Ursuline for the Diocese and Sammartino authored and issued the first false and fraudulent email-letter to Ursuline parents and the media), knowing them to be false with purpose to corrupt the outcome of any such proceeding or investigation.

1178. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1179. The conduct complained of above constitutes criminal acts by Defendant Sammartino, individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1180. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1181. Defendant Sammartino was an agent and employee of Defendants Ursuline High School and the Catholic Diocese of Youngstown, acting on their behalf and within the scope of his office or employment.

1182. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration and through them Defendant Diocese acting on behalf of the organizations and within the scope of the administrator's office or employment.

1183. Defendant Sammartino was an agent and employee of Defendant Ursuline High School and Defendant Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, he engaged in conduct constituting the offense; and

(b) He had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1184. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable,

including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1185. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 15
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH RECORDS) UNDER OHIO REV. CODE §§ 2307.60 AND 2913.42(A)(1)(2)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGTOWN, AND MATTHEW SAMMARTINO)

1186. Plaintiffs incorporate all previous allegations.

1187. Under Ohio Rev. Code § 2913.42(A)(1), "No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall… Falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record."

1188. Under Ohio Rev. Code § 2913.42(A)(2), "No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall… Utter any writing or record, knowing it to have been tampered with…"

1189. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious

purpose to avoid learning the fact."

1190. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1191. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(1) are criminal acts, indeed felonies, under § 2921.12(B).

1192. Defendants Ursuline High School, Catholic Diocese of Youngstown, and Sammartino, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud (they were covering-up what occurred on the trip), falsified writings, computer software, data, or records (Ursuline for Diocese and Sammartino authored and issued the first false and fraudulent email-letter to Ursuline parents and the media).

1193. Defendants Ursuline High School, Catholic Diocese of Youngstown, and Sammartino, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud (they were covering-up what occurred on the trip), uttered writings or records (Ursuline for the Diocese and Sammartino authored and issued the first false and fraudulent email-letter to Ursuline parents and the media), knowing it to have been tampered with (falsified).

1194. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1195. The conduct complained of above constitutes criminal acts by Defendant Sammartino, individually and through personal accountability for organizational conduct under Ohio Rev.

Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1196. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1197. Defendant Sammartino was an agent and employee of Defendants Ursuline and the Diocese acting on their behalf and within the scope of his office or employment.

1198. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration and the Diocese acting on behalf of the organizations and within the scope of the administrator's office or employment.

1199. Defendant Sammartino was an agent and employee of Defendants Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, he engaged in conduct constituting the offense; and

(b) He had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1200. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1201. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 16
CIVIL LIABILITY FOR CRIMINAL ACTS (OBSTRUCTING JUSTICE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.32(A)(5)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1202. Plaintiffs incorporate all previous allegations.

1203. Under Ohio Rev. Code § 2921.32(A)(4), "No person, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another for crime or to assist another to benefit from the commission of a crime, and no person, with purpose to hinder the

discovery, apprehension, prosecution, adjudication as a delinquent child, or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, shall… Communicate false information to any person."

1204. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1205. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.32(A)(4) are criminal acts, indeed misdemeanors and felonies, under § 2921.12(B).

1206. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, Damore, and DeSantis with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another (Reardon, McGlynn, and Syrianoudis) for crime or to assist another to benefit from the commission of a crime communicated false information to another person (Ursuline for the Diocese and Sammartino authored and issued the first false and fraudulent email-letter to Ursuline parents and the media; and Ursuline, Sammartino, Damore, and DeSantis failed to inform law enforcement that hazing had occurred for several years and that several players, including D.T. and J.P. confessed to participating in the hazing).

1207. Defendants Ursuline High School, the Diocese, Sammartino, Damore, and DeSantis with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child (football players), or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult

would be a crime, communicated false information to another person (Ursuline for the Diocese and Sammartino authored and issued the first false and fraudulent email-letter to Ursuline parents and the media; and Ursuline, Sammartino, Damore, and DeSantis failed to inform law enforcement that the hazing had occurred for years and that several players, including D.T. and J.P. confessed to participating in the hazing).

1208. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1209. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1210. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1211. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline and the Diocese acting on their behalf and within the scope of their offices or employment.

1212. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's administration and the Diocese acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1213. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1214. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1215. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless

manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 17
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH EVIDENCE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.12(A)(2)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, AND MATTHEW SAMMARTINO)

1216. Plaintiffs incorporate all previous allegations.

1217. Under Ohio Rev. Code § 2921.12(A)(2), "No person, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted, shall… Make, present, or use any record, document, or thing, knowing it to be false and with purpose to mislead a public official who is or may be engaged in such proceeding or investigation, or with purpose to corrupt the outcome of any such proceeding or investigation."

1218. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

1219. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1220. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(2) are criminal acts, indeed felonies, under § 2921.12(B).

1221. Defendants Ursuline High School, Catholic Diocese of Younstown, and Sammartino, knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted (Sammartino reported the matter to children services and Youngstown Police were/about to/likely to investigating the matter), made, presented, or used records, documents, or things (Ursuline for the Diocese and Sammartino authored and issued the second false and fraudulent email-letter to Ursuline parents and the media), knowing it to be false with purpose to corrupt the outcome of any such proceeding or investigation.

1222. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1223. The conduct complained of above constitutes criminal acts by Defendant Sammartino, individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1224. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1225. Defendant Sammartino was an agent and employee of Defendants Ursuline and the Diocese acting on their behalf and within the scope of his office or employment.

1226. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organizations and within the scope of the administrator's office or employment.

1227. Defendant Sammartino was an agent and employee of Defendants Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, he engaged in conduct constituting the offense; and

(b) He had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1228. As a direct and proximate result of these actions, Son Doe has suffered and will continue

to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1229. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 18
CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH RECORDS) UNDER OHIO REV. CODE §§ 2307.60 AND 2913.42(A)(1)(2)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, AND MATTHEW SAMMARTINO)

1230. Plaintiffs incorporate all previous allegations.

1231. Under Ohio Rev. Code § 2913.42(A)(1), "No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall… Falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record."

1232. Under Ohio Rev. Code § 2913.42(A)(2), "No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall… Utter any writing or record, knowing it to have been tampered with…"

1233. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes

that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

1234. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1235. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.12(A)(1) are criminal acts, indeed felonies, under § 2921.12(B).

1236. Defendants Ursuline High School, Catholic Diocese of Youngstown, and Sammartino, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud (they were covering-up what occurred on the trip), falsified writings, computer software, data, or records (Ursuline for the Diocese and Sammartino authored and issued the second false and fraudulent email-letter to Ursuline parents and the media).

1237. Defendants Ursuline High School, Catholic Diocese of Youngstown, and Sammartino, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud (they were covering-up what occurred on the trip), uttered writings or records (Ursuline for the Diocese and Sammartino authored and issued the second false and fraudulent email-letter to Ursuline parents and the media), knowing it to have been tampered with (falsified).

1238. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1239. The conduct complained of above constitutes criminal acts by Defendant Sammartino,

individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1240. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1241. Defendant Sammartino was an agent and employee of Defendants Ursuline and Diocese acting on their behalf and within the scope of his office or employment.

1242. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's and the Diocese's administration acting on behalf of the organizations

and within the scope of the administrator's office or employment.

1243. Defendant Sammartino was an agent and employee of Defendants Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, he engaged in conduct constituting the offense; and

(b) He had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1244. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1245. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 19
CIVIL LIABILITY FOR CRIMINAL ACTS (OBSTRUCTING JUSTICE) UNDER OHIO REV. CODE §§ 2307.60 AND 2921.32(A)(5)

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1246. Plaintiffs incorporate all previous allegations.

1247. Under Ohio Rev. Code § 2921.32(A)(4), "No person, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another for crime or to assist

another to benefit from the commission of a crime, and no person, with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child, or disposition of a child for an act that if committed by an adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, shall… Communicate false information to any person."

1248. Under Ohio Rev. Code § 2901.22(A), "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature."

1249. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2921.32(A)(4) are criminal acts, indeed misdemeanors and felonies, under § 2921.12(B).

1250. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, Damore, and DeSantis with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another (Reardon, McGlynn, and Syrianoudis) for crime or to assist another to benefit from the commission of a crime communicated false information to another person (Ursuline for the Diocese and Sammartino authored and issued the second false and fraudulent email-letter to Ursuline parents and the media; and Ursuline, Sammartino, Damore, and DeSantis failed to inform law enforcement that the hazing had occurred for years and that several players, including D.T. and J.P. confessed to participating in the hazing).

1251. Defendants Ursuline High School, Catholic Diocese of Youngstown, Sammartino, and Damore, with purpose to hinder the discovery, apprehension, prosecution, adjudication as a delinquent child (football players), or disposition of a child for an act that if committed by an

adult would be a crime or to assist a child to benefit from the commission of an act that if committed by an adult would be a crime, communicated false information to another person (Ursuline for the Diocese and Sammartino authored and issued the second false and fraudulent email-letter to Ursuline parents and the media; and Ursuline, Sammartino, Damore, and DeSantis failed to inform law enforcement that hazing had occurred for several years and that several players, including D.T. and J.P. confessed to participating in the hazing).

1252. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1253. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1254. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Alabama Code § 16-1-23(c);

(c) hazing under Florida Statute Title XLVIII Chapter 1006.135;

(d) hazing under Tennessee Code § 49-2-120;

(e) reporting of child abuse, abandonment, or neglect under Alabama Code § 26-14-3;

(f) reporting of child abuse under Florida Statute Title V Chapter 39.205;

(g) culpable negligence under Florida Statute Title XLVI Chapter 784.05;

(h) tampering with evidence under Ohio Rev. Code § 2921.12(A)(1);

(i) tampering with records under Ohio Rev. Code § 2913.42(A)(1);

(j) obstructing justice under Ohio Rev. Code § 2921.32(A)(4);

(k) tampering with evidence under Ohio Rev. Code § 2921.12(A)(2);

(l) tampering with records under Ohio Rev. Code § 2913.42(A)(1)(2);

(m) obstructing justice under Ohio Rev. Code § 2921.32(A)(5); and

(n) obstructing justice under Ohio Rev. Code § 2921.32(A)(5).

1255. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline High School and Catholic Diocese of Youngstown acting on their behalf and within the scope of their offices or employment.

1256. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's administration and the Diocese acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1257. Defendants Sammartino, Damore, and DeSantis were agents and employees of Defendants Ursuline High School and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1258. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional

distress.

1259. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 20
NEGLIGENT SUPERVISION OF CHILDREN

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, THE CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1260. Plaintiffs incorporate all previous allegations.

1261. Defendants had a legal duty to supervise the students under their care.

1262. Defendants failed to meet the standard of reasonable and prudent administrators, educators, and coaches in supervising the students.

1263. Defendants' failure to provide adequate supervision directly caused or contributed to the Plaintiff Son Doe's injuries and harm.

1264. As a direct and proximate result of these actions, Plaintiff Son Doe student suffered damages from Defendants' negligence.

1265. The organizational Defendants are vicariously liable for the employee's negligent supervision.

1266. Plaintiff Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1267. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 21
NEGLIGENT AND RECKLESS HIRING, TRAINING, SUPERVISION, DISCIPLINE, STAFFING, AND RETENTION UNDER OHIO LAW

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND THE CATHOLIC DIOCESE OF YOUNGSTOWN)

1268. Plaintiffs incorporate all previous allegations.

1269. Defendants Ursuline and the Diocese failed to exercise due care and acted in both a negligent and reckless manner in hiring, training, supervising, disciplining, staffing, and retaining the individual Defendants—especially Defendants Reardon and McGlynn.

1270. The individual Defendants were unfit for their positions and duties, as was obvious from their previous, harmful misconduct.

1271. Defendants Ursuline and the Diocese's negligent and reckless conduct in this regard proximately caused Son Doe the injuries.

1272. As a direct and proximate result of these actions, Son Doe, has suffered and will continue to suffer damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1273. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 22
NEGLIGENCE

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, THE CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1274. Plaintiffs incorporate all previous allegations.

1275. Defendants failed to exercise the care that reasonably prudent people or organizations would exercise in a similar situation, resulting in injury.

1276. They owed a duty of care owed to Plaintiff Son Doe.

1277. They breached that duty.

1278. The organizational Defendants are vicariously liable for the negligence.

1279. As a direct and proximate result of these actions, Plaintiff Son Doe student suffered damages from Defendants' negligence.

1280. Plaintiff Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1281. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 23
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UNDER OHIO LAW

(BY PLAINTIFFS SON DOE AND JANE (MOTHER) DOE AGAINST DEFENDANTS MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1282. Plaintiffs incorporate all previous allegations.

1283. Named Defendants' conduct was so extreme and outrageous as to go beyond the bounds of decency–conduct that can be considered utterly intolerable in a civilized society.

1284. Defendants and their actions caused severe emotional distress to Son Doe and Mother Doe.

1285. At all material times, Defendants acted intentionally; to cause emotional distress to Son Doe and Jane (Mother) Doe; and knew with substantial certainty that their acts would cause severe emotional distress to Son Doe and Mother Doe.

1286. The mental anguish suffered by Son Doe and Mother Doe is so serious and of a nature that no reasonable person could be expected to endure it.

1287. The unreasonable, improper, and unlawful acts of Defendants were made with willful and reckless disregard of the consequences, with callous disregard for Son and Mother Doe's rights and physical and mental well-being, with legal malice, and with substantial certainty that the consequences thereof would cause serious personal injury to Son Doe and Mother Doe.

1288. As a direct and proximate result of these actions, Son Doe and Mother Doe have suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1289. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless

manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 24
SPOLIATION UNDER OHIO LAW

(BY PLAINTIFF SON DOE DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, AND JOHN DESANTIS)

1290. Plaintiffs incorporate all previous allegations.

1291. Ohio recognizes a cause of action for destruction of evidence. To succeed, a plaintiff must show that (1) there was pending or probable litigation involving the plaintiff, (2) knowledge on the part of the defendant that litigation exists or is probable, (3) defendant's willful destruction of evidence was designed to disrupt the plaintiff's case, (4) the plaintiff's case was disrupted, and (5) the defendant caused damages by destroying evidence. *Smith v. Howard Johnson Co.*, 615 N.E.2d 1037, 1038.

1292. Ursuline, the Diocese, Sammartino, Damore, and DeSantis failed to preserve evidence, including the Ursuline High School Facebook account pages containing post from the football trip and other Ursuline football social-media accounts.

1293. Ursuline, the Diocese, Sammartino, Damore, and DeSantis knew that litigation involving Plaintiff Son Doe was probable and willfully destroyed the evidence to disrupt Son Doe's case.

1294. Son Doe's case was disrupted.

1295. Son Doe suffered damages from Ursuline, the Diocese, Sammartino, Damore, and DeSantis's destruction of the evidence.

1296. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable,

including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1297. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 25
CIVIL ACTION RELATING TO DISCLOSURE OF INTIMATE IMAGES FOR DAMAGES AND INJUNCTIVE RELIEF, UNDER 15 U.S.C. § 6851

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE PLAYERS TA.W., G.C., B.S., AND J.B.)

1298. Plaintiff incorporates all previous allegations.

1299. Title 15 U.S.C. § 6851(b)(1)(A) establishes a federal civil cause of action by

> an individual whose intimate visual depiction is disclosed, in or affecting interstate or foreign commerce or using any means or facility of interstate or foreign commerce, without the consent of the individual, where such disclosure was made by a person who knows that, or recklessly disregards whether, the individual has not consented to such disclosure, may bring a civil action against that person in an appropriate district court of the United States

for actual damages or liquidated damages of $150,000 and injunctive relief, along with the costs of the action including reasonable attorney fees and litigation costs.

1300. Title 15 U.S.C. 6851(a) defines key terms in the statute that apply here:

> **(2) Consent**
>
> The term "consent" means an affirmative, conscious, and voluntary authorization made by the individual free from force, fraud, misrepresentation, or coercion.
>
> **(3) Depicted individual**
>
> The term "depicted individual" means an individual whose body appears in whole or in part in an intimate visual depiction and who is identifiable by virtue of the person's face, likeness, or other distinguishing characteristic, such as a unique birthmark or other recognizable feature, or from information displayed in connection with the visual

depiction.

(4) Disclose

The term "disclose" means to transfer, publish, distribute, or make accessible.

(5) Intimate visual depiction

The term "intimate visual depiction"—

(A) means a visual depiction, as that term is defined in section 2256(5) of title 18, that depicts—

(i) the uncovered genitals, pubic area, anus, or post-pubescent female nipple of an identifiable individual; …

***

1301. Title 15 U.S.C. § 6851(b)(2) clarifies that "the fact that the individual consented to the creation of the depiction shall not establish that the person consented to its distribution" (15 U.S.C. § 6851(b)(2)(A)) and "the fact that the individual disclosed the intimate visual depiction to someone else shall not establish that the person consented to the further disclosure of the intimate visual depiction by the person alleged to have violated paragraph (1)." (15 U.S.C. § 6851(b)(2)(B).)

1302. Defendant Ta.W. videorecorded and captured intimate visual depictions of Plaintiff Son Doe on his phone and posted the videos to the team's group Snapchat.

1303. G.C., B.S., and J.B. saved and transferred the videos in Snapchat.

1304. The videos were disseminated over state lines to other Ursuline football players and students in Ohio. The videos were further disseminated throughout the surrounding community.

1305. The named Defendants violated 15 U.S.C. § 6851(b)(1)(A)'s prohibition against disclosing these intimate visual depictions of a depicted individual by disclosing—that is

transferring from his cellphone and publishing the photos to Snapchat, in or affecting interstate or foreign commerce, and using a means or facility of interstate or foreign commerce, without Plaintiff Son Doe's consent, and knowing that, and recklessly disregarding whether, Son Doe had not consented to their disclosure.

1306. The named Defendants are liable to Son Doe for actual damages or liquidated damages of $150,000 and equitable relief.

1307. The named Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct. Their acts also merit injunctive relief.

CLAIM 26
CIVIL LIABILITY OF PARENTS FOR WILLFUL AND MALICIOUS ASSAULTS BY THEIR CHILDREN UNDER OHIO REV. CODE § 3109.10

(PLAINTIFF SON DOE AGAINST DEFENDANTS PARENTS OF URSULINE PLAYERS D.P., TA.W., C.C., TO.W., D.T., A.B., G.C., C.S., B.S., AND T.S.)

1308. Plaintiffs incorporate all previous allegations.

1309. Under Ohio Rev. Code § 3109.10, in relevant part, "Any person is entitled to maintain an action to recover compensatory damages in a civil action, in an amount not to exceed ten thousand dollars and costs of suit in a court of competent jurisdiction, from the parent of a child under the age of eighteen if the child willfully and maliciously assaults the person by a means or force likely to produce great bodily harm."

1310. D.P., Ta.W., C.C., To.W., D.T., A.B., G.C., C.S., B.S., and T.S. willfully and maliciously assaulted Son Doe by means or force likely to produce great bodily injured.

1311. Son Doe suffered, or was assaulted in such a manner as to likely produce, great bodily injury.

1312. The named-Defendant Parents are liable for the actions of their named children.

1313. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1314. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 27
CIVIL LIABILITY FOR CRIMINAL ACTS (MULTIPLE CRIMES, INCLUDING HAZING; ASSAULT IN THE THIRD DEGREE; AND SEXUAL ASSAULT IN THE FIRST DEGREE) UNDER OHIO REV. CODE §§ 2307.60 AND MULTIPLE ALABAMA CODE SECTIONS

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE PLAYERS D.P., TA.W., AND C.C.)

1315. Plaintiffs incorporate all previous allegations.

1316. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of the following Alabama Code Sections are criminal acts, indeed misdemeanors and felonies.

1317. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1318. The named Defendants committed the following crimes/criminal acts against Son Doe, including, but are not limited to:

(a) **Ta.W., C.C., and R.H. committed Hazing**, in violation of Alabama Code § 16-1-23(b), which provides, "No person shall engage in what is commonly known and recognized as hazing, or encourage, aid, or assist any other person thus offending." Under subsection (c), "No person shall knowingly permit, encourage, aid, or assist any person in

committing the offense of hazing, or willfully acquiesce in the commission of such offense, or fail to report promptly his knowledge or any reasonable information within his knowledge of the presence and practice of hazing in this state to the chief executive officer of the appropriate school, college, university, or other educational institution in this state. Any act of omission or commission shall be deemed hazing under the provisions of this section."[47] Hazing is a Class C misdemeanor.

(b) **Ta.W. and C.C. committed Assault in the third degree**, in violation of Alabama Code § 13A-6-22(a), which provides, in relevant part, "A person commits the crime of assault in the third degree if: (1) With intent to cause physical injury to another person, he causes physical injury to any person; or (2) He recklessly causes physical injury to another person…" Assault in the third degree is a Class A misdemeanor.

(c) **Ta.W. committed Sexual abuse in the first degree**, in violation of Alabama Code § 13A-6-66(a), which provides, in relevant part, "A person commits the crime of sexual abuse in

[47] Hazing, under Alabama Code Title 16 Chapter 1 § 16-1-23(a), is defined as:

(1) Any willful action taken or situation created, whether on or off any school, college, university, or other educational premises, which recklessly or intentionally endangers the mental or physical health of any student, or

(2) Any willful act on or off any school, college, university, or other educational premises by any person alone or acting with others in striking, beating, bruising, or maiming; or seriously offering, threatening, or attempting to strike, beat, bruise, or maim, or to do or seriously offer, threaten, or attempt to do physical violence to any student of any such educational institution or any assault upon any such students made for the purpose of committing any of the acts, or producing any of the results to such student as defined in this section.

(3) The term hazing as defined in this section does not include customary athletic events or similar contests or competitions, and is limited to those actions taken and situations created in connection with initiation into or affiliation with any organization. The term hazing does not include corporal punishment administered by officials or employees of public schools when in accordance with policies adopted by local boards of education.

the first degree if he or she… (1) Subjects another person to sexual contact by forcible compulsion."[48] Sexual abuse in the first degree is a Class C felony.

1319. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1320. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 28
CIVIL LIABILITY FOR CIVIL ASSAULT AND BATTERY UNDER ALABAMA LAW

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE PLAYERS TA.W. AND C.C.)

1321. Plaintiffs incorporate all previous allegations.

1322. Under Alabama law, the elements of civil assault and battery are: (1) the defendant touched the plaintiff; (2) the defendant intended to touch the plaintiff; and (3) the touching was conducted in a harmful or offensive manner. *Dolgencorp, LLC v. Spence*, 224 So.3d 171, 180 (Ala. 2016).

1323. The named Defendants committed an assault-and-battery against Son Doe, by their touching, and intending to touch, Son Doe in a harmful or offensive manner constituting assault and battery.

1324. As a direct and proximate result of these actions, Son Doe has suffered and will continue

[48] Alabama Code § 13A-6-60 defines "sexual contact" as "Any touching of the sexual or other intimate parts of a person done for the purpose of gratifying the sexual desire of either party. The term does not require skin to skin contact."

to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1325. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 29
CIVIL LIABILITY FOR CRIMINAL ACTS (MULTIPLE CRIMES INCLUDING

HAZING;

KIDNAPPING;

FALSE IMPRISONMENT;

ASSAULT;

AGGRAVATED ASSAULT;

BATTERY;

STALKING;

SEXUAL CYBERHARASSMENT;

CHILD PORNOGRAPHY;

PROHIBITION OF CERTAIN ACTS IN CONNECTION WITH OBSCENE, LEWD, ETC., MATERIALS;

PROTECTION OF MINORS, PROHIBITION OF CERTAIN ACTS IN CONNECTION WITH OBSCENITY;

TRANSMISSION OF PORNOGRAPHY BY ELECTRONIC DEVICE OR EQUIPMENT PROHIBITED;

TRANSMISSION OF MATERIAL HARMFUL TO MINORS TO A MINOR BY ELECTRONIC DEVICE OR EQUIPMENT PROHIBITED;

SEXTING; AND

BREACH OF THE PEACE, DISORDERLY CONDUCT)

UNDER OHIO REV. CODE §§ 2307.60 AND MULTIPLE FLORIDA STATUTES

(AGAINST DEFENDANTS URSULINE PLAYERS TA.W., TO.W., D.T., A.B., G.C., C.S., AND B.S.)

1326. Plaintiffs incorporate all previous allegations.

1327. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of the following Florida Statutes are

criminal acts, indeed misdemeanors and felonies.

1328. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1329. The named-Defendants committed the following crimes/criminal acts against Son Doe, including, but are not limited to:

(a) **Ta.W., To.W., D.T., A.B., G.C., C.S., and B.S. committed Hazing**, in violation of Florida Statute Title XLVIII Chapter 1006.135, which means any action or situation that endangers the mental or physical health or safety of a student at a school with any of grades 6 through 12 for purposes including, but not limited to, initiation or admission into or affiliation with any organization operating under the sanction of a school with any of grades 6 through 12. 'Hazing' includes, but is not limited to:

(a) Pressuring, coercing, or forcing a student into:

4. Violating state or federal law;

5. Consuming any food, liquor, or other substance; or

6. Participating in physical activity that could adversely affect the health or safety of the student.

(b) Any brutality of a physical nature, such as whipping, beating, branding, or exposure to the elements. Hazing does not include customary athletic events or other similar contests or competitions or any activity or conduct that furthers a legal and legitimate objective.

Hazing is a misdemeanor of the first degree but could be elevated to a third-degree felony under certain circumstances.

(b) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Kidnapping**, in violation of

Florida Statute Title XLVI Chapter 787.01(1)(a), which "means forcibly, secretly, or by threat confining, abducting, or imprisoning another person against her or his will and without lawful authority, with intent to…(2) Commit or facilitate commission of any felony; (3) Inflict bodily harm upon or terrorize the victim of another person." Kidnapping is a felony of first degree.

(c) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed False imprisonment**, in violation of Florida Statute Title XLVI Chapter 787.02(1)(a), which "means forcibly, by threat, or secretly confining, abducting, imprisoning, or restraining another person without lawful authority and against her or his will." False imprisonment is a felony of third degree.

(d) **Ta.W., To.W., D.T., A.B., G.C., C.S., and B.S. committed Assault**, in violation of Florida Statute Title XLVI Chapter 784.011(1), which "is an intentional, unlawful threat by word or act to do violence to the person of another, coupled with an apparent ability to do so, and doing some act which creates a well-founded fear in such other person that such violence is imminent." Assault is a misdemeanor of second degree.

(e) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Aggravated assault**, in violation of Florida Statute Title XLVI Chapter 784.021(1), which "is an assault…(b) With intent to commit a felony." Aggravated assault is a felony of third degree.

(f) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Battery**, in violation of Florida Statute Title XLVI Chapter 784.03(1)(a), which "occur when a person: 1. Actually and intentionally touches or strikes another person against the will of the

other; or 2. Intentionally causes bodily harm to another person." Battery is a misdemeanor of first degree.

(g) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Stalking**, in violation of Florida Statute Title XLVI Chapter 784.048(2), which occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of stalking, a misdemeanor of the first degree." **Stalking**, under Florida Statute Title XVLI Chapter 784.048(3), occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony of the third degree." **Stalking**, under Florida Statute Title XVLI Chapter 784.048(5), occurs when "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks a child under 16 years of age commits the offense of aggravated stalking, a felony of the third degree."

(h) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Sexual cyberharassment**, in violation of Florida Statute Title XLVI Chapter 784.049(3)(a), which occurs when "a person who willfully and maliciously sexually cyberharasses another person commits a misdemeanor of the first degree."[49]

[49] Florida Statute XLVI Chapter 784.049 [Sexual cyberharassment] provides:

(2) As used in this section, the term:

(c) "Image" includes, but is not limited to, any photograph, picture, motion picture, film, video, or representation.

(b) "Personal identification information" means any information that identifies an individual, and includes, but is not limited to, any name, postal or electronic mail

(i) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Child pornography**, in violation of Florida Statute Title XLVI Chapter 827.071(4), which provides, in relevant part, "It is unlawful for any person to possess with the intent to promote any photograph, motion picture, exhibition, show, representation, or other presentation which, in whole or in part, includes child pornography… A person who violates this subsection commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."

(j) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Child pornography**, in violation of Florida Statute Title XLVI Chapter 827.071(5), which provides, in relevant part, "It is unlawful for any person to knowingly possess, control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation which, in whole or in part, he or she knows to include child pornography… A person who violates this paragraph commits a felony of the third degree, punishable as provided in s. 775.082, s.

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address, telephone number, social security number, date of birth, or any unique physical representation.

(d) "Sexually cyberharass" means to publish to an Internet website or disseminate through electronic means to another person a sexually explicit image of a person that contains or conveys the personal identification information of the depicted person without the depicted person's consent, contrary to the depicted person's reasonable expectation that the image would remain private, for no legitimate purpose, with the intent of causing substantial emotional distress to the depicted person. Evidence that the depicted person sent a sexually explicit image to another person does not, on its own, remove his or her reasonable expectation of privacy for that image.

(d) "Sexually explicit image" means any image depicting nudity, as defined in s. 847.001, or depicting a person engaging in sexual conduct, as defined in s. 847.001.

775.083, or s. 775.084.

(k) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Prohibition of certain acts in connection with obscene, lewd, etc., materials**, in violation of Florida Statute Title XLVI Chapter 847.011(1)(a), which provides, "any person who knowingly sells, lends, gives away, distributes, transmits, shows, or transmutes, or offers to sell, lend, give away, distribute, transmit, show, or transmute, or has in his or her possession, custody, or control with intent to sell, lend, give away, distribute, transmit, show, transmute, or advertise in any manner, any obscene book, magazine, periodical, pamphlet, newspaper, comic book, story paper, written or printed story or article, writing, paper, card, picture, drawing, photograph, motion picture film, figure, image, phonograph record, or wire or tape or other recording, or any written, printed, or recorded matter of any such character which may or may not require mechanical or other means to be transmuted into auditory, visual, or sensory representations of such character, or any article or instrument for obscene use, or purporting to be for obscene use or purpose; or who knowingly designs, copies, draws, photographs, poses for, writes, prints, publishes, or in any manner whatsoever manufactures or prepares any such material, matter, article, or thing of any such character; or who knowingly writes, prints, publishes, or utters, or causes to be written, printed, published, or uttered, any advertisement or notice of any kind, giving information, directly or indirectly, stating, or purporting to state, where, how, of whom, or by what means any, or what purports to be any, such material, matter, article, or thing of any such character can be purchased, obtained, or had; or who in any manner knowingly hires, employs, uses, or permits any person knowingly to do or assist in doing any act or

thing mentioned above, commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083."[50] Under subsection (1)(c), if the violation "is based on materials that depict a minor engaged in any act or conduct that is harmful to minors commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."

(l) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Prohibition of certain acts in connection with obscene, lewd, etc., materials**, in violation of Florida Statute Title XLVI Chapter 847.011(2), which provides, "a person who knowingly has in his or

[50] Florida Statute Title XLVI Chapter 847.001 provides:

(12) "Obscene" means the status of material which:

(c) The average person, applying contemporary community standards, would find, taken as a whole, appeals to the prurient interest;

(d) Depicts or describes, in a patently offensive way, sexual conduct as specifically defined herein; and

(c) Taken as a whole, lacks serious literary, artistic, political, or scientific value.

