

LUCAS COUNTY COMMON PLEAS COURT  
CASE DESIGNATION

FILED LUCAS COUNTY  
12/30/2021 11:54 AM  
COMMON PLEAS COURT  
BERNIE QUILTER, CLERK

TO: Bernie Quilter, Clerk of Courts

CASE NO. \_\_\_\_\_

JUDGE \_\_\_\_\_

G-4801-CI-0202103887-000  
Judge  
ERIC ALLEN MARKS

740

The following type of case is being filed:

Professional Malpractice

Legal Malpractice (L)

Medical Malpractice (M)

Product Liability (B)

Other Tort (C)

Workers' Compensation

State Funded (D)

Self Insured (K)

Administrative Appeal (F)

Commercial Docket

By submitting the complaint, with the signature of the Attorney, the Attorney affirms that the name of person with settlement authority and his/her direct phone number will be provided upon request to a party or counsel in this matter.

Other Civil

Consumer Fraud (N)  Forfeiture

Appropriation (P)  Court Ordered

Other Civil (H)  Certificate of Title

Copyright Infringement (W)

This case was previously dismissed pursuant to CIVIL RULE 41 and is to be assigned to Judge \_\_\_\_\_, the original Judge at the time of dismissal. The previously filed case number was CI \_\_\_\_\_.

This case is a civil forfeiture case related to a criminal case currently pending on the docket of Judge \_\_\_\_\_. The pending case number is \_\_\_\_\_.

This case is a Declaratory Judgment case with a personal injury or related case currently pending. The pending case number is \_\_\_\_\_, assigned to Judge \_\_\_\_\_.

This case is to be reviewed for consolidation in accordance with Local Rule 5.02 as a companion or related case. This designation sheet will be sent by the Clerk of Courts to the newly assigned Judge for review with the Judge who has the companion or related case with the lowest case number. The Judge who would receive the consolidated case may accept or deny consolidation of the case. Both Judges will sign this designation sheet to indicate the action taken. If the Judge with the lowest case number agrees to accept, the reassignment of the case by the Administration Judge shall be processed. If there is a disagreement between the Judges regarding consolidation, the matter may be referred to the Administrative Judge.

Related/companion case number \_\_\_\_\_ Assigned Judge \_\_\_\_\_

Approve/Deny \_\_\_\_\_ Date \_\_\_\_\_ Approve/Deny \_\_\_\_\_ Date \_\_\_\_\_

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4. For many months prior to suit, the victims asked the District to simply meet with them; most notably toward ensuring that this sort of abuse would never happen again, to current/future students, and toward getting the victims current and future help – counseling, etc. – that they may very much need. In response, the District refused to even sit down with them.

5. In the meantime, a number of weeks after Ronald Stevens' conviction, the District authored a publication proclaiming to be one of the very "safest" school districts not just in Northwestern Ohio, but in the entire State and Nation.

#### **Parties and Jurisdiction**

6. At all times relevant, Plaintiffs John Does I, II, III, IV, and Jane Does I and II (collectively "**Plaintiffs**") were residents of Ottawa Hills, Lucas County, Ohio. Plaintiffs are seeking anonymity because this case involves matters that outweigh the presumption of open judicial proceedings for the following reasons:

- a. Plaintiffs are suing, in part, to challenge governmental activity – namely, the policies, procedures, actions, and inactions of the District that enabled the abuses by Ronald Stevens;
- b. Prosecution of this claim will require Plaintiffs to disclose matters of the utmost privacy and intimacy by detailing specific instances of abuse; and
- c. John Does II and III are still minors.

7. At all times relevant, John Does I, II, and III were minors and students at the District.

8. The District and the Ottawa Hills Local School District Board of Education (collectively, the “**District**”) are located in Lucas County, Ohio, and all the events which are the subject of this lawsuit occurred there.

9. Defendant Ronald Stevens was a resident of Ottawa Hills, Lucas County, Ohio, and is currently incarcerated in the Noble Correctional Institution in Caldwell, Noble County, Ohio.

10. At all times relevant, Defendant Kristie Stevens was a resident of Ottawa Hills, Lucas County, Ohio, and was and is the spouse of Defendant Ronald Stevens.

