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IN THE COURT OF COMMON PLEAS
ERIE COUNTY, OHIO

JAMES, SENIOR. AND JENNIFER)
WEST, INDIVIDUALLY AND ON)
BEHALF OF THEIR MINOR SON,)
MI.W., AND MINOR DAUGHTER,)
MA.W.)
9607 Mudbrook Road)
Huron, OH 44839)

CASE NO.

JUDGE:

-and-

COMPLAINT FOR
DAMAGES

JAMES WEST, JUNIOR)
1708 Shearwater Cir.)
Huron, OH 44839)

[JURY DEMAND ENDORSED
HEREIN]

-and-

JIM'S PIZZA BOX HURON, LLC)
819 Main Street)
Huron, OH 44839)

-and-

JIM'S PIZZA BOX MILAN, LLC)
10 N Main Street)
Milan, OH 44846)

-and-

JIM'S PIZZA BOX VERMILLION, LLC)
4503 Liberty Ave.)
Vermilion, OH 44089)

-and-

JIM'S PIZZA BOX, INC.)
1338 E Perkins Ave.)
Sandusky, OH 44870)

Plaintiffs,)



v.)
SHAWN JORDAN)
925 Glenview Drive)
Huron, OH 44839)
-and-)
MICHELLE JORDAN)
925 Glenview Drive)
Huron, OH 44839)
-and-)
JACOB JORDAN)
925 Glenview Drive)
Huron, OH 44839)
-and-)
I.J., A MINOR)
c/o SHAWN AND MICHELLE JORDAN)
925 Glenview Drive)
Huron, OH 44839)
-and-)
OGDEN NEWS PUBLISHING OF OHIO,)
INC., d/b/a THE SANDUSKY REGISTER)
314 West Market Street)
Sandusky, OH 44870)
-and-)
MATTHEW WESTERHOLD)
4709 Venice Heights Blvd #125,)
Sandusky, OH 44870)
-and-)
ALLISON ONTKO)
119 Miami Place)
Huron, OH 44839)
-and-)



DANIELLE FRESCH
8306 Poorman Road
Vermillion, OH 44089

-and-

JEREMY YOUNT
132 Atwood Place
Huron, OH 44839

-and-

JOSEPH BILGEN
519 Lincoln Avenue
Huron, OH 44839

-and-

KELLY NETHERLAND-GILLESPIE
416 Leisure Drive
Huron, OH 44839

-and-

JASON WERNER
317 Brunswick Drive
Huron, OH 44839

Defendants.

For their Complaint against the Defendants, Plaintiffs Mi.W., James West, Sr., Jennifer West, Jim's Pizza Box Huron, LLC, Jim's Pizza Box Milan, LLC, Jim's Pizza Box Vermillion, LLC, and Jim's Pizza Box, Inc. state as follows:

PARTIES AND VENUE

1. James West, Senior, is a resident of the city of Huron, county of Erie, state of Ohio.
2. Jennifer West is a resident of the city of Huron, county of Erie, state of Ohio.



3. Mi.W. is the minor son of James West, Sr. and Jennifer West, and is a resident of the city of Huron, county of Erie, state of Ohio.
4. Ma.W. is the minor daughter of James West, Sr. and Jennifer West, and is the sister of Mi.W., and is a resident of the city of Huron, county of Erie, state of Ohio.
5. James West, Junior is a resident of the city of Huron, county of Erie, state of Ohio.
6. Jim's Pizza Box Huron, LLC, Jim's Pizza Box Milan, LLC, and Jim's Pizza Box Vermillion, LLC are domestic limited liability companies owned and operated by the James West, Sr. and James West, Jr.
7. Jim's Pizza Box, Inc. is a domestic corporation with a principal place of business in Erie County, Ohio
8. Jim's Pizza Box Huron, LLC, Jim's Pizza Box Milan, LLC, Jim's Pizza Box Vermillion, LLC, and Jim's Pizza Box, Inc. (collectively, "Jim's Pizza Box Entities") operate pizzerias throughout the state of Ohio.
9. The Jim's Pizza Box Entities' restaurants are referred to as "Jim's Pizza Box."
10. Ogden News Publishing Of Ohio, Inc. is a domestic corporation for profit that owns and operates a newspaper known as the "Sandusky Register."
11. The Sandusky Register has its principal place of business in Erie County, Ohio.
12. Matthew Westerhold is a resident of the state of Ohio.
13. At all relevant times herein, Westerhold was the managing editor of the Sandusky Register.
14. Shawn Jordan is a resident of the city of Huron, county of Erie, state of Ohio.
15. Michelle Jordan is a resident of the city of Huron, county of Erie, state of Ohio.
16. Jacob Jordan is a resident of the city of Huron, county of Erie, state of Ohio.



17. Allison Ontko is a resident of the city of Huron, county of Erie, state of Ohio.
18. Danielle Fresch is a resident of the city of Vermillion, county of Erie, state of Ohio.
19. Joseph Bilgen is a resident of the city of Huron, county of Erie, state of Ohio.
20. Jeremy Yount is a resident of the city of Huron, county of Erie, state of Ohio.
21. Kelly Netherland-Gillespie is a resident of the city of Huron, county of Erie, state of Ohio.
22. Jason Warner is a resident of the city of Huron, county of Erie, state of Ohio.
23. The acts of Defendants giving rise to this Complaint happened in Erie County, Ohio.
24. Personal jurisdiction is proper over Defendants under R.C. § 2307.382(A)(1) and (4).
25. Venue is proper pursuant to Civ. R. 3(C)(3) and (6).
26. This Court is a court of general jurisdiction over the claims presented herein, including all subject matters of this Complaint.