A mother's breastfeeding of her baby is not under any circumstance "obscene."

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(19) "Sexual conduct" means actual or simulated sexual intercourse, deviate sexual intercourse, sexual bestiality, masturbation, or sadomasochistic abuse; actual or simulated lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed. A mother's breastfeeding of her baby does not under any circumstance constitute "sexual conduct."

her possession, custody, or control any obscene book, magazine, periodical, pamphlet, newspaper, comic book, story paper, written or printed story or article, writing, paper, card, picture, drawing, photograph, motion picture film, film, any sticker, decal, emblem or other device attached to a motor vehicle containing obscene descriptions, photographs, or depictions, any figure, image, phonograph record, or wire or tape or other recording, or any written, printed, or recorded matter of any such character which may or may not require mechanical or other means to be transmuted into auditory, visual, or sensory representations of such character, or any article or instrument for obscene use, or purporting to be for obscene use or purpose, without intent to sell, lend, give away, distribute, transmit, show, transmute, or advertise the same, commits a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083." Under subsection (1)(c), if the violation "is based on materials that depict a minor engaged in any act or conduct that is harmful to minors commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[51]

(m) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Protection of minors; prohibition of certain acts in connection with obscenity**, in violation of Florida Statute Title XLVI Chapter 847.0133(1), which provides, in relevant part, "A person may not knowingly sell, rent, loan, give away, distribute, transmit, or show any obscene material to a minor."[52] Protection of minors; prohibition of certain acts in

[51] *Id.*

[52] *Id.*

connection with obscenity is a felony of third degree.

(n) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Transmission of pornography by electronic device or equipment prohibited**, in violation of Florida Statute Title XLVI Chapter 847.0137(2), which provides, in relevant part, "any person in this state who knew or reasonably should have known that he or she was transmitting child pornography, as defined in s. 847.001, to another person in this state or in another jurisdiction commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[53] Under subsection (1), "the term 'transmit' means the act of sending and causing to be delivered, including the act of providing access for receiving and causing to be delivered, any image, information, or data over or through any medium, including the Internet or an interconnected network, by use of any electronic equipment or other device."

(o) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Transmission of material harmful to minors to a minor by electronic device or equipment prohibited**, in violation of Florida Statute Title XLVI Chapter 847.0138(2), which provides, in

[53] Florida Statute Title XLVI Chapter 874.001 provides:

(3) "Child pornography" means:

(a) Any image depicting a minor engaged in sexual conduct; or

(b) Any image that has been created, altered, adapted, or modified by electronic, mechanical, or other means, to portray an identifiable minor engaged in sexual conduct.

(19) "Sexual conduct" means actual or simulated sexual intercourse, deviate sexual intercourse, sexual bestiality, masturbation, or sadomasochistic abuse; actual or simulated lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed. A mother's breastfeeding of her baby does not under any circumstance constitute "sexual conduct."

relevant part, "any person who knew or believed that he or she was transmitting an image, information, or data that is harmful to minors, as defined in s. 847.001, to a specific individual known by the defendant to be a minor commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."[54] Transmission of material harmful to minors to a minor by electronic device or equipment prohibited is a misdemeanor of first degree.

(p) **Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Sexting**, in violation of Florida Statute Title XLVI Chapter 847.0141(1), which provides, "A minor commits the offense of sexting if he or she knowingly: (a) Uses a computer, or any other device capable of electronic data transmission or distribution, to transmit or distribute to another minor any photograph or video of any person which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001 Uses a computer, or any other device capable of electronic data transmission or distribution, to transmit or distribute to another minor any photograph or video of any person which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001. (b) Possesses a photograph or video of any person that was transmitted or

[54] Florida Statute Title XLVI Chapter 874.001 provides:

(7) "Harmful to minors" means any reproduction, imitation, characterization, description, exhibition, presentation, or representation, of whatever kind or form, depicting nudity, sexual conduct, or sexual excitement when it:

(a) Predominantly appeals to a prurient, shameful, or morbid interest;

(b) Is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable material or conduct for minors; and

(c) Taken as a whole, is without serious literary, artistic, political, or scientific value for minors.

A mother's breastfeeding of her baby is not under any circumstance "harmful to minors."

distributed by another minor which depicts nudity, as defined in s. 847.001, and is harmful to minors, as defined in s. 847.001. A minor does not violate this paragraph if all of the following apply: 1. The minor did not solicit the photograph or video. 2. The minor took reasonable steps to report the photograph or video to the minor's legal guardian or to a school or law enforcement official. 3. The minor did not transmit or distribute the photograph or video to a third party."[55] Under subsection (3)(a) sexting is a noncriminal violation for a first violation.

(q) **Ta.W., To.W., D.T., A.B., G.C., C.S., and B.S. committed Breach of the peace; disorderly conduct**, in violation of Florida Statute Title XLVI Chapter 877.03, which provides, "Whoever commits such acts as are of a nature to corrupt the public morals, or outrage the sense of public decency, or affect the peace and quiet of persons who may witness them, or engages in brawling or fighting, or engages in such conduct as to constitute a breach of the peace or disorderly conduct, shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083."

1330. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable,

[55] Florida Statute Title XLVI Chapter 874.001 provides:

(11) "Nudity" means the showing of the human male or female genitals, pubic area, or buttocks with less than a fully opaque covering; or the showing of the female breast with less than a fully opaque covering of any portion thereof below the top of the nipple; or the depiction of covered male genitals in a discernibly turgid state. A mother's breastfeeding of her baby does not under any circumstance constitute "nudity," irrespective of whether or not the nipple is covered during or incidental to feeding.

including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1331. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 30
CIVIL LIABILITY FOR CIVIL BATTERY UNDER FLORIDA LAW

(BY PLAINTIFF SON DOE AGAINST DEFENDANTS URSULINE PLAYERS T.A.W., T.O.W., D.T., A.B., G.C., C.S., AND B.S.)

1332. Plaintiffs incorporate all previous allegations.

1333. Under Florida law, civil battery "consists of the infliction of a harmful or offensive contact upon another with intent to cause such contact or the apprehension that such contact is imminent." *Paul v. Holbrook*, 696 So.2d 1311, 1312 (Fla. 5th DCA 1997), citing *Sullivan v. Atlantic Fed. Sav. & Loan Ass'n*, 454 So.2d 52, 54 (Fla. 4th DCA 1984), *review denied*, 461 So.2d 116 (Fla. 1985) (other citations omitted).

1334. The named Defendants committed a battery against Son Doe, by their infliction of a harmful or offensive contact of Son Doe with intent to cause such contact or the apprehension of such contact was imminent.

1335. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1336. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 31
CIVIL LIABILITY FOR CRIMINAL ACTS (MULTIPLE CRIMES INCLUDING HAZING AND ASSAULT) UNDER OHIO REV. CODE §§ 2307.60 AND MULTIPLE TENNESSEE CODE SECTIONS

(BY PLAINTIFF SON DOE AGAINST DEFENDANT T.S.)

1337. Plaintiffs incorporate all previous allegations.

1338. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of the following Florida Statutes are criminal acts, indeed misdemeanors and felonies.

1339. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1340. The named-Defendants committed the following crimes/criminal acts against Son Doe, including, but are not limited to:

(a) **T.S. committed Hazing**, in violation of Tennessee Code § 49-2-120, which "means any intentional or reckless act in this state, on or off LEA property, by one (1) student acting alone or with others, that is directed against any other student, that endangers the mental or physical health or safety of that student or that induces or coerces a student to endanger that student's mental or physical health or safety. 'Hazing' does not include customary athletic events or similar contests or competitions and is limited to those actions taken and situations created in connection with initiation into or affiliation with any organization." Hazing may be a criminal offense in Tennessee under certain circumstances.

(b) **T.S. committed Assault**, in violation of Tennessee Code § 39-13-101(a), which provides, in relevant part, "A person commits assault who… (2) Intentionally or

knowingly causes another to reasonably fear imminent bodily injury…" Assault is a Class A misdemeanor.

1341. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1342. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 32
CIVIL LIABILITY FOR CIVIL BATTERY UNDER TENNESSEE LAW

(BY PLAINTIFF SON DOE AGAINST DEFENDANT T.S.)

1343. Plaintiffs incorporate all previous allegations.

1344. Under Tennessee law, civil assault has the name elements as criminal assault under Tennessee Code § 39-13-101(a), which provides, in relevant part, "A person commits assault who… (2) Intentionally or knowingly causes another to reasonably fear imminent bodily injury…." *Hughes v. Metro. Gov. of Nashville and Davidson Cty.*, 240 S.W.3rd 352, 370–71 (Tenn. 2011).

1345. The named Defendant committed an assault against Son Doe, by intentionally to knowingly causing Son Doe to reasonably fear imminent bodily injury.

1346. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1347. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless

manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 33
CIVIL LIABILITY FOR CRIMINAL ACTS (MULTIPLE CRIMES INCLUDING HAZING; ILLEGAL USE OF MINOR OR IMPAIRED PERSON IN NUDITY-ORIENTED MATERIAL OR PERFORMANCE; AND TELECOMMUNICATIONS HARASSMENT)
UNDER OHIO REV. CODE §§ 2307.60 AND MULTIPLE OHIO REV. CODE SECTIONS
(BY PLAINTIFF SON DOE AGAINST DEFENDANT D.P., TA.W., C.C., TO.W., D.T., A.B., G.C., C.S., B.S., T.S.)

1348. Plaintiffs incorporate all previous allegations.

1349. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of the following Florida Statutes are criminal acts, indeed misdemeanors and felonies.

1350. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1351. The named-Defendants committed the following crimes/criminal acts against Son Doe, including, but are not limited to:

(a) **D.P., Ta.W., To.W., D.T., A.B., G.C., C.S., B.S., and T.S. committed Hazing**, in violation of Ohio Rev. Code § 2903.31(B)(1), which provides, "No person shall recklessly participate in the hazing of another."[56] The violation of which is a misdemeanor of the second degree.

[56] **Hazing**, under Ohio Rev. Code § 2903.31(A)(1), "means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act

(b) **D.P., Ta.W., To.W., D.T., A.B., G.C., and C.S. committed Illegal use of minor or impaired person in nudity-oriented material or performance**, in violation of Ohio Rev. Code § 2907.323(A), which provides, in relevant part, "No person shall do any of the following: (1) Photograph any minor or impaired person who is not the person's child or ward in a state of nudity, or create, direct, produce, or transfer any material or performance that shows the minor or impaired person in a state of nudity… (3) Possess or view any material or performance that shows a minor or impaired person who is not the person's child or ward in a state of nudity." Illegal use of minor or impaired person in nudity-oriented material or performance, under subsection (1), is a felony of the second degree; and, under subsection (3), a felony of the fifth degree.

(c) **D.P., Ta.W., To.W., D.T., A.B., G.C., C.S., and B.S. committed Telecommunications harassment**, in violation of Ohio Rev. Code § 2917.21(B)(1), which provides, "No person shall make or cause to be made a telecommunication, or permit a telecommunication to be made from a telecommunications device under the person's control, with purpose to abuse, threaten, or harass another person." Under subsection (2), "No person shall knowingly post a text or audio statement or an image on an internet web site or web page for the purpose of abusing, threatening, or harassing another person." Telecommunications harassment, under subsection (B), is a misdemeanor of the first degree.

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to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse, as defined in section 3719.0111 of the Revised Code.

1352. The named-Defendants committed the following crimes/criminal acts against Son Doe, Daughter Doe, and Mother Doe, including, but are not limited to:

(a) **D.T. committed Intimidation of attorney, victim or witness in criminal action or delinquent child action proceedings**, in violation of Ohio Rev. Code § 2921.04(A), which provides, "No person shall knowingly attempt to intimidate or hinder the victim of a crime or delinquent act in the filing or prosecution of criminal charges or a delinquent child action or proceeding, and no person shall knowingly attempt to intimidate a witness to a criminal or delinquent act by reason of the person being a witness to that act." Intimidation of attorney, victim or witness in criminal action or delinquent child action proceedings, as stated in subsection (A) is a misdemeanor of the first degree.

1353. As a direct and proximate result of these actions, Son Doe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

1354. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 34
VIOLATION OF TITLE IX OF THE CIVIL RIGHTS ACT (EDUCATION AMENDMENTS OF 1972), 20 U.S.C. § 1681, *ET SEQ.*

(BY PLAINTIFF SON ROE AGAINST DEFENDANT URSULINE HIGH SCHOOL)

1355. Plaintiffs incorporate all previous allegations.

1356. Ursuline High School, as a recipient of federal funding, is subject to Title IX, which prohibits discrimination based on sex in educational programs and activities. 20 U.S.C. §§ 1681 *et seq.*

1357. Religious schools that receive federal funding are only excluded from Title IX's requirements "if the application of [the requirements] would not be consistent with the religious tenets of such organization." 20 U.S.C. § 1681(a)(3).

1358. These religious exemptions are commonly known to include the exclusion from sports teams based on gender identity, the ability to expel pregnant students, and to have policies denying LGBTQ+ rights.

1359. Ursuline has not requested Title IX–exemption regarding the sexual-harassment and assault of athletes on the basis that preventing these assaults would not be consistent with its religious tenets.

1360. Nor would it—unless it wants people to believe that Catholic teaching embraces sexual harassment and sexual assaults.

1361. The harassment, hazing, and abuse Son Roe endured included:

(a) Threats by upperclassmen football players, in front of Reardon, McGlynn, and Syrianoudis, such as J.L. telling Son Roe while on the bus from Ohio to Indiana, "Oh yeah, wait until we get to the hotel. I got something for you."

(b) Ursuline football players J.L., T.D., D.T., and J.F. said, "jump him," and proceeded to attack and haze Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear.

(c) Ursuline football players J.L., T.D., D.T. J.F., K.R., and An.B. attacking and hazing Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear.

(d) Players videotaping the assaults of Son Roe and posting them to the 2024 football team's group Snapchat.

1362. These acts targeted Son Doe's male identity, involved sexual misconduct, and were rooted in gendered expectations of masculinity and male identity within the football program.

1363. The harassment, hazing, and abuse Son Roe suffered was severe, pervasive, and objectively offensive, and deprived Son Roe of access to educational opportunities or benefits.

1364. Ursuline, through its football program and administrators, including Defendants Reardon, McGlynn, Syrianoudis, Sammartino, Damore, and DeSantis had actual knowledge of the severe, pervasive, and objectively offensive harassment, hazing, and abuse Son Roe suffered.

1365. Upon information and belief, Ursuline, through the same defendants, had actual knowledge of the culture of hazing historically involved in the school's football program.

1366. Despite this knowledge, Ursuline maintained a policy and practice of responding with deliberate indifference to the hazing of underclassmen football players, including Son Roe. The football program has known of the hazing Son Roe endured since the spring of 2025, when Son Roe met with Reardon and DeSantis to discuss his transferring to another high school. Yet the program and School failed to take prompt and effective action to investigate, discipline the perpetrators, or remedy the hostile environment.

1367. Ursuline's deliberate indifference is further evidenced by its failure to train coaches, including Reardon, McGlynn, and Syrianoudis on recognizing and preventing gender-based hazing, despite known risks in the football program; implement effective anti-hazing policies, procedures, or oversight mechanisms for the football team; and investigate or sanction the football program despite prior complaints of misconduct.

1368. Under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a), Ursuline created, tolerated, and subjected Son Roe to a hostile educational environment because Son Roe was treated disparately based upon his gender; suffered gender-based hazing, assault, and other

harassment; and Ursuline lacked adequate policies, training, and procedures and deliberately failed to take appropriate preventive or remedial measures.

1369. Because of Ursuline's discriminatory policy and practice, Son Roe was denied equal access to the educational and athletic opportunities of the football program and school, forced to endure a hostile environment, and ultimately forced to transfer schools to escape the harassment and retaliation.

1370. As a direct and proximate result of Ursuline's failures, Son Roe suffered and will continue to suffer economic and non-economic damages including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 35
CIVIL LIABILITY FOR HAZING UNDER OHIO REV. CODE § 2307.44

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS)

1371. Ohio Rev. Code § 2307.44 [Hazing civil liability] provides:

> Any person who is subjected to hazing, as defined in division (A) of section 2903.31 of the Revised Code, may commence a civil action for injury or damages, including mental and physical pain and suffering, that result from the hazing. The action may be brought against any participants in the hazing, any organization whose local or national directors, trustees, or officers authorized, requested, commanded, or tolerated the hazing, and any local or national director, trustee, or officer of the organization who authorized, requested, commanded, or tolerated the hazing. If the hazing involves students in a primary, secondary, or post-secondary school, university, college, or any other educational institution, an action may also be brought against any administrator, employee, or faculty member of the school, university, college, or other educational institution who knew or reasonably should have known of the hazing and who did not make reasonable attempts to prevent it and against the school, university, college, or other educational institution. If an administrator, employee, or faculty member is found liable in a civil action for hazing, then notwithstanding Chapter 2743. of the Revised Code, the school, university, college, or other educational institution that employed the administrator, employee, or faculty member may also be held liable.

1372. The named player Defendants engaged in or permitted hazing against Son Roe, as further detailed above and below.

1373. Officers, administrators, employees, and faculty members of Defendants Ursuline High School and the Catholic Diocese of Youngstown authorized, requested, commanded, or tolerated the hazing, and knew or reasonably should have known of the hazing and did not make reasonable attempts to prevent it.

1374. As a direct and proximate result of these actions, Son Roe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1375. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 36
CIVIL LIABILITY FOR CRIMINAL ACTS (HAZING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.31

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1376. Plaintiffs incorporate all previous allegations.

1377. Under Ohio Rev. Code § 2903.31(B)(2), "No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other educational institution, public or private, shall recklessly permit the hazing of any person associated with the organization."

1378. Under the relevant part of Ohio Rev. Code § 2903.31(A)(1):

> "'Hazing' means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person…

1379. Under Ohio Rev. Code § 2901.22(C):

> A person acts recklessly when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that the person's conduct is likely to cause a certain result or is likely to be of a certain nature. A person is reckless with respect to circumstances when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that such circumstances are likely to exist.

1380. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.31(B)(2) are criminal acts, indeed misdemeanors, under § 2903.31(D).

1381. Defendants Ursuline High School (organization; private educational institution), Catholic Diocese of Youngstown, principal Sammartino, assistant principal Damore, athletic director John DeSantis, head coach Reardon, assistant coach McGlynn, and assistant coach Syrianoudis (each of whom is at least an administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of Ursuline) recklessly permitted the hazing of Son Roe, a student associated with Ursuline.

1382. The named Defendants' reckless permitting of the hazing included, but were not limited to:

(a) Before the 2024 trip, Defendants were aware of the football team's tradition and culture of hazing, but failed to take steps to prevent the hazing during the 2024 trip.

(b) On Day 1, threats by upperclassmen football players, in front of Reardon, McGlynn, and Syrianoudis, like J.L. telling Son Roe while on the bus from Ohio to Indiana,

"Oh yeah, wait until we get to the hotel. I got something for you."

(c) On Day 2, Ursuline football players J.L., T.D., D.T., and J.F. said, "jump him," and proceeded to attack and haze Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear.

(d) On Day 7, Ursuline football players J.L., T.D., D.T. J.F., K.R., and An.B. attacking and hazing Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear

(e) Players videotaping the assaults of Son Roe and posting them to the 2024 football team's group Snapchat

(f) The named Defendants recklessly permitted the present-day hazing to occur because the hazing of other player-students had occurred for years, and they failed to prevent it.

1383. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1384. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline High School and the Diocese acting on their behalf and within the scope of their offices or employment.

1385. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline High School's administration and the Diocese acting on behalf of the organizations and within the scope of the administrator's office or employment.

1386. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline High School and the Diocese as defined in Ohio

Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1387. As a direct and proximate result of these actions, Son Roe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 37
CIVIL LIABILITY FOR CRIMINAL ACTS (FAILING TO ACT TO PREVENT BODILY HARM) UNDER OHIO REV. CODE §§ 2307.60 AND WISCONSIN STATUTE § 948.03(4)

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, CATHOLIC DIOCESE OF YOUNGSTOWN, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1388. Plaintiffs incorporate all previous allegations.

1389. Under Wisconsin Statute § 948.03(4)(b) [Failing to act to prevent bodily harm]:

> A person responsible for the child's welfare is guilty of a Class H felony if that person has knowledge that another person intends to cause, is causing or has intentionally or recklessly caused bodily harm to the child and is physically and emotionally capable of taking action which will prevent the bodily harm from occurring or being repeated, fails to take that action and the failure to act exposes the child to an unreasonable risk of bodily harm by the other person or facilitates the bodily harm to the child that is caused by the other person.

1390. Under Wisconsin Statute § 948.03(1), "In this section, 'recklessly' means conduct which

creates a situation of unreasonable risk of harm to and demonstrates a conscious disregard for the safety of the child."

1391. Under Wisconsin Statute § 948.51(2) [Hazing]:

> No person may intentionally or recklessly engage in acts which endanger the physical health or safety of a student for the purpose of initiation or admission into or affiliation with any organization operating in connection with a school, college or university. Under those circumstances, prohibited acts may include any brutality of a physical nature, such as whipping, beating, branding, forced consumption of any food, liquor, drug or other substance, forced confinement or any other forced activity which endangers the physical health or safety of the student.

1392. Under Wisconsin Statute § 948.51(1), "In this section 'forced activity' means any activity which is a condition of initiation or admission into or affiliation with an organization, regardless of a student's willingness to participate in the activity."

1393. Under Wisconsin Statute § 939.22(4), "'Bodily harm' means physical pain or injury, illness, or any impairment of physical condition."

1394. Under Wisconsin Statute § 939.22(14), "'Great bodily harm' means bodily injury which creates a substantial risk of death, or which causes serious permanent disfigurement, or which causes a permanent or protracted loss or impairment of the function of any bodily member or organ or other serious bodily injury."

1395. Under Wisconsin Statute § 939.23(3), "'Intentionally' means that the actor either has a purpose to do the thing or cause the result specified, or is aware that his or her conduct is practically certain to cause that result. In addition, except as provided in sub. (6), the actor must have knowledge of those facts which are necessary to make his or her conduct criminal and which are set forth after the word 'intentionally.'"

1396. Under Wisconsin Statute § 939.24(1), "In this section, 'criminal recklessness' means that the actor creates an unreasonable and substantial risk of death or great bodily harm to another

human being and the actor is aware of that risk, except that for purposes of ss. 940.02 (1m), 940.06 (2) and 940.23 (1) (b) and (2) (b), 'criminal recklessness' means that the actor creates an unreasonable and substantial risk of death or great bodily harm to an unborn child, to the woman who is pregnant with that unborn child or to another and the actor is aware of that risk." Under the relevant part of § 939.24, "if criminal recklessness is an element of a crime in chs. 939 to 951, the recklessness is indicated by the term 'reckless' or 'recklessly.'"

1397. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Wisconsin Statute § 948.03(4)(b)) are criminal acts, indeed and felonies, under Wisconsin Statute § 948.03(4)(b).

1398. Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were responsible for Son Roe's welfare.

1399. Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis had knowledge—before and during the 2024 trip—that the football players intended to cause, were causing, or had intentionally or recklessly caused bodily harm to Son Roe by the players subjecting Son Roe to physical abuse and hazing.

1400. Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were physically and emotionally capable of taking action that would prevent the bodily harm of Son Roe from occurring or being repeated.

1401. But Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis failed to take that action and the failure to act exposed Son Roe to an unreasonable risk of bodily harm by the football players or facilitated the bodily harm to Son Roe that was caused by the football players.

1402. The named Defendants engaged in acts or situations that permitted the hazing giving rise to their failure to act to prevent the bodily harm of Son Roe that included, but were not limited to:

(a) Before the 2024 trip, Defendants were aware of the football team's tradition and culture of hazing, but failed to take steps to prevent the hazing during the 2024 trip.

(b) On Day 1, threats by upperclassmen football players, in front of Reardon, McGlynn, and Syrianoudis, such as J.L. telling Son Roe while on the bus from Ohio to Indiana, "Oh yeah, wait until we get to the hotel. I got something for you."

(c) On Day 2, Ursuline football players J.L., T.D., D.T., and J.F. said, "jump him," and proceeded to attack and haze Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear.

(d) On Day 7, Ursuline football players J.L., T.D., D.T. J.F., K.R., and An.B. attacking and hazing Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear

(e) Players videotaping the assaults of Son Roe and posting them to the 2024 football team's group Snapchat

(f) The named Defendants engaged in acts or situations that permitted the present-day hazing to occur because the hazing of other players-students had occurred for years, and they failed to prevent it.

1403. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1404. The conduct complained of above constitutes criminal acts by Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal

accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1405. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Wisconsin Statute § 948.51; and

(c) failure to act to prevent bodily harm under Wisconsin Statute § 948.03.

1406. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendants Ursuline and the Diocese acting on their behalf and within the scope of their offices or employment.

1407. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline and the Diocese's administration acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1408. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

1409. As a direct and proximate result of these actions, Son Roe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1410. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 38
CIVIL LIABILITY FOR CRIMINAL ACTS (NEGLECT OF A DEPENDENT) UNDER OHIO REV. CODE §§ 2307.60 AND INDIANA CODE § 35-46-1-4

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, THE DIOCESE, MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1411. Plaintiffs incorporate all previous allegations.

1412. Under Indiana Code § 35-46-1-4(a), in relevant part, "A person having the care of a dependent, whether assumed voluntarily or because of a legal obligation, who knowingly or intentionally: (1) places the dependent in a situation that endangers the dependent's life or health… commits neglect of a dependent, a Level 6 felony."

1413. Under Indiana Code § 35-46-1-4(b)(1)(A), an offense under subsection (a)(1) is a Level 5 felony if the offense results in bodily injury.

1414. Under Indiana Code § 35-46-1-1, in relevant, "'Dependent' means… an unemancipated person who is under eighteen (18) years of age." Son Roe is a dependent.

1415. Under Indiana Code § 35-42-2-2.5(a), "'hazing' means forcing or requiring another person: (1) with or without the consent of the other person; and (2) as a condition of association with a group or organization; to perform an act that creates a substantial risk of bodily injury."

1416. Under Indiana Code § 35-42-2-2.5(b), "A person who knowingly or intentionally performs hazing commits a Class B misdemeanor. However, the offense is a Level 6 felony if it results in serious bodily injury to another person, and a Level 5 felony if it is committed by means of a deadly weapon."

1417. Under Indiana Code § 35-41-2-2(a), "A person engages in conduct 'intentionally' if, when he engages in the conduct, it is his conscious objective to do so."

1418. Under Indiana Code § 35-41-2-2(b), "A person engages in conduct "knowingly" if, when he engages in the conduct, he is aware of a high probability that he is doing so."

1419. Under Indiana Code § 35-31.5-2-29, "'Bodily injury' means any impairment of physical condition, including physical pain."

1420. Under Indiana Code § 35-31.5-2-292, "'Serious bodily injury' means bodily injury that creates a substantial risk of death or that causes: (1) serious permanent disfigurement; (2) unconsciousness; (3) extreme pain; (4) permanent or protracted loss or impairment of the function of a bodily member or organ; or (5) loss of a fetus.

1421. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Indiana Code § 35-46-1-4(a)(1) are criminal acts, indeed felonies, under Indiana Code § 35-46-1-4(a)-(b).

1422. Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were responsible for the care of Son Roe during the 2024 trip, whether assumed voluntarily or because of a legal obligation.

1423. Defendants Ursuline, Diocese, Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis knowingly or intentionally placed Son Roe in a situation that endangered Son Roe's life or health by subjecting him to the football players' hazing, which resulted in bodily harm to

Son Roe.

1424. The named Defendants engaged in acts or situations that permitted the hazing giving rise to their failure to act to prevent the bodily harm of Son Roe that included, but were not limited to:

(a) Prior to the 2024 trip, Defendants were aware of the football team's tradition and culture of hazing, but failed to take steps to prevent the hazing during the 2024 trip.

(b) On Day 1, threats by upperclassmen football players, in front of Reardon, McGlynn, and Syrianoudis, such as J.L. telling Son Roe while on the bus from Ohio to Indiana, "Oh yeah, wait until we get to the hotel. I got something for you."

(c) On Day 2, Ursuline football players J.L., T.D., D.T., and J.F. said, "jump him," and proceeded to attack and haze Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear.

(d) On Day 7, Ursuline football players J.L., T.D., D.T. J.F., K.R., and An.B. attacking and hazing Son Roe by grabbing and holding him while forcibly trying to strip off his pants and underwear

(e) Players videotaping the assaults of Son Roe and posting them to the 2024 football team's group Snapchat

(f) The named Defendants engaged in acts or situations that permitted the present-day hazing to occur because the hazing of other players-students had occurred for years, and they failed to prevent it.

1425. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

1426. The conduct complained of above constitutes criminal acts by Defendants Sammartino,

Damore, DeSantis, Reardon, McGlynn, and Syrianoudis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

1427. The crimes include, but are not limited to,

(a) hazing under Ohio Rev. Code § 2901.31;

(b) hazing under Indiana Code § 35-42-2-2.5; and

(c) neglect of a dependent under Indiana Code § 35-46-1-4.

1428. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline and the Diocese acting on their behalf and within the scope of their offices or employment.

1429. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendants Ursuline and the Diocese's administrations acting on behalf of the organizations and within the scope of the administrators' offices or employment.

1430. Defendants Sammartino, Damore, DeSantis, Reardon, McGlynn, and Syrianoudis were agents and employees of Defendant Ursuline and the Diocese as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organizations or on their behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organizations by law—namely the duty to protect the students whose safety was entrusted to

them—and did not discharge that duty.

1431. As a direct and proximate result of these actions, Son Roe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1432. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 39
NEGLIGENT SUPERVISION OF CHILDREN

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, THE CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS, AND JOHN DESANTIS)

1433. Plaintiffs incorporate all previous allegations.

1434. Defendants had a legal duty to supervise the students under their care.

1435. Defendants failed to meet the standard of reasonable and prudent administrators, educators, and coaches in supervising the students.

1436. Defendants' failure to provide adequate supervision directly caused or contributed to the Plaintiff Son Roe's injuries and harm.

1437. As a direct and proximate result of these actions, Plaintiff Son Roe student suffered damages from Defendants' negligence.

1438. The organizational Defendants are vicariously liable for the employee's negligent supervision.

1439. Plaintiff Son Roe has suffered and will continue to suffer economic and non-economic

damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1440. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 40
NEGLIGENT AND RECKLESS HIRING, TRAINING, SUPERVISION, DISCIPLINE, STAFFING, AND RETENTION UNDER OHIO LAW

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND THE CATHOLIC DIOCESE OF YOUNGSTOWN)

1441. Plaintiffs incorporate all previous allegations.

1442. Defendants Ursuline and the Diocese failed to exercise due care and acted in both a negligent and reckless manner in hiring, training, supervising, disciplining, staffing, and retaining the individual Defendants—especially Defendants Reardon and McGlynn.