### **Factual Allegations**

11. Ronald Stevens was employed by the District as a janitor, and was eventually promoted to its Operations Manager.

12. Upon information and belief, Kristie Stevens was hired by the District in or about 2008 as a teacher, and has since been promoted to a supervisory position as a gifted intervention specialist.

13. At all times relevant, Ronald and Kristie Stevens lived in the same household located on West Bancroft Street in Ottawa Hills.

14. Kristie Stevens, as a teacher employed by the District, is a mandatory reporter under O.R.C. § 2151.421.

15. Ronald Stevens maintained two offices in the District’s schools.

16. The windows to one of Ronald Stevens’ offices were blacked-out, so passersby would be unable to see inside; the other office did not have windows at all.

17. Upon information and belief, an I.T. professional expressed concern to the District regarding Ronald Stevens' blacked-out office windows, concerns the District dismissed without appropriate investigation or inquiry.

18. Additionally, upon information and belief, Ronald Stevens was permitted to have unfettered control of the District's security cameras including placement of cameras and monitoring/maintenance of footage.

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19. Beginning in 2017, upon information and belief, Ronald Stevens engaged in Snapchat with certain Plaintiffs and other young boys enrolled at the District.

20. Ronald Stevens sent Snapchat messages to certain Plaintiffs and other young boys discussing sex, masturbation, and other inappropriate subjects, and would send and solicit inappropriate photographs and videos.

21. In or about November of 2017, parents of District students expressed concern to the District regarding Ronald Stevens' boundary issues with students and showed (1) copies of Snapchat messages between Ronald Stevens and District students, including certain Plaintiffs, and (2) a video depicting Ronald Stevens driving late at night with District students in his car, including certain Plaintiffs.

22. Upon information and belief, the District briefly met with Ronald Stevens and suggested that he exit Snapchat and use "better judgment."

23. Upon information and belief, Ronald Stevens exited Snapchat only to re-engage one day later under a different username.

24. Upon information and belief, no further attempt was made by the District to follow up with or monitor Ronald Stevens' behavior to ensure his compliance with its suggestion.

25. The District failed to investigate the parents' concerns, did not speak with the involved boys, and failed to notify all boys' parents.

26. In fact, the District told the complaining parents to voice any future concerns to the police, as opposed to the District.

27. According to Ronald Stevens' personnel file, the District did not file a report, record the parents' concerns about him, or issue a reprimand of any kind.

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28. The District placed young, male students, including John Does I, II, and III, in danger.

29. In spite of parents' concerns about Ronald Stevens, and the District's knowledge of same, the District suggested to John Doe I and Jane Doe I that Ronald Stevens tutor John Doe I, and recommended, prepared, and pressured Jane Doe I into signing paperwork appointing Ronald Stevens as a guardian of John Doe I.

30. Placing John Doe I under the guardianship of an employee with no teaching credentials who was known by the District to have boundary issues was reckless.

31. The District routinely permitted Ronald Stevens to remove boys, including certain Plaintiffs, from teachers' classrooms – including, most notably, that of Kristie Stevens.

32. Upon removing boys, including certain Plaintiffs, from class, Ronald Stevens would:

- a. Direct the boys, including certain Plaintiffs, to meet Ronald Stevens in a designated location later in the day, to be abused;
- b. Escort the boys, including certain Plaintiffs, directly to one of Ronald Stevens' offices at the District, to be abused; or

- c. Transport the boys, including certain Plaintiffs, off of school property during school hours, to be abused.

33. Upon information and belief, releasing students from class in the middle of a school day into the care of Ronald Stevens violated District policies and procedures.

34. Upon information and belief, the District's administration and teachers/staff regularly observed Ronald Stevens in the hallway with students, including certain Plaintiffs, in the middle of a school day when these students should have been in class.

35. Upon information and belief, the District's administration and teachers/staff also observed Ronald Stevens transporting boys, including certain Plaintiffs, off of school property during school hours – again, when these students should have been in class.

36. Ronald Stevens provided boys, including certain Plaintiffs, condoms on school property, during school hours; Ronald Stevens also provided certain Plaintiffs with “Plan B” pills.