FACTS

27. This case involves the ongoing defamatory statements and malicious acts made by Defendants concerning events that happened in March 2019 through September 2019.
28. From March 2019 through May 2019, Mi.W. was enrolled in 8th grade at McCormick Junior High.
29. From March 2019 through May 2019, I.J. was enrolled in 8th grade at McCormick Junior High.
30. I.J. is the minor daughter of Shawn and Michelle Jordan, and the sister of Jake Jordan. (collectively, the “Jordan Defendants”)
31. On or around March 2, 2019, Mi.W. and I.J. were engaged in a conversation using Snapchat. (“March 2, 2019 Snapchat Conversation”)



32. Snapchat is a smartphone application that allows users to send and receive picture messages that are displayed temporarily on the app.
33. Unless a Snapchat user takes a “screen shot” of the image displayed on the screen, an image sent over Snapchat effectively becomes permanently deleted after the recipient closes the image and/or the onscreen timer expires.
34. If a Snapchat user takes a “screen shot” of the image displayed on the screen, the sender of the image is notified that the image was saved by the recipient.
35. Because of its features, Snapchat is often used to send and solicit sexually explicit images from other users.
36. During the March 2, 2019 Snapchat Conversation, I.J. asked Mi.W. whether he had seen her “butt at school lately.” (“Flirting with Mi.W. on Snapchat”)
37. I.J.’s Flirting with Mi.W. on Snapchat was done with the intention of having Mi.W. send I.J. a risqué Snapchat.
38. As a result of I.J.’s Flirting with Mi.W., Mi.W. sent a Snapchat picture of his groin area with his hand covering his genitalia. (“First Mi.W. Snapchat”)
39. After receiving the First Mi.W. Snapchat, I.J. asked Mi.W. to “move his hand [away],” with the intent that Mi.W. would send her a Snapchat picture of his exposed penis. (“Request for Nude Photo of Mi.W.”)
40. In response to and feeling pressured by the Request for Nude Photo of Mi.W., Mi.W. responded by sending a picture of his exposed penis via Snapchat. (“Second Mi.W. Snapchat”)
41. At the time of sending the Mi.W. Snapchat, both Mi.W. and I.J. were 13 years old.



42. Besides the First Mi.W. Snapchat and Second Mi.W. Snapchat, Mi.W. has sent I.J. no other sexually explicit images of himself, whether over Snapchat or otherwise.
43. Because of their ages at the time, neither Mi.W. nor I.J. understood that sending and/or receiving sexually explicit images was a criminal offense that could carry significant, life-altering consequences.
44. Many teenagers send and solicit sexually explicit images over Snapchat without ever being disciplined.
45. Following the March 2, 2019 Snapchat Conversation, Mi.W. and I.J. continued interacting as normal and without incident at school.
46. Before March 19, 2019, I.J. received and saved images of minor's male genitalia on her phone. ("I.J.'s Collection of Images of Underage Male Genitalia")
47. I.J.'s Collection of Images of Underage Male Genitalia included images and videos of male genitalia of individuals other than Mi.W.
48. I.J.'s Collection of Images of Underage Male Genitalia comprised four or more photographs.
49. In March 2019, before March 19, 2019, Michelle Jordan saw I.J.'s Collection of Images of Underage Male Genitalia, while going through the photographs on I.J.'s phone. ("March 2019 Discovery of Male Genitalia on I.J.'s Phone")
50. During the March 2019 Discovery of Male Genitalia on I.J.'s Phone, Michelle Jordan saw that I.J. had saved at least four images of male genitalia.
51. During the March 2019 Discovery of Male Genitalia on I.J.'s Phone, Michelle Jordan saw that I.J. had saved at least four images of male genitalia from underaged males.



52. The four images of male genitalia that Michelle Jordan saw during the March 2019 Discovery of Male Genitalia on I.J.'s Phone were not Mi.W.
53. During the March 2019 Discovery of Male Genitalia on I.J.'s Phone, Michelle Jordan saw that I.J. saved two videos she was sent of a minor male ejaculating.
54. The videos of the male ejaculating on I.J.'s Phone were not Mi.W.
55. Before March 19, 2019, in March 2019, I.J. discussed I.J.'s Collection of Images of Underage Male Genitalia with her then-boyfriend during lunch at McCormick Junior High. ("I.J.'s Telling Her Boyfriend About Her Collection of Images of Underage Male Genitalia")
56. On or about March 19, 2019, I.J.'s then-boyfriend, R.C., was 14 years old.
57. I.J.'s Telling Her Boyfriend About Her Collection of Images of Underage Male Genitalia was because Michelle Jordan had found I.J.'s Collection of Images of Underage Male Genitalia.
58. On information and belief, I.J.'s Telling Her Boyfriend About Her Collection of Images of Underage Male Genitalia was because some of the sexually graphic pictures and videos that I.J. received were of and from her then-boyfriend.
59. Following I.J.'s Telling Her Boyfriend About Her Collection of Images of Underage Male Genitalia, in March 2019, R.C. told other male students at McCormick Junior High about I.J.'s Collection of Images of Underage Male Genitalia.
60. Because of I.J.'s Telling Her Boyfriend About Her Collection of Images of Underage Male Genitalia, students at McCormick Junior High were aware that I.J. possessed images of minor's male genitalia on her phone.