1443. The individual Defendants were unfit for their positions and duties, as was obvious from their previous, harmful misconduct.

1444. Defendants Ursuline and the Diocese's negligent and reckless conduct in this regard proximately caused Son Roe the injuries.

1445. As a direct and proximate result of these actions, Son Roe, has suffered and will continue to suffer damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1446. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 41
NEGLIGENCE

(BY PLAINTIFF SON ROE AGAINST DEFENDANTS URSULINE HIGH SCHOOL, THE CATHOLIC DIOCESE OF YOUNGSTOWN, DANIEL REARDON, TIMOTHY MCGLYNN, CHRISTIAN SYRIANOUDIS, AND JOHN DESANTIS)

1447. Plaintiffs incorporate all previous allegations.

1448. Defendants failed to exercise the care that reasonably prudent people or organizations would exercise in a similar situation, resulting in injury.

1449. They owed a duty of care owed to Plaintiff Son Roe.

1450. They breached that duty.

1451. The organizational Defendants are vicariously liable for the negligence.

1452. As a direct and proximate result of these actions, student Plaintiff Son Roe suffered damages from Defendants' negligence.

1453. Plaintiff Son Roe has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1454. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 42
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UNDER OHIO LAW

(BY PLAINTIFFS SON ROE, FATHER ROE, AND MOTHER ROE AGAINST DEFENDANTS MATTHEW SAMMARTINO, MARGARET DAMORE, JOHN DESANTIS, DANIEL REARDON, TIMOTHY MCGLYNN, AND CHRISTIAN SYRIANOUDIS)

1455. Plaintiffs incorporate all previous allegations.

1456. Named Defendants' conduct was so extreme and outrageous as to go beyond the bounds of decency–conduct that can be considered utterly intolerable in a civilized society.

1457. Defendants and their actions caused severe emotional distress to Son Roe, Father Roe, and Mother Roe.

1458. At all material times, Defendants acted intentionally; to cause emotional distress to Son Roe, Father Roe, and Mother Roe; and knew with substantial certainty that their acts would cause severe emotional distress to Son Roe, Father Roe, and Mother Roe.

1459. The mental anguish suffered by Son Roe, Father Roe, and Mother Roe is so serious and of a nature that no reasonable person could be expected to endure it.

1460. The unreasonable, improper, and unlawful acts of Defendants were made with willful and reckless disregard of the consequences, with callous disregard for Son, Father, and Mother Roe's rights and physical and mental well-being, with legal malice, and with substantial certainty that the consequences thereof would cause serious personal injury to Son Roe, Father Roe, and Mother Roe.

1461. As a direct and proximate result of these actions, Son Roe, Father Roe, and Mother Roe have suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

1462. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

PRAYER FOR RELIEF

For the above reasons, Plaintiff respectfully requests the following relief from the Court:

(a) Declare that Defendants' acts and conduct constitute violations of federal and state law and the United States Constitution;

(b) Enjoin Defendants from retaliating against Mother Doe, Son Doe, Daughter Doe, Father Roe, Mother Roe, and Son Roe.

(c) Enter judgment in Mother Doe, Son Doe, and Daughter Doe, Father Roe, Mother Roe, and Son Roe's favor on all claims for relief;

(d) Award Mother Doe, Son Doe, Daughter Doe, Father Roe, Mother Roe, and Son Roe full compensatory damages, economic and non-economic, including, but not limited to, pain and suffering, mental anguish, emotional distress, reputational harm, sense of betrayal, and trauma that they have suffered and are reasonably certain to suffer in the future;

(e) Award Mother Doe, Son Doe, Daughter Doe, Father Roe, Mother Roe, and Son Roe punitive damages as appropriate for all intentional and malicious violations of federal and state law and constitutional rights;

(f) Award prejudgment and post-judgment interest at the highest lawful rate;

(g) Award Mother Doe, Son Doe, Daughter Doe, Father Roe, Mother Roe, and Son Roe their reasonable attorney fees, expert fees, and all other costs and expenses of this suit;

(h) Award all other relief in law or equity to which Mother Doe, Son Doe, Daughter Doe, Father Roe, Mother Roe, and Son Roe is entitled and that the Court deems equitable, just, or proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues within this complaint.

Dated: November 10, 2025

Respectfully submitted,

/s/ Subodh Chandra
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Attorneys for Plaintiffs
Mother, Son, and Daughter Doe
(Pseudonyms); and
Father, Mother, and Son Roe
(Pseudonyms)

CERTIFICATIONS

I certify that on this day, November 10, 2025, a copy of this document was filed electronically under Fed. R. Civ. P. 5(b)(2)(E). Notice of this filing will be sent via operation of the Court's electronic-filing system to all parties reflected on the electronic-filing receipt.

I certify that beginning on November 11, 2025, Plaintiffs' counsel will begin serving the summons and Complaint to Defendants without counsel, at the following addresses:

D.P.
Ursuline Player and minor child, individually; and
Dale Peterman,
Parent of Ursuline Player D.P.,
Individually and on behalf of minor child
465 Gypsy Lane, Apt. 28
Youngstown, Ohio 44505;
and
LayShawna Garner,
Parent of Ursuline Player D.P.,
Individually and on behalf of minor child
116 Alburn Drive
Youngstown, Ohio 44512

Ta.W.

Ursuline Player and minor child, individually; and
Raylette Robinson,
Grandparent and Guardian of Ursuline Player Ta.W.
Individually and on behalf of minor child
739 Annawan Lane
Boardman, Ohio 44512

To.W.
Ursuline Player and minor child, individually; and
Todd White, Jr. & Migdalia Sauceda,
Parent(s) of Ursuline Player To.W.,
Individually and on behalf of minor child
2641 Cooper Street
Youngstown, Ohio 44502

A.B.
Ursuline Player and minor child, individually; and
Kristen Brown & [FNU] [LNU],
Parent(s) of Ursuline Player A.B.,
Individually and on behalf of minor child
2228 Selma Ave.
Youngstown, Ohio 44504

G.C.
Ursuline Player and minor child, individually; and
Anthony Camuso,
Parent of Ursuline Player G.C.,
Individually and on behalf of minor child
4475 Jannell Court,
Canfield, Ohio 44406; and
Rachel Camuso,
Parent of Ursuline Player G.C.,
Individually and on behalf of minor child
150 Preserve Boulevard
Canfield, Ohio 44406

C.S.
Ursuline Player and minor child, individually; and
Liza Strawn and [FNU] Strawn,
Parent(s) of Ursuline Player C.S.
171 Glenview Road
Canfield, Ohio 44406

B.S.
Ursuline Player and minor child, individually; and
Benjamin Smith and Janell Bankston
Parent(s) of Ursuline Player B.S.,
Individually and on behalf of minor child
34 South Hartford Avenue
Youngstown, Ohio 44509

/s/ Subodh Chandra
One of the attorneys for Plaintiffs *Jane Doe*, *et al.*

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Mother Chef, individually and on behalf of her minor child, Daughter Chef (Pseudonyms) c/o The Chandra Law Firm LLC The Chandra Law Building 1265 W. 6th Street, Suite 400 Cleveland, OH 44113-1326 Plaintiffs, v. **Ursuline High School** 750 Wick Avenue Youngstown, Ohio 44505 **Margaret Damore** Assistant Principal, Ursuline High School 6097 Herons Circle Austintown, Ohio 44515 **John DeSantis** Athletic Director & Assistant Football Coach, Ursuline High School 6123 Celesta Place, Poland, Ohio 44514 **Catholic Diocese of Youngstown** c/o Bishop David Bonnar 144 West Wood Street Youngstown, Ohio 44503 and **Ursuline Player-6 (pseudonym),** minor child, individually; and **[FNU] Harris & [FNU] Harris** Parent(s) of Ursuline Player-6, Individually and on behalf of minor child	Case No. _____-CV-_____ Judge _____ Magistrate _____ **COMPLAINT WITH JURY DEMAND**

PLAINTIFF'S EXHIBIT 1

[ADDRESS UNKNOWN] Defendants.	

COMPLAINT WITH JURY DEMAND

NATURE OF ACTION

1. This is a federal civil-rights action brought by a female Ursuline High School student and her family against a high school, its officials and coach, and a football player and his parents. It alleges violations of Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.* It includes supplemental claims for Ohio legal violations, including statutes establishing civil liability for criminal acts like felonious assault, assault, failure to report abuse; aggravated menacing; menacing; and menacing by stalking. And includes other state-law civil claims for failure to report abuse; negligence; negligent supervision; negligent training, supervision, discipline, hiring, and retention; assault; battery; and negligent infliction of emotional distress.

2. Ursuline High School is a Catholic high school within the Diocese of Youngstown. Rather than act in accordance with its stated values and motto "*Soli Deo Gloria*" (Latin for "*Glory to God alone*"), Ursuline and at least two of its administrators, a coach, and student—consistent with Ursuline's *modus operandi*—opted to violate those values and acted solely for the glory of its football team alone.

3. Beginning in June 2023, Defendant Player-6—a six-foot-tall, star Ursuline High School football player—began sexually harassing fellow student Daughter Chef, asking this petite, under five-foot-tall freshman for sex and nude photos.

4. Uninterested, and still childlike in her growth stage, Daughter refused Player-6's overtures.

5. Unable to accept her rejection, Player-6's bullying and harassment escalated into a physical attack at school, causing Daughter serious physical injuries, photographically depicted below.

6. Despite Mother Chef and Daughter Chef reporting the attack that day, Defendant Assistant Principal Margaret Damore—on Defendant Ursuline High School behalf—"strongly advise[d]" them **not** to report the attack to police and falsely assured Mother the school would handle the matter. Both Defendant Damore and Defendant Athletic Director John DeSantis, after learning about the attack and injury, failed to report the matter to children's services or law enforcement—as required by law. By Ohio criminal statute, they are mandated reporters.

7. For the next *two years*, even after Defendant Player-6 continued to harass, stalk, menace, ogle, and intimidate Daughter, these Ursuline Defendants took no action to protect Daughter. Their failures continued even after Daughter's elder brother—an Ursuline graduate once close to DeSantis—voiced frustration and disappointment about Ursuline officials' persistent failures to protect his little sister, and pressed DeSantis to act.

8. The Ursuline Defendants' intentional failures persisted even after Daughter herself *repeatedly* reported to school officials Defendant Player-6's ongoing predatory behavior.

9. The Ursuline Defendants' failures weren't just negligent. They were reckless and intentional, because they sought to protect their venerated star football player—at any cost.

10. And they just didn't care about Daughter. What mattered was the false idol of football.

11. Mother had to sell her home and move so she could transfer Daughter to another school and protect her child.

12. Ursuline's culture of ignoring violent assaults by its football players has existed for many years—due, in part, to the school's negligent and reckless hiring, training, supervision, and retention of administrators, coaches, and teachers; and the School's willingness to turn a blind eye to the physical victimization of students it is entrusted to protect—all because the School elevates the glory of the football team above basic humanity and decency.

13. Victims, both named and unnamed, have endured permanent and lasting harm, degradation, humiliation, intimidation, and retaliation. Ursuline and its administrators could and should have prevented all of this.

14. Now, because of the actions detailed in this Complaint, Defendants must be held accountable.

PARTIES

15. Plaintiff Mother Chef ("Mother") is the mother of the victim, Daughter Chef. They both reside in Trumbull County, Ohio. She is filing suit on behalf of her minor daughter.

16. Plaintiff Daughter Chef ("Daughter"), a minor at the time of filing, was a freshman and sophomore at Ursuline, but has since transferred to another high school. She resides with Mother in Trumbull County, Ohio. When the sexual harassment and violence Defendant Player-6 perpetrated against her starting when she was a freshman happened, she was childlike and still playing with baby dolls. The events described below robbed her of her innocence.

17. Defendant Ursuline High School ("Ursuline") is a Catholic school under the Catholic Diocese of Youngstown ("Diocese"). Ursuline (with the Diocese's approval) is responsible for its employee's hiring, retention, training, supervision, and termination. That includes its administrators, coaches, and teachers. Father Richard Murphy is Ursuline's president. Ursuline is in Mahoning County, Ohio. At times relevant, Ursuline received and receives federal funds.

18. Defendant Margaret Damore is Ursuline's assistant principal. She resides in Mahoning County, Ohio.

19. Defendant John DeSantis is Ursuline's athletic director, teacher, and assistant football coach. He resides in Mahoning County, Ohio.

20. Defendant Catholic Diocese of Youngstown ("Diocese") is led by the Bishop, currently Bishop David Bonnar, who owns the Diocesan property and is the final decisionmaker for the Diocese and all entities within it, including Ursuline. The Diocese is headquartered in Mahoning County, Ohio. The Diocese is responsible for the negligent training, supervision, discipline, hiring, and retention of Defendants Damore and Desantis.

21. Defendant Ursuline Player-6 ("Player-6"), a minor, is an Ursuline junior football player. His address is unknown. Despite reasonable and diligent efforts, Plaintiffs could not discover Player-6's address. After identifying Player-6's address, Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending full discovery.

22. Defendants [FNU] Harris and [FNU] Harris are Player-6's parents, whose exact identities are unknown, but whose involvement Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs could not discover [FNU] Harris and [FNU] Harris's names and identities. Upon identification of [FNU] Harris and [FNU] Harris, Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending discovery.

OTHER NON-PARTY INDIVIDUALS

23. Roy Schmidt is an Ursuline teacher and head girls' soccer coach.

24. Louise Kotel is an Ursuline guidance counselor.

INCORPORATION BY REFERENCE

25. Plaintiffs incorporate by reference the Complaint captioned *King, et al., v. Ursuline High*

Sch., et al., filed in the Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822 ("Ursuline-hazing Complaint"), and all its successor complaints. The current operative complaint is filed concurrently with and incorporated as **Ex. 1**.

26. Defendants Ursuline High School, Assistant Principal Margaret Damore, and the Diocese are also named defendants in the Ursuline-hazing Complaint.

27. Defendant John DeSantis, while not a named defendant in the Ursuline-hazing Complaint, is referenced in it.

28. Defendant Player-6 is not a named defendant in the Ursuline-hazing Complaint; but Player-6 is referenced in the Ursuline-hazing Complaint for hazing, assaulting, and abusing a fellow Ursuline football player.

JURISDICTION AND VENUE

29. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331, 1343, and 2201, for federal claims under Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.*, which provide for attorney and expert fees. This Court has supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367.

30. This Court has personal jurisdiction over the Defendants, who reside in and conduct business in this District.

31. Venue is proper under 28 U.S.C. § 1391, because the substantial events giving rise to several of the claims took place within this District.

FACTUAL BACKGROUND

In June 2023, Daughter Chef attended summer gym class at Ursuline High School—and Ursuline football Player-6 violently assaulted her.

32. In June 2023, Plaintiff Daughter Chef, who had just completed the eighth grade and was about to become a freshman that fall at Defendant Ursuline High School, attended a summer gym class.

33. Daughter was only 14 years old and stood under five-feet tall, weighing less 120 pounds.

34. Defendant Player-6, a then-freshman at Ursuline, was also in the same summer gym class.

35. Player-6 was an Ursuline football player and stood about six-feet tall and weighed about 200 pounds.

36. Before the start of summer class, Daughter had never met Player-6.

37. Almost immediately, Player-6 made advances and flirted with Daughter, often trying to touch her hands and arms or putting his arms around her shoulders.

38. At first, Daughter thought Player-6 was just being playful. When Player-6 added Daughter to his Snapchat friends list, Daughter accepted the friend request.

39. Player-6 became increasingly aggressive over Snapchat and asked Daughter to send him nude photos and if she wanted to have sex.

40. Daughter adamantly refused both!

41. Daughter, innocent and naïve having just graduated from a Catholic grade school, was shocked by Player-6's words and actions.

42. Daughter, uninterested in Player-6's advances, made her feelings known to him.

43. But Player-6 became more aggressive on Snapchat and Daughter had to "block" him on Snapchat.

44. After Daughter rejected Player-6, he became even more aggressive. The once playful touches of the arms and shoulders became forceful and hostile.

45. As Player-6 became increasingly angry with Daughter's continued rejection, he became more aggressive.

46. On the last day of class, June 29, during a break, Daughter and some of her friends/classmates were at one end of the turf on Cafaro Field, located across the street from Ursuline.

47. Daughter and one of her friends were picking up the black turf pellets and playfully sprinkling them on each other's legs.

48. Player-6 walked over and sat across from Daughter.

49. Player-6 tried to flirt with Daughter and tried to put the pellets on Daughter's legs. Daughter told Player-6 to stop, but he kept doing it. And she kept telling him to stop.

50. Another of Daughter's friends jokingly sprinkled pellets in her hair, causing Daughter to turn toward her friend and say, "Stop."

51. Player-6 picked up a handful of black pellets from the turf and threw them at Daughter's face hitting her.

52. Daughter told Player-6 to stop, but he said "No" and continued to forcibly throw the pellets hitting Daughter in the face.

53. Daughter again told Player-6 to stop and that he was hurting her.

54. When Player-6 continued to throw the pellets at her, Daughter picked up some pellets and threw them back at Player-6.

55. Daughter said, "See, you don't like when it happens to you, do you?"

56. Daughter tried to get up, but Player-6 grabbed her ankle to prevent her from leaving.

57. Daughter kicked away Player-6's hand and started to run away in fear.

58. Player-6 became enraged at Daughter and said, "Now I'm going to beat her ass!"

59. As Player-6 chased after Daughter, he again yelled, "Now I'm going to beat her ass!"

60. Player-6 quickly caught up to Daughter, grabbed her by the waist, picked up her off the ground, and, as Daughter struggled to break free, he dropped her on her back.

61. Player-6 picked up Daughter again and threw her over his shoulders.

62. Daughter cried hysterically and screamed, "Someone help me!" and "Help!" multiple times. Daughter even pleaded with Player-6 to put her down.

63. But he refused.

64. Player-6 carried Daughter toward the concrete and, as Daughter struggled to get away, he dropped her on her face and stomach on the turf.

65. Daughter kept screaming both in pain and for help.

66. No Ursuline teachers came to her rescue.

67. Player-6 grabbed Daughter's ankles, flipped her on her back, and dragged her across the turf yelling, "I'm going to give you turf burn real bad."

68. Player-6 dragged Daughter for about 30 feet across the turf, while he continued yelling about giving Daughter "turf burn."

69. Daughter cried throughout the attack.

70. Throughout the vicious attack, Player-6 laughed sadistically.

71. Finally, another Ursuline student yelled at Player-6 to stop and he let go.

72. Crying, daughter ran over to a group of girl-students and asked them to look at her back.

73. Daughter was in excruciating pain from the burns on her back. The stinging pain was exacerbated because, due to the summer heat and it being gym class, Daughter was sweating, and the sweat was getting into the open wounds.

74. The turf pellets had also embedded into the open wounds contributing to Daughter's pain.

75. A junior female looked at Daughter's back and said, "This is really bad" and that they had to go to the bathroom.

76. Daughter and the junior went to the gym teacher, Roy Schmidt, and told him that Player-6 had dragged her across the turf and showed him the turf burns on her back.

77. Schmidt is also Ursuline's girls' soccer coach.

78. Daughter asked Schmidt if she could go to the restroom, which he permitted. Schmidt said, "Yeah, you can go to the bathroom and get that cleaned up."

79. As Daughter and the junior were on the way to the restroom, Daughter saw Defendant John DeSantis, who is Ursuline's athletic director and an assistant football coach responsible for Player-6.

80. DeSantis was grilling hot dogs for the last-day-of-summer-school picnic.

81. DeSantis asked what happened and Daughter told him that they just gotten "rough" with her.

82. DeSantis, with no interest or sympathy, just said "Okay," and told her to go to the bathroom. He went back to grilling the hot dogs.

Daughter Chef was seriously injured.

83. When Daughter got to the bathroom and the junior tried to wash off the pellets and turf from Daughter's back. The junior asked if Daughter wanted her to take photos of her back to show her mother stating, "This is really bad."

84. At 11:00 AM, the junior photographed Daughter's back and Daughter texted it to Mother:



85. Daughter, concerned about what her Mother would do if she told her the extent of what happened, and not wanting to go into details, texted Mother she "got dragged."

86. Daughter was afraid of Player-6 and felt he would retaliate against her if she told anyone what happened. She did not want him to physically abuse again.

87. Daughter did not call Mother while she was in the bathroom because technically, she wasn't allowed to use a cellphone to make a call in class.

88. Mother knew from the photo that the injuries were not from gym class and questioned Daughter about what really happened. But Daughter didn't want to go into details.

89. When Mother received Daughter's texts, she immediately completed her work, left home and headed to Ursuline.

90. After cleaning herself up, Daughter returned to the gym class and waited for any Ursuline administrator or teacher to come talk to her.

91. But no one from Ursuline came to check on Daughter or talk to her about the attack.

92. Player-6 was still present at the class.

93. Toward the end of class, there was a water-balloon fight on Ursuline's grass field, but anyone who didn't want to participate was permitted to stay in the parking lot.

94. Daughter and another student-friend stood in the parking lot.

95. Player-6 walked over and tried to throw water on Daughter.

96. The student-friend yelled at Player-6, "You did this to her! What the fuck is wrong with you?"

97. And Player-6 responded, "*Yeah, and I'd do it again.*"

98. Mother arrived at Ursuline about 11:59 AM as the gym class was ending.

Mother and Daughter went to the office and reported Defendant Player-6's violent attack to Defendants Assistant Principal Margaret Damore and Athletic Director John DeSantis.

99. Mother knew that Daughter's injuries were not from gym class.

100. Daughter broke down crying and told Mother what happened in detail.

101. Mother took Daughter directly to Ursuline's main office and asked to speak with the principal.

102. As they were waiting, DeSantis entered the office.

103. Mother told him, "I'm hot about this. This shouldn't have happened. No boy should be touching a girl like this."

104. He didn't respond.

105. Defendant-Ursuline Assistant Principal Margaret Damore came out and escorted Mother, Daughter, and DeSantis to her office.

106. Daughter tried to explain what happened going back to the start of class with Player-6, his sexual Snapchat messages, and his increasingly aggressive behavior, leading up to the attack.

107. Despite Daughter reporting sexual harassment, Damore responded coldly, "I'm not interested in what happened before" and that "I only want to hear what happened today."

108. Daughter explained in detail as much as she could about the attack, but Damore was clearly impatient and hurried to end the meeting.

109. Sensing Damore's disinterest in what happened and attempts to downplay the violent attack, Mother finally had Daughter lift her shirt to expose the injuries to her back.

110. Upon seeing Daughter's injuries, Damore, unsympathetically, tried to blame Daughter for not telling anyone what happened "immediately."

111. Upon seeing Daughter's injuries, DeSantis excused himself from the meeting.

112. Mother explained that Daughter *did* "immediately" inform the gym teacher Roy Schmidt about the attack—yet Schmidt did nothing.

113. Mother also explained that Daughter informed DeSantis on her way to bathroom—yet DeSantis, too, did nothing.

114. Damore stated that she would "handle it."

115. Mother responded, "This is a physical assault on my daughter. No man should be touching a girl, and this kid should not be at Ursuline High School."

116. Damore's indifference and lack of sympathy became even more evident and her demeanor became even more dismissive.

117. Mother demanded that Player-6 be disciplined and further demanded that Player-6 not be in any classes with Daughter and have no contact with Daughter.

118. Damore promised Mother and Daughter that Player-6 would be in no classes with Daughter and would have no contact with her during the school day.

119. Mother told Damore that she wanted to file a police report—because Player-6's attack was a crime.

120. Damore pleaded with Mother and convinced Mother not to file a police report.

121. Damore insisted that the attack be handled "in-house" and said, "I strongly advise you **not** to file a police report."

122. Damore said it wasn't necessary to involve law-enforcement authorities and that she wasn't going to contact them.

123. When Mother insisted that the school must act, Damore claimed there was "nothing" that could be done at the time because it was summer and summer classes had ended.

124. Daughter pointed out that Player-6 was a football player practicing that summer.

125. Damore said, "I will see what I can do"—and then did … *nothing*.

126. Damore assured Mother that she would address Player-6's conduct on the first day of school.

127. Other Ursuline students told Daughter that Player-6 was at the football team's summer practices and had not been disciplined.

128. Neither Damore, nor DeSantis, reported the criminal attack to children services or law enforcement—even though they are both mandatory reporters and are required to report it under Ohio Rev. Code § 2151.421.

129. Neither children services nor law enforcement ever contacted Mother.

130. No one from Ursuline contacted Mother or Daughter to inform them that Player-6 was disciplined.

131. Based on information and belief, Defendants never disciplined Player-6 for the attack on Daughter. He played the entire football season.

For weeks after Player-6's attack, Daughter Chef suffered in extreme pain.

132. Upon returning home, Daughter was in excruciating pain. Mother had to carefully remove the turf and pellets, which had been ground into the wounds on Daughter's back.

133. Daughter couldn't shower the first night because of the pain.

134. The turf burns on Daughter's back were visible for more than a week.

135. The injuries and pain from the turf burn and from being dropped twice on the ground persisted for weeks.

136. Even after the first night, Daughter, for weeks, couldn't shower without pain because of the turf burns. And when she did try to shower, she cried.

137. Because of the injuries, Daughter, for weeks, could not sleep or lie down on her back without pain.

138. Daughter could not wear a shirt without pain for weeks because of the turf burn.

139. Daughter's back pain has been continuous and ongoing.

Despite Defendant Assistant Principal Margaret Damore's assurance that Player-6 wouldn't be in class with her, when Daughter Chef began school in the fall, Defendant Player-6 *was* in class with her. Ursuline put him there.

140. When Daughter started class in the fall of 2023, Player-6 was in at least one class with her.

141. The school is large enough that this was completely avoidable.

142. Damore broke her promise to Mother that Player-6 would be in no classes with Daughter.

143. Player-6 continued to harass and make sexual advances toward Daughter.

144. Daughter tried to ignore Player-6, but he persisted.

145. On several days in September 2023, while in class, Player-6 would walk over and sit at Daughter's table with her and her friend.

146. Each time, Daughter immediately got up and sat at another table.

147. Player-6 tried to get Daughter's friends to side with him and told them her wanted to "put on" with her (teenage lingo for "date").

148. Daughter refused.

149. Player-6 even had his friends approach Daughter and tell her that he wanted to "put on" with her.

150. Daughter again refused.

151. In October 2023, Player-6 tried to turn Daughter's friends against her claiming that she lied about him assaulting her—despite his admitting it previously.

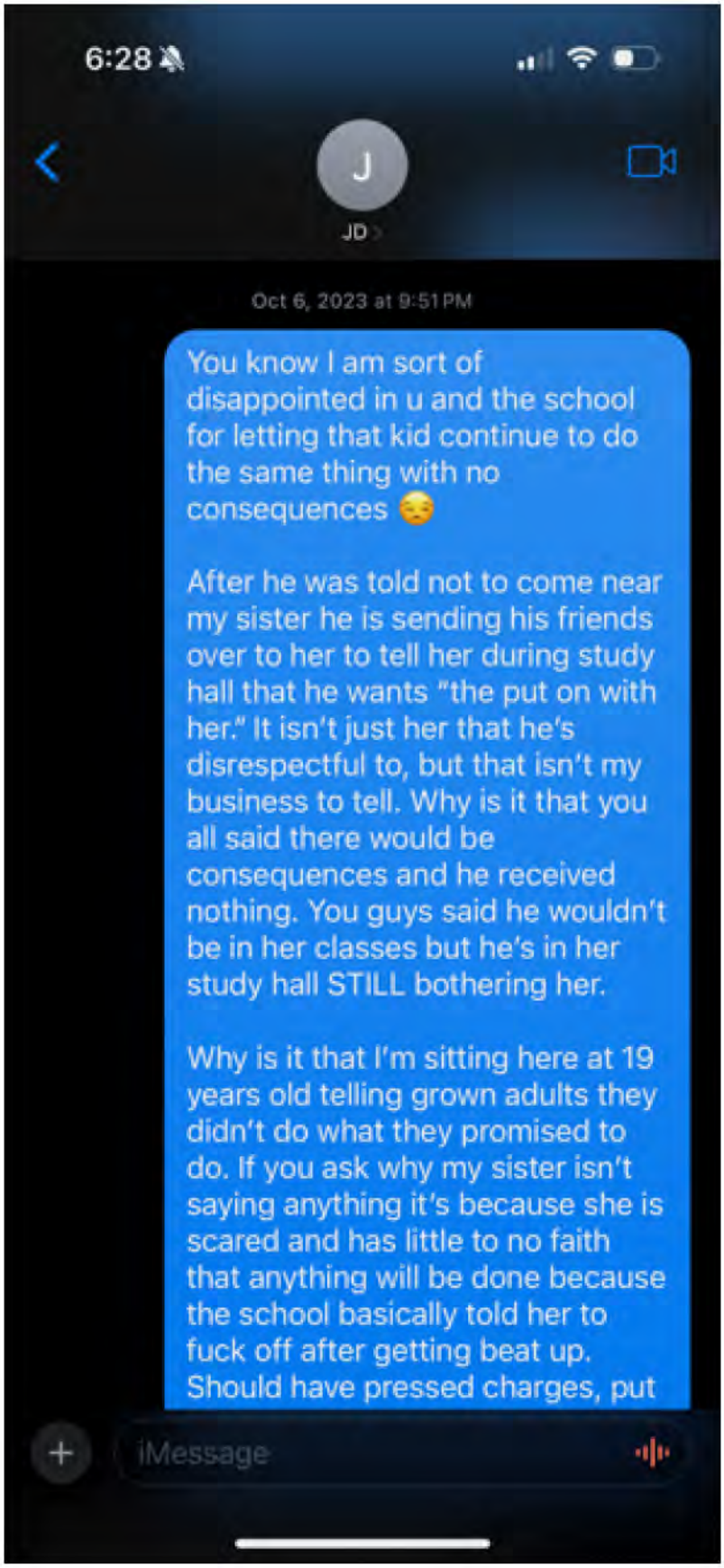
152. Daughter communicated her concerns and fears to her older brother ("Brother"), who graduated from Ursuline in 2023.

153. On Friday, October 6, 2023, worried for his sister's safety, Brother texted Athletic Director DeSantis hoping that DeSantis would handle the situation.

154. Brother wrote:

> You know I am sort of disappointed in u and the school for letting that kid continue to do the same thing with no consequences ☹
>
> After he was told not to come near my sister he is sending his friends over to her to tell her during study hall that he wants "the put on with her." It isn't just her that he's disrespectful to, but that isn't my business to tell. Why is it that you all said there would be consequences and he received nothing. You guys said he wouldn't be in her classes but he's in her study hall STILL bothering her.
>
> Why is it that I'm sitting here at 19 years old telling grown adults they didn't do what they promised to do. If you ask why my sister isn't saying anything it's because she is scared and has little to no faith that anything will be done because the school basically told her to fuck off after getting beat up. Should have pressed charges, put faith in people and it was a mistake.