37. Ronald Stevens also offered to, and did, shave certain Plaintiffs' pubic hair.

38. Additionally, young, male boys, including certain Plaintiffs, would be invited to regular “sleepovers” at Ronald and Kristie Stevens' home.

39. During these “sleepovers,” Ronald Stevens would offer and on occasion provide these boys, including certain Plaintiffs, melatonin and sometimes alcohol. Further, Ronald Stevens would give boys, including certain Plaintiffs, “massages” that culminated in molestation and/or rape.

40. Ronald Stevens kept masturbation devices both at his home and in his office(s) on District property.



41. Ronald Stevens would use these devices on boys, including certain Plaintiffs, either at his home or in either of his offices on school property, during school hours.

42. In or about August of 2019, Jane Doe I met with the District, expressed concerns regarding further behavior and boundary issues pertaining to both Ronald and Kristie Stevens, and demanded that neither Ronald nor Kristie Stevens be permitted to have further contact with her children – John Does I and II. The District assured Jane Doe I that no further contact would occur.

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43. Despite its assurance, the District took no action to prevent Ronald Stevens from contacting either John Doe I or II; the abuse of John Doe I continued, including on school property, during school hours, and the abuse of other young boys, including John Does II and III, began.

44. From 2017 through 2019, Ronald Stevens sexually abused and/or raped John Doe I nearly every other day, often on school property, during school hours.

45. Following the abuses and rapes, John Doe I attempted to commit suicide in or about November of 2019.

46. In or about December of 2019, John Doe IV and another parent met with the District to demand that the District take appropriate action with respect to Ronald Stevens. Once again, the District was dismissive, instructing John Doe IV that the District “had too much on its plate to deal with this.”

47. Ronald Stevens was arrested on December 23, 2019 on allegations of sexual abuse of the District’s students, including John Does I, II, and III.

48. Following Ronald Stevens’ arrest, certain Plaintiffs felt ostracized and were constructively forced from the District, after having been provided no support.

49. Following Ronald Stevens' arrest, Ronald and Kristie Stevens spoke by telephone, when Ronald Stevens was incarcerated, and discussed victims via coded conversation (*i.e.*, creating ambiguous nicknames to refer to victims, and using numbers to refer to tasks).

50. Upon information and belief, the purpose of this conversation was to have Kristie Stevens destroy evidence relating to the abuse of victims of Ronald Stevens, including John Does I, II, and III.

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51. During this conversation, Ronald and Kristie Stevens referenced coded letters in each other's possession. Ronald Stevens instructed, and Kristie Stevens agreed, that the contents of these letters were never to be disclosed, even under threat of torture, and that each letter was to be destroyed; Ronald Stevens was to eat his letter while Kristie Stevens was to burn hers.

52. The actions taken by Ronald and Kristie Stevens against John Does I, II, and III were both willful and malicious.

53. In September of 2021, Ronald Stevens was tried on the sexual abuse charges.

54. During trial, Ronald and Kristie Stevens had an out-of-court conversation discussing what certain witnesses had testified to, in direct violation of the presiding judge's separation of witnesses order.

55. On September 23, 2021, Ronald Stevens was found guilty of thirty-one felony counts of sexual abuse and/or rape of the District's students, including John Does I, II, and III, and on October 12, 2021 was sentenced to 101 years in prison.

56. Notwithstanding Ronald Stevens' conviction, the District failed to terminate his employment; rather, on September 30, 2021, the District permitted him to resign.

57. Much of the involved sexual abuse, including rapes, occurred on school property, during school hours; other sexual abuse, including rapes, occurred at the Stevens household, where Kristie Stevens also resided.

58. Upon information and belief, Kristie Stevens had actual knowledge of and/or was willfully blind to the heinous abuses perpetrated by Ronald Stevens upon young boys, including John Does I, II, and III.

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59. Upon information and belief, the District became aware that Kristie Stevens knew of or suspected Ronald Stevens' abuses, that her actions had served to facilitate the abuses, and that she had conspired with Ronald Stevens to destroy evidence of the abuses. To date, upon information and belief, the District has failed to report Kristie Stevens to the State and/or terminate her employment.