61. Following the March 2019 Discovery of Male Genitalia on I.J.'s Phone, Michelle Jordan asked I.J. for the names of the individuals who sent I.J. the pictures and videos contained in I.J.'s Collection of Images of Underage Male Genitalia.
62. When confronted about the March 2019 Discovery of Male Genitalia on I.J.'s Phone, I.J. stated that Mi.W. sent and was the subject of the pictures and videos in I.J.'s Collection of Images of Underage Male Genitalia. ("I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender")
63. I.J. wholly fabricated I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender.
64. I.J. knew that I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender was a lie.
65. I.J. intentionally fabricated I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender.
66. I.J. willfully fabricated I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender.
67. I.J. made I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender with the intent to injure Mi.W.
68. I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
69. I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender was done to protect the identity of the actual sender of the pictures and videos uncovered during the March 2019 Discovery of Male Genitalia on I.J.'s Phone.
70. After the March 2019 Discovery of Male Genitalia on I.J.'s Phone, Shawn and Michelle Jordan contacted Plaintiffs to discuss the images that Michelle Jordan found on I.J.'s phone. ("March 19, 2019 Jordan-West Meeting")



71. During the March 19, 2019 Jordan-West Meeting, Michelle and Shawn Jordan told James West, Sr., and Jennifer West that Mi.W. had sent I.J. a picture of his exposed penis.
72. During the March 19, 2019 Jordan-West Meeting, James West, Sr., disciplined Mi.W. in front of Shawn and Michelle Jordan and assured them that Mi.W.'s behavior was not tolerated.
73. During the March 19, 2019 Jordan-West Meeting, Mi.W. explained that he had sent I.J. only one nude image of himself to I.J., only after Request for Nude Photo of Mi.W., and that any other images on her phone belonged to someone else.
74. During the March 19, 2019 Jordan-West Meeting, Mi.W. denied sending any video to I.J.
75. During the March 19, 2019 Jordan-West Meeting, Mi.W. apologized to Shawn and Michelle Jordan and promised that he would never again send such explicit images. ("Mi.W.'s Apology")
76. During the March 19, 2019 Jordan-West Meeting, Shawn and Michelle Jordan accepted Mi.W.'s Apology and stated that, though irresponsible and wrong, Mi.W. did not deserve further punishment from the school or law enforcement as long as did not send I.J. any more photos.
77. On or about March 20, 2019, the day after the March 19, 2019 Jordan-West Meeting, I.J. approached Mi.W. and commented about how upset her parents were.
78. On or about March 20, 2019, Mi.W.'s friends asked about the March 19, 2019 Jordan-West Meeting, so Mi.W. the told his friends that he was in trouble and could not talk about any situation with I.J. ("March 20, 2019 Can't-Talk-About-It Comment")



79. In making the March 20, 2019 Can't-Talk-About-It Comment, Mi.W. was taking the responsible approach and diffusing the situation.
80. Making the March 20, 2019 Can't-Talk-About-It Comment was consistent with Mi.W.'s Apology to Shawn and Michelle Jordan that he regretted his actions that prompted the March 19, 2019 Jordan-West Meeting.
81. Despite Mi.W.'s March 20, 2019 Can't-Talk-About-It Comment, Mi.W.'s classmates continued to ask him and I.J. about what happened the day before.
82. On or about March 21, 2019, Shawn and Michelle Jordan reported Mi.W. to the Huron Police Department. ("March 21, 2019 Report of Mi.W. to Huron PD")
83. The information that Shawn and Michelle Jordan provided in the March 21, 2019 Report of Mi.W. to Huron PD is described in detail in Huron Police Department Incident Report for Incident No. 20-190309. ("First Incident Report")
84. A true and accurate copy of the First Incident Report is attached as Exhibit A to this Complaint.
85. As noted in the First Incident Report, Shawn and Michelle Jordan alleged that Mi.W. sent I.J., "several pictures and videos of his penis" and that Mi.W. "admitted to sending the photos." ("Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions")
86. Mi.W. never sent a video of his penis to I.J.
87. Mi.W. admitted to only sending the First Mi.W. Snapchat and Second Mi.W. Snapchat during the March 19, 2019 Jordan-West Meeting



88. Based on what was discussed during the March 19, 2019 Jordan-West Meeting, Shawn and Michelle Jordan knew that Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions were false.
89. Based on what was discussed during the March 19, 2019 Jordan-West Meeting, Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions were false and incomplete, as Shawn and Michelle Jordan both knew that Mi.W. admitted to sending only the First Mi.W. Snapchat and Second Mi.W. Snapchat and they had no basis to believe that Mi.W. sent any other image or video.
90. Shawn Jordan and Michelle Jordan fabricated Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions.
91. Shawn Jordan and Michelle Jordan knew that Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions were lies.
92. Shawn Jordan and Michelle Jordan intentionally fabricated Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions.
93. Shawn Jordan and Michelle Jordan willfully fabricated Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions.
94. Shawn Jordan and Michelle Jordan made Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions with the intent to injure Mi.W.
95. Shawn and Michelle Jordan's March 21, 2019 Statements About Mi.W.'s Actions is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
96. In making the March 21, 2019 Report of Mi.W. to Huron PD, Michelle Jordan stated that she contacted the Huron Police Department after I.J. stated that "several boys"



asked her about whether Mi.W. sent her pictures of his penis. (“Reason for Making the March 21, 2019 Report of Mi.W. to Huron PD”)