[*Sic.*]

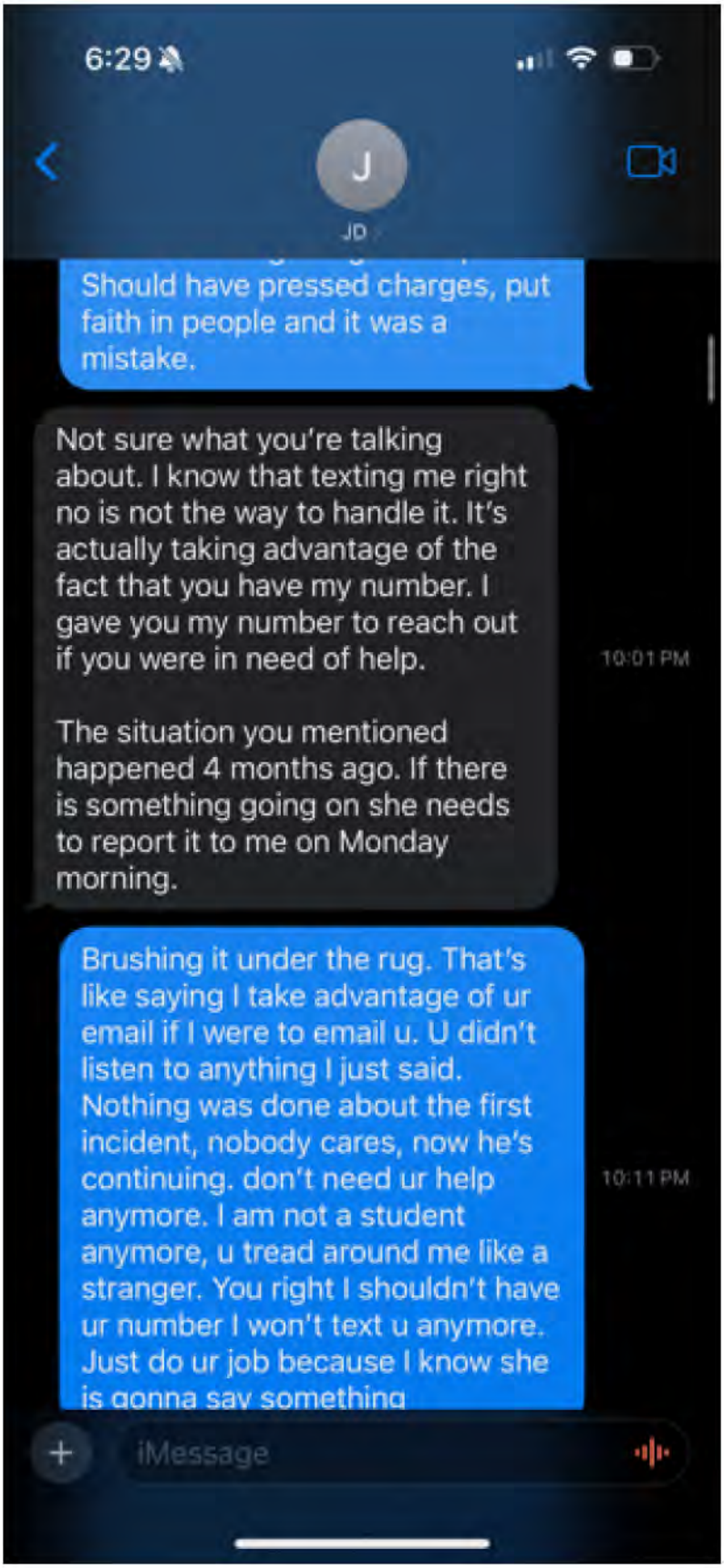

6:28
J
JD
Oct 6, 2023 at 9:51 PM
You know I am sort of disappointed in u and the school for letting that kid continue to do the same thing with no consequences 😒
After he was told not to come near my sister he is sending his friends over to her to tell her during study hall that he wants "the put on with her." It isn't just her that he's disrespectful to, but that isn't my business to tell. Why is it that you all said there would be consequences and he received nothing. You guys said he wouldn't be in her classes but he's in her study hall STILL bothering her.
Why is it that I'm sitting here at 19 years old telling grown adults they didn't do what they promised to do. If you ask why my sister isn't saying anything it's because she is scared and has little to no faith that anything will be done because the school basically told her to fuck off after getting beat up. Should have pressed charges, put
iMessage

155. DeSantis did nothing.

156. Worse than that, he falsely claimed he didn't know what Brother was talking about even though Brother told him what was currently happening. In the next breath, he acknowledged that a "situation happened four months ago." DeSantis simply ignored and wished away the report about Player-6's current conduct in study hall.

157. And on top of that, he remonstrated Brother for texting him:

> Not sure what you're talking about. I know that texting me right no [*sic*] is not the way to handle it. It's actually taking advantage of the fact that you have my number. I gave you my number to reach out if you were in need of help.
>
> The situation you mentioned happened 4 months ago. If there is something going on she needs to report it to me on Monday morning.

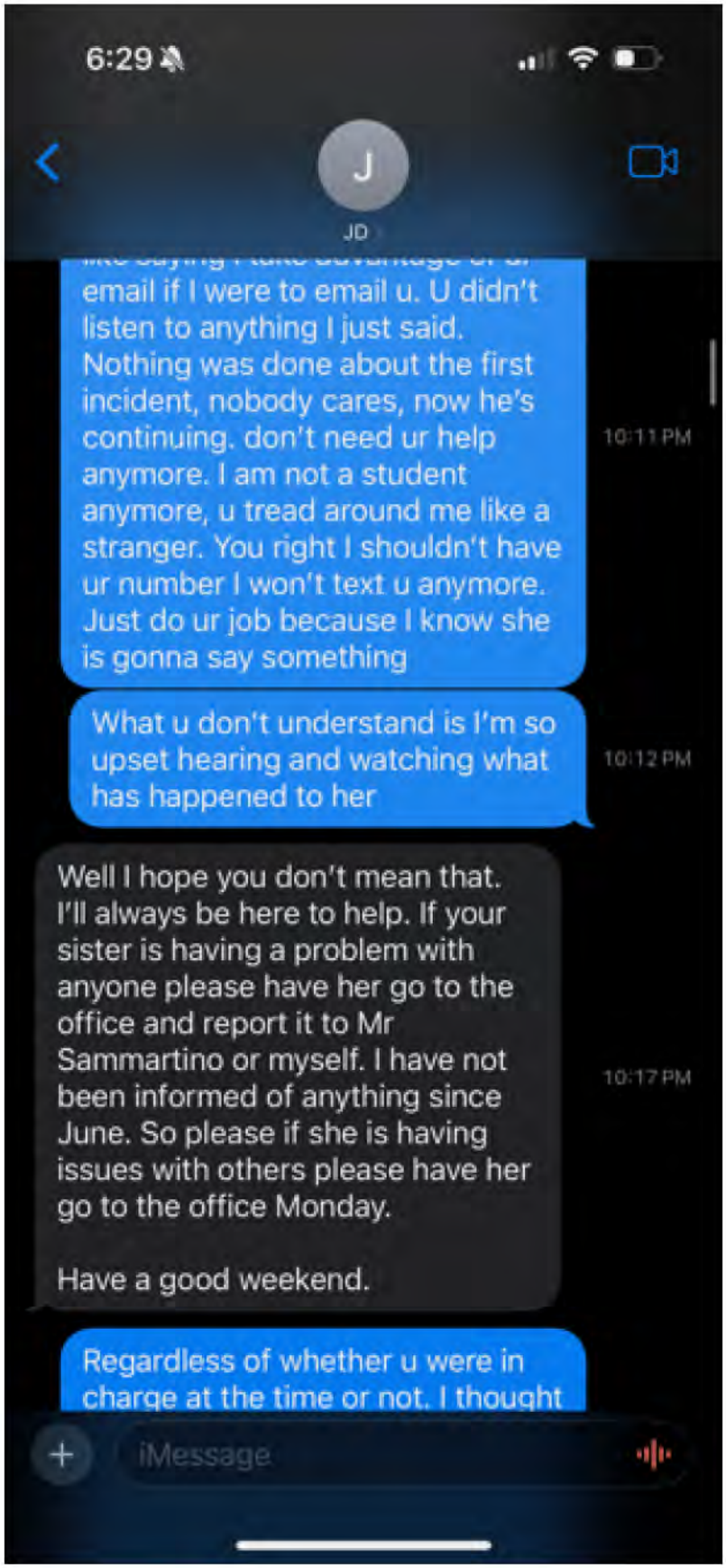

6:29
J
JD
Should have pressed charges, put faith in people and it was a mistake.
Not sure what you're talking about. I know that texting me right no is not the way to handle it. It's actually taking advantage of the fact that you have my number. I gave you my number to reach out if you were in need of help.
10:01 PM
The situation you mentioned happened 4 months ago. If there is something going on she needs to report it to me on Monday morning.
Brushing it under the rug. That's like saying I take advantage of ur email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
10:11 PM
iMessage

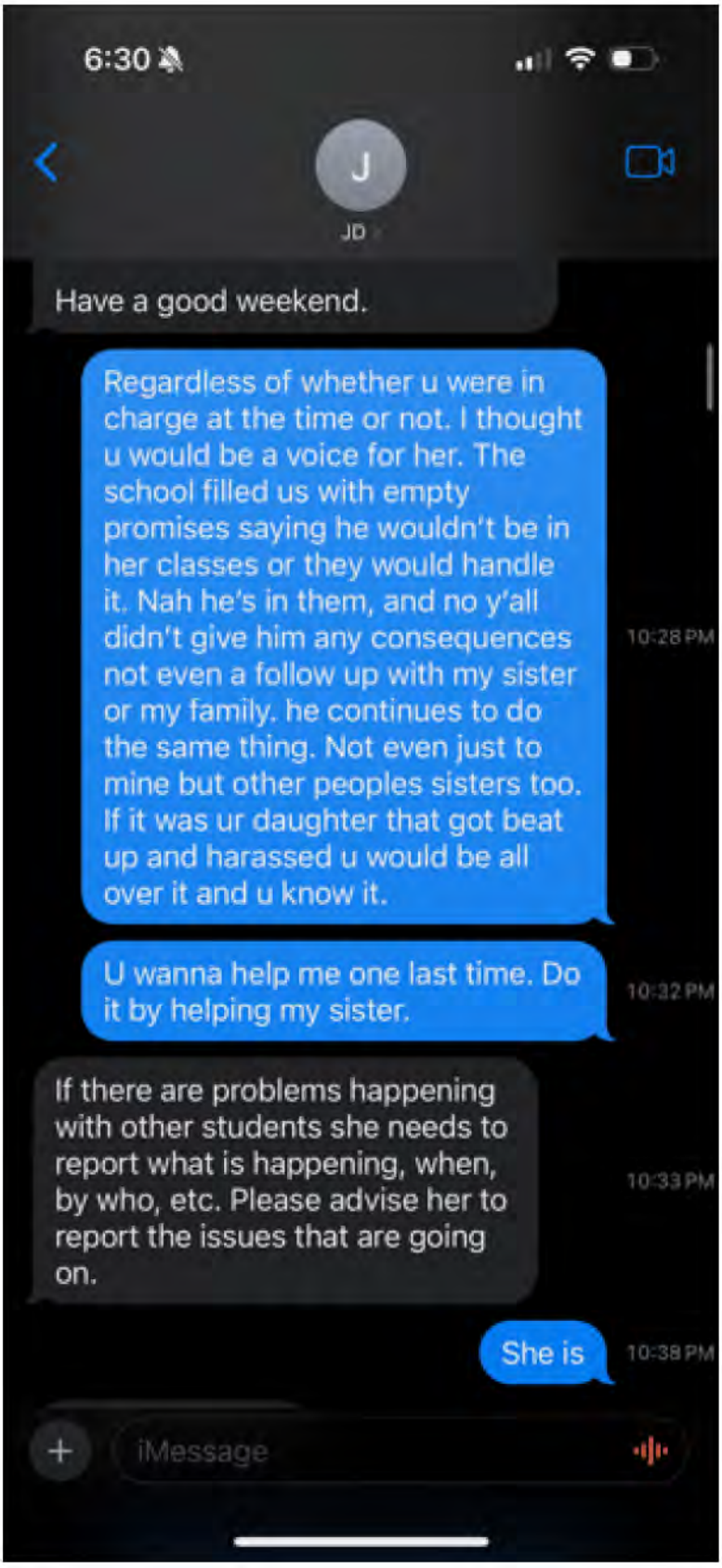
158. Brother responded:

> Brushing it under the rug. That's like saying I take advantage of ur email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
>
> What u don't understand is I'm so upset hearing and watching what has happened to her.

[*Sic.*]

159. Defendant DeSantis claimed he'd not been "informed of anything since June." He said this despite Damore having promised she would address Player-6's conduct on the first day of school. So Defendants never had any intention of addressing Player-6's conduct and protecting Daughter.


6:29
J
JD
email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
10:11 PM
What u don't understand is I'm so upset hearing and watching what has happened to her
10:12 PM
Well I hope you don't mean that. I'll always be here to help. If your sister is having a problem with anyone please have her go to the office and report it to Mr Sammartino or myself. I have not been informed of anything since June. So please if she is having issues with others please have her go to the office Monday.
Have a good weekend.
10:17 PM
Regardless of whether u were in charge at the time or not. I thought
iMessage


6:30
J
JD
Have a good weekend.
Regardless of whether u were in charge at the time or not. I thought u would be a voice for her. The school filled us with empty promises saying he wouldn't be in her classes or they would handle it. Nah he's in them, and no y'all didn't give him any consequences not even a follow up with my sister or my family. he continues to do the same thing. Not even just to mine but other peoples sisters too. If it was ur daughter that got beat up and harassed u would be all over it and u know it.
10:28 PM
U wanna help me one last time. Do it by helping my sister.
10:32 PM
If there are problems happening with other students she needs to report what is happening, when, by who, etc. Please advise her to report the issues that are going on.
10:33 PM
She is
10:38 PM
iMessage

160. Brother urged DeSantis to act. But it was futile:

> Regardless of whether u were in charge at the time or not. I thought u would be a voice for her. The school filled us with empty promises saying he wouldn't be in her classes or they would handle it. Nah he's in them, and no y'all didn't give him any consequences not even a follow up with my sister or my family. he continues to do the same thing. Not even just to mine but other peoples sisters too.
>
> If it was ur daughter that got beat up and harassed u would be all over it and u know it.
>
> U wanna help me one last time. Do it by helping my sister.

[*Sic.*]

161. Defendant DeSantis, downplaying the situation, said Daughter should report anything to him or the office.

162. On Tuesday, October 10, 2023, Daughter went to Ursuline guidance counselor Louise Kotel and said she wasn't comfortable with Player-6 being in her class, because of the attack and his continued harassment. Daughter elaborated on Player-6's attack and continued harassment.

163. Kotel took notes of the conversation. She told Daughter she might tell the principal, but that she would address it with DeSantis.

164. Later that day, DeSantis spoke to Daughter.

165. DeSantis was very short with Daughter and showed no interest in obtaining any of the details about what was happening.

166. DeSantis told Daughter that they were not going to remove Player-6 from her class because she "didn't like him, especially over something that happened more than three months ago" and "it's time to get over it."

167. DeSantis wanted Daughter to "settle your differences" with Player-6 and become friends. That is, he expected her to befriend her attacker.

168. Daughter tried to explain that it had nothing to do with her liking Player-6; it had to do with Player-6 violently attacking and injuring her, and his continued advancements and harassment.

169. DeSantis retorted that he wasn't removing Player-6 from the class and reiterated, "It's time [for Daughter] to move on." He abruptly ended the meeting.

170. DeSantis, a football coach, showed not the slightest interest in his charge, football Player-6's, ongoing harassment.

171. Ursuline Defendants did not remove Player-6 from Daughter's class.

172. Within days of Daughter's report to Kotel and DeSantis, Player-6 called Daughter a "snitch" and, while staring at Daughter, said to a classmate loud enough for Daughter to hear, "She tried to get me in trouble, but she failed."

173. He was right that Daughter failed in securing any help from Defendants.

174. Player-6 knew that at Ursuline, football is the false idol and that he was above any accountability from administrators and coaches. Even in the class with Daughter, he (and she) got to hear the teacher sing his praises for his performance on the gridiron.

175. Player-6 felt he could do anything to Daughter and get away with it. Because Ursuline administrators made him feel that way.

176. Emboldened, Player-6 persisted in repeatedly walking over to Daughter's table during class and trying to talk to her and her friends.

177. Throughout her freshman year, Player-6 stared at and ogled Daughter when he would see her in class and the school's hallways, causing her more fear and apprehension—especially given Damore and DeSantis's refusal to properly address the situation.

178. And at other times, when Daughter refused to engage with Player-6, he stared angrily at her, causing her fear and apprehension that he would suddenly and violently attack her again.

179. At least two to three more times, Daughter reported Player-6's predatory behavior and words to Kotel, who stated there was nothing they could do now, but assured Daughter that Player-6 wouldn't be in class with her next semester.

180. Fall semester 2024, Daughter (now a sophomore) had another class with Player-6.

181. That semester, the cycle of Player-6 staring at and ogling Daughter, which she consistently rejected, and then Player-6 glaring at Daughter daily, continued just as it had Daughter's freshman year.

182. Knowing Defendants were not going to help her, caused Daughter to give up all hope. She stopped going to them.

183. As a reasonable and foreseeable result, Daughter fell into a state of depression and didn't want to go to school most days. Daughter missed at least 35 days of school her sophomore year and arrived late and early on many other days.

184. Daughter even became physically sick many days because of the situation.

185. Daughter often says, "Going to Ursuline was the worst two years of my life. They drained the life out of me."

Daughter experienced disparate treatment at the hands of Defendants Ursuline High School and Margaret Damore.

186. In August–September 2024, Daughter let her friend (Friend-1), another Ursuline student, borrow her cellphone.

187. Friend-1 used Daughter's cellphone to prank text an Ursuline teacher.

188. Friend-1 pranked that she got the teacher's number from a dating app and carried on a conversation with him.

189. Initially, Daughter did not know Friend-1 was using her cellphone to prank text a teacher, but, upon learning, joined in.

190. Ursuline learned of Daughter and Friend-1's prank soon after school began.

191. Daughter admitted her involvement in the silliness.

192. Damore blamed Daughter for letting Friend-1 barrow her cellphone in the first place.

193. Ursuline and Damore suspended Daughter from school for *five days*—the maximum suspension permitted without Diocesan approval.

194. Ursuline and Damore also took away Daughter's cellphone privileges at school for the remainder of the year.

195. Based on information and belief, Friend-1 was only suspended for three days, when she was the one who started the silliness in the first place.

196. At Ursuline, a girl prank-texting warrants the maximum five-day suspension and loss of cellphone privileges, but violent attacks by a male football player merits no discipline or safety measures.

197. Shortly after this, another Ursuline teacher called Friend-1 "gay" during class and posted Friend-1's test grade on the board for the entire class to see and belittled Friend-1 in front of the class.

198. Based on information and belief, Friend-1's parents threatened to sue Ursuline and settled the matter out-of-court.

199. Friend-1 transferred to another high school.

200. In April 2024, two of Daughter's best friends were feuding and Daughter learned that Friend-2 and Friend-3 planned to fight in the cafeteria during lunch.

201. Both the night before and the morning of the planned fight, in the hope of preventing it, Friend-3's mother contacted Ursuline and Damore to alert them.

202. Ursuline and Damore ignored the warnings.

203. The morning of the planned fight, Daughter, hoping to prevent the fight between her best friends, asked her substitute teacher during class if she could go to her locker, which the teacher permitted.

204. Because Friend-2 was in class with Daughter, Daughter didn't want Friend-2 to know Daughter was leaving class to alert the school about the planned fight.

205. Daughter went to her locker and grabbed a book, but rather than return to class, Daughter went to the guidance counselor's office, which was near her locker.

206. Daughter told Ursuline guidance counselor Louise Kotel about the planned fight. Kotel assured Daughter that she would alert DeSantis, which she did.

207. When Daughter returned to class, the substitute teacher gave Daughter a detention for taking too long to return to class.

208. When Daughter went to lunch, no extra administrations, teachers, resource officers, or anyone were there to prevent the fight.

209. The fight occurred and Friend-3 was seriously injured, requiring a trip to the emergency room.

210. The fight was videorecorded and shared with other students and the community at-large.

211. Ursuline administrators broke up the fight and escorted Friend-2 to the office.

212. When no Ursuline administrators or teachers came to Friend-3's aid, Daughter's other friends helped Friend-3 to the bathroom, while Daughter retrieved Friend-3's belongings.

213. As Daughter was going to check on Friend-3, Damore saw her in the hallways and yelled at her for not being at lunch.

214. Daughter explained why she was not at lunch and Damore yelled at her to "mind your own business."

215. That afternoon, Damore summoned Daughter to her office.

216. Damore chastised Daughter for being away from class too long and getting the detention. Daughter protested the detention because her intentions were good—she was trying to stop the planned fight.

217. Despite Daughter trying to prevent violence, Damore refused to waive the five-point deduction on Daughter's conduct grade but agreed to waive Daughter's serving the detention.

218. A few weeks later, Damore reneged and forced Daughter to serve the detention.

219. Daughter met with Damore and questioned why she was forced to serve the detention, but Damore never disciplined Player-6 for his far worse conduct.

220. Damore sat unresponsive.

221. Daughter said, "So you're just never going to help me [with Player-6 or anything else]?"

222. Damore responded simply, "No."

223. So no good deed goes unpunished at Ursuline.

224. These were acts of retaliation for Daughter's reports about the all-important football Player-6.

Because of Defendant Player-6's violent attack and continued harassment, and because Defendants Assistant Principal Margaret Damore and Athletic Director John DeSantis's failed to report the matter or act—combined with Defendants Ursuline High School and Assistant Principal Margaret Damore's retaliatory and disparate treatment—Defendant was compelled to transfer schools.

225. Daughter fell into another state of depression and continued desire to not return to school because of Defendants.

226. Mother rightfully feared for her Daughter's safety and well-being if she returned to Ursuline.

227. So, in August 2025, Mother sold their house—in which the family lived for 28 years—and moved to another school district so Daughter could leave Ursuline and transfer to another high school.

228. Mother refused to speak to Ursuline about the transfer because Defendants lied to her family so many times.

229. Mother had the new high school arrange the transfer.

DEFENDANT URSULINE HIGH SCHOOL'S PREFERENTIAL TREATMENT OF ITS FOOTBALL PLAYERS AND DESIRE TO KEEP MISCONDUCT SILENT HAS BEEN ONGOING FOR YEARS.

230. The Ursuline-hazing Complaint, attached as Ex. 1 and incorporated by reference, is a prime example of Defendants' preferential treatment of its football players and desire to keep silent (or cover up their misconduct). But this behavior isn't isolated to the hazing matter; it has occurred over several years.

231. In the spring of 2023, after morning weight lifting, an Ursuline student (who has since graduated) witnessed a fight between two Ursuline football players in the locker room.

232. Word of the fight quickly spread throughout the school and the students openly discussed it during the day.

233. That afternoon, Athletic Director DeSantis was distracted and visibly upset during class.

234. After class, the witness-student asked DeSantis, "are you good with everything that happened this morning" with the fight.

235. DeSantis became immediately defensive and in an angry tone said, "I don't know what you're talking about." He was trying to downplay and silence the matter.

236. The witness-student said, "You know what I'm talking about," and DeSantis just glared at him and didn't answer.

237. The witness-student, now fearing retaliation if he continued to discuss the fight, walked away and kept his mouth shut—that is until the Ursuline-hazing Complaint was filed. He then felt safe and justified in reporting the incident.

238. In another instance, a former Ursuline student, while attending college, witnessed a fight between two players at the college. The former student felt the college's coach unjustly punished the non-aggressor-player over the aggressor, who was the better player.

239. The former-student spoke to DeSantis, with whom he became friendly with during his time at Ursuline, for insight.

240. DeSantis responded that "it's the coaches' job to win games" and that "if they don't win games, they're out of a job."

241. DeSantis continued that "sometimes they have to make tough choices to protect the better players to win games."

242. All Defendants cared about was football.

DEFENDANTS CATHOLIC DIOCESE OF YOUNGSTOWN AND URSULINE HIGH SCHOOL FAILED TO TRAIN, SUPERVISE, AND DISCIPLINE DEFENDANTS DAMORE AND DESANTIS ON HOW TO HANDLE STUDENT VIOLENCE AND HARASSMENT (INCLUDING SEXUAL HARASSMENT), PROPERLY REPORT CHILD ABUSE, AND PROTECT STUDENTS—THAT IS, HOW NOT TO TREAT FOOTBALL AND FOOTBALL PLAYERS AS MORE IMPORTANT THAN EVERYTHING

243. Defendant Catholic Diocese of Youngstown and Ursuline High School failed to train, supervise, and discipline Defendants Damore and DeSantis about how to properly address and investigate allegations of student

(a) violence,

(b) sexual harassment,

(c) stalking,

(d) menacing,

(e) Title IX violations, and

(f) all the other misconduct described above.

244. These institutional Defendants also failed to train and supervise Damore and DeSantis on fulfilling their mandatory duties to report such misconduct and abuse to law enforcement or children services.

245. And despite receiving federal funding, Defendant Ursuline High School had no Title IX coordinator. Defendant Catholic Diocese of Youngstown, which oversees the high school, did not ensure it did, or that its administrators like Defendant Damore designated one.

CLAIMS

Although all claims below for Plaintiff Daughter Chef, are through Mother Chef, Mother Chef's name is omitted for simplicity's sake.

CLAIM 1
VIOLATION OF TITLE IX OF THE CIVIL RIGHTS ACT (EDUCATION AMENDMENTS OF 1972), 20 U.S.C. § 1681 *ET SEQ.*

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT URSULINE HIGH SCHOOL)

246. Plaintiffs incorporate all previous allegations.

247. Ursuline High School, as a recipient of federal funding, is subject to Title IX, which prohibits discrimination based on sex in educational programs and activities, as well as retaliation for engaging in protected activity complaining of discrimination. 20 U.S.C. §§ 1681 *et seq.*

248. Religious schools that receive federal funding are only excluded from Title IX's requirements "if the application of [the requirements] would not be consistent with the religious tenets of such organization." 20 U.S.C. § 1681(a)(3).

249. These religious exemptions are commonly known to include the exclusion from sports teams based on gender identity, the ability to expel pregnant students, and to have policies denying LGBTQ+ rights.

250. Ursuline has not requested Title IX–exemption regarding the sexual-harassment and assault of students on the basis that preventing these assaults would conflict with its religious tenets.

251. Nor would it—unless it wants people to believe that Catholic teaching embraces sexual harassment and warmth toward male-on-female physical violence.

252. The sexual harassment Daughter Chef endured from football Player-6 was severe, pervasive, objectively offensive, and deprived her of access to educational opportunities or benefits.

253. Ursuline, through its administrators, including Defendants Damore and DeSantis, had actual knowledge of the severe, pervasive, and objectively offensive harassment Daughter suffered.

254. Despite this knowledge, Ursuline maintained a policy and practice of responding with deliberate indifference to misconduct by football players, including Player-6. This habit included the hazing detailed in the Ursuline-hazing Complaint.

255. Ursuline's deliberate indifference is further evidenced by its failure to train Damore and DeSantis on recognizing and preventing sexual harassment and violence.

256. Under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a), Ursuline created, tolerated, and subjected Daughter Chef to a hostile educational environment because she was treated disparately based on her gender; suffered sexual harassment, assault, and other harassment, and treated her disparately in discipline.

257. And Ursuline lacked adequate policies, training, and procedures and deliberately failed to take appropriate preventive or remedial measures.

258. Because of Ursuline's discriminatory policy and practice, Daughter was denied equal access to the School's educational opportunities, forced to endure a hostile environment, and ultimately forced to transfer schools to escape the harassment and retaliation.

259. On top of all that, Ursuline assistant principal Defendant Damore retaliated against Daughter for her protected activity—her reports and opposition to persistent sexually motivated violence, sex discrimination, and sexual harassment by Player-6—by punishing Daughter with disparate treatment detailed above, forcing Daughter to transfer from Ursuline.

260. As a direct and proximate result of Ursuline's failures, Daughter suffered and will continue to suffer economic and non-economic damages including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 2
CIVIL LIABILITY FOR (FAILURE TO) REPORTING CHILD ABUSE UNDER OHIO REV. CODE § 2151.421

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

261. Plaintiffs incorporate all previous allegations.

262. Under the relevant part of Ohio Rev. Code § 2151.421(A)(1)(a):

> No person described in division (A)(1)(b) of this section who is acting in an official or professional capacity and knows, or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age… has suffered or faces a threat of suffering any physical or mental wound, injury… or condition of a nature that reasonably indicates abuse or neglect of the child shall fail to immediately report that knowledge or reasonable cause to suspect to the entity or persons specified in this division. Except as otherwise provided in this division or section 5120.173 of the Revised Code, the person making the report shall make it to the public children services agency or a peace officer in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. If the person making the report is a peace officer, the officer shall make it to the public children services agency in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. In the circumstances described in section 5120.173 of the Revised Code, the person making the report shall make it to the entity specified in that section.

263. Under the relevant part of Ohio Rev. Code § 2151.421(B), "Division (A)(1)(a) of this section applies to any person who is [a]… school teacher; school employee; school authority…."

264. Under the relevant part of Ohio Rev. Code § 2151.421(M):

> Whoever violates division (A) of this section is liable for compensatory and exemplary damages to the child who would have been the subject of the report that was not made. A person who brings a civil action or proceeding pursuant to this division against a person who is alleged to have violated division (A)(1) of this section may use in the action or proceeding reports of other incidents of known or suspected abuse or neglect, provided that any information in a report that would identify the child who is the subject of the report or the maker of the report, if the maker is not the defendant or an agent or

employee of the defendant, has been redacted.

265. Defendants Ursuline High School, Damore, and DeSantis, acting in professional and official capacities, failed to report Player-6's attack on Daughter.

266. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Defendant Ursuline is vicariously liable.

267. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

268. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 3
CIVIL LIABILITY FOR CRIMINAL ACTS (REPORTING CHILD ABUSE) UNDER OHIO REV. CODE §§ 2307.60 AND 2151.421

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

269. Plaintiffs incorporate all previous allegations.

270. Under the relevant part of Ohio Rev. Code § 2151.421(A)(1)(a):

> No person described in division (A)(1)(b) of this section who is acting in an official or professional capacity and knows, or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age… has suffered or faces a threat of suffering any physical or mental wound, injury… or condition of a nature that reasonably indicates abuse or neglect of the child shall fail to immediately report that knowledge or reasonable cause to suspect to the entity or persons specified in this division. Except as otherwise provided in this division or section 5120.173 of the Revised Code, the person making the report shall make it to the public children services agency or a peace officer in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. If the person making the report is a peace officer, the officer shall make it to the public children services agency in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. In the circumstances described in section 5120.173 of the Revised Code, the person making the report shall make it to the entity specified in that section.

271. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2151.421(A)(1) are criminal acts, indeed misdemeanors, under § 2151.99(C).