60. In fact, after Ronald Stevens' arrest, and despite its knowledge of Kristie Stevens' actions and involvement, the District rehired Kristie Stevens and promoted her.

61. Multiple parents complained to the District regarding Kristie Stevens' continued employment. In response, the District admitted that it would rather keep Kristie Stevens on the payroll than face the potential of expending District funds in defense of a wrongful termination lawsuit. In doing so, the District knowingly and deliberately prioritized money over student safety.

62. Notwithstanding the District's knowledge of Ronald Stevens' rampant abuse and rape of District students, including on school property, during school hours, and Ronald Stevens' related conviction, the District subsequently published a newsletter claiming to be one of the "safest" school districts not only in Northwest Ohio, but in the entire State and Nation.

63. In or about August of 2014, a District student was abused by another member of the janitorial staff, also on school property, also during school hours. The District failed to take appropriate disciplinary action then and/or to take appropriate remedial action to mitigate against the potential for similar, future abuse.

64. As a direct and proximate result of Defendants' wrongful, tortious, and criminal behavior, Plaintiffs are entitled to recover economic, non-economic, and punitive damages plus interest, costs, and attorney's fees, all as further discussed herein, and as will be offered as proof at trial.

**Count I – 20 U.S.C. § 1681 (Title IX) as to the District**

65. Plaintiffs incorporate and reallege paragraphs 1-64 as if expressly rewritten herein.

66. The District is a federal funding recipient and therefore amenable to suit under Title IX.

67. District administrators and/or Board members and/or Kristie Stevens were appropriate persons to receive knowledge under Title IX.

68. Upon information and belief, certain District administrators had knowledge of and/or were willfully blind to the abuses committed by Ronald Stevens.

69. Upon information and belief, certain District administrators and Board members had an unusually close relationship with Ronald Stevens and/or Kristie Stevens, such that a reasonable inference can be made as to the administrators' knowledge of the abuses committed by Ronald Stevens, and the wrongful actions of Kristie Stevens.

70. Ronald Stevens' grossly inappropriate Snapchat messages, his boundary issues, his blacked-out office windows, and his having apparent *carte blanche* to remove students from

classrooms while class was in session to escort students to his office(s) and/or transport students off of school property, are all indicative of the District's knowledge of a likelihood of Ronald Stevens' abuse of students, including certain Plaintiffs.

71. Kristie Stevens is "any employee" under 34 C.F.R. § 106.30 and as such her actual knowledge is imputed to the District.

72. Upon information and belief, Kristie Stevens had actual knowledge of and/or was willfully blind to Ronald Stevens' sexual abuse, including rape, of District students, including John Does I, II, and III, and her knowledge is imputed to the District.

73. Kristie Stevens had a duty to report Ronald Stevens' abuses, known or suspected, under state law.

74. The District had certain duties and requirements under Title IX including but not limited to ending the abuse, conducting an independent investigation, contacting the abused boys, and offering supportive measures.

75. The District failed to end the abuse as required by Title IX.

76. To date, the District has failed to conduct any "independent" investigation of the abuse as required by Title IX.

77. The District failed to contact the abused students as required by Title IX, and in fact has rejected Plaintiffs' repeated requests to meet with the District.

78. The District failed to offer supportive measures to John Does I, II, and III as required by Title IX.

79. The District has been deliberately indifferent to the abuse of John Does I, II, and III, and other school children in various respects, including but not limited to the District:

- a. Failing to take appropriate remedial action following the prior sexual abuse by another member of the janitorial staff;
- b. Failing to conduct an appropriate investigation of prior complaints pertaining to Ronald Stevens, and/or ensure that Ronald Stevens maintained appropriate boundaries;
- c. Failing to place any report of parents' concerns in Ronald Stevens' personnel file, and not issuing him any reprimand;
- d. Permitting Ronald Stevens to have his office windows blacked-out, in spite of concerns voiced by other District employees;
- e. Permitting Ronald Stevens to remove students, including certain Plaintiffs, from their classes in violation of District policy;
- f. Failing to end the abuse;
- g. Failing to stop Ronald and Kristie Stevens from contacting certain Plaintiffs despite the request of Jane Doe I;
- h. Failing to conduct an independent investigation of allegations of inappropriate conduct/abuse;
- i. Failing to contact any of the affected boys, including John Does I, II, and III, and in fact rejecting Plaintiffs' repeated requests to meet with the District;
- j. Failing to offer supportive measures, including counseling and related services, to the affected boys, including John Does I, II, and III;
- k. Dismissing John Doe IV's concerns and responding that the District "has too much on its plate to deal with this."