97. The Reason for Making the March 21, 2019 Report of Mi.W. to Huron PD was because Michelle Jordan wrongly assumed that Mi.W. was responsible for his classmates’ learning about the March 19, 2019 Jordan-West Meeting.
98. In reality, the Reason for Making the March 21, 2019 Report of Mi.W. to Huron PD was because I.J. told her classmates about the images on her phone that prompted the March 19, 2019 Jordan-West Meeting.
99. Based on the contents of the First Incident Report, Shawn and Michelle Jordan contacted the Huron Police Department without confirming that Mi.W. had actually told anybody about the pictures on I.J.’s phone.
100. Following the March 21, 2019 Report of Mi.W. to Huron PD, a detective from the Huron Police Department went to McCormick Junior High to conduct a further investigation into Mi.W. (“March 21, 2019 Investigation”)
101. The notes about the contents of the March 21, 2019 Investigation are provided in the First Incident Report.
102. Upon arriving at McCormick Junior High for the March 21, 2019 Investigation, the detective contacted Principal Chad Carter to inform him of the situation.
103. During the March 21, 2019 Investigation, Principal Carter called a series of students to the office for interviews with the detective.
104. The detective first interviewed I.J. during the March 21, 2019 Investigation. (“March 21, 2019 I.J. Interview”)



105. During the March 21, 2019 I.J. Interview, I.J. falsely stated that Mi.W. sent the Second Mi.W. Snapchat unsolicited.
106. During the March 21, 2019 I.J. Interview, I.J. falsely stated that she told Mi.W. to stop sending her pictures over Snapchat.
107. During the March 21, 2019 I.J. Interview, I.J. falsely stated that Mi.W. sent I.J. an image of himself ejaculating.
108. During the March 21, 2019 I.J. Interview, I.J. falsely stated that Mi.W. saw I.J.'s exposed genitalia when she wore a skirt to school.
109. During the March 21, 2019 I.J. Interview, I.J. falsely stated that Mi.W. showed I.J. and another female classmate a picture of Mi.W.'s penis on his phone.
110. In reality, Mi.W. sent the Second Mi.W. Snapchat after I.J. asked him to do so.
111. In reality, I.J. did not tell Mi.W. to stop sending her pictures when he sent her the Second Mi.W. Snapchat.
112. In reality, I.J. showed her classmate a picture of a penis on Mi.W.'s phone after I.J. took Mi.W.'s phone and accessed his photo vault without his permission.
113. Following the March 21, 2019 I.J. Interview, the detective spoke to another student, E.C., and her parents. ("March 21, 2019 E.C. Family Interview")
114. I.J. stated that E.C. was present when Mi.W. sent I.J. the First Mi.W. Snapchat and Second Mi.W. Snapchat.
115. During the March 21, 2019 E.C. Family Interview, E.C. stated only that she saw that I.J. and Mi.W. were communicating via Snapchat and that Mi.W. had sent the First Mi.W. Snapchat and Second Mi.W. Snapchat.



116. During the March 21, 2019 E.C. Family Interview, E.C was unable to substantiate whether I.J. asked for the First Mi.W. Snapchat and Second Mi.W. Snapchat and whether I.J. asked Mi.W. to stop messaging her.
117. During the March 21, 2019 Investigation, students mentioned that Mi.W. would jokingly flash his genitalia though his shorts to another male student, N.L., during class to make that student laugh. (“Flashing Game”)
118. During the March 21, 2019 Investigation, each student that was interviewed, other than I.J., noted that Mi.W. did not intend for anybody other than N.L. to see the Flashing Game.
119. During the March 21, 2019 Investigation, N.L. explained that the Flashing Game was a joke between him and Mi.W.
120. During the March 21, 2019 Investigation, both Mi.W. and I.J. provided the detective with their respective phones so that the Huron Police Department could review its content.
121. The Huron Police Department, Erie County Sheriff’s Department, and/or Erie County Prosecutor’s Office maintained constant possession of Mi.W.’s cellphone from March 21, 2019 through September 2019.
122. Principle Carter made notes of his interactions with anyone that concerned the Jordan Defendants’ accusations against Mi.W., a true and accurate copy of which are attached to this Complaint as Exhibit B. (“Carter Notes”)
123. The Carter Notes explain that Shawn Jordan contacted Principal Carter to report behavior that I.J. had relayed to him. (“First Jordan-Carter Phone Call”)



124. During the First Jordan-Carter Phone Call, Shawn Jordan stated that I.J. mentioned that, on March 21, 2019, another student, N.Z., harassed I.J. about the drama surrounding her and Mi.W.
125. N.Z. was absent from school on March 21, 2019.
126. N.Z. could not have possibly harassed I.J. at school on March 21, 2019.
127. Shawn Jordan's comments during the First Jordan-Carter Phone Call have no basis in fact.
128. I.J. willfully lied to Shawn Jordan about an interaction that never happened to help make herself look like a victim of Mi.W.
129. Following the March 21, 2019 Investigation, McCormick Junior High was closed for Spring Break.
130. Upon return from Spring Break, on or about April 1, 2019, Plaintiffs had a meeting with Principal Carter concerning the March 21, 2019 Investigation. ("April 1, 2019 West-Carter Meeting")
131. During the April 1, 2019 West-Carter Meeting, Principal Carter asked Mi.W. about his in-class behavior.
132. During the April 1, 2019 West-Carter Meeting, Mi.W. admitted to playing the Flashing Game with N.L.
133. During the April 1, 2019 West-Carter Meeting, Mi.W. stated that I.J. took his phone without his permission and showed another student a picture of a penis on his phone.
134. Based on Mi.W.'s admission to playing the Flashing Game during the April 1, 2019 West-Carter Meeting, Mi.W. was issued a 5-day suspension from McCormick Middle School.