272. Defendants Ursuline High School, Damore, and DeSantis, acting in professional and official capacities, failed to report Player-6's attack on Daughter.

273. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

274. The conduct complained of above constitutes criminal acts by Defendants Damore and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

275. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment.

276. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organization and within the scope of the administrator's office or employment.

277. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organization or on its behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organization by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

278. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

279. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 4
OHIO COMMON-LAW NEGLIGENCE AND RECKLESSNESS

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

280. Plaintiffs incorporate all previous allegations.

281. The named Defendants failed to exercise the care that a reasonably prudent person would exercise in a similar situation, resulting in injury.

282. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Ursuline High School is vicariously liable.

283. As a school and school officials, named Defendants owed a duty of care owed to Daughter, who was entrusted to their care at school.

284. They breached that duty.

285. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

286. Defendants' acts were in conscious disregard for Daughter's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 5
OHIO COMMON-LAW NEGLIGENT SUPERVISION AND RECKLESS SUPERVISION

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

287. Plaintiffs incorporate all previous allegations.

288. Defendants had a duty to provide reasonable supervision of students.

289. The named Defendants left Player-6 and Daughter unsupervised, leading to her injuries.

290. The school ignoring repeated complaints of violence, bullying, stalking, predatory behavior, and harassment.

291. The named Defendants failed to meet the standard of reasonable and prudent educators in supervising the students.

292. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Ursuline High School is vicariously liable.

293. As a school and school officials, they owed a duty of care owed to Daughter, who was entrusted to their care at school.

294. They breached that duty.

295. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

296. Defendants' acts were in conscious disregard for Daughter's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 6
NEGLIGENT AND RECKLESS TRAINING, SUPERVISION, DISCIPLINE, STAFFING, HIRING, AND RETENTION UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND THE CATHOLIC DIOCESE OF YOUNGSTOWN)

297. Plaintiffs incorporate all previous allegations.

298. The named Defendants failed to exercise due care and acted in both a negligent and reckless manner in training, supervising, disciplining, staffing, hiring, and retaining the individual Defendants—especially Defendants Damore and DeSantis.

299. The named Defendants failed to train, supervise, and discipline Defendants Damore and DeSantis about how to properly address and investigate allegations of violence, sexual harassment, stalking, menacing, and all the conduct described above.

300. The named Defendants also failed to discipline and hold Defendants Damore and DeSantis accountable for failing to fulfill their mandatory duties to report such misconduct to law enforcement or children services.

301. The named Defendants failed to train, supervise, and discipline Defendants Damore and DeSantis about caring about such allegations more than football.

302. Defendants Ursuline and the Diocese's negligent and reckless conduct in this regard proximately caused Daughter's injuries.

303. As a direct and proximate result of these actions, Daughter, has suffered and will continue to suffer damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

304. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 7
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

305. Plaintiffs incorporate all previous allegations.

306. Defendants had duties to, and breached those duties, acting negligently and causing harm to Daughter.

307. As a direct and proximate result of Defendants' negligence, Daughter suffered severe emotional distress and physical harm and injury. The distress was severe enough to disrupt her daily life.

308. The harm caused by Defendants' negligence and recklessness was reasonably foreseeable by Defendants at all relevant times.

309. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

310. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 8
CIVIL LIABILITY OF PARENTS FOR WILLFUL AND MALICIOUS ASSAULTS BY THEIR CHILDREN UNDER OHIO REV. CODE § 3109.10

(PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS PARENTS OF PLAYER-6)

311. Plaintiffs incorporate all previous allegations.

312. Under Ohio Rev. Code § 3109.10, in relevant part:

> Any person is entitled to maintain an action to recover compensatory damages in a civil action, in an amount not to exceed ten thousand dollars and costs of suit in a court of competent jurisdiction, from the parent of a child under the age of eighteen if the child willfully and maliciously assaults the person by a means or force likely to produce great bodily harm.

313. Player-6 willfully and maliciously assaulted Daughter by means or force likely to produce great bodily harm.

314. Daughter suffered, or was assaulted in such a manner as to likely produce, great bodily injury.

315. The named-Defendant Parents are liable for the actions of their named children.

316. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

317. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 9
CIVIL LIABILITY FOR CRIMINAL ACTS (FELONIOUS ASSAULT) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.11

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

318. Plaintiffs incorporate all previous allegations.

319. Under Ohio Rev. Code § 2903.11(A)(1), "No person shall knowingly… Cause serious physical harm to another…"

320. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

321. Under the relevant part of Ohio Rev. Code § 2901.01(A)(5):

> "Serious physical harm to person" means any of the following… (c) Any physical harm that involves some permanent incapacity, whether partial or total, or that involves some temporary, substantial incapacity; (d) Any physical harm that involves some permanent disfigurement or that involves some temporary, serious disfigurement; (e) Any physical harm that involves acute pain of such duration as to result in substantial suffering or that involves any degree of prolonged or intractable pain.

322. Daughter's injuries constitute serious physical harm.

323. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.11(A)(1) are criminal acts, indeed felonies, under § 2903.11(D)(1)(a).

324. Defendant Player-1 knowingly caused serious physical harm to Daughter.

325. The named Defendant is culpable as a principal offender, complicitor, and/or conspirator for the criminal act and are civilly liable.

326. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

327. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 10
CIVIL LIABILITY FOR CRIMINAL ACTS (ASSAULT) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.11

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

328. Plaintiffs incorporate all previous allegations.

329. Under the relevant part of Ohio Rev. Code § 2903.13(A), "No person shall knowingly cause or attempt to cause physical harm to another…" Under the relevant part of subsection (B), "No person shall recklessly cause serious physical harm to another…"

330. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

331. Under Ohio Rev. Code § 2901.22(C), "A person acts recklessly when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that the person's conduct is likely to cause a certain result or is likely to be of a certain nature. A person is reckless with respect to circumstances when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that such circumstances are likely to exist."

332. Under Ohio Rev. Code § 2901.01(A)(3), "'Physical harm to persons' means any injury, illness, or other physiological impairment, regardless of its gravity or duration."

333. Under the relevant part of Ohio Rev. Code § 2901.01(A)(5):

> "Serious physical harm to person" means any of the following… (c) Any physical harm that involves some permanent incapacity, whether partial or total, or that involves some temporary, substantial incapacity; (d) Any physical harm that involves some permanent disfigurement or that involves some temporary, serious disfigurement; (e) Any physical harm that involves acute pain of such duration as to result in substantial suffering or that involves any degree of prolonged or intractable pain.

334. Daughter's injuries constitute physical harm and serious physical harm.

335. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.13 are criminal acts, indeed misdemeanors, under § 2903.13(C)(1).

336. Defendant Player-1 knowingly caused physical harm to Daughter.

337. Defendant Player-1 recklessly caused serious physical harm to Daughter.

338. The named Defendant is culpable as a principal offender, complicitor, and/or conspirator for the criminal act and are civilly liable.

339. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

340. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 11
CIVIL LIABILITY FOR CRIMINAL ACTS (AGGRAVATING MENACING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.21

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

341. Plaintiffs incorporate all previous allegations.

342. Under the relevant part of Ohio Rev. Code § 2903.21(A): "No person shall knowingly cause another to believe that the offender will cause serious physical harm to the person…." (Cleaned up.)

343. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.21 are misdemeanor criminal acts under § 2903.21(B).

344. Defendant Player-6 committed aggravated menacing against Daughter Chef in all the ways described above.

345. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

346. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 12
CIVIL LIABILITY FOR CRIMINAL ACTS (MENACING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.22

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

347. Plaintiffs incorporate all previous allegations.

348. Under the relevant part of Ohio Rev. Code § 2903.22(A)(1): "No person shall knowingly cause another to believe that the offender will cause physical harm to the person…." (Cleaned up.)

349. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.21 are misdemeanor criminal acts under § 2903.22(B).

350. Defendant Player-6 committed menacing against Daughter Chef in all the ways described above.

351. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

352. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 13
CIVIL LIABILITY FOR CRIMINAL ACTS (MENACING BY STALKING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.211

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

353. Plaintiffs incorporate all previous allegations.

354. Under the relevant part of Ohio Rev. Code § 2903.211(A)(1): "No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person…." (Cleaned up.)

355. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.211 where, as here, the victim is a minor or the offender has a history of violence toward the victim, are criminal acts—indeed felonies—under § 2903.211(B)(2)(d)–(e).

356. Defendant Player-6 committed menacing by stalking against Daughter Chef in all the ways described above.

357. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

358. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 14
CIVIL ASSAULT UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

359. Plaintiffs incorporate all previous allegations.

360. Player-6 willfully threatened or attempted to harm or offensively touch Daughter, which reasonably placed Daughter in fear of such contact; coupled with Player-6 taking a definitive act to do so and having the apparent present ability to do harm or to commit the offensive touching.

361. Player-6 intentionally created the fear of injury.

362. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

363. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 15
CIVIL BATTERY UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

364. Plaintiffs incorporate all previous allegations.

365. Player-6 harmfully or offensively touched Daughter.

366. Player-6 unlawfully touched Daughter with the intent of inflicting injury.

367. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

368. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

PRAYER FOR RELIEF

For the above reasons, Plaintiff respectfully requests the following relief from the Court:

(a) Declare that Defendants' acts and conduct constitute violations of federal and state law and the United States Constitution;

(b) Enjoin Defendants from retaliating against Mother and Daughter Chef;

(c) Enter judgment in Mother and Daughter Chef's favor on all claims for relief;

(d) Award Mother and Daughter Chef full compensatory damages, economic and non-economic, including, but not limited to, pain and suffering, mental anguish, emotional distress, reputational harm, sense of betrayal, and trauma that they have suffered and are reasonably certain to suffer in the future;

(e) Award Mother and Daughter Chef punitive damages as appropriate for all intentional and malicious violations of federal and state law and constitutional rights;

(f) Award prejudgment and post-judgment interest at the highest lawful rate;

(g) Award Mother and Daughter Chef their reasonable attorney fees, expert fees, and all other costs and expenses of this suit;

(h) Award all other relief in law or equity to which Mother and Daughter Chef is entitled and that the Court deems equitable, just, or proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues within this complaint.

Dated: September 10, 2025

Respectfully submitted,

/s/ Subodh Chandra
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IN THE COMMON PLEAS COURT
MAHONING COUNTY, OHIO

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Michael P. Ciccone, CLERK OF COURT - MAHONING

ROSS KOLLAR & KATE KOLLAR, as Natural Guardian, and next of kin, of L.K., a Minor PLAINTIFFS VS. OHIO HIGH SCHOOL ATHLETIC ASSOCIATION ("OHSAA"), AND CARDINAL MOONEY HIGH SCHOOL DEFENDANTS	CASE NO. 2025 CV 2716 MAGISTRATE TIMOTHY G. WELSH **MAGISTRATE'S DECISION FINDINGS OF FACT AND CONCLUSIONS OF LAW AND INTERIM ORDER OF THE TRIAL COURT**

Case called for evidentiary hearing this 31st day of October, 2025 upon the Verified Complaint for Injunctive and Equitable Relief, Plaintiffs' Motion for Temporary Restraining Order, Preliminary and Permanent Injunction Pursuant to Civ.R. 65 and Defendant, Ohio High School Athletic Association's Memorandum in Opposition to Plaintiffs' Motion for Injunctive Relief. This evidentiary hearing proceeded in open court before the Magistrate on October 31, 2025. All parties or their authorized representatives appeared before the Magistrate accompanied by trial counsel. All parties were afforded the opportunity to introduce testimonial evidence subject to cross-examination and Exhibits, the admission of which are reflected in the record. All counsel waived opening statements and were afforded the opportunity to deliver closing arguments which the Magistrate has taken into consideration.

Procedurally, it should be noted on October 17, 2025 Magistrate William Scott Fowler, on behalf of Magistrate Timothy G. Welsh, who was absent at the time, issued a Temporary Restraining Order enjoining Defendants, Ohio High School Athletic Association ("OSHAA") and Cardinal Mooney High School from prohibiting L.K. from participating in the remainder of the 2025-2026 interscholastic athletic seasons and postseason tournaments at Cardinal Mooney High School or until further Order of this Court. The Order, by its own terms issued pursuant to Civ.R. 65(A) and was to remain in effect for fourteen (14) days thereafter or until October 31, 2025.

PLAINTIFF'S EXHIBIT 2

Furthermore, by prior Order of the Magistrate filed October 28, 2025, the trial of the action upon the merits was advanced and consolidated with the hearing upon Plaintiffs' Motion for Preliminary Injunction pursuant to Civ.R. 65(B)(2).

The focus of this proceeding for injunctive and equitable relief involves the ultimate decision of OSHAA to not grant an exception to OSHAA Bylaw 4-7-2 which if applied to L. K. would render him ineligible for all athletic contests at all levels after the first 50% of the maximum allowable varsity regular season contests had been competed in those sports in which the student participated in the 12-months immediately preceding the transfer. Bylaw 4-7-2 further provides that the transfer consequence "shall remain in effect until one-year anniversary of the date of enrollment in the school to which the student transferred, at which time the student is no longer considered a transfer student".

L.K. is an 18-year-old student athlete who initially enrolled at Ursuline High School in 2022. L.K.'s family has a rich history at Ursuline as his father was a recognized member of the football team and likewise his grandfather had significant ties to the school. As such, it was this young man's dream to attend Ursuline High School and participate in the athletic programs it had to offer.

When L.K. entered Ursuline High School he started as a varsity player on both the football and baseball teams. In fact, he was recognized as the "Most Valuable Player" on the varsity football team in his freshman year. He excelled in football and baseball, however, his baseball participation was interrupted after undergoing Tommy John surgery. Nevertheless, he continued to start as a varsity player on both football and baseball teams through his junior year.

Prior to entering his junior year of high school, his mother, Kate Kollar testified at the hearing before the Magistrate under oath that she recognized changes in her son's demeanor and his willingness to engage in social activities. Prior to his junior year, he expressed to his mother that he no longer wished to play football but she insisted that he proceed. Once L.K.'s junior season ended he told his parents unequivocally that he was quitting playing football. L.K. did not participate in any of the training programs offered for the 2025 football program at Ursuline High School.

Ms. Kollar testified that she saw increased anxiety in her son leading up to his senior year. Upon enrolling in Ursuline High School and attending his first day of class on August 19, 2025, L.K. returned home

from school crying, begging to be home schooled. His mother testified he threatened to kill himself if he had to return as the environment had deteriorated to the point he ate his lunch in the bathroom since he felt he no longer had any friends with which to associate. Ultimately, on August 22, 2025 L.K. transferred to Cardinal Mooney High School. He was taking medication at the time in the form of generic Adderall as he was diagnosed by his physician as suffering from Attention Deficit Hyperactivity Disorder.

Ms. Kollar testified that L.K.'s emotional condition has significantly improved since enrolling at Cardinal Mooney High School and while he initially had no intention of playing football there he has been encouraged by the coaches to do so and is now a member of the football team. In addition, his grades for the first nine weeks of the school year have dramatically improved. Ms. Kollar testified that she "has her kid back". Ms. Kollar testified that she began to learn of some of the difficulties L.K. was experiencing at the hands of the coaching staff at Ursuline prior to his transfer. L.K. related incidents to his mother and to the Magistrate while directly testifying under oath of the challenges he faced at Ursuline. L.K. related several incidents of ridicule at the hands of his coaches and specifically, Timothy McGlynn. Throughout his tenure as a member of the football team at Ursuline, L.K. testified that he played safety. He acknowledged that he did not play offense since he had difficulties understanding the plays. This resulted in outbursts from McGlynn which were primarily verbal in nature. Apparently, at one point L.K. had been given the opportunity to wrestle at Canfield High School since that was the school system in which he lived. Since Ursuline did not offer a wrestling program, he was afforded the opportunity to wrestle at Canfield while maintaining his status as a student at Ursuline. L.K. relayed one outburst by Coach McGlynn when McGlynn told him to return to Canfield and wrestle with his "faggot Canfield friends". According to L.K., McGlynn called him "retarded", "stupid", a "f***ing retard" and "f***ing stupid". He also related one incident in which McGlynn became physically aggressive, grabbing him on the sideline after he returned from the field after a disappointing play. L.K. related that this incident was significant enough as to require another member of the coaching staff to pull McGlynn off of the young man.

The Defendant, OSHAA called Ronald Sayers to testify. Mr. Sayers currently serves as the Senior Manager of Eligibility & Technology. He indicated that Cardinal Mooney High School initially applied for an Exception to the transfer Bylaw prohibitions under Exception 7 involving harassment, intimidation and

bullying. The Application which was brought by Cardinal Mooney High School was ultimately denied by Kristin Ronai, Associate Executive Director. However, the appeal submitted by Cardinal Mooney High School was apparently supplemented to include an Appeal pursuant to Exception 12 of OSHAA Bylaws. Exception 12 specifically provides:

> If, as a result of the conduct of an adult associated with the school, a student is compelled to transfer in order to protect the student's physical and/or mental well-being, the Executive Director's Office may waive all or part of the period of ineligibility for one or more sport/sport seasons provided ALL of the following criteria are met:
>
> (a) there is documented evidence the adult conduct was directed specifically towards the student; and
> (b) the adult conduct is of such a nature as to trigger a criminal investigation or an event covered under ORC 2151.421 that would require a mandatory reporter to report to the proper legal authorities; and
> (c) the student suffered/suffers physical harm and/or severe emotional distress that required/requires medical treatment and/or mental health treatment, which was contemporaneously documented at the time of the event; and
> (d) there is no evidence the transfer is due to the student/family's displeasure with a former coach's training tactics and/or the student's playing time.
>
> For purposes of this bylaw, "conduct" may include behavior of a physical nature as well as verbal and/or written expressions, gestures and interactions. The conduct referred to herein may also include interactions via social media or other forms of electronic communications.
>
> This exception will not be applied where there has been no documented evidence of a criminal investigation or a "reportable" event as outlined in criteria (b), nor will this exception be applied for a student who simply alleges displeasure with a former coach's training tactics.

Generally speaking to the procedure itself available to applicants who are appealing the denial of a Bylaw Exception by the Executive Director, Mr. Sayers did not address any of the factual allegations made by Plaintiffs in these proceedings. Rather, he concentrated on the fact that certain elements of this behavior were not "documented" properly to withstand scrutiny by the Appeals Panel. It must be emphasized that the Defendant, OSHAA offered no testimony whatsoever at any time in these proceedings to refute or in any way rebut the testimony of Ms. Kollar and her son with respect to the treatment rendered him over the years.

The Defendant, OHSAA is simply concerned with the rigid application of technical rules which, they argue, must be properly applied and adhered to, to guarantee and promote fulfillment of its "Mission Statement" in which they promote "interscholastic athletics participation" and "a student's educational experience". In support of its "Mission Statement", the OHSAA believes that it is committed to "ethical behavior" in "interscholastic athletics by all participants, coaches, administrators, officials and spectators", to

name a few. The Magistrate is of the opinion that, in an effort to rigidly and strictly apply provisions of its Constitution and Bylaws, at least in the case before the Court presently, the Defendant, OHSAA has simply lost its way. Its commitment to the strident and rigid application of its Constitution and Bylaws has, in fact, had an opposite and deleterious impact upon L.K. and the very valuable experience he would enjoy while engaging in scholastic athletic endeavors.

In cases involving injunctive relief, the court sits as a court of equity and, in ruling, "will balance the equities between the parties and consider the benefit to the plaintiff of a mandatory writ as against the inconvenience and damage to the defendant, and award relief accordingly." *Brady v. Haines*, 2021-Ohio-4565. The Court exercises broad discretion to balance the competing interests of the parties and fashion a just and appropriate remedy.

Requiring the Plaintiffs and, particularly L.K., to strictly comply with Exception 12 leads to an absurd result. For example, subsection (a) "requires that there be documented evidence the adult conduct was directed specifically towards the student". This places an enormous burden on a young student athlete, already besieged by intimidation, frustration, humiliation and fear to document the episodes which he has experienced at or near the time of the occurrence. Subsection (b) analyzes the alleged "adult conduct" in light of whether it is of such a nature "that would require a mandatory reporter to report to the proper legal authorities". The very coaches and other individuals in positions of authority whose behavior is complained of herein are themselves considered "mandatory reporters" of this "adult conduct" as those terms are defined in R.C. 2151.421. As such, this reporting requirement, which rests with coaches and other school officials, did not occur and their failure to comply with the OHSAA Bylaws should certainly not operate to the detriment of the student athlete.

The Court must carefully balance the following four factors when deciding whether to issue an injunction: (1) whether the plaintiff has shown a strong or substantial likelihood or probability of success on the merits; (2) whether the plaintiff has shown irreparable injury; (3) whether the issuance of a permanent injunction would cause substantial harm to others; and (4) whether the public interest will be served by a permanent injunction. *Sinoff v. Ohio Permanente Med. Group, Inc.*, 2001-Ohio-4186.

Upon a thorough review of the testimonial evidence, all exhibits submitted, the aforementioned motions and memoranda filed with the Court and the arguments of counsel, the Magistrate finds that the Plaintiffs have established all four elements entitling them to the injunctive relief sought by clear and convincing evidence. In conducting its review herein, the OHSAA chose to become embroiled in the minutiae of its Bylaws without considering the factual testimony which was utterly unrefuted by any credible testimony or evidence, whatsoever. The OHSAA did not even resort to any factual findings other than the Plaintiffs' apparent failure to document what they have established by sworn testimony. The Magistrate finds that Plaintiffs have shown a strong and substantial likelihood of probability of success on the merits given the gravity of what this young man endured while a student at Ursuline High School.

The Magistrate cannot imagine any more irreparable injury than to deny a young student the opportunity to participate in scholastic athletics, in which he has excelled in the past, by virtue of this transfer. Denying him that opportunity would cause irreparable injury and harm with no other adequate remedy at law.

Allowing this young man to participate fully in high school athletics at Cardinal Mooney High School would not cause substantial harm to others; to the contrary, allowing him to participate will promote the welfare of students in engaging in such activities at a time in their lives when discipline, camaraderie and teamwork can and will be a vital ingredient to their development. Finally, the Magistrate can think of no greater public interest than participation in scholastic athletics that would indeed be served by issuing the injunctive relief sought by the Plaintiffs herein.

Based upon the foregoing, Plaintiffs' Motion for a Permanent Injunction Pursuant to Civ.R. 65 is sustained. The procedural inadequacies of the OHSAA in conducting a thirty-minute hearing, outside the physical presence of counsel, in which testimony is unsworn has resulted in an arbitrary, unreasonable and unconscionable result. Therefore, a Permanent Injunction is hereby awarded Plaintiffs, Ross Kollar & Kate Kollar as Natural Guardians of and Next of Kin of L.K. and against Defendant, Ohio High School Athletic Association. This Order prohibits the Defendant, Ohio High School Athletic Association from taking or enforcing any action or order based upon its October 6, 2025 ruling or any subsequent ruling by its Executive Director declaring L.K. ineligible or in any way, interfering with, restraining, preventing or precluding L.K.

from participating in interscholastic athletics during the 2025-2026 school year at any OHSAA member school. In addition, the ruling issued by the Defendant, Ohio High School Athletic Association on October 2, 2025 is hereby declared null and void. Costs shall be taxed to the administrative agent of Defendant, Ohio High School Athletic Association.

This is an appealable Order and the Clerk of Court shall serve copies of this decision upon all counsel and unrepresented parties within three (3) days of the filing hereof.

11-4-25
DATE

Timothy G. Welsh
MAGISTRATE TIMOTHY G. WELSH

The parties shall have fourteen (14) days from the filing of this decision to file written objections with the Clerk of this Court. Any such objections shall be served upon all parties to this action and a copy must be provided to the Court. A party shall not assign as error on appeal on Court's adoption of any factual finding or legal conclusion of law under Civ. R. 53 (D)(3)(a)(ii), unless the party timely and specifically objects to the factual finding or legal conclusion as required by Civ. R. 53 (D)(3)(b). Any party may request the magistrate to provide written findings of fact and conclusions of law. In accordance with Civ. R. 52, this request must be made within seven (7) days from the date of filing of this decision.

INTERIM ORDER

The Trial Court hereby enters the foregoing Magistrate's Decision, Findings of Fact and Conclusions of Law as the Interim Order of this Court finding that immediate relief is justified pursuant to Civ.R. 53(D)(4)(e)(ii).

11-4-25
DATE

R. Scott Krichbaum
JUDGE R. SCOTT KRICHBAUM

STATE OF OHIO)
)
MAHONING COUNTY)

AFFIDAVIT OF D.T.

AFFIANT, D.T., being first duly sworn according to law, deposes and says:

1. I have personal knowledge of the information set forth in this affidavit.

2. Although I am now 18 years old, I was 17 years old during the 2025 camp trip.

3. I am the defendant Ursuline High School football player identified as "D.T." in *Jane Doe, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822BYP.

4. I am currently a senior in high school.

5. I transferred to Ursuline High School in 2023 after my freshman year.

6. I was a member of the Ursuline High School football team.

2022 Ursuline football-team camp trip

7. I did not attend the 2022 Ursuline football-team camp trip because I was not a student at Ursuline at that time.

8. But when I was added to the football team's group Snapchat after I transferred to Ursuline in 2023, another player posted a video of a former player being hazed during the 2022 trip.

9. In the video, a victim-player was kneeling down on the ground beside a bed in a hotel room.

10. One player ordered the victim to say, "Please don't beat my ass."

11. The victim complied and said, "Please don't beat my ass."

12. The player then ordered the victim to say, "I'll do whatever you need."

13. When the victim refused, two of the players attacked, punched, kicked, and stomped on the victim-player on the ground.

14. Several other players stood around laughing and cheering during the beating.

15. The victim screamed during the attack.

16. One of the players then grabbed a sheet or towel and wrapped it around the victim's head.

PLAINTIFF'S EXHIBIT 3

17. The victim screamed even louder.

18. The player, still holding the sheet/towel around the victim's head, began swinging the victim around on the ground.

19. One of the other players said, "Finger him! Finger him please!"

20. The player then threw the victim's head toward the floor.

21. As the victim was lying on the ground, another player squatted down and put his clothed buttocks on the victim's head.

22. The attack was videorecorded and posted on the football team's group Snapchat.

23. In or another October 2025, I provided a copy of this video and the other videos (discussed below) I could access to my counsel and law enforcement.

2023 Ursuline football-team camp trip

24. In the summer of 2023, I went with the Ursuline football team on the team camp trip.

25. Coaches Daniel Reardon, Timothy McGlynn, and Christian Syrianoudis were on the trip.

26. Before the trip, I was added to the 2023 football team's group Snapchat.

27. During the trip, several players were hazed.

28. The hazing included non-consensual wrestling, humping, and "taking butts."

29. "Taking butts" means the hazing activity of grabbing and holding down players; ripping off their pants and underwear; and then humping them with the genitals.

30. Several of the hazing activities were videorecorded and posted on the 2023 football team's group Snapchat.

31. I was not hazed during the 2023 trip.

32. The players openly discussed the hazing activities in the hotel in front of Coaches Reardon, McGlynn, and Syrianoudis.

33. No one told us to stop the hazing.

34. In one video recorded by player "[B.]," two players were wrestling on a hotel bed.

35. The first video was uploaded to the 2023 football team's group Snapchat.

36. I gave a copy of the first video to my counsel and law enforcement.

37. In a second video recorded by "[A.S.]," one player was holding a victim-player face down on the floor of the bus while the player humped and ground his penis into the victim's buttocks. Both players were clothed.

38. The second video was uploaded to the 2023 football team's group Snapchat.

39. I also gave a copy of the second video to my counsel and law enforcement.

40. In a third video recorded by "[T.]," the victim-player is on the floor wearing only a t-shirt, but no pants or underwear.

41. The victim is covering his genitals with his hands while another player states, "So much for that fucking orgy that you wanted, bitch!"

42. The third video was uploaded to the 2023 football team's group Snapchat.

43. I also gave a copy of the third video to my counsel and law enforcement.

44. In a fourth video recorded by "[B.]," the players engaged in a tug-of-war using clothes through a closed hotel-room door. The players on one side of the door pulled on clothing through a closed hotel door; while it looks like a player on the other side of the closed door tried to pull the clothes through the closed door.

45. The video has a meme caption saying, "get you drawls [*sic*] back [victim]."

46. The victim in the third and fourth video is the same player.

47. The fourth video was uploaded to the 2023 football team's group Snapchat.

48. I also gave a copy of the fourth video to my counsel and law enforcement.

49. In a fifth video recorded by "[T.]," a player held up a pair of ripped underwear saying, "I'm the ma fucking WWE champ n---a. What you talking about. Got this shit on me. Fuck you talking about."

50. The fifth video was uploaded to the 2023 football team's group Snapchat.

51. I also gave a copy of the fifth video to my counsel and law enforcement.

52. In a sixth video recorded by "[T.]," a player held up a pair of ripped pants and underwear, and said, "Man. I got this n***a's drawers and his phone."

53. The sixth video was uploaded to the 2023 football team's group Snapchat.

54. I gave a copy of the sixth video to my counsel and law enforcement.

55. In a seventh video recorded by "[B.]," a player picked up another player-victim by the throat and slammed him onto the hotel bed. The player then ripped off the victim's pants and underwear exposing the victim's naked body; the victim tried covering his genitals with his hands.

56. Several other players were standing around watching, laughing, and cheering.

57. The player recording the attack walked over and stood over the naked victim while video recording.

58. The seventh video was uploaded to the 2023 football team's group Snapchat.

59. I also gave a copy of the seventh video to my counsel and law enforcement.

60. In the eighth video, which I recorded, one player was held face down on a hotel bed while a second player humped and ground his penis into the first player's buttocks. A third player humped and ground the second player. Then a fourth player joined in and humped and ground the third player, and then a fifth player joined in and humped and ground the fourth player. All players were clothed.

61. The eighth video was uploaded to the 2023 football team's group Snapchat.

62. I also gave a copy of the eighth video to my counsel and law enforcement.

63. In the ninth video recorded by an unknown player, three shirtless players stood in the hotel hallway wearing only shorts. One player grabbed the second player and ripped off his shorts and underwear, exposing the second player's genitals and buttocks.

64. The third player laughed.

65. The ninth video was uploaded to the 2023 football team's group Snapchat.

66. I also gave a copy of the ninth video to my counsel and law enforcement.

67. The third player in the ninth video was hazed at a different time being held down and stripped, but I do not believe there is a video of that attack.

2024 Ursuline football-team camp trip

68. In the summer of 2024, I went with the Ursuline football team on the team camp trip.

69. Coaches Daniel Reardon, Timothy McGlynn, and Christian Syrianoudis were on that trip.

70. The hazing of players continued during the 2024 trip.

71. The players hazed another player, but he was able to defend himself before all his clothes could be stripped off.

72. I don't have any videos from the 2024 trip.

2025 Ursuline football-team camp trip

73. In June 2025, I went with the Ursuline football team on the team camp trip.

74. My mother paid for me to attend the trip.

75. Coaches Daniel Reardon, Timothy McGlynn, and Christian Syrianoudis were on that 2025 trip.

76. The hazing of players continued during the 2025 trip.

77. Hazing had become the tradition and culture of the Ursuline football team.

78. The non-consensual hazing, wrestling, humping, and "taking butts" happened regularly.

79. I thought the hazing was normal because it happened so much and we laughed about it at the time.

80. By 2025, because it had happened for so many years and the players and coaches knew about it, the players and I openly talked about the hazing in front of the coaches on the bus, at the hotel, and during camps.