- l. Renewing Kristie Stevens' contract and in fact promoting her even though her actions served to facilitate the abuse, she failed to report known or suspected abuse, and she conspired with Ronald Stevens to destroy evidence of the abuse;
- m. Defending such renewal by citing concern for potential wrongful termination litigation expenses – this being communicated to parents whose children had been sexually abused and/or raped by Ronald Stevens due in part to facilitation from Kristie Stevens; and
- n. Publishing a newsletter proudly declaring itself to be one of the “safest” school districts not only in Northwest Ohio, but in the entire State and Nation, such newsletter being published within weeks of Ronald Stevens' conviction of rampant sexual abuse and rape of District students, including on school property, during school hours.

80. Upon information and belief, all of Ronald Stevens' victims, including John Does I, II, and III, were young boys.

81. Ronald Stevens' actions impeded certain Plaintiffs' access to education.

82. John Does I, II, and III were discriminated against on the basis of sex.

83. Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens, and the dereliction of the District's duties under Title IX.

**Count II – 42 U.S.C. § 1983 Civil Rights Violation as  
Against the District (Monell Liability)**

84. Plaintiffs incorporate and reallege paragraphs 1-83 as if expressly rewritten herein.

85. The District is a person under 42 U.S.C. § 1983.

86. John Does I, II, and III, as schoolchildren, had a constitutional right pursuant to the 14th Amendment to personal security, bodily integrity, and the right to be free from sexual abuse at the hands of a public-school employee.

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87. The District, acting under the color of law, invited and tolerated a pervasive custom of inaction toward abuse that directly and proximately caused the deprivation of Plaintiffs' constitutional right to personal security and bodily integrity by among other things, the following:

- a. Failing to take appropriate remedial action following the prior sexual abuse by another member of the janitorial staff, which occurred on school property, during school hours;
- b. Failing to investigate parents' concerns of Ronald Stevens' boundary issues; specifically the District failed to interview involved students, failed to notify students' parents, and failed to adequately address Ronald Stevens' conduct;
- c. Failing to take any action after the parents' concerns to ensure that Ronald Stevens was actually using "better judgment";
- d. Failing to investigate Jane Doe I's complaints and/or to honor her repeated requests that Ronald and Kristie Stevens be prohibited from having contact with John Does I and II;



- e. Dismissing John Doe IV's concerns as to Ronald Stevens by responding that the District has "too much on its plate to deal with this";
- f. Permitting Ronald Stevens, a public-school employee, to maintain blacked-out office windows, notwithstanding other District employees' concerns with respect to same;
- g. Failing to question or investigate Ronald Stevens and/or involved students, including certain Plaintiffs, when observed by administration in the halls after Ronald Stevens had removed them from their classrooms in the middle of a school day, in violation of District policy, such inaction constituting an implicit and/or overt ratification of this conduct; and
- h. Upon information and belief, not reporting the abuse or suspected abuse, as required by law, by Ronald Stevens and/or the previous janitorial staff member, and the related wrongful actions of Kristie Stevens.

88. The District's custom and deliberate indifference allowed Ronald Stevens to engage in further abuse of John Does I, II, and III, and resulted in the deprivation of their constitutional rights directly and proximately causing their injuries.