135. Throughout the entire process of the March 19, 2019 Jordan-West Meeting to the March 21, 2019 Investigation to the April 1, 2019 West-Carter Meeting, Mi.W. consistently took responsibility for his actions and admitted to his inappropriate behavior, including admitting to playing the Flashing Game and sending the First and Second Mi.W. Snapchats.
136. At no point during the entire process of the March 19, 2019 Jordan-West Meeting to the March 21, 2019 Investigation to the April 1, 2019 West-Carter Meeting did Mi.W. admit to sending multiple images of his fully exposed penis to I.J., to sending I.J. a video/image of an ejaculating penis, or to any other conduct that he did not, in fact, do.
137. Throughout the entire process of the March 19, 2019 Jordan-West Meeting to the March 21, 2019 Investigation, I.J., Shawn Jordan, and Michelle Jordan repeatedly embellished the extent of Mi.W.'s culpability, deliberately withheld information about I.J.'s culpability, and flat out lied about I.J.'s role in prompting the First and Second Mi.W. Snapchats.
138. Mi.W. returned to McCormick Junior High on or about April 8, 2019 after serving his 5-day suspension. ("Return to School")
139. Following Mi.W.'s return to school on or about April 8, 2019, Principal Carter made frequent 1-on-1 meetings with Mi.W., I.J., and E.C. to ensure that there were no lingering issues concerning Mi.W.'s interactions with I.J. and E.C.
140. Before Mi.W.'s Return to School, I.J. began spreading a rumor that Mi.W. was going to be suspended for up to a month and that Mi.W. was going to be sent to a juvenile



detention center because of his sending the Second Mi.W. Snapchat and playing the Flashing Game. (“I.J.’s Rumor About Mi.W.”)

141. I.J.’s Rumor About Mi.W. was another attempt by I.J. to embellish and lie about Mi.W.’s culpability and divert attention away from her own actions.
142. On or about April 8, 2019, Principal Carter and E.C. met to discuss how everything went with Mi.W.’s Return to School. (“April 8, 2019 E.C. Meeting”)
143. During the April 8, 2019 E.C. Meeting, E.C. stated that she had no issues with Mi.W. since his Return to School.
144. During the April 8, 2019 E.C. Meeting, E.C. stated that Mi.W.’s seat had been moved away from hers in the only class they had together.
145. During the April 8, 2019 E.C. Meeting, E.C. stated that nobody other than I.J. had asked E.C. about Mi.W. since Mi.W.’s Return to School.
146. On or about April 8, 2019, Principal Carter received a text from Michelle Jordan that stated that students at McCormick Junior High made comments to I.J. about Mi.W. (“April 8, 2019 Text Message”)
147. On or about April 8, 2019, no students at McCormick Junior High made comments to I.J. about Mi.W.
148. Alternatively, on or about April 8, 2019, any comments to I.J. about M.W were prompted by I.J.’s Rumor About Mi.W.
149. The contents of the April 8, 2019 Text Message reveal I.J.’s and/or Michelle Jordan’s embellishing and lying about Mi.W.’s actions.
150. On or about April 9, 2019, Principal Carter met with Mi.W. to discuss how things were going with his Return to School. (“April 9, 2019 Mi.W. Meeting”)



151. During the April 9, 2019 Mi.W. Meeting, Mi.W. stated things were great with his Return to School.
152. During the April 9, 2019 Mi.W. Meeting, Mi.W. stated that he had no issue with his seat being moved away from I.J. and E.C. in their shared class.
153. During the April 9, 2019 Mi.W. Meeting, Mi.W. told Principal Carter about I.J.'s Rumor About Mi.W.
154. On or about April 9, 2019, following the April 9, 2019 Mi.W. Meeting, Principal Carter met with I.J. ("April 9, 2019 First I.J. Meeting")
155. During the April 9, 2019 First I.J. Meeting, Principal Carter asked how everything was going with Mi.W.'s Return to School.
156. During the April 9, 2019 First I.J. Meeting, I.J. stated that her only problem was that she believed Mi.W. threw a pencil at her during class. ("Pencil-Throwing Incident")
157. Mi.W. did not throw a pencil at I.J. during class.
158. Following the April 9, 2019 First I.J. Meeting, Principal Carter investigated the Pencil-Throwing Incident.
159. Following the April 9, 2019 First I.J. Meeting, separate interviews confirmed that Mi.W. was not responsible for the Pencil-Throwing Incident.
160. After concluding his investigation into the Pencil-Throwing Incident, Principal Carter had a second meeting with I.J. on April 9, 2019. ("April 9, 2019 Second I.J. Meeting")
161. During the April 9, 2019 Second I.J. Meeting, Principal Carter told I.J. that he had confirmed that another student—not Mi.W.—was responsible for the Pencil-Throwing Incident.



162. During the April 9, 2019 Second I.J. Meeting, after learning that Mi.W. would not be in trouble for the Pencil-Throwing Incident, I.J. alleged that Mi.W. had confronted her after school on or about April 8, 2019, and that Mi.W. said that I.J. “knows [she] sent pictures, too.” (“Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation”)
163. During the April 9, 2019 Second I.J. Meeting, I.J. also stated that other McCormick Junior High students said things to I.J. about how she got Mi.W. in trouble.
164. On or about April 10, 2019, Principal Carter met with I.J. (“April 10, 2019 I.J. Meeting”)
165. During the April 10, 2019 I.J. Meeting, I.J. restated the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation.
166. After the April 10, 2019 I.J. Meeting, Principal Carter reviewed security footage of the day on which the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation took place. (“Review of Security Footage”)
167. Based on Principal Carter’s Review of Security Footage, Mi.W. and I.J. were never in the same location—or even same floor—of the school building during when the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation took place.
168. Based on Principal Carter’s Review of Security Footage, the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation never happened.
169. The Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation by I.J. has no basis in fact.
170. The Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation was another blatant lie that I.J. concocted to get Mi.W. in further trouble.