81. Throughout the years, the discussions about hazing happened constantly during the trips and even when we returned home and went to school.

82. During the hazing discussions, we openly played and replayed the videos of the hazing activities during the trip and in front of the coaches.

83. None of us tried to hide that we were hazing other players.

84. Coaches Reardon, McGlynn, and Syrianoudis never told us to stop, never tried to stop it, and never said anything even when we talked about it in front of them.

85. The players and I openly posted the hazing activities on all the football team's group Snapchat and shared it with others outside the team, including other Ursuline students and students from other schools.

86. One of the first nights, R.H., W.S., C.S., and I hazed C.C.

87. We held C.C. down and stripped off his pants and underwear exposing his genitals and buttocks.

88. Another player videorecorded the hazing of C.C. and posted it to the 2025 football team's group Snapchat.

89. I was in the hotel room when C.C. was hazed, but I did not participate in the hazing of him.

90. Another night, Ta.W. and I hazed another player-victim.

91. Ta.W. held the victim down on a hotel bed; while I picked up the victim's legs and pinned them up by his head, but I didn't hump him. We were clothed.

92. But after I jumped off the bed, Ta.W. continued holding the victim down, then jumped over onto the victim.

93. Ta.W. then picked up the victim's legs and pinned them up by his head; and then humped and ground his penis into the victim's buttocks.

94. Other players stood around the hotel room waiting for their turn.

95. Another player videorecorded the hazing of the victim and posted to the 2025 football team's group Snapchat.

96. Another night, To.W., D.D., and Son Doe (whose true identity is known to me), were hanging out in a hotel room with me.

97. To.W. wanted to haze me, but Son Doe and D.D. would not join in.

98. Son Doe locked himself in the bathroom, but To.W., J.P., A.B. and I forced open the door and carried him out.

99. I held up Son Doe off the ground by his shirt and arms, while To.W. J.P., and A.B. tried to rip off his pants and underwear.

100. Before we could strip Son Doe, someone yelled and everyone ran.

101. Later that same night, Son Doe and G.C. came to another hotel room.

102. When Son Doe saw Ta.W., To.W., J.P., A.B., C.S., and me, he tried to leave, but G.C. blocked the door preventing Son Doe from leaving.

103. We carried Son Doe into the bedroom, slammed him onto the bed, and held him down.

104. While we held Son Doe down on the bed, To.W. tried to rip off Son Doe's pants and underwear.

105. Son Doe fell onto the floor and we continued to pull at his pants and underwear.

106. We were able to rip off Son Doe's pants and underwear, exposing his genitals and buttocks.

107. While Son Doe was lying naked on the floor, J.P. grabbed his arms and I smacked Son Doe's buttocks.

108. Son Doe tried to stand up, but To.W. pushed him back on the ground. And then another player threw him a small towel to cover himself.

109. Ta.W. videorecorded the hazing of Son Doe and posted on the 2025 football team's group Snapchat.

110. A couple of days later, while at the waterpark, Coach McGlynn pulled me aside and said, "Knock it off. We know what's been going on" and told me to delete the videos from my phone.

111. Coach McGlynn didn't seem angry and didn't say we were in any trouble, and that led me to believe that he was referring to the videorecording of the hazing because he told me to delete the videos and didn't specifically order me to stop the hazing.

112. I felt Coach McGlynn was warning me because he didn't want me to get in trouble in the future.

113. Coaches Reardon and Syrianoudis never said anything to me about the hazing, even though they, too, knew it was going on.

114. Coaches Reardon, McGlynn, and Syrianoudis never ordered me to stop the hazing, never threatened to punish me if we kept hazing, and never punished or disciplined me for the hazing.

115. The hazing had been going on for years and the players and coached knew it, so I didn't think it was a problem at the time.

116. So we kept hazing other players even after Coach McGlynn spoke to me.

117. If Coaches Reardon, McGlynn, and Syrianoudis had ordered to me stop the hazing and threatened to punish or discipline me, I would have stopped.

118. A couple nights later, other players and I hazed K.B.

119. K.B. came into the room wearing extra underwear because he knew he was going to be hazed, but thought he would be able to fight us off, but he wasn't able to fight us off.

120. K.B.'s father is an Ursuline assistant football coach.

121. We held K.B. down and ripped off his pants and underwear, just like we did with the other players.

122. Another player videorecorded the hazing of K.B. and posted it to 2025 football team's group Snapchat.

123. Another player also posted a photo of K.B.'s ripped underwear on the 2025 football team's group Snapchat.

124. We talked about the hazing openly in front of Coaches Reardon, McGlynn, and Syrianoudis—even after Coach McGlynn spoke to me about it. The coaches never said anything.

125. I returned from the trip on Friday, June 20, 2025.

After returning from the 2025 trip

126. The following week, which was the week of June 30, 2025, we had non-mandatory practices scheduled.

127. But when I arrived at Ursuline for practice on Monday, June 23, 2025, the coaches told us practice was canceled because of the heat.

128. The coaches also told us the season could be suspended because of what happened on the camp trip.

129. That day, the girls' basketball coach told the boys' basketball coach that Son Doe's mother went to Ursuline and told the administrators about the hazing.

130. The boys' basketball coach's son heard the conversation and told several of the football players and me.

131. When we found out that Son Doe's mother went to the school and the football season could be suspended, we deleted the 2025 football team's group Snapchat.

132. I later deleted the videos I had, too.

133. On Wednesday, June 25, when I arrived at Ursuline for practice, the coaches told me I had to meet with the Ursuline administrators.

134. I met with Ursuline administrators Principal Matthew Sammartino, Assistant Principal Margaret Damore, and Athletic Director John DeSantis.

135. When the administrators told me why I was there, I immediately admitted my involvement in the hazing activities.

136. Assistant Principal Damore said they knew I was "involved" in the hazing.

137. Principal Sammartino said I was "suspended indefinitely" during the investigation.

138. The administrators never asked me if I had the videos or any other evidence.

139. The administrators never asked me any follow-up questions either.

140. Athletic Director DeSantis said, "You should be better than that" and "You should be a leader."

141. Principal Sammartino asked me why I did it, and I told them "it has been going on for years" and it is a "tradition."

142. Principal Sammartino told me there was an "ongoing investigation" and that law enforcement was investigating.

143. Principal Sammartino instructed or ordered me to "lay low" and "don't talk about it" to anyone. He didn't say "except for police." So I assumed that meant law enforcement, too.

144. Ursuline officials gave me no punishment or discipline, even though I admitted my involvement in the hazing.

145. No one from Ursuline contacted me to be interviewed as part of the investigation. Nor did anyone from Ursuline interview me after the initial meeting.

146. No one from Ursuline provided my mother or me any other updates or information.

147. No coaches were suspended, even though they knew about the hazing.

148. While I was suspended, Ursuline assistant football coach James Campana texted me that everything was going to be okay; to trust the coaches; and it was going to pass over.

149. There was no practice the following week of June 30 because that was the week of July 4.

150. The weeks of July 7 and July 14, we only had non-mandatory practices scheduled.

151. Around July 15, my father and I went to a meeting with Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis.

152. Principal Sammartino told me that, even though the investigation was still ongoing, I was permitted to return to the football team and practice.

153. My father and I had to sign paperwork that stated:

Ursuline High School continues to cooperate with the civil authorities regarding the football camp trip. Beginning July 15, 2025, your football team suspension is lifted and you may return to the team. Ursuline High School reserves the right to impose a punishment for the incident during the football camp trip as the investigation reveals facts/information..

154. A true and accurate copy of this paperwork is attached as Exhibit 1.

155. The administrators again never asked me any questions as part of the still ongoing investigation.

156. Principal Sammartino again instructed or ordered me to "lay low" and "don't talk about it" to anyone. He didn't say "except for police."

157. I missed no mandatory practices during my suspension.

158. Ursuline officials still gave me no punishment or discipline, even though I admitted my involvement in the hazing.

159. No one from Ursuline talked to me about the hazing until after the *Jane Doe, et al.* lawsuit was filed.

160. Even after the *Jane Doe, et al.* lawsuit was filed, the Ursuline administrators and coaches did not punish or discipline me for the hazing.

161. Soon after the *Jane Doe, et al.* lawsuit was filed, my mother withdrew me from Ursuline.

162. No one from Ursuline contacted me after the filing of the *Jane Doe, et al.* lawsuit.

163. My involvement in the hazing is out of character for me. I know better and should not have been involved, but the culture of hazing on the Ursuline football team was so overbearing that I felt compelled to join in.

164. Also, because the coaches knew for years about the hazing, never told us to stop it, and never punished or disciplined us for the hazing, I felt like they were giving me permission to continue the tradition of the Ursuline-football hazing.

165. Also, because the administrators knew about the hazing in June 2025, but never punished or disciplined us for the hazing, they made me feel like they were going to cover everything up and it would go away.

166. If the Ursuline administrators or coaches had trained or educated us not to haze and had taken a hard line ordering us not to haze, I know that I would have complied. And from knowing my teammates, I believe they would have complied, too. But because the administrators and coaches never did, and the coaches seemed to support the hazing culture by saying nothing, even though they knew there was a strong culture of hazing, the hazing continued for years.

167. And when Coach Campana texted that everything was going to be okay, to trust the coaches, and it was going to pass, I felt that the Ursuline administrators and coaches were going to cover up everything. And they did cover it up until the *Jane Doe, et al.* lawsuit was filed and everything became public.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury. I understand what I am signing; I am competent to sign this affidavit; and I have reviewed it with my mother and counsel.

D.T. 11/10/25
Signature [Initials] of Affiant Date

Signature of Affiant's Parent Date

State of Ohio
County of Mahoning

Sworn to and subscribed before me on 11-10-2025

at Mahoning County, Ohio.

(Signature of Notary Public) (Notary Public Seal)

Kimberly Stehura
(Printed Name of Notary Public)
Notary Public, State of Ohio

My commission expires on _____

Kimberly Stehura
Notary Public
State of Ohio
Certificate # 2019-RE-762663
My Commission Expires
January 22, 2029

URSULINE HIGH SCHOOL
YOUNGSTOWN, OHIO

July 15, 2025

Ursuline High School continues to cooperate with the civil authorities regarding the football camp trip. Beginning July 15, 2025, your football team suspension is lifted and you may return to the team. Ursuline High School reserves the right to impose a punishment for the incident during the football camp trip as the investigation reveals facts/information.

Parent

Principal

D.T.

Student

Assistant Principal

7/16/25

Date

750 WICK AVENUE, YOUNGSTOWN, OHIO 44505-2892 (330) 744-4563 PHONE (330) 744-3358 FAX WWW.URSULINE.COM

EXHIBIT
1

STATE OF OHIO)
)
MAHONING COUNTY)

AFFIDAVIT OF J.P.

AFFIANT, J.P., being first duly sworn according to law, deposes and says:

1. I have personal knowledge of the information set forth in this affidavit.

2. I am 16 years old.

3. I am the defendant Ursuline High School football player identified as "J.P." in *Jane Doe, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822BYP.

4. I am currently a junior in high school.

5. I transferred to Ursuline High School in 2025 to play football.

6. I was a member of the Ursuline High School football team.

7. In June 2025, I went with the Ursuline football team on the team camp trip.

8. My mother paid for me to attend the trip.

9. Before the trip, I was added to the football team's group Snapchat.

10. On the first day, during the bus ride to the first location, D.T. showed me multiple videos of players being hazed from earlier years' camp trips.

11. The players in these videos were in their underwear and were humping each other; in other videos, players stripped naked other players.

12. On the bus rides and throughout the rest trip, the players openly, regularly, and repeatedly discussed their ongoing hazing activities daily.

13. The players discussed the hazing activities in front of Coaches Reardon, McGlynn, and Syrianoudis, who were close enough to hear the conversations.

14. Coaches Reardon, McGlynn, and Syrianoudis never said anything to the players when the hazing activities were discussed in front of them.

15. It was obvious to me that hazing was the "culture" of the Ursuline football team because the players and coaches knew about it and accepted it; it had been happening for several years, and no one was punished for it.

16. During the trip, the hazing happened every day.



17. On the first or second night, about 20 players attacked and hazed C.C.

18. The hazing of C.C. was videorecorded and uploaded to the football team's group Snapchat.

19. I was not there for the hazing of C.C., but I saw the video on Snapchat.

20. In the video, several players attacked C.C., held him down, and stripped him naked.

21. The next hazing incident that I remember was the attack on the Plaintiff known as Son Doe, whose identity I know.

22. Son Doe came into the hotel room and G.C. stood by the door.

23. Several players and I grabbed Son Doe and carried him into the bedroom and slammed him on the bed.

24. I held Son Doe's left arm and covered his mouth, while other players grabbed and held his other arm and legs.

25. The other players and I tried to forcibly rip off Son Doe's pants and underwear.

26. Son Doe tried to defend himself and fell off the bed onto the ground.

27. While Son Doe was on the floor, the other players and I continued to try to strip off his pants and underwear.

28. Eventually, the players and I succeeded in ripping off Son Doe's pants and underwear, exposing his genitals and butt.

29. I grabbed Son Doe's arms when he was naked on the ground, exposing him even more.

30. Other players pushed and slapped Son Doe when he tried to get up and cover himself.

31. The attack of Son Doe was video-recorded and uploaded to the football team's group Snapchat.

32. There were multiple videos of the attack on Son Doe; each video had short snippets of the attack.

33. The videos showed Son Doe naked.

34. I downloaded one of the videos, which showed Son Doe being held down on the bed.

35. I do not recall downloading the other videos.

36. Two nights later, when I was walking back to my hotel room after swimming, Coach McGlynn spoke to me privately.

37. Coach McGlynn said, "We know what you guys have been doing" and "It's better if you guys stop that stuff because it's gonna hurt your future."

38. Coach McGlynn did not order me to "stop" the hazing; he only said it would be "better" for my future if we stopped.

39. From the conversation, I understood that Coach McGlynn was not referring to hurting my "future" at Ursuline or the team because the school and coaches were not going to punish us.

40. Rather, by Coach McGlynn referring to my "future," I understood that Coach McGlynn was referring to some other third party possibly hurting my future.

41. Ursuline coaches did not punish other players or me for the hazing activities. Or even investigate or inquire.

42. Coaches Reardon and Syrianoudis never said anything to me about the hazing, even though they, too, knew it was going on.

43. Coaches Reardon, McGlynn, and Syrianoudis never ordered me to stop the hazing, never threatened to punish me if we kept hazing, and never punished or disciplined me for the hazing.

44. The hazing had been going on for years and the players and coaches knew it, so I didn't think it was a big deal.

45. So we kept hazing other players even after Coach McGlynn spoke to me.

46. If Coaches Reardon, McGlynn, and Syrianoudis had ordered to me stop the hazing and threatened to punish or discipline me, I would have stopped.

47. A couple nights later, several other players and I hazed K.B.

48. K.B. was hazed in the same way as Son Doe—held down and stripped naked.

49. I returned from the trip on Friday, June 20, 2025.

50. The next week, we had non-mandatory practices scheduled.

51. But when I arrived at Ursuline for practice on Monday, June 23, the coaches told us practice was canceled because of the heat.

52. The coaches also told us the season could be suspended because of what happened on the camp trip.

68. After I transferred, my concerns that Ursuline was going to protect certain players were confirmed. I learned that Ursuline supporters and players' parents were **falsely** accusing me on social media of being one of the ringleaders of the hazing.

69. I'm truly sorry for my conduct, but I was **not** one of the ringleaders of the hazing activities.

70. The Ursuline football team's hazing had been occurring for years—long before I transferred there.

71. Because of the culture of hazing and the players and coaches knowing about it, I felt like I had to join in on the Ursuline football team's hazing traditions.

72. I would not have engaged in any hazing if it wasn't part of the Ursuline football's tradition.

73. After transferring, I turned over the one video I had of Son Doe being hazed to my counsel and law enforcement.

74. After transferring, I voluntarily met with and was interviewed by law enforcement.

75. If Ursuline's coaches and administrators had ordered us not to engage in assaults and hazing, trained us, warned us, and held us accountable, I wouldn't have engaged in the hazing and I'm sure the other players wouldn't have engaged in the conduct either. The coaches and administrators left us unsupervised.

76. No Ursuline officials contacted me after the filing of the *Jane Doe, et al.* lawsuit.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury. I understand what I am signing; I am competent to sign this affidavit; and I have reviewed it with my mother and counsel.

[redacted] 11/10/25

Signature of Affiant Date

Signature of Affiant's Parent 11/10/25

Date

State of Ohio
County of Mahoning

Sworn to and subscribed before me on 11-10-2025

at Mahoning County, Ohio.

(Signature of Notary Public)

(Notary Public Seal)

(Printed Name of Notary Public)
Notary Public, State of Ohio

My commission expires on

Kimberly Stehura
Notary Public
State of Ohio
Certificate # 2019-RE-762663
My Commission Expires
January 22, 2029

STATE OF OHIO)
)
MAHONING COUNTY)

AFFIDAVIT OF SOMER THOMAS

AFFIANT, Somer Thomas, being first duly sworn according to law, deposes and says:

1. I am an adult competent to testify and have personal knowledge of the information contained in this affidavit.

2. I am the mother of the defendant Ursuline High School football player identified as "D.T." in *Jane Doe, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822BYP.

3. D.T. is currently a senior in high school.

4. D.T. transferred to Ursuline High School in 2023 after his freshman year.

5. D.T. was a member of the Ursuline High School football team.

6. In the spring of 2025, during the end of D.T.'s junior year, I met with Ursuline's head football coach Daniel Reardon, athletic directors/assistant football coach John DeSantis, and assistant football coach James Campana about D.T.'s grades.

7. D.T. was getting Ds in several classes.

8. The coaches informed me that for college football-recruiting purposes, D.T. needed better grades.

9. The coaches did not mention that D.T. could be ineligible because of his poor grades.

10. D.T. went with the Ursuline football team on the team camp trip in the summer of 2023, summer of 2024, and June 2025.

11. I paid for D.T. to go on all the camp trips.

12. I paid $1,600 to Ursuline High School for the June 2025 trip.

13. D.T. returned from the trip on Friday, June 20, 2025.

14. On Wednesday, June 25, 2025, when D.T. returned from football practice, D.T. informed me that he was suspended from the team until further notice and the season could be suspended because of what happened on the trip.

15. D.T. told me that he met with Principal Matthew Sammartino, Assistant Principal Margaret Damore, and Athletic Director John DeSantis that day.

16. D.T. told me that he was suspended for his involvement in misconduct that happened during the camp trip and that it was being investigated.

17. I was not present for this meeting between D.T. and Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis.

18. No one from Ursuline High School contacted me before D.T. was suspended.

19. On Wednesday, June 25, 2025, I received an email from Ursuline High School Assistant Principal Maggie Damore with an attached letter stating:

> Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room. Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

20. A true and accurate copy of the letter is attached as Exhibit 1.

21. During the period of D.T.'s suspension, no one from Ursuline contacted me to be interviewed as part of the investigation.

22. About two weeks later, D.T. and his father met with Ursuline administrators.

23. During the meeting, D.T. told me that he and his father had to sign paperwork.

24. A true and accurate copy of this paperwork is attached to this affidavit as Exhibit 2.

25. Ursuline permitted D.T. to return to practice with no punishment or discipline.

26. After D.T. returned to practice, no one from Ursuline contacted me about this matter.

27. D.T. was not disciplined or punished by Ursuline for his involvement in the activities related to the football-team camp trip.

28. D.T. left Ursuline High School after the filing of the *Jane Doe, et al.* lawsuit.

29. No one from Ursuline contacted D.T. or me after the filing of the *Jane Doe, et al.* lawsuit.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury.

Signature of Affiant Date 11/10/25

State of Ohio
County of Mahoning

Sworn to and subscribed before me on 11-10-2025

at Mahoning County, Ohio.

(Signature of Notary Public) (Notary Public Seal)

(Printed Name of Notary Public)
Notary Public, State of Ohio

My commission expires on

Kimberly Stehura
Notary Public
State of Ohio
Certificate # 2019-RE-762663
My Commission Expires
January 22, 2029

Suspension From Football Notification

Student Name: **D.T.**

Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room. Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

A copy of this notification is being mailed to your home.

URSULINE HIGH SCHOOL
YOUNGSTOWN, OHIO

July 15, 2025

Ursuline High School continues to cooperate with the civil authorities regarding the football camp trip. Beginning July 15, 2025, your football team suspension is lifted and you may return to the team. Ursuline High School reserves the right to impose a punishment for the incident during the football camp trip as the investigation reveals facts/information.

Parent

Principal

D.T.

Student

Assistant Principal

7/16/25

Date

750 WICK AVENUE, YOUNGSTOWN, OHIO 44505-2892 (330) 744-4563 PHONE (330) 744-3358 FAX WWW.URSULINE.COM

EXHIBIT
2

STATE OF OHIO)
)
MAHONING COUNTY)

AFFIDAVIT OF JAZHMINE PHILLIPS

AFFIANT, Jazhmine Phillips, being first duly sworn according to law, deposes and says:

1. I am over the age of 18 and have personal knowledge of the information contained in this affidavit.

2. I am the mother of the defendant Ursuline High School football player identified as "J.P." in *Jane Doe, et al. v. Ursuline High School, et al.*, Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822BYP.

3. J.P. is currently a junior in high school.

4. J.P. transferred to Ursuline High School in 2025.

5. J.P. was a member of the Ursuline High School football team.

6. In June 2025, J.P. went with the Ursuline football team on the team camp trip.

7. J.P.'s father only paid a portion of the $1,300 due to Ursuline High School for the trip.

8. J.P. returned from the trip on Friday, June 20, 2025.

9. On Wednesday, June 25, 2025, when J.P. returned from football practice, J.P. told me he was "indefinitely suspended" from the team and football season could be suspended because of what happened on the trip.

10. J.P. told me that he met with Principal Matthew Sammartino, Assistant Principal Margaret Damore, and Athletic Director John DeSantis that day.

11. J.P. told me that he was suspended for related to misconduct that happened during the camp trip and that it was being investigated.

12. I wasn't present for this meeting between J.P. and Principal Sammartino, Assistant Principal Damore, and Athletic Director DeSantis.

13. No one from Ursuline High School contacted me before J.P. was suspended.

14. On Wednesday, June 25, 2025, I received an email from Ursuline High School Assistant Principal Maggie Damore with an attached letter stating:

> Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room. Once the

investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

15. A true and accurate copy of the email and letter are attached as Exhibit 1 and 2.

16. J.P. showed me a video of the plaintiff known as Son Doe (whose identity I know) being held down on a bed by several players, but the video cut-off before the players stripped off Son Doe's pants and underwear.

17. We gave this video to my counsel and law enforcement.

18. I understand there are several other videos of the attack on Son Doe that show the players stripping off his pants and underwear and exposing his genitals and buttocks, but I never saw those videos.

19. No one from Ursuline contacted me to be interviewed or to have J.P. interviewed as part of the investigation.

20. Ursuline administrators and coaches did not discipline J.P. for his involvement in the activities related to the football team camp trip.

21. Aside from the email I mentioned above, I never received any other paperwork from Ursuline about this hazing matter. No one asked us to sign anything.

22. The week of June 30, I transferred J.P. to another school; he officially withdrew from Ursuline on July 9, 2025.

23. No one from Ursuline contacted J.P. or me after the filing of the *Jane Doe, et al.* lawsuit.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury.

Jasmine Phillips 11/10/25

Signature of Affiant Date

State of Ohio
County of Mahoning

Sworn to and subscribed before me on 11-10-2025

at Mahoning County Ohio, Ohio.

Kimby Fahn

(Signature of Notary Public) (Notary Public Seal)

Kimberly Stehura

(Printed Name of Notary Public)
Notary Public, State of Ohio

My commission expires on _____

Kimberly Stehura
Notary Public
State of Ohio
Certificate # 2019-RE-762663
My Commission Expires
January 22, 2029

From: "Maggie (Matune) Damore" <mdamore@youngstowndiocese.org>
Date: June 26, 2025 at 2:30:24PM EDT
To: Jazhmine Phillips [redacted]
Subject: Suspension Notification Attached

Good Afternoon,

Please see attached.

Thank you,
Maggie Damore

--
Maggie Damore '06
Ursuline High School
Assistant Principal
mdamore@youngstowndiocese.org
330-744-4563
www.ursuline.com

Disclaimer:
The information contained in this email message is intended for the sole, confidential use of the designated recipient(s) and may contain confidential information. If you have received this information in error, any review, dissemination, distribution or copying of this information is strictly prohibited. If

you have received this communication in error, please notify us immediately and delete the original message in its entirety. Thank you.

Suspension From Football Notification

Student Name: [redacted]

Due to an on-going investigation regarding the 2025 Ursuline Football Camp trip your son has been suspended from the Ursuline Football Team until further notice. He may not attend any practice, scrimmage, team event, nor be in the locker room. Once the investigation has progressed to an appropriate point, you will be contacted with follow up information, including possible consequences. The Office of Catholic Schools for the Diocese of Youngstown is aware of the situation.

A copy of this notification is being mailed to your home.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Mother Chef, individually and on behalf of her minor child, Daughter Chef
(Pseudonyms)
c/o The Chandra Law Firm LLC
The Chandra Law Building
1265 W. 6th Street, Suite 400
Cleveland, OH 44113-1326

Plaintiffs,

v.

Ursuline High School
750 Wick Avenue
Youngstown, Ohio 44505

Margaret Damore
Assistant Principal, Ursuline High School
6097 Herons Circle
Austintown, Ohio 44515

John DeSantis
Athletic Director & Assistant Football Coach,
Ursuline High School
6123 Celesta Place,
Poland, Ohio 44514

Catholic Diocese of Youngstown
c/o Bishop David Bonnar
144 West Wood Street
Youngstown, Ohio 44503

and

Ursuline Player-6 (pseudonym),
minor child, individually; and
[FNU] Harris & [FNU] Harris
Parent(s) of Ursuline Player-6,
Individually and on behalf of minor child

Case No. _____-CV-_____

Judge _____

Magistrate _____

COMPLAINT WITH JURY DEMAND

PLAINTIFF'S EXHIBIT 2

[ADDRESS UNKNOWN] Defendants.	

COMPLAINT WITH JURY DEMAND

NATURE OF ACTION

1. This is a federal civil-rights action brought by a female Ursuline High School student and her family against a high school, its officials and coach, and a football player and his parents. It alleges violations of Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.* It includes supplemental claims for Ohio legal violations, including statutes establishing civil liability for criminal acts like felonious assault, assault, failure to report abuse; aggravated menacing; menacing; and menacing by stalking. And includes other state-law civil claims for failure to report abuse; negligence; negligent supervision; negligent training, supervision, discipline, hiring, and retention; assault; battery; and negligent infliction of emotional distress.

2. Ursuline High School is a Catholic high school within the Diocese of Youngstown. Rather than act in accordance with its stated values and motto "*Soli Deo Gloria*" (Latin for "*Glory to God alone*"), Ursuline and at least two of its administrators, a coach, and student—consistent with Ursuline's *modus operandi*—opted to violate those values and acted solely for the glory of its football team alone.

3. Beginning in June 2023, Defendant Player-6—a six-foot-tall, star Ursuline High School football player—began sexually harassing fellow student Daughter Chef, asking this petite, under five-foot-tall freshman for sex and nude photos.

4. Uninterested, and still childlike in her growth stage, Daughter refused Player-6's overtures.

5. Unable to accept her rejection, Player-6's bullying and harassment escalated into a physical attack at school, causing Daughter serious physical injuries, photographically depicted below.

6. Despite Mother Chef and Daughter Chef reporting the attack that day, Defendant Assistant Principal Margaret Damore—on Defendant Ursuline High School behalf—"strongly advise[d]" them **not** to report the attack to police and falsely assured Mother the school would handle the matter. Both Defendant Damore and Defendant Athletic Director John DeSantis, after learning about the attack and injury, failed to report the matter to children's services or law enforcement—as required by law. By Ohio criminal statute, they are mandated reporters.

7. For the next *two years*, even after Defendant Player-6 continued to harass, stalk, menace, ogle, and intimidate Daughter, these Ursuline Defendants took no action to protect Daughter. Their failures continued even after Daughter's elder brother—an Ursuline graduate once close to DeSantis—voiced frustration and disappointment about Ursuline officials' persistent failures to protect his little sister, and pressed DeSantis to act.

8. The Ursuline Defendants' intentional failures persisted even after Daughter herself *repeatedly* reported to school officials Defendant Player-6's ongoing predatory behavior.

9. The Ursuline Defendants' failures weren't just negligent. They were reckless and intentional, because they sought to protect their venerated star football player—at any cost.

10. And they just didn't care about Daughter. What mattered was the false idol of football.

11. Mother had to sell her home and move so she could transfer Daughter to another school and protect her child.

12. Ursuline's culture of ignoring violent assaults by its football players has existed for many years—due, in part, to the school's negligent and reckless hiring, training, supervision, and retention of administrators, coaches, and teachers; and the School's willingness to turn a blind eye to the physical victimization of students it is entrusted to protect—all because the School elevates the glory of the football team above basic humanity and decency.

13. Victims, both named and unnamed, have endured permanent and lasting harm, degradation, humiliation, intimidation, and retaliation. Ursuline and its administrators could and should have prevented all of this.

14. Now, because of the actions detailed in this Complaint, Defendants must be held accountable.

PARTIES

15. Plaintiff Mother Chef ("Mother") is the mother of the victim, Daughter Chef. They both reside in Trumbull County, Ohio. She is filing suit on behalf of her minor daughter.

16. Plaintiff Daughter Chef ("Daughter"), a minor at the time of filing, was a freshman and sophomore at Ursuline, but has since transferred to another high school. She resides with Mother in Trumbull County, Ohio. When the sexual harassment and violence Defendant Player-6 perpetrated against her starting when she was a freshman happened, she was childlike and still playing with baby dolls. The events described below robbed her of her innocence.

17. Defendant Ursuline High School ("Ursuline") is a Catholic school under the Catholic Diocese of Youngstown ("Diocese"). Ursuline (with the Diocese's approval) is responsible for its employee's hiring, retention, training, supervision, and termination. That includes its administrators, coaches, and teachers. Father Richard Murphy is Ursuline's president. Ursuline is in Mahoning County, Ohio. At times relevant, Ursuline received and receives federal funds.

18. Defendant Margaret Damore is Ursuline's assistant principal. She resides in Mahoning County, Ohio.

19. Defendant John DeSantis is Ursuline's athletic director, teacher, and assistant football coach. He resides in Mahoning County, Ohio.