89. As a result thereof, Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

**Count III – 42 U.S.C. § 1983 Civil Rights Violation as  
Against the District (State Created Danger)**

90. Plaintiffs incorporate and reallege paragraphs 1-89 as if expressly rewritten herein.
91. The District permitted Ronald Stevens to have blacked-out office windows, notwithstanding concerns voiced by other District employees.
92. The District permitted Ronald Stevens to remove students, including certain Plaintiffs, from their classes during the school day, in violation of District policy.
93. The District permitted Ronald Stevens to escort students, including certain Plaintiffs, to his office(s) where he would perpetrate abuse.
94. The District permitted Ronald Stevens to transport students, including certain Plaintiffs, from school property, during school hours, where he would perpetrate abuse.
95. The District suggested that John Doe I be tutored by Ronald Stevens, notwithstanding known boundary issues and the fact that Ronald Stevens had no teaching credentials.
96. The District recommended, prepared, and pressured Jane Doe I into signing paperwork that placed Ronald Stevens in a guardianship position over John Doe I.
97. These actions were performed by the District notwithstanding its knowledge of Ronald Stevens' boundary issues and inappropriate conduct with young, male students.
98. These, and other actions and inactions, specifically placed certain Plaintiffs at risk of sexual abuse; sexual abuse that occurred literally hundreds of times, almost every other day, for more than two years.

99. The District knew or should have known that its actions specifically endangered John Does I, II, and III, and in any event, such actions were egregious and shock the conscience.

100. As a result thereof, Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

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**Count IV – 42 U.S.C. § 1983 Civil Rights Violation as  
Against the District (Special Relationship)**

101. Plaintiffs incorporate and reallege paragraphs 1-100 as if expressly rewritten herein.

102. The District created and/or assumed a special relationship between itself and John Doe I when it recommended that Ronald Stevens tutor John Doe I even though Ronald Stevens had no teaching credentials, and when the District recommended, prepared, and pressured Jane Doe I into signing a temporary guardianship of Ronald Stevens over John Doe I.

103. The District had an affirmative constitutional duty to protect John Doe I from abuse.

104. The District breached that duty by:

- a. Failing to protect John Doe I;
- b. Permitting Ronald Stevens to remove John Doe I from classes during school hours;
- c. Permitting Ronald Stevens to escort John Doe I to his office(s), on school property, during school hours;
- d. Permitting Ronald Stevens to take John Doe I off school property, during school hours; and

e. Failing to take any action to prevent in-school contact between Ronald Stevens and John Doe I, notwithstanding repeated requests from Jane Doe I.

105. These actions and inactions led to further abuse which resulted in John Doe I attempting suicide.

106. As a result thereof, John Doe I has suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. John Doe I also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

**Count V – 42 U.S.C. § 1983 Civil Rights Violation as  
Against Ronald and Kristie Stevens**

107. Plaintiffs incorporate and reallege paragraphs 1-106 as if expressly rewritten herein.

108. John Does I, II, and III, as schoolchildren, had a constitutional right to personal security, bodily integrity, and the right to be free from sexual abuse at the hands of a public-school employee.

109. Ronald Stevens, as a state actor, abused his authority under color of law as a public-school employee by sexually abusing and/or raping John Does I, II, III, and other boys who were enrolled at the District.

110. Much of the abuse of certain Plaintiffs occurred on school property, during school hours.

111. Ronald Stevens deprived John Does I, II, and III of their constitutional rights directly and proximately causing Plaintiffs' injuries and damages.

112. Upon information and belief, Kristie Stevens had knowledge of or was willfully blind to the abuse, failed to report the abuse, and in fact conspired with Ronald Stevens to destroy evidence of the abuse.

113. On many occasions, Kristie Stevens released certain Plaintiffs from her classroom into the custody of Ronald Stevens during school hours, in violation of District policy, thereby directly facilitating in-school abuse by Ronald Stevens.

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114. As a result thereof, Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

**Count VI – 42 U.S.C. § 1983 Civil Rights Violation as  
Against the District (Supervisory Liability)**

115. Plaintiffs incorporate and reallege paragraphs 1-114 as if expressly rewritten herein.

116. The District is a person under 42 U.S.C. § 1983.

117. John Does I, II, and III, as schoolchildren, had a constitutional right pursuant to the 14th Amendment to personal security, bodily integrity, and the right to be free from sexual abuse at the hands of a public-school employee.

118. At all times relevant, the District, by and through its board members and administrators, directly supervised and oversaw the actions of Ronald Stevens.

119. The District failed to train and/or control Ronald Stevens and is responsible for Ronald Stevens' abuse.

120. The District had actual knowledge of, or was willfully blind to, the abuse perpetrated by Ronald Stevens which deprived young, male students, including certain Plaintiffs, of their constitutional rights.