171. I.J. knowingly lied in making the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation.
172. I.J. willingly lied in making the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation.
173. I.J. made the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation with the intent to injure Mi.W.
174. The Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
175. Following Principal Carter’s Review of Security Footage, Principal Carter called Shawn Jordan to update Shawn Jordan on I.J.’s situation at school. (“Second Jordan-Carter Phone Call”)
176. During the Second Jordan-Carter Phone Call, Principal Carter stated that the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation had no basis in fact based on his Review of Security Footage.
177. During the Second Jordan-Carter Phone Call, Shawn Jordan was confronted with a second instance where I.J.’s lying was documented.
178. During the Second Jordan-Carter Phone Call, Shawn Jordan again took I.J.’s side, even though there was objective evidence that the Falsely Alleged April 8, 2019 I.J.-Mi.W. Confrontation did not happen, much like how N.Z. could not have harassed I.J. at school on March 21, 2019 when he was absent.
179. On or about April 11, 2019, Principal Carter met with Mi.W. to check how things were going since his Return to School. (“April 11, 2019 Mi.W. Meeting”)



180. During the April 11, 2019 Mi.W. Meeting, Mi.W. said that he had no issues other than I.J.'s Rumor About M.W, which were still being spread by I.J.
181. During the April 11, 2019 Mi.W. Meeting, Mi.W. confirmed that he had not spoken with I.J. since his Return to School.
182. On or about April 17, 2019, Principal Carter met with I.J. to see how things were going since Mi.W.'s Return to School. ("April 17, 2019 I.J. Meeting")
183. During the April 17, 2019 I.J. Meeting, I.J. stated that everything was okay, nobody had said anything about Mi.W., and that she had no issues.
184. On or about April 17, 2019, Principal Carter met with E.C. to see how things were going since Mi.W.'s Return to School. ("April 17, 2019 E.C. Meeting")
185. During the April 17, 2019 E.C. Meeting, E.C. stated that everything was okay and that she had no issues with Mi.W.
186. On or about April 25, 2019, Principal Carter met with I.J. to see how things were going since Mi.W.'s Return to School. ("April 25, 2019 I.J. Meeting")
187. During the April 25, 2019 I.J. Meeting, I.J. stated that there were no issues and that everything had died down.
188. On or about April 25, 2019, Principal Carter met with E.C. to see how things were going since Mi.W.'s Return to School. ("April 25, 2019 E.C. Meeting")
189. During the April 25, 2019 E.C. Meeting, E.C. stated that there were no issues and that everything had died down.
190. On or about May 21, 2019, I.J. told Erie County Juvenile Prosecutor, Cheryl Goodrum, that Mi.W. had sexually assaulted I.J. in the boys' locker room at



McCormick Junior High on March 13, 2019. (“May 21, 2019 I.J. Sexual Assault False Report”)

191. Mi.W. did not sexually assaulted I.J. in the boys’ locker room at McCormick Junior High on March 13, 2019.

192. Mi.W. was not in the boys’ locker room at McCormick Junior High on March 13, 2019 at the same time as I.J.

193. In the May 21, 2019 I.J. Sexual Assault False Report, I.J. falsely alleged that Mi.W. pushed her against a locker and put his hand down her pants. (“Falsely Alleged Sexual Assault”)

194. Given that Mi.W. was not in the locker room with I.J. on May 21, 2019, he did not push her.

195. When I.J. made the May 21, 2019 I.J. Sexual Assault False Report, she knew that Mi.W. had not pushed her.

196. Given that Mi.W. was not in the locker room with I.J. on May 21, 2019, he did not put his hands down her pants.

197. When I.J. made the May 21, 2019 I.J. Sexual Assault False Report, she knew that Mi.W. had not put his hands down her pants.

198. When I.J. made the May 21, 2019 I.J. Sexual Assault False Report, she knew that Mi.W. did not sexually assaulted her in the boys’ locker room at McCormick Junior High on March 13, 2019.

199. When I.J. made the May 21, 2019 I.J. Sexual Assault False Report, she knew that it was false.

200. I.J. knowingly lied in making the May 21, 2019 I.J. Sexual Assault False Report.



201. I.J. willfully lied in making the May 21, 2019 I.J. Sexual Assault False Report.
202. I.J. made the May 21, 2019 I.J. Sexual Assault False Report with the intent to injure Mi.W.
203. The May 21, 2019 I.J. Sexual Assault False Report is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
204. Before the May 21, 2019 I.J. Sexual Assault False Report, I.J. never mentioned that Mi.W. had sexually assaulted her, even though she had spoken about Mi.W. to Principal Carter, a Huron Police Department detective, and other authority figures on no fewer than seven separate occasions between the dates of the Falsely Alleged Sexual Assault and the May 21, 2019 I.J. Sexual Assault False Report.
205. Before the March 19, 2019 Jordan-West Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.
206. Before the March 19, 2019 Jordan-West Meeting I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
207. During the March 21, 2019 I.J. Interview, when asked whether there was “anything else [the detective] needed to know about [Mi.W.],” I.J. responded by stating a rumor about Mi.W. that she had heard.
208. During the March 21, 2019 I.J. Interview, I.J. did not allege that Mi.W. had sexually assaulted her.
209. During the March 21, 2019 I.J. Interview, I.J. did not assert that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
210. During the April 9, 2019 First I.J. Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.