20. Defendant Catholic Diocese of Youngstown ("Diocese") is led by the Bishop, currently Bishop David Bonnar, who owns the Diocesan property and is the final decisionmaker for the Diocese and all entities within it, including Ursuline. The Diocese is headquartered in Mahoning County, Ohio. The Diocese is responsible for the negligent training, supervision, discipline, hiring, and retention of Defendants Damore and Desantis.

21. Defendant Ursuline Player-6 ("Player-6"), a minor, is an Ursuline junior football player. His address is unknown. Despite reasonable and diligent efforts, Plaintiffs could not discover Player-6's address. After identifying Player-6's address, Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending full discovery.

22. Defendants [FNU] Harris and [FNU] Harris are Player-6's parents, whose exact identities are unknown, but whose involvement Plaintiffs anticipate. Despite reasonable and diligent efforts, Plaintiffs could not discover [FNU] Harris and [FNU] Harris's names and identities. Upon identification of [FNU] Harris and [FNU] Harris, Plaintiffs intend to amend this Complaint. Plaintiffs reserve the right to amend this paragraph pending discovery.

OTHER NON-PARTY INDIVIDUALS

23. Roy Schmidt is an Ursuline teacher and head girls' soccer coach.

24. Louise Kotel is an Ursuline guidance counselor.

INCORPORATION BY REFERENCE

25. Plaintiffs incorporate by reference the Complaint captioned *King, et al., v. Ursuline High*

Sch., et al., filed in the Northern District of Ohio, Eastern District, Case No. 4:25-cv-01822 ("Ursuline-hazing Complaint"), and all its successor complaints. The current operative complaint is filed concurrently with and incorporated as **Ex. 1**.

26. Defendants Ursuline High School, Assistant Principal Margaret Damore, and the Diocese are also named defendants in the Ursuline-hazing Complaint.

27. Defendant John DeSantis, while not a named defendant in the Ursuline-hazing Complaint, is referenced in it.

28. Defendant Player-6 is not a named defendant in the Ursuline-hazing Complaint; but Player-6 is referenced in the Ursuline-hazing Complaint for hazing, assaulting, and abusing a fellow Ursuline football player.

JURISDICTION AND VENUE

29. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331, 1343, and 2201, for federal claims under Title IX of the Education Amendment, as codified under 20 U.S.C. §§ 1681, *et seq.*, which provide for attorney and expert fees. This Court has supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367.

30. This Court has personal jurisdiction over the Defendants, who reside in and conduct business in this District.

31. Venue is proper under 28 U.S.C. § 1391, because the substantial events giving rise to several of the claims took place within this District.

FACTUAL BACKGROUND

In June 2023, Daughter Chef attended summer gym class at Ursuline High School—and Ursuline football Player-6 violently assaulted her.

32. In June 2023, Plaintiff Daughter Chef, who had just completed the eighth grade and was about to become a freshman that fall at Defendant Ursuline High School, attended a summer gym class.

33. Daughter was only 14 years old and stood under five-feet tall, weighing less 120 pounds.

34. Defendant Player-6, a then-freshman at Ursuline, was also in the same summer gym class.

35. Player-6 was an Ursuline football player and stood about six-feet tall and weighed about 200 pounds.

36. Before the start of summer class, Daughter had never met Player-6.

37. Almost immediately, Player-6 made advances and flirted with Daughter, often trying to touch her hands and arms or putting his arms around her shoulders.

38. At first, Daughter thought Player-6 was just being playful. When Player-6 added Daughter to his Snapchat friends list, Daughter accepted the friend request.

39. Player-6 became increasingly aggressive over Snapchat and asked Daughter to send him nude photos and if she wanted to have sex.

40. Daughter adamantly refused both!

41. Daughter, innocent and naïve having just graduated from a Catholic grade school, was shocked by Player-6's words and actions.

42. Daughter, uninterested in Player-6's advances, made her feelings known to him.

43. But Player-6 became more aggressive on Snapchat and Daughter had to "block" him on Snapchat.

44. After Daughter rejected Player-6, he became even more aggressive. The once playful touches of the arms and shoulders became forceful and hostile.

45. As Player-6 became increasingly angry with Daughter's continued rejection, he became more aggressive.

46. On the last day of class, June 29, during a break, Daughter and some of her friends/classmates were at one end of the turf on Cafaro Field, located across the street from Ursuline.

47. Daughter and one of her friends were picking up the black turf pellets and playfully sprinkling them on each other's legs.

48. Player-6 walked over and sat across from Daughter.

49. Player-6 tried to flirt with Daughter and tried to put the pellets on Daughter's legs. Daughter told Player-6 to stop, but he kept doing it. And she kept telling him to stop.

50. Another of Daughter's friends jokingly sprinkled pellets in her hair, causing Daughter to turn toward her friend and say, "Stop."

51. Player-6 picked up a handful of black pellets from the turf and threw them at Daughter's face hitting her.

52. Daughter told Player-6 to stop, but he said "No" and continued to forcibly throw the pellets hitting Daughter in the face.

53. Daughter again told Player-6 to stop and that he was hurting her.

54. When Player-6 continued to throw the pellets at her, Daughter picked up some pellets and threw them back at Player-6.

55. Daughter said, "See, you don't like when it happens to you, do you?"

56. Daughter tried to get up, but Player-6 grabbed her ankle to prevent her from leaving.

57. Daughter kicked away Player-6's hand and started to run away in fear.

58. Player-6 became enraged at Daughter and said, "Now I'm going to beat her ass!"

59. As Player-6 chased after Daughter, he again yelled, "Now I'm going to beat her ass!"

60. Player-6 quickly caught up to Daughter, grabbed her by the waist, picked up her off the ground, and, as Daughter struggled to break free, he dropped her on her back.

61. Player-6 picked up Daughter again and threw her over his shoulders.

62. Daughter cried hysterically and screamed, "Someone help me!" and "Help!" multiple times. Daughter even pleaded with Player-6 to put her down.

63. But he refused.

64. Player-6 carried Daughter toward the concrete and, as Daughter struggled to get away, he dropped her on her face and stomach on the turf.

65. Daughter kept screaming both in pain and for help.

66. No Ursuline teachers came to her rescue.

67. Player-6 grabbed Daughter's ankles, flipped her on her back, and dragged her across the turf yelling, "I'm going to give you turf burn real bad."

68. Player-6 dragged Daughter for about 30 feet across the turf, while he continued yelling about giving Daughter "turf burn."

69. Daughter cried throughout the attack.

70. Throughout the vicious attack, Player-6 laughed sadistically.

71. Finally, another Ursuline student yelled at Player-6 to stop and he let go.

72. Crying, daughter ran over to a group of girl-students and asked them to look at her back.

73. Daughter was in excruciating pain from the burns on her back. The stinging pain was exacerbated because, due to the summer heat and it being gym class, Daughter was sweating, and the sweat was getting into the open wounds.

74. The turf pellets had also embedded into the open wounds contributing to Daughter's pain.

75. A junior female looked at Daughter's back and said, "This is really bad" and that they had to go to the bathroom.

76. Daughter and the junior went to the gym teacher, Roy Schmidt, and told him that Player-6 had dragged her across the turf and showed him the turf burns on her back.

77. Schmidt is also Ursuline's girls' soccer coach.

78. Daughter asked Schmidt if she could go to the restroom, which he permitted. Schmidt said, "Yeah, you can go to the bathroom and get that cleaned up."

79. As Daughter and the junior were on the way to the restroom, Daughter saw Defendant John DeSantis, who is Ursuline's athletic director and an assistant football coach responsible for Player-6.

80. DeSantis was grilling hot dogs for the last-day-of-summer-school picnic.

81. DeSantis asked what happened and Daughter told him that they just gotten "rough" with her.

82. DeSantis, with no interest or sympathy, just said "Okay," and told her to go to the bathroom. He went back to grilling the hot dogs.

Daughter Chef was seriously injured.

83. When Daughter got to the bathroom and the junior tried to wash off the pellets and turf from Daughter's back. The junior asked if Daughter wanted her to take photos of her back to show her mother stating, "This is really bad."

84. At 11:00 AM, the junior photographed Daughter's back and Daughter texted it to Mother:



85. Daughter, concerned about what her Mother would do if she told her the extent of what happened, and not wanting to go into details, texted Mother she "got dragged."

86. Daughter was afraid of Player-6 and felt he would retaliate against her if she told anyone what happened. She did not want him to physically abuse again.

87. Daughter did not call Mother while she was in the bathroom because technically, she wasn't allowed to use a cellphone to make a call in class.

88. Mother knew from the photo that the injuries were not from gym class and questioned Daughter about what really happened. But Daughter didn't want to go into details.

89. When Mother received Daughter's texts, she immediately completed her work, left home and headed to Ursuline.

90. After cleaning herself up, Daughter returned to the gym class and waited for any Ursuline administrator or teacher to come talk to her.

91. But no one from Ursuline came to check on Daughter or talk to her about the attack.

92. Player-6 was still present at the class.

93. Toward the end of class, there was a water-balloon fight on Ursuline's grass field, but anyone who didn't want to participate was permitted to stay in the parking lot.

94. Daughter and another student-friend stood in the parking lot.

95. Player-6 walked over and tried to throw water on Daughter.

96. The student-friend yelled at Player-6, "You did this to her! What the fuck is wrong with you?"

97. And Player-6 responded, "*Yeah, and I'd do it again.*"

98. Mother arrived at Ursuline about 11:59 AM as the gym class was ending.

Mother and Daughter went to the office and reported Defendant Player-6's violent attack to Defendants Assistant Principal Margaret Damore and Athletic Director John DeSantis.

99. Mother knew that Daughter's injuries were not from gym class.

100. Daughter broke down crying and told Mother what happened in detail.

101. Mother took Daughter directly to Ursuline's main office and asked to speak with the principal.

102. As they were waiting, DeSantis entered the office.

103. Mother told him, "I'm hot about this. This shouldn't have happened. No boy should be touching a girl like this."

104. He didn't respond.

105. Defendant-Ursuline Assistant Principal Margaret Damore came out and escorted Mother, Daughter, and DeSantis to her office.

106. Daughter tried to explain what happened going back to the start of class with Player-6, his sexual Snapchat messages, and his increasingly aggressive behavior, leading up to the attack.

107. Despite Daughter reporting sexual harassment, Damore responded coldly, "I'm not interested in what happened before" and that "I only want to hear what happened today."

108. Daughter explained in detail as much as she could about the attack, but Damore was clearly impatient and hurried to end the meeting.

109. Sensing Damore's disinterest in what happened and attempts to downplay the violent attack, Mother finally had Daughter lift her shirt to expose the injuries to her back.

110. Upon seeing Daughter's injuries, Damore, unsympathetically, tried to blame Daughter for not telling anyone what happened "immediately."

111. Upon seeing Daughter's injuries, DeSantis excused himself from the meeting.

112. Mother explained that Daughter *did* "immediately" inform the gym teacher Roy Schmidt about the attack—yet Schmidt did nothing.

113. Mother also explained that Daughter informed DeSantis on her way to bathroom—yet DeSantis, too, did nothing.

114. Damore stated that she would "handle it."

115. Mother responded, "This is a physical assault on my daughter. No man should be touching a girl, and this kid should not be at Ursuline High School."

116. Damore's indifference and lack of sympathy became even more evident and her demeanor became even more dismissive.

117. Mother demanded that Player-6 be disciplined and further demanded that Player-6 not be in any classes with Daughter and have no contact with Daughter.

118. Damore promised Mother and Daughter that Player-6 would be in no classes with Daughter and would have no contact with her during the school day.

119. Mother told Damore that she wanted to file a police report—because Player-6's attack was a crime.

120. Damore pleaded with Mother and convinced Mother not to file a police report.

121. Damore insisted that the attack be handled "in-house" and said, "I strongly advise you **not** to file a police report."

122. Damore said it wasn't necessary to involve law-enforcement authorities and that she wasn't going to contact them.

123. When Mother insisted that the school must act, Damore claimed there was "nothing" that could be done at the time because it was summer and summer classes had ended.

124. Daughter pointed out that Player-6 was a football player practicing that summer.

125. Damore said, "I will see what I can do"—and then did … *nothing*.

126. Damore assured Mother that she would address Player-6's conduct on the first day of school.

127. Other Ursuline students told Daughter that Player-6 was at the football team's summer practices and had not been disciplined.

128. Neither Damore, nor DeSantis, reported the criminal attack to children services or law enforcement—even though they are both mandatory reporters and are required to report it under Ohio Rev. Code § 2151.421.

129. Neither children services nor law enforcement ever contacted Mother.

130. No one from Ursuline contacted Mother or Daughter to inform them that Player-6 was disciplined.

131. Based on information and belief, Defendants never disciplined Player-6 for the attack on Daughter. He played the entire football season.

For weeks after Player-6's attack, Daughter Chef suffered in extreme pain.

132. Upon returning home, Daughter was in excruciating pain. Mother had to carefully remove the turf and pellets, which had been ground into the wounds on Daughter's back.

133. Daughter couldn't shower the first night because of the pain.

134. The turf burns on Daughter's back were visible for more than a week.

135. The injuries and pain from the turf burn and from being dropped twice on the ground persisted for weeks.

136. Even after the first night, Daughter, for weeks, couldn't shower without pain because of the turf burns. And when she did try to shower, she cried.

137. Because of the injuries, Daughter, for weeks, could not sleep or lie down on her back without pain.

138. Daughter could not wear a shirt without pain for weeks because of the turf burn.

139. Daughter's back pain has been continuous and ongoing.

Despite Defendant Assistant Principal Margaret Damore's assurance that Player-6 wouldn't be in class with her, when Daughter Chef began school in the fall, Defendant Player-6 *was* in class with her. Ursuline put him there.

140. When Daughter started class in the fall of 2023, Player-6 was in at least one class with her.

141. The school is large enough that this was completely avoidable.

142. Damore broke her promise to Mother that Player-6 would be in no classes with Daughter.

143. Player-6 continued to harass and make sexual advances toward Daughter.

144. Daughter tried to ignore Player-6, but he persisted.

145. On several days in September 2023, while in class, Player-6 would walk over and sit at Daughter's table with her and her friend.

146. Each time, Daughter immediately got up and sat at another table.

147. Player-6 tried to get Daughter's friends to side with him and told them her wanted to "put on" with her (teenage lingo for "date").

148. Daughter refused.

149. Player-6 even had his friends approach Daughter and tell her that he wanted to "put on" with her.

150. Daughter again refused.

151. In October 2023, Player-6 tried to turn Daughter's friends against her claiming that she lied about him assaulting her—despite his admitting it previously.

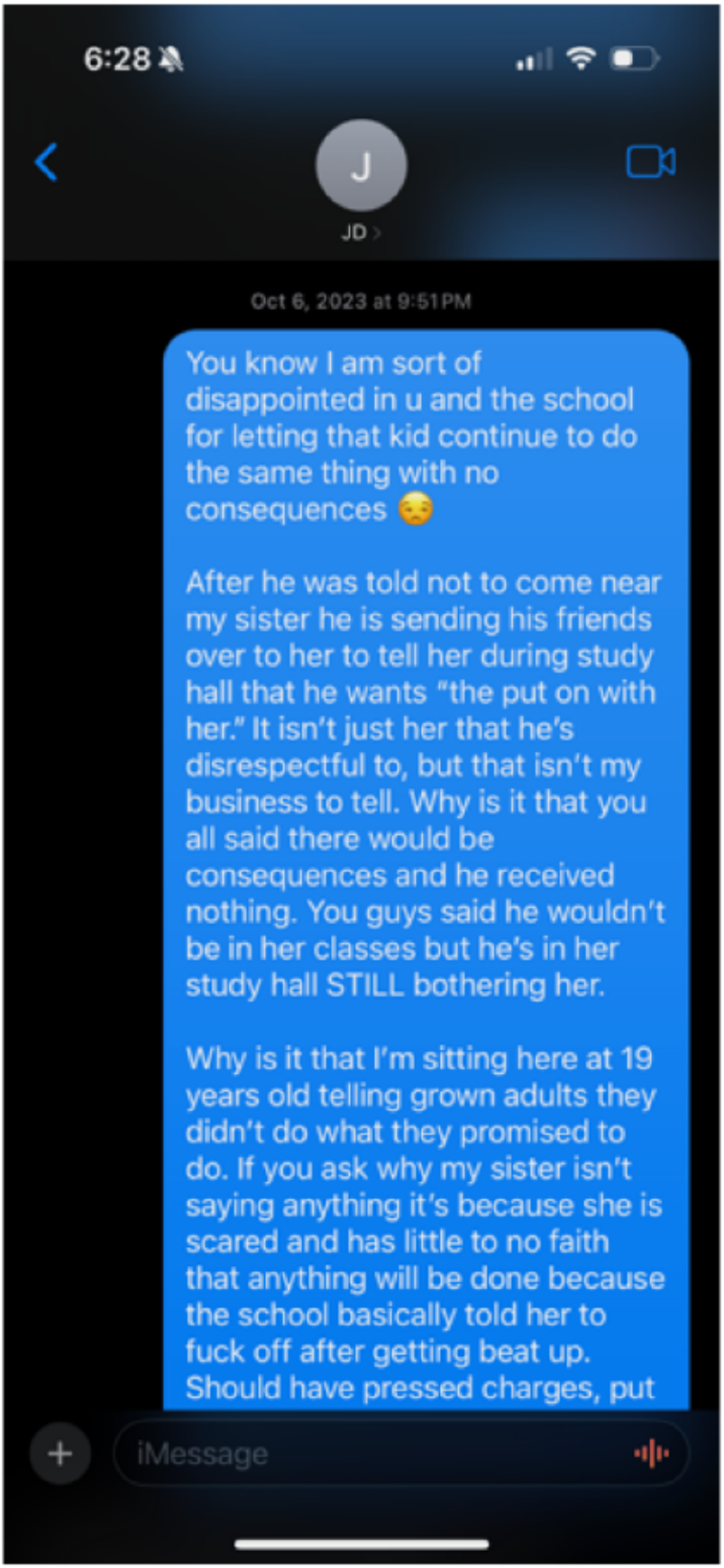
152. Daughter communicated her concerns and fears to her older brother ("Brother"), who graduated from Ursuline in 2023.

153. On Friday, October 6, 2023, worried for his sister's safety, Brother texted Athletic Director DeSantis hoping that DeSantis would handle the situation.

154. Brother wrote:

> You know I am sort of disappointed in u and the school for letting that kid continue to do the same thing with no consequences ☹
>
> After he was told not to come near my sister he is sending his friends over to her to tell her during study hall that he wants "the put on with her." It isn't just her that he's disrespectful to, but that isn't my business to tell. Why is it that you all said there would be consequences and he received nothing. You guys said he wouldn't be in her classes but he's in her study hall STILL bothering her.
>
> Why is it that I'm sitting here at 19 years old telling grown adults they didn't do what they promised to do. If you ask why my sister isn't saying anything it's because she is scared and has little to no faith that anything will be done because the school basically told her to fuck off after getting beat up. Should have pressed charges, put faith in people and it was a mistake.

[*Sic.*]

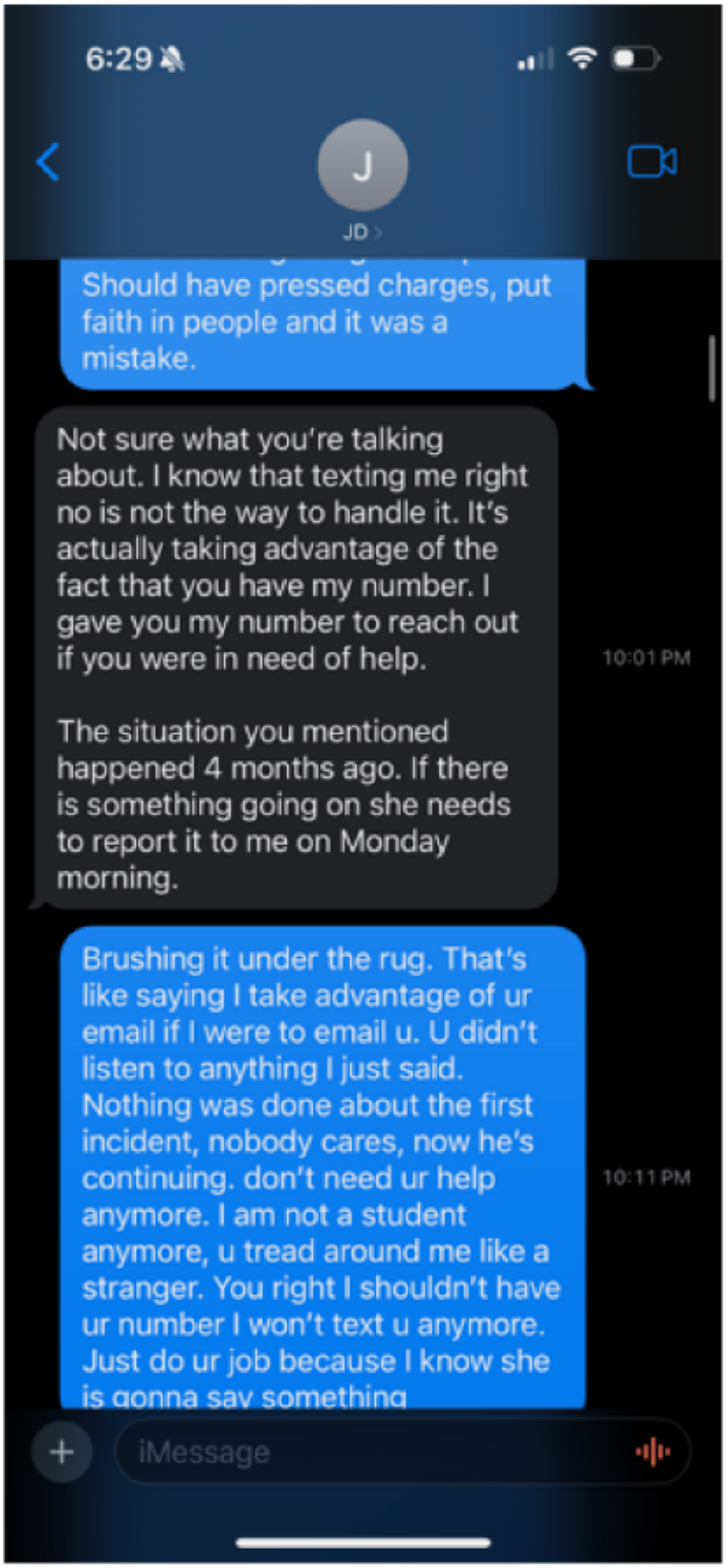

6:28
J
JD
Oct 6, 2023 at 9:51 PM
You know I am sort of disappointed in u and the school for letting that kid continue to do the same thing with no consequences 😔
After he was told not to come near my sister he is sending his friends over to her to tell her during study hall that he wants "the put on with her." It isn't just her that he's disrespectful to, but that isn't my business to tell. Why is it that you all said there would be consequences and he received nothing. You guys said he wouldn't be in her classes but he's in her study hall STILL bothering her.
Why is it that I'm sitting here at 19 years old telling grown adults they didn't do what they promised to do. If you ask why my sister isn't saying anything it's because she is scared and has little to no faith that anything will be done because the school basically told her to fuck off after getting beat up. Should have pressed charges, put
iMessage

155. DeSantis did nothing.

156. Worse than that, he falsely claimed he didn't know what Brother was talking about even though Brother told him what was currently happening. In the next breath, he acknowledged that a "situation happened four months ago." DeSantis simply ignored and wished away the report about Player-6's current conduct in study hall.

157. And on top of that, he remonstrated Brother for texting him:

> Not sure what you're talking about. I know that texting me right no [*sic*] is not the way to handle it. It's actually taking advantage of the fact that you have my number. I gave you my number to reach out if you were in need of help.
>
> The situation you mentioned happened 4 months ago. If there is something going on she needs to report it to me on Monday morning.

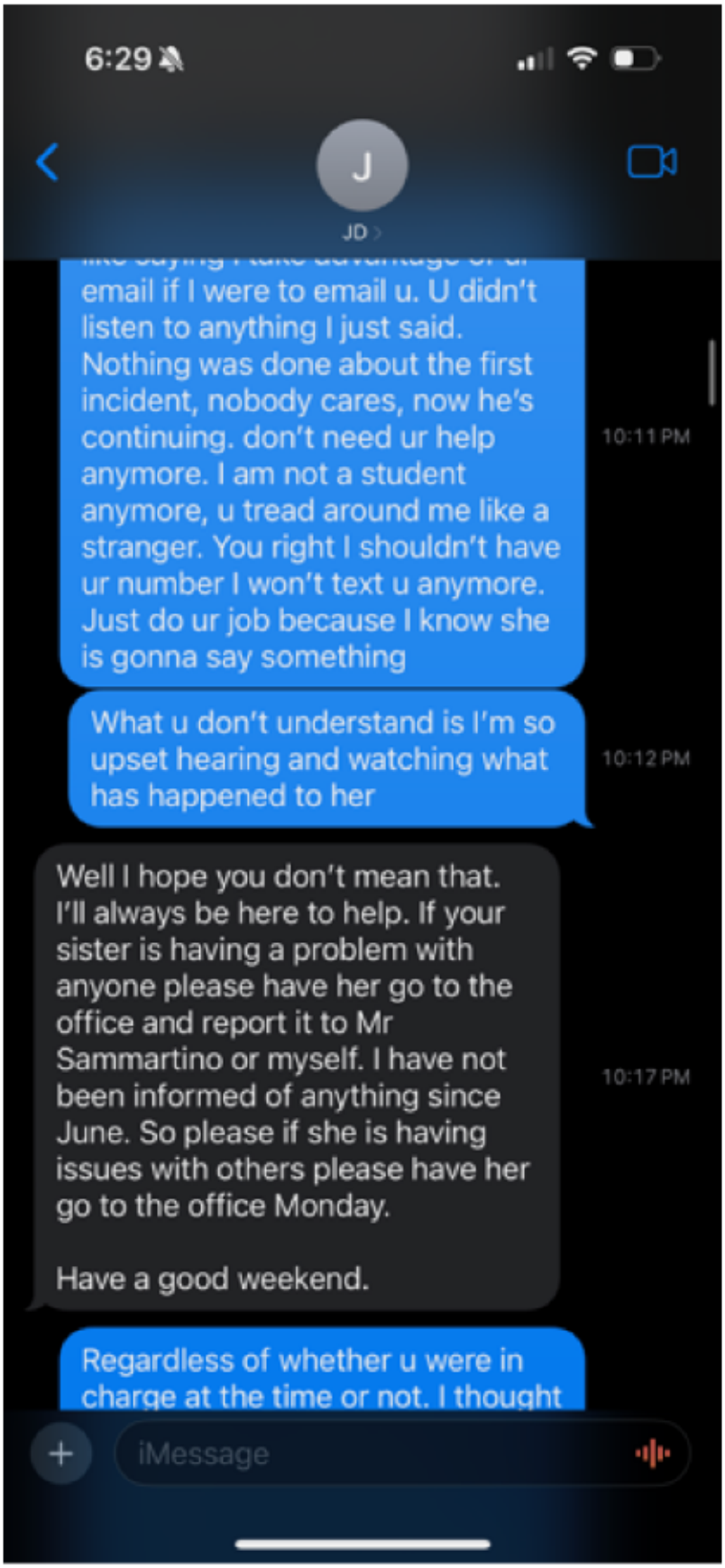

6:29
J
JD
Should have pressed charges, put faith in people and it was a mistake.
Not sure what you're talking about. I know that texting me right no is not the way to handle it. It's actually taking advantage of the fact that you have my number. I gave you my number to reach out if you were in need of help.
10:01 PM
The situation you mentioned happened 4 months ago. If there is something going on she needs to report it to me on Monday morning.
Brushing it under the rug. That's like saying I take advantage of ur email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
10:11 PM
iMessage

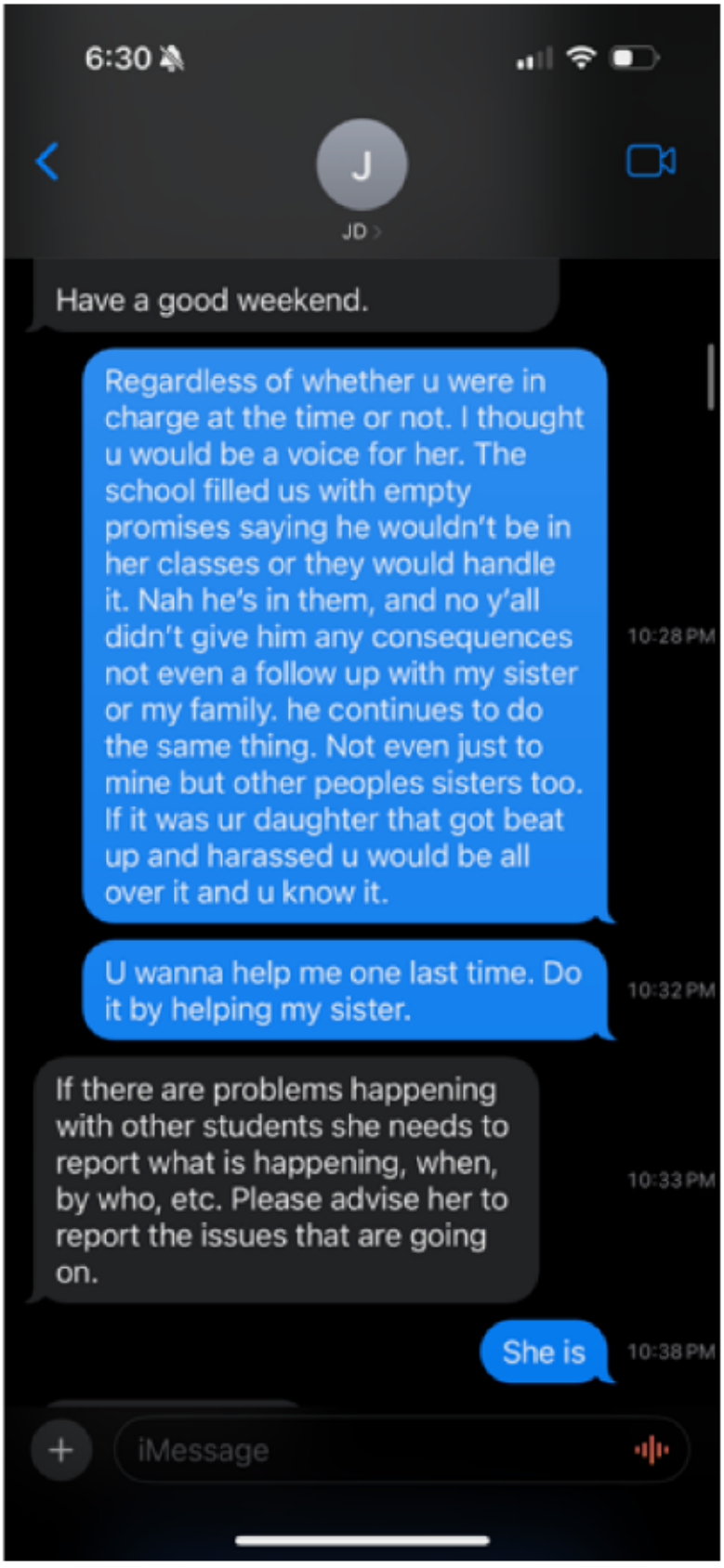
158. Brother responded:

> Brushing it under the rug. That's like saying I take advantage of ur email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
>
> What u don't understand is I'm so upset hearing and watching what has happened to her.