121. The District's response to that knowledge was deliberately indifferent and severely inadequate by among other things, the following:

- a. ~~Failing to prohibit Ronald Stevens from engaging in inappropriate relationships~~ with young, male students despite concerns from other employees and parents;
- b. Failing to place any record of these concerns in Ronald Stevens' personnel file;
- c. Requiring Ronald Stevens be a temporary guardian to John Doe I;
- d. Dismissing parents' complaints and instructing them to follow up with the police instead of the District directly;
- e. Permitting Ronald Stevens to remove students, including certain Plaintiffs, from their classes during school;
- f. Failing to stop Ronald Stevens from having contact with John Does I and II notwithstanding specific requests from their mother, Jane Doe I;
- g. Telling parents, including John Doe IV, that the District has "too much on its plate to deal with this";
- h. Failing to terminate Ronald Stevens, and rehiring and promoting Kristie Stevens despite its knowledge of her actions and involvement; and
- i. Failing to report either Ronald Stevens and/or Kristie Stevens to the State.

122. The District's failures constituted an implicit and/or tacit authorization of the unconstitutional conduct of Ronald Stevens and Kristie Stevens.

123. The District's failures resulted in continued abuse by Ronald Stevens against young, male students, including certain Plaintiffs.

124. As a result thereof, Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

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**Count VII – Sexual Battery as Against Ronald Stevens**

125. Plaintiffs incorporate and reallege paragraphs 1-124 as if expressly rewritten herein.

126. Ronald Stevens sexually abused and/or raped John Doe I hundreds of times, with much of this abuse occurring on school property, during school hours.

127. Much of the abuse committed against John Does I, II, and III also occurred at the home of the District's employee, Kristie Stevens, while she was home.

128. Ronald Stevens sexually abused John Doe II approximately three times.

129. Ronald Stevens sexually abused John Doe III approximately seven times.

130. Ronald Stevens intended to sexually abuse and/or rape John Doe I, and to sexually abuse John Does II and III.

131. The abuses suffered by John Does I, II, and III were both harmful and offensive causing them to have sustained physical and emotional trauma as well as other injuries.

132. As a result of these abuses, John Doe I attempted to commit suicide in or about November of 2019.

133. As a result thereof, Plaintiffs have suffered physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

134. Ronald Stevens' conduct was willful, wanton, and in complete disregard for Plaintiffs' rights such that punitive damages are warranted.

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**Count VIII – Civil Recovery for Criminal Act**

135. Plaintiffs incorporate and reallege paragraphs 1-134 as if expressly rewritten herein.

136. Ronald Stevens sexually abused and/or raped John Does I, II, and III in violation of R.C. § 2907.02 and R.C. § 2907.05.

137. Ronald Stevens was convicted of 31 related felony counts, including sexual abuse and rape, on September 23, 2021.

138. Ronald Stevens' actions proximately caused Plaintiffs' damages in an amount to be proven at trial, but more than \$25,000, and Plaintiffs will continue to suffer damages into the future.

139. Plaintiffs are entitled to recovery of their full damages under R.C. § 2307.60.

**Count IX – State Law Claim Against the District under RC 2744.01 et seq.**

140. Plaintiffs incorporate and reallege paragraphs 1-139 as if expressly rewritten herein.

141. The District had a duty that it created and imposed on itself when it suggested that Ronald Stevens tutor John Doe I, despite Ronald Stevens having no teaching credentials, and when



it recommended, prepared, and pressured Jane Doe I to sign a temporary guardianship of Ronald Stevens over John Doe I.

142. The tutoring/guardianship arrangement was a proprietary function under R.C. 2744.02(B)(2).

143. The District created this tutoring/guardianship arrangement wantonly and/or recklessly.

144. This tutoring/guardianship arrangement helped to facilitate Ronald Stevens' abuse of John Doe I.

145. Much of the abuse perpetrated by Ronald Stevens occurred on school property, during school hours.

146. The District knew, or had reason to know, of the abuses being committed by Ronald Stevens on school property, during school hours; and as such, the District had a duty to exercise reasonable care to control its employee, Ronald Stevens, to prevent the abuse.