211. During the April 9, 2019 First I.J. Meeting, I.J. I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
212. During the April 9, 2019 Second I.J. Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.
213. During the April 9, 2019 Second I.J. Meeting, I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
214. During the April 10, 2019 I.J. Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.
215. During the April 10, 2019 I.J. Meeting, I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
216. During the April 17, 2019 I.J. Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.
217. During the April 17, 2019 I.J. Meeting, I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
218. During the April 25, 2019 I.J. Meeting, I.J. did not allege that Mi.W. had sexually assaulted her.
219. During the April 25, 2019 I.J. Meeting, I.J. did not allege that Mi.W. sexually assaulted her because Mi.W. never assaulted her.
220. Following the May 21, 2019 I.J. Sexual Assault False Report, I.J. met with a Huron Police Department detective, on or about May 22, 2019, to give a statement about the Falsely Alleged Sexual Assault. (“May 22, 2019 Statement to Huron PD”)
221. The contents of the May 22, 2019 Statement to Huron PD are included in a Huron Police Department Incident Report No. 20-190627. (“Second Incident Report”)



222. A true and accurate copy of the Second Incident Report is attached to this Complaint as Exhibit C.
223. In her May 22, 2019 Statement to Huron PD, I.J. alleged that Mi.W. cornered I.J. in the locker room at the beginning of 9th period, during which I.J. was in the “Get Moving” class taught by Scott Demos.
224. In her May 22, 2019 Statement to Huron PD, I.J. alleged that Mi.W. pushed her against a locker and put his hand down her pants, but over her underwear during the Falsely Alleged Sexual Assault.
225. In her May 22, 2019 Statement to Huron PD, I.J. alleged that she kned Mi.W. in the groin area and ran out of the locker room during the Falsely Alleged Sexual Assault.
226. On or about March 13, 2019, during the Falsely Alleged Sexual Assault, I.J. did not knee Mi.W. in the groin area.
227. On or about March 13, 2019, during the Falsely Alleged Sexual Assault, I.J. did not knee Mi.W. in the groin area because the Falsely Alleged Sexual Assault never happened.
228. When I.J. made the May 22, 2019 Statement to Huron PD, she knew that she did not knee Mi.W. in the groin area on or about March 13, 2019, during the Falsely Alleged Sexual Assault, because the Falsely Alleged Sexual Assault never happened.
229. In her May 22, 2019 Statement to Huron PD, I.J. alleged that, after fleeing from Mi.W., she encountered another student, K.W., who asked I.J. what was wrong because K.W. said that I.J. looked upset. (“Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault”)



230. On or about March 13, 2019, during the Falsely Alleged Sexual Assault, I.J. did not encounter K.W. after fleeing from the locker room.
231. On or about March 13, 2019, during the Falsely Alleged Sexual Assault, K.W. did not ask I.J. what was wrong.
232. The Falsely Alleged Sexual Assault had no basis in fact.
233. I.J. wholly fabricated the Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault.
234. I.J. knew that the Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault was a lie.
235. I.J. intentionally fabricated the Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault.
236. I.J. willfully fabricated the Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault.
237. I.J. made the Falsely Alleged Encounter with K.W. after the Falsely Alleged Sexual Assault with the intent to injure Mi.W.
238. The Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
239. Following I.J.'s May 22, 2019 Statement to Huron PD, the Huron Police Department investigated the Falsely Alleged Sexual Assault. ("May 2019 Sexual Assault Investigation")
240. The contents of the May 2019 Sexual Assault Investigation are included in the Second Incident Report.



241. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed K.W.
242. During the May 2019 Sexual Assault Investigation, K.W. denied seeing I.J. looking upset or sad.
243. During the May 2019 Sexual Assault Investigation, K.W. denied seeing Mi.W. near the gym around the period during which the Falsely Alleged Sexual Assault was alleged to have happened.
244. Based on K.W.'s statements during the May 2019 Sexual Assault Investigation, the Falsely Alleged Encounter with K.W. after Falsely Alleged Sexual Assault never happened.
245. During the May 2019 Sexual Assault Investigation, Scott Demos, the gym teacher, was interviewed by a Huron Police Department detective.
246. During the May 2019 Sexual Assault Investigation, Demos stated that he has never seen Mi.W. in the gym around the period during which the Falsely Alleged Sexual Assault was alleged to have happened.
247. During the May 2019 Sexual Assault Investigation, Cory Schoenherr, who taught Mi.W.'s 9th period class, was interviewed by a Huron Police Department detective.
248. During the May 2019 Sexual Assault Investigation, Schoenherr stated that he could not recall any instance in which Mi.W. was away from class for an extended period of time.
249. No students in Mi.W.'s 9th period class reported that Mi.W. was late or had left the class.



250. If the Falsely Alleged Sexual Assault had any basis in fact, Mi.W. would not have been in his 9th period class for an extended period of time.
251. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed each student in the “Get Moving” class during which I.J. stated that the Falsely Alleged Sexual Assault took place.
252. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed K.A., who was in I.J.’s “Get Moving” class.
253. During the May 2019 Sexual Assault Investigation, K.A. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
254. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed A.B., who was in I.J.’s “Get Moving” class.
255. During the May 2019 Sexual Assault Investigation, A.B. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
256. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed S.C., who was in I.J.’s “Get Moving” class.
257. During the May 2019 Sexual Assault Investigation, S.C. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
258. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed K.C., who was in I.J.’s “Get Moving” class.
259. During the May 2019 Sexual Assault Investigation, K.C. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
260. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed O.C., who was in I.J.’s “Get Moving” class.