[*Sic.*]

159. Defendant DeSantis claimed he'd not been "informed of anything since June." He said this despite Damore having promised she would address Player-6's conduct on the first day of school. So Defendants never had any intention of addressing Player-6's conduct and protecting Daughter.


6:29
J
JD
email if I were to email u. U didn't listen to anything I just said. Nothing was done about the first incident, nobody cares, now he's continuing. don't need ur help anymore. I am not a student anymore, u tread around me like a stranger. You right I shouldn't have ur number I won't text u anymore. Just do ur job because I know she is gonna say something
10:11 PM
What u don't understand is I'm so upset hearing and watching what has happened to her
10:12 PM
Well I hope you don't mean that. I'll always be here to help. If your sister is having a problem with anyone please have her go to the office and report it to Mr Sammartino or myself. I have not been informed of anything since June. So please if she is having issues with others please have her go to the office Monday.
Have a good weekend.
10:17 PM
Regardless of whether u were in charge at the time or not. I thought
iMessage


6:30
J
JD
Have a good weekend.
Regardless of whether u were in charge at the time or not. I thought u would be a voice for her. The school filled us with empty promises saying he wouldn't be in her classes or they would handle it. Nah he's in them, and no y'all didn't give him any consequences not even a follow up with my sister or my family. he continues to do the same thing. Not even just to mine but other peoples sisters too. If it was ur daughter that got beat up and harassed u would be all over it and u know it.
10:28 PM
U wanna help me one last time. Do it by helping my sister.
10:32 PM
If there are problems happening with other students she needs to report what is happening, when, by who, etc. Please advise her to report the issues that are going on.
10:33 PM
She is
10:38 PM
iMessage

160. Brother urged DeSantis to act. But it was futile:

> Regardless of whether u were in charge at the time or not. I thought u would be a voice for her. The school filled us with empty promises saying he wouldn't be in her classes or they would handle it. Nah he's in them, and no y'all didn't give him any consequences not even a follow up with my sister or my family. he continues to do the same thing. Not even just to mine but other peoples sisters too.
>
> If it was ur daughter that got beat up and harassed u would be all over it and u know it.
>
> U wanna help me one last time. Do it by helping my sister.

[*Sic.*]

161. Defendant DeSantis, downplaying the situation, said Daughter should report anything to him or the office.

162. On Tuesday, October 10, 2023, Daughter went to Ursuline guidance counselor Louise Kotel and said she wasn't comfortable with Player-6 being in her class, because of the attack and his continued harassment. Daughter elaborated on Player-6's attack and continued harassment.

163. Kotel took notes of the conversation. She told Daughter she might tell the principal, but that she would address it with DeSantis.

164. Later that day, DeSantis spoke to Daughter.

165. DeSantis was very short with Daughter and showed no interest in obtaining any of the details about what was happening.

166. DeSantis told Daughter that they were not going to remove Player-6 from her class because she "didn't like him, especially over something that happened more than three months ago" and "it's time to get over it."

167. DeSantis wanted Daughter to "settle your differences" with Player-6 and become friends. That is, he expected her to befriend her attacker.

168. Daughter tried to explain that it had nothing to do with her liking Player-6; it had to do with Player-6 violently attacking and injuring her, and his continued advancements and harassment.

169. DeSantis retorted that he wasn't removing Player-6 from the class and reiterated, "It's time [for Daughter] to move on." He abruptly ended the meeting.

170. DeSantis, a football coach, showed not the slightest interest in his charge, football Player-6's, ongoing harassment.

171. Ursuline Defendants did not remove Player-6 from Daughter's class.

172. Within days of Daughter's report to Kotel and DeSantis, Player-6 called Daughter a "snitch" and, while staring at Daughter, said to a classmate loud enough for Daughter to hear, "She tried to get me in trouble, but she failed."

173. He was right that Daughter failed in securing any help from Defendants.

174. Player-6 knew that at Ursuline, football is the false idol and that he was above any accountability from administrators and coaches. Even in the class with Daughter, he (and she) got to hear the teacher sing his praises for his performance on the gridiron.

175. Player-6 felt he could do anything to Daughter and get away with it. Because Ursuline administrators made him feel that way.

176. Emboldened, Player-6 persisted in repeatedly walking over to Daughter's table during class and trying to talk to her and her friends.

177. Throughout her freshman year, Player-6 stared at and ogled Daughter when he would see her in class and the school's hallways, causing her more fear and apprehension—especially given Damore and DeSantis's refusal to properly address the situation.

178. And at other times, when Daughter refused to engage with Player-6, he stared angrily at her, causing her fear and apprehension that he would suddenly and violently attack her again.

179. At least two to three more times, Daughter reported Player-6's predatory behavior and words to Kotel, who stated there was nothing they could do now, but assured Daughter that Player-6 wouldn't be in class with her next semester.

180. Fall semester 2024, Daughter (now a sophomore) had another class with Player-6.

181. That semester, the cycle of Player-6 staring at and ogling Daughter, which she consistently rejected, and then Player-6 glaring at Daughter daily, continued just as it had Daughter's freshman year.

182. Knowing Defendants were not going to help her, caused Daughter to give up all hope. She stopped going to them.

183. As a reasonable and foreseeable result, Daughter fell into a state of depression and didn't want to go to school most days. Daughter missed at least 35 days of school her sophomore year and arrived late and early on many other days.

184. Daughter even became physically sick many days because of the situation.

185. Daughter often says, "Going to Ursuline was the worst two years of my life. They drained the life out of me."

Daughter experienced disparate treatment at the hands of Defendants Ursuline High School and Margaret Damore.

186. In August–September 2024, Daughter let her friend (Friend-1), another Ursuline student, borrow her cellphone.

187. Friend-1 used Daughter's cellphone to prank text an Ursuline teacher.

188. Friend-1 pranked that she got the teacher's number from a dating app and carried on a conversation with him.

189. Initially, Daughter did not know Friend-1 was using her cellphone to prank text a teacher, but, upon learning, joined in.

190. Ursuline learned of Daughter and Friend-1's prank soon after school began.

191. Daughter admitted her involvement in the silliness.

192. Damore blamed Daughter for letting Friend-1 barrow her cellphone in the first place.

193. Ursuline and Damore suspended Daughter from school for *five days*—the maximum suspension permitted without Diocesan approval.

194. Ursuline and Damore also took away Daughter's cellphone privileges at school for the remainder of the year.

195. Based on information and belief, Friend-1 was only suspended for three days, when she was the one who started the silliness in the first place.

196. At Ursuline, a girl prank-texting warrants the maximum five-day suspension and loss of cellphone privileges, but violent attacks by a male football player merits no discipline or safety measures.

197. Shortly after this, another Ursuline teacher called Friend-1 "gay" during class and posted Friend-1's test grade on the board for the entire class to see and belittled Friend-1 in front of the class.

198. Based on information and belief, Friend-1's parents threatened to sue Ursuline and settled the matter out-of-court.

199. Friend-1 transferred to another high school.

200. In April 2024, two of Daughter's best friends were feuding and Daughter learned that Friend-2 and Friend-3 planned to fight in the cafeteria during lunch.

201. Both the night before and the morning of the planned fight, in the hope of preventing it, Friend-3's mother contacted Ursuline and Damore to alert them.

202. Ursuline and Damore ignored the warnings.

203. The morning of the planned fight, Daughter, hoping to prevent the fight between her best friends, asked her substitute teacher during class if she could go to her locker, which the teacher permitted.

204. Because Friend-2 was in class with Daughter, Daughter didn't want Friend-2 to know Daughter was leaving class to alert the school about the planned fight.

205. Daughter went to her locker and grabbed a book, but rather than return to class, Daughter went to the guidance counselor's office, which was near her locker.

206. Daughter told Ursuline guidance counselor Louise Kotel about the planned fight. Kotel assured Daughter that she would alert DeSantis, which she did.

207. When Daughter returned to class, the substitute teacher gave Daughter a detention for taking too long to return to class.

208. When Daughter went to lunch, no extra administrations, teachers, resource officers, or anyone were there to prevent the fight.

209. The fight occurred and Friend-3 was seriously injured, requiring a trip to the emergency room.

210. The fight was videorecorded and shared with other students and the community at-large.

211. Ursuline administrators broke up the fight and escorted Friend-2 to the office.

212. When no Ursuline administrators or teachers came to Friend-3's aid, Daughter's other friends helped Friend-3 to the bathroom, while Daughter retrieved Friend-3's belongings.

213. As Daughter was going to check on Friend-3, Damore saw her in the hallways and yelled at her for not being at lunch.

214. Daughter explained why she was not at lunch and Damore yelled at her to "mind your own business."

215. That afternoon, Damore summoned Daughter to her office.

216. Damore chastised Daughter for being away from class too long and getting the detention. Daughter protested the detention because her intentions were good—she was trying to stop the planned fight.

217. Despite Daughter trying to prevent violence, Damore refused to waive the five-point deduction on Daughter's conduct grade but agreed to waive Daughter's serving the detention.

218. A few weeks later, Damore reneged and forced Daughter to serve the detention.

219. Daughter met with Damore and questioned why she was forced to serve the detention, but Damore never disciplined Player-6 for his far worse conduct.

220. Damore sat unresponsive.

221. Daughter said, "So you're just never going to help me [with Player-6 or anything else]?"

222. Damore responded simply, "No."

223. So no good deed goes unpunished at Ursuline.

224. These were acts of retaliation for Daughter's reports about the all-important football Player-6.

Because of Defendant Player-6's violent attack and continued harassment, and because Defendants Assistant Principal Margaret Damore and Athletic Director John DeSantis's failed to report the matter or act—combined with Defendants Ursuline High School and Assistant Principal Margaret Damore's retaliatory and disparate treatment—Defendant was compelled to transfer schools.

225. Daughter fell into another state of depression and continued desire to not return to school because of Defendants.

226. Mother rightfully feared for her Daughter's safety and well-being if she returned to Ursuline.

227. So, in August 2025, Mother sold their house—in which the family lived for 28 years—and moved to another school district so Daughter could leave Ursuline and transfer to another high school.

228. Mother refused to speak to Ursuline about the transfer because Defendants lied to her family so many times.

229. Mother had the new high school arrange the transfer.

DEFENDANT URSULINE HIGH SCHOOL'S PREFERENTIAL TREATMENT OF ITS FOOTBALL PLAYERS AND DESIRE TO KEEP MISCONDUCT SILENT HAS BEEN ONGOING FOR YEARS.

230. The Ursuline-hazing Complaint, attached as Ex. 1 and incorporated by reference, is a prime example of Defendants' preferential treatment of its football players and desire to keep silent (or cover up their misconduct). But this behavior isn't isolated to the hazing matter; it has occurred over several years.

231. In the spring of 2023, after morning weight lifting, an Ursuline student (who has since graduated) witnessed a fight between two Ursuline football players in the locker room.

232. Word of the fight quickly spread throughout the school and the students openly discussed it during the day.

233. That afternoon, Athletic Director DeSantis was distracted and visibly upset during class.

234. After class, the witness-student asked DeSantis, "are you good with everything that happened this morning" with the fight.

235. DeSantis became immediately defensive and in an angry tone said, "I don't know what you're talking about." He was trying to downplay and silence the matter.

236. The witness-student said, "You know what I'm talking about," and DeSantis just glared at him and didn't answer.

237. The witness-student, now fearing retaliation if he continued to discuss the fight, walked away and kept his mouth shut—that is until the Ursuline-hazing Complaint was filed. He then felt safe and justified in reporting the incident.

238. In another instance, a former Ursuline student, while attending college, witnessed a fight between two players at the college. The former student felt the college's coach unjustly punished the non-aggressor-player over the aggressor, who was the better player.

239. The former-student spoke to DeSantis, with whom he became friendly with during his time at Ursuline, for insight.

240. DeSantis responded that "it's the coaches' job to win games" and that "if they don't win games, they're out of a job."

241. DeSantis continued that "sometimes they have to make tough choices to protect the better players to win games."

242. All Defendants cared about was football.

DEFENDANTS CATHOLIC DIOCESE OF YOUNGSTOWN AND URSULINE HIGH SCHOOL FAILED TO TRAIN, SUPERVISE, AND DISCIPLINE DEFENDANTS DAMORE AND DESANTIS ON HOW TO HANDLE STUDENT VIOLENCE AND HARASSMENT (INCLUDING SEXUAL HARASSMENT), PROPERLY REPORT CHILD ABUSE, AND PROTECT STUDENTS—THAT IS, HOW NOT TO TREAT FOOTBALL AND FOOTBALL PLAYERS AS MORE IMPORTANT THAN EVERYTHING

243. Defendant Catholic Diocese of Youngstown and Ursuline High School failed to train, supervise, and discipline Defendants Damore and DeSantis about how to properly address and investigate allegations of student

(a) violence,

(b) sexual harassment,

(c) stalking,

(d) menacing,

(e) Title IX violations, and

(f) all the other misconduct described above.

244. These institutional Defendants also failed to train and supervise Damore and DeSantis on fulfilling their mandatory duties to report such misconduct and abuse to law enforcement or children services.

245. And despite receiving federal funding, Defendant Ursuline High School had no Title IX coordinator. Defendant Catholic Diocese of Youngstown, which oversees the high school, did not ensure it did, or that its administrators like Defendant Damore designated one.

CLAIMS

Although all claims below for Plaintiff Daughter Chef, are through Mother Chef, Mother Chef's name is omitted for simplicity's sake.

CLAIM 1
VIOLATION OF TITLE IX OF THE CIVIL RIGHTS ACT (EDUCATION AMENDMENTS OF 1972), 20 U.S.C. § 1681 *ET SEQ.*

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT URSULINE HIGH SCHOOL)

246. Plaintiffs incorporate all previous allegations.

247. Ursuline High School, as a recipient of federal funding, is subject to Title IX, which prohibits discrimination based on sex in educational programs and activities, as well as retaliation for engaging in protected activity complaining of discrimination. 20 U.S.C. §§ 1681 *et seq.*

248. Religious schools that receive federal funding are only excluded from Title IX's requirements "if the application of [the requirements] would not be consistent with the religious tenets of such organization." 20 U.S.C. § 1681(a)(3).

249. These religious exemptions are commonly known to include the exclusion from sports teams based on gender identity, the ability to expel pregnant students, and to have policies denying LGBTQ+ rights.

250. Ursuline has not requested Title IX–exemption regarding the sexual-harassment and assault of students on the basis that preventing these assaults would conflict with its religious tenets.

251. Nor would it—unless it wants people to believe that Catholic teaching embraces sexual harassment and warmth toward male-on-female physical violence.

252. The sexual harassment Daughter Chef endured from football Player-6 was severe, pervasive, objectively offensive, and deprived her of access to educational opportunities or benefits.

253. Ursuline, through its administrators, including Defendants Damore and DeSantis, had actual knowledge of the severe, pervasive, and objectively offensive harassment Daughter suffered.

254. Despite this knowledge, Ursuline maintained a policy and practice of responding with deliberate indifference to misconduct by football players, including Player-6. This habit included the hazing detailed in the Ursuline-hazing Complaint.

255. Ursuline's deliberate indifference is further evidenced by its failure to train Damore and DeSantis on recognizing and preventing sexual harassment and violence.

256. Under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a), Ursuline created, tolerated, and subjected Daughter Chef to a hostile educational environment because she was treated disparately based on her gender; suffered sexual harassment, assault, and other harassment, and treated her disparately in discipline.

257. And Ursuline lacked adequate policies, training, and procedures and deliberately failed to take appropriate preventive or remedial measures.

258. Because of Ursuline's discriminatory policy and practice, Daughter was denied equal access to the School's educational opportunities, forced to endure a hostile environment, and ultimately forced to transfer schools to escape the harassment and retaliation.

259. On top of all that, Ursuline assistant principal Defendant Damore retaliated against Daughter for her protected activity—her reports and opposition to persistent sexually motivated violence, sex discrimination, and sexual harassment by Player-6—by punishing Daughter with disparate treatment detailed above, forcing Daughter to transfer from Ursuline.

260. As a direct and proximate result of Ursuline's failures, Daughter suffered and will continue to suffer economic and non-economic damages including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

CLAIM 2
CIVIL LIABILITY FOR (FAILURE TO) REPORTING CHILD ABUSE UNDER OHIO REV. CODE § 2151.421

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

261. Plaintiffs incorporate all previous allegations.

262. Under the relevant part of Ohio Rev. Code § 2151.421(A)(1)(a):

> No person described in division (A)(1)(b) of this section who is acting in an official or professional capacity and knows, or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age… has suffered or faces a threat of suffering any physical or mental wound, injury… or condition of a nature that reasonably indicates abuse or neglect of the child shall fail to immediately report that knowledge or reasonable cause to suspect to the entity or persons specified in this division. Except as otherwise provided in this division or section 5120.173 of the Revised Code, the person making the report shall make it to the public children services agency or a peace officer in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. If the person making the report is a peace officer, the officer shall make it to the public children services agency in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. In the circumstances described in section 5120.173 of the Revised Code, the person making the report shall make it to the entity specified in that section.

263. Under the relevant part of Ohio Rev. Code § 2151.421(B), "Division (A)(1)(a) of this section applies to any person who is [a]… school teacher; school employee; school authority…."

264. Under the relevant part of Ohio Rev. Code § 2151.421(M):

> Whoever violates division (A) of this section is liable for compensatory and exemplary damages to the child who would have been the subject of the report that was not made. A person who brings a civil action or proceeding pursuant to this division against a person who is alleged to have violated division (A)(1) of this section may use in the action or proceeding reports of other incidents of known or suspected abuse or neglect, provided that any information in a report that would identify the child who is the subject of the report or the maker of the report, if the maker is not the defendant or an agent or

employee of the defendant, has been redacted.

265. Defendants Ursuline High School, Damore, and DeSantis, acting in professional and official capacities, failed to report Player-6's attack on Daughter.

266. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Defendant Ursuline is vicariously liable.

267. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

268. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 3
CIVIL LIABILITY FOR CRIMINAL ACTS (REPORTING CHILD ABUSE) UNDER OHIO REV. CODE §§ 2307.60 AND 2151.421

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

269. Plaintiffs incorporate all previous allegations.

270. Under the relevant part of Ohio Rev. Code § 2151.421(A)(1)(a):

> No person described in division (A)(1)(b) of this section who is acting in an official or professional capacity and knows, or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age… has suffered or faces a threat of suffering any physical or mental wound, injury… or condition of a nature that reasonably indicates abuse or neglect of the child shall fail to immediately report that knowledge or reasonable cause to suspect to the entity or persons specified in this division. Except as otherwise provided in this division or section 5120.173 of the Revised Code, the person making the report shall make it to the public children services agency or a peace officer in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. If the person making the report is a peace officer, the officer shall make it to the public children services agency in the county in which the child resides or in which the abuse or neglect is occurring or has occurred. In the circumstances described in section 5120.173 of the Revised Code, the person making the report shall make it to the entity specified in that section.

271. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2151.421(A)(1) are criminal acts, indeed misdemeanors, under § 2151.99(C).

272. Defendants Ursuline High School, Damore, and DeSantis, acting in professional and official capacities, failed to report Player-6's attack on Daughter.

273. The named Defendants are culpable as principal offenders, complicitors, and/or conspirators for the criminal act and are civilly liable.

274. The conduct complained of above constitutes criminal acts by Defendants Damore and DeSantis individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and, by other Defendants, through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

275. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment.

276. Acting with the kind of culpability otherwise required for the commission of the offense, its commission was also authorized, requested, commanded, and tolerated by Defendant Ursuline High School's administration acting on behalf of the organization and within the scope of the administrator's office or employment.

277. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School as defined in Ohio Rev. Code § 2901.24 and acted with the kind of culpability required for the commission of the offense. At least one of the following apply:

(a) In the name of the organization or on its behalf, they engaged in conduct constituting the offense; and

(b) They had the primary responsibility to discharge a duty imposed on the organization by law—namely the duty to protect the students whose safety was entrusted to them—and did not discharge that duty.

278. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

279. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 4
OHIO COMMON-LAW NEGLIGENCE AND RECKLESSNESS

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

280. Plaintiffs incorporate all previous allegations.

281. The named Defendants failed to exercise the care that a reasonably prudent person would exercise in a similar situation, resulting in injury.

282. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Ursuline High School is vicariously liable.

283. As a school and school officials, named Defendants owed a duty of care owed to Daughter, who was entrusted to their care at school.

284. They breached that duty.

285. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

286. Defendants' acts were in conscious disregard for Daughter's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 5
OHIO COMMON-LAW NEGLIGENT SUPERVISION AND RECKLESS SUPERVISION

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

287. Plaintiffs incorporate all previous allegations.

288. Defendants had a duty to provide reasonable supervision of students.

289. The named Defendants left Player-6 and Daughter unsupervised, leading to her injuries.

290. The school ignoring repeated complaints of violence, bullying, stalking, predatory behavior, and harassment.

291. The named Defendants failed to meet the standard of reasonable and prudent educators in supervising the students.

292. Defendants Damore and DeSantis were agents and employees of Defendant Ursuline High School acting on its behalf and within the scope of their office or employment. Ursuline High School is vicariously liable.

293. As a school and school officials, they owed a duty of care owed to Daughter, who was entrusted to their care at school.

294. They breached that duty.

295. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

296. Defendants' acts were in conscious disregard for Daughter's rights, malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 6
NEGLIGENT AND RECKLESS TRAINING, SUPERVISION, DISCIPLINE, STAFFING, HIRING, AND RETENTION UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL AND THE CATHOLIC DIOCESE OF YOUNGSTOWN)

297. Plaintiffs incorporate all previous allegations.

298. The named Defendants failed to exercise due care and acted in both a negligent and reckless manner in training, supervising, disciplining, staffing, hiring, and retaining the individual Defendants—especially Defendants Damore and DeSantis.

299. The named Defendants failed to train, supervise, and discipline Defendants Damore and DeSantis about how to properly address and investigate allegations of violence, sexual harassment, stalking, menacing, and all the conduct described above.

300. The named Defendants also failed to discipline and hold Defendants Damore and DeSantis accountable for failing to fulfill their mandatory duties to report such misconduct to law enforcement or children services.

301. The named Defendants failed to train, supervise, and discipline Defendants Damore and DeSantis about caring about such allegations more than football.

302. Defendants Ursuline and the Diocese's negligent and reckless conduct in this regard proximately caused Daughter's injuries.

303. As a direct and proximate result of these actions, Daughter, has suffered and will continue to suffer damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

304. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 7
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS URSULINE HIGH SCHOOL, MARGARET DAMORE, AND JOHN DESANTIS)

305. Plaintiffs incorporate all previous allegations.

306. Defendants had duties to, and breached those duties, acting negligently and causing harm to Daughter.

307. As a direct and proximate result of Defendants' negligence, Daughter suffered severe emotional distress and physical harm and injury. The distress was severe enough to disrupt her daily life.

308. The harm caused by Defendants' negligence and recklessness was reasonably foreseeable by Defendants at all relevant times.

309. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

310. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 8
CIVIL LIABILITY OF PARENTS FOR WILLFUL AND MALICIOUS ASSAULTS BY THEIR CHILDREN UNDER OHIO REV. CODE § 3109.10

(PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANTS PARENTS OF PLAYER-6)

311. Plaintiffs incorporate all previous allegations.

312. Under Ohio Rev. Code § 3109.10, in relevant part:

> Any person is entitled to maintain an action to recover compensatory damages in a civil action, in an amount not to exceed ten thousand dollars and costs of suit in a court of competent jurisdiction, from the parent of a child under the age of eighteen if the child willfully and maliciously assaults the person by a means or force likely to produce great bodily harm.

313. Player-6 willfully and maliciously assaulted Daughter by means or force likely to produce great bodily harm.

314. Daughter suffered, or was assaulted in such a manner as to likely produce, great bodily injury.

315. The named-Defendant Parents are liable for the actions of their named children.

316. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

317. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 9
CIVIL LIABILITY FOR CRIMINAL ACTS (FELONIOUS ASSAULT) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.11

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

318. Plaintiffs incorporate all previous allegations.

319. Under Ohio Rev. Code § 2903.11(A)(1), "No person shall knowingly… Cause serious physical harm to another…"

320. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

321. Under the relevant part of Ohio Rev. Code § 2901.01(A)(5):

> "Serious physical harm to person" means any of the following… (c) Any physical harm that involves some permanent incapacity, whether partial or total, or that involves some temporary, substantial incapacity; (d) Any physical harm that involves some permanent disfigurement or that involves some temporary, serious disfigurement; (e) Any physical harm that involves acute pain of such duration as to result in substantial suffering or that involves any degree of prolonged or intractable pain.

322. Daughter's injuries constitute serious physical harm.

323. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.11(A)(1) are criminal acts, indeed felonies, under § 2903.11(D)(1)(a).

324. Defendant Player-1 knowingly caused serious physical harm to Daughter.

325. The named Defendant is culpable as a principal offender, complicitor, and/or conspirator for the criminal act and are civilly liable.

326. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

327. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 10
CIVIL LIABILITY FOR CRIMINAL ACTS (ASSAULT) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.11

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

328. Plaintiffs incorporate all previous allegations.

329. Under the relevant part of Ohio Rev. Code § 2903.13(A), "No person shall knowingly cause or attempt to cause physical harm to another…" Under the relevant part of subsection (B), "No person shall recklessly cause serious physical harm to another…"

330. Under Ohio Rev. Code § 2901.22(B), "A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact."

331. Under Ohio Rev. Code § 2901.22(C), "A person acts recklessly when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that the person's conduct is likely to cause a certain result or is likely to be of a certain nature. A person is reckless with respect to circumstances when, with heedless indifference to the consequences, the person disregards a substantial and unjustifiable risk that such circumstances are likely to exist."

332. Under Ohio Rev. Code § 2901.01(A)(3), "'Physical harm to persons' means any injury, illness, or other physiological impairment, regardless of its gravity or duration."

333. Under the relevant part of Ohio Rev. Code § 2901.01(A)(5):

"Serious physical harm to person" means any of the following… (c) Any physical harm that involves some permanent incapacity, whether partial or total, or that involves some temporary, substantial incapacity; (d) Any physical harm that involves some permanent disfigurement or that involves some temporary, serious disfigurement; (e) Any physical harm that involves acute pain of such duration as to result in substantial suffering or that involves any degree of prolonged or intractable pain.

334. Daughter's injuries constitute physical harm and serious physical harm.

335. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.13 are criminal acts, indeed misdemeanors, under § 2903.13(C)(1).

336. Defendant Player-1 knowingly caused physical harm to Daughter.

337. Defendant Player-1 recklessly caused serious physical harm to Daughter.

338. The named Defendant is culpable as a principal offender, complicitor, and/or conspirator for the criminal act and are civilly liable.

339. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

340. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 11
CIVIL LIABILITY FOR CRIMINAL ACTS (AGGRAVATING MENACING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.21

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

341. Plaintiffs incorporate all previous allegations.

342. Under the relevant part of Ohio Rev. Code § 2903.21(A): "No person shall knowingly cause another to believe that the offender will cause serious physical harm to the person…." (Cleaned up.)

343. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.21 are misdemeanor criminal acts under § 2903.21(B).

344. Defendant Player-6 committed aggravated menacing against Daughter Chef in all the ways described above.

345. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

346. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 12
CIVIL LIABILITY FOR CRIMINAL ACTS (MENACING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.22

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

347. Plaintiffs incorporate all previous allegations.

348. Under the relevant part of Ohio Rev. Code § 2903.22(A)(1): "No person shall knowingly cause another to believe that the offender will cause physical harm to the person…." (Cleaned up.)

349. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.21 are misdemeanor criminal acts under § 2903.22(B).

350. Defendant Player-6 committed menacing against Daughter Chef in all the ways described above.

351. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

352. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 13
CIVIL LIABILITY FOR CRIMINAL ACTS (MENACING BY STALKING) UNDER OHIO REV. CODE §§ 2307.60 AND 2903.211

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

353. Plaintiffs incorporate all previous allegations.

354. Under the relevant part of Ohio Rev. Code § 2903.211(A)(1): "No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person…." (Cleaned up.)

355. Under Ohio Rev. Code § 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of Ohio Rev. Code §§ 2903.211 where, as here, the victim is a minor or the offender has a history of violence toward the victim, are criminal acts—indeed felonies—under § 2903.211(B)(2)(d)–(e).

356. Defendant Player-6 committed menacing by stalking against Daughter Chef in all the ways described above.

357. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which Defendant Player-6 is liable, including, but not limited to, pain and suffering, reputational harm, betrayal, and emotional distress.

358. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 14
CIVIL ASSAULT UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

359. Plaintiffs incorporate all previous allegations.

360. Player-6 willfully threatened or attempted to harm or offensively touch Daughter, which reasonably placed Daughter in fear of such contact; coupled with Player-6 taking a definitive act to do so and having the apparent present ability to do harm or to commit the offensive touching.

361. Player-6 intentionally created the fear of injury.

362. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

363. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 15
CIVIL BATTERY UNDER OHIO LAW

(BY PLAINTIFF DAUGHTER CHEF AGAINST DEFENDANT PLAYER-6)

364. Plaintiffs incorporate all previous allegations.

365. Player-6 harmfully or offensively touched Daughter.

366. Player-6 unlawfully touched Daughter with the intent of inflicting injury.

367. As a direct and proximate result of these actions, Daughter has suffered and will continue to suffer economic and non-economic damages for which the named Defendant is liable, including, but not limited to, pain and suffering, reputational harm, and emotional distress.

368. Defendant's acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

PRAYER FOR RELIEF

For the above reasons, Plaintiff respectfully requests the following relief from the Court:

(a) Declare that Defendants' acts and conduct constitute violations of federal and state law and the United States Constitution;

(b) Enjoin Defendants from retaliating against Mother and Daughter Chef;

(c) Enter judgment in Mother and Daughter Chef's favor on all claims for relief;

(d) Award Mother and Daughter Chef full compensatory damages, economic and non-economic, including, but not limited to, pain and suffering, mental anguish, emotional distress, reputational harm, sense of betrayal, and trauma that they have suffered and are reasonably certain to suffer in the future;

(e) Award Mother and Daughter Chef punitive damages as appropriate for all intentional and malicious violations of federal and state law and constitutional rights;

(f) Award prejudgment and post-judgment interest at the highest lawful rate;

(g) Award Mother and Daughter Chef their reasonable attorney fees, expert fees, and all other costs and expenses of this suit;

(h) Award all other relief in law or equity to which Mother and Daughter Chef is entitled and that the Court deems equitable, just, or proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues within this complaint.

Dated: September 10, 2025

Respectfully submitted,

/s/ Subodh Chandra
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