147. The District's failure to use reasonable care directly and proximately resulted in Plaintiffs' physical, mental, and emotional injury and damages in an amount to be proven at trial but more than \$25,000, and Plaintiffs will continue to suffer damages into the future. Certain Plaintiffs also incurred medical bills, and will incur counseling expenses in the future as a result of the severe trauma suffered at the hands of Ronald Stevens.

**Count X – Failure to Report Suspected Abuse of a Minor  
Pursuant to O.R.C. § 2151.421 as Against Kristie Stevens**

148. Plaintiffs incorporate and reallege paragraphs 1-147 as if expressly rewritten herein.

149. Kristie Stevens had actual knowledge of, or reasonable cause to suspect, Ronald Stevens' sexual abuse of John Does I, II, and III.

150. As a teacher employed by the District, Kristie Stevens had and continues to have a duty to report abuses under O.R.C. § 2151.421, yet upon information and belief, Kristie Stevens has failed to report Ronald Stevens' abuses of John Does I, II, and III. Further, Kristie Stevens undermined the very intent of the reporting statute, by conspiring with Ronald Stevens to destroy evidence of abuse.

151. As a result thereof, Plaintiffs were physically, mentally, and emotionally injured and damaged in an amount to be proven at trial but more than \$25,000, and will continue to suffer damages into the future.

152. Kristie Stevens is liable for Plaintiffs' compensatory and exemplary damages pursuant to O.R.C. § 2151.421(N).

**Count XI – Failure to Report Suspected Abuse of a Minor**  
**Pursuant to O.R.C. § 2151.421 as Against the District**

153. Plaintiffs incorporate and reallege paragraphs 1-152 as if expressly rewritten herein.

154. The District, through its administrators and Board members, had a duty to report its knowledge, or reasonable cause to suspect:

- a. Ronald Stevens' abuse of John Does I, II, and III; and
- b. Kristie Stevens' knowledge of abuse and/or facilitation of abuse and/or subsequent conspiracy to destroy evidence relating to the abuse.

155. Upon information and belief, the District failed meet that duty and in fact rehired Kristie Stevens.

156. The District, through its administrators and Board members, is liable for Plaintiffs' compensatory and exemplary damages pursuant to O.R.C. § 2151.421(N).

**Count XII – Spoliation as Against Ronald Stevens and Kristie Stevens**

157. Plaintiffs incorporate and reallege paragraphs 1-156 as if expressly rewritten herein.

158. Following Ronald Stevens' arrest, Ronald and Kristie Stevens had a coded phone conversation where they used pseudonyms to refer to victims and numbers to refer to tasks, and referenced a coded letter that outlined who each pseudonym referred to, and what specific task each number referred to.

159. These tasks were requested by Ronald Stevens and agreed to be performed by Kristie Stevens for the purpose of destroying evidence relating to victims, including certain Plaintiffs.

160. Ronald and Kristie Stevens conspired that neither would discuss the contents of their communication, even under threat of torture.

161. Upon information and belief, Ronald and Kristie Stevens actually destroyed evidence relating to victims, including certain Plaintiffs.

162. Upon information and belief, this evidence was willfully destroyed by Ronald and Kristie Stevens notwithstanding their knowledge of the pending criminal litigation and probable civil litigation involving Plaintiffs.

163. Upon information and belief, Ronald Stevens ate his coded letter.

164. Upon information and belief, Kristie Stevens burned her coded letter.

165. The coded letters and other evidence were destroyed prior to Plaintiffs having had an opportunity to inspect them, thereby disrupting Plaintiffs' case against all Defendants.

166. As a proximate result thereof, Plaintiffs are entitled to compensatory and punitive damages.

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**WHEREFORE**, Plaintiffs respectfully pray that judgment be entered in their favor in an amount to be determined by a jury, but more than \$25,000 as to each count. Plaintiffs further pray for an award of actual, compensatory, special, and punitive damages, as well as an award for costs and attorney's fees, and any and all other relief the Court may find just and equitable under the circumstances.

Respectfully submitted,

EASTMAN & SMITH LTD.

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Attorneys for Plaintiffs

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all issues so triable.

/s/ D. Casey Talbott

Attorneys for Plaintiffs