261. During the May 2019 Sexual Assault Investigation, O.C. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
262. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed E.C., who was in I.J.’s “Get Moving” class.
263. During the May 2019 Sexual Assault Investigation, E.C. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
264. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed Al.D., who was in I.J.’s “Get Moving” class.
265. During the May 2019 Sexual Assault Investigation, Al.D. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
266. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed Ay.D., who was in I.J.’s “Get Moving” class.
267. During the May 2019 Sexual Assault Investigation, A.H. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
268. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed J.H., who was in I.J.’s “Get Moving” class.
269. During the May 2019 Sexual Assault Investigation, J.H. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
270. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed J.J., who was in I.J.’s “Get Moving” class.
271. During the May 2019 Sexual Assault Investigation, J.J. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.



272. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed J.L., who was in I.J.'s "Get Moving" class.
273. During the May 2019 Sexual Assault Investigation, J.L. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
274. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed S.L., who was in I.J.'s "Get Moving" class.
275. During the May 2019 Sexual Assault Investigation, S.L. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
276. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed C.M., who was in I.J.'s "Get Moving" class.
277. During the May 2019 Sexual Assault Investigation, C.M. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
278. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed A.M., who was in I.J.'s "Get Moving" class.
279. During the May 2019 Sexual Assault Investigation, A.M. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
280. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed M.H., who was in I.J.'s "Get Moving" class.
281. During the May 2019 Sexual Assault Investigation, M.H. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
282. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed C.N., who was in I.J.'s "Get Moving" class.



283. During the May 2019 Sexual Assault Investigation, C.N. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
284. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed E.P., who was in I.J.’s “Get Moving” class.
285. During the May 2019 Sexual Assault Investigation, E.P. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
286. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed I.R., who was in I.J.’s “Get Moving” class.
287. During the May 2019 Sexual Assault Investigation, I.R. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
288. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed C.S., who was in I.J.’s “Get Moving” class.
289. During the May 2019 Sexual Assault Investigation, C.S. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
290. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed E.R., who was in I.J.’s “Get Moving” class.
291. During the May 2019 Sexual Assault Investigation, E.R. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.
292. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed T.W., who was in I.J.’s “Get Moving” class.
293. During the May 2019 Sexual Assault Investigation, T.W. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the “Get Moving” class.



294. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed P.W., who was in I.J.'s "Get Moving" class.
295. During the May 2019 Sexual Assault Investigation, P.W. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
296. During the May 2019 Sexual Assault Investigation, a Huron Police Department detective interviewed N.Z., who was in I.J.'s "Get Moving" class.
297. During the May 2019 Sexual Assault Investigation, N.Z. stated that he/she had never seen Mi.W. in or around the gym or locker-room area during the "Get Moving" class.
298. Of the 25 people other than I.J. in the 9th period "Get Moving" class, not one of them had ever seen Mi.W. near the gym or locker room area around the time period during which the Falsely Alleged Sexual Assault was alleged to have taken place.
299. Based on the May 2019 Sexual Assault Investigation, the Huron Police Department determined that there was no probable cause to arrest Mi.W. for the Falsely Alleged Sexual Assault.
300. Based on the May 2019 Sexual Assault Investigation, the Huron Police Department refused to sign charges against Mi.W. for the Falsely Alleged Sexual Assault.
301. On or about May 27, 2021, Mi.W. was charged for the crimes associated with the Second Mi.W. Snapchat and playing the Flashing Game. ("Juvenile Charges")
302. The Juvenile Charges do not include any charge that Mi.W. had sexually assaulted I.J.
303. In connection with the Juvenile Charges, a visiting judge was assigned to ensure impartiality, as Mi.W. had relatives employed at the Erie County Courthouse.



304. Upon being informed of the Juvenile Charges, Mi.W. was sent to the Erie County Juvenile Detention Home (“Juvenile Detention Home”)
305. Mi.W. spent two weeks in the Juvenile Detention Home.
306. On or about June 12, 2019, Mi.W. was allowed to leave the Juvenile Detention Home, subject to being placed on house arrest. (“House Arrest”)
307. While on House Arrest, Mi.W. was permitted to go to only certain places, subject to the Court’s order, and was monitored by an ankle monitor.
308. On or about July 1, 2019, Mi.W. was administered a polygraph test by Larry J. Silcox, a forensic psychophysicologist who is a Distinguished Fellow with the Academy of Certified Polygraphists. (“July 1, 2019 Polygraph Test”)
309. A true and accurate report of the information generated during the July 1, 2019 Polygraph Test is attached to this Complaint as Exhibit D.
310. During the July 1, 2019 Polygraph Test, Mi.W. was asked whether he pushed I.J. against a locker in the locker room at school, to which Mi.W. stated “No.”
311. During the July 1, 2019 Polygraph Test, Mi.W. was asked whether he touched I.J. in a sexual way in the locker room at school, to which Mi.W. stated “No.”
312. During the July 1, 2019 Polygraph Test, Mi.W. was asked whether he put his hands down I.J.’s pants in the locker room at school, to which Mi.W. stated “No.”
313. During the July 1, 2019 Polygraph Test, Mi.W. was asked whether he touched I.J.’s vagina locker room at school, to which Mi.W. stated “No.”
314. During the July 1, 2019 Polygraph Test, it was determined that Mi.W. gave truthful responses to each question he was asked.



315. Based on the results of the July 1, 2019 Polygraph Test, Mi.W. did not sexually assault I.J.
316. Based on the results of the July 1, 2019 Polygraph Test, the Falsely Alleged Sexual Assault did not happen.
317. Based on the July 1, 2019 Polygraph Test, the Falsely Alleged Sexual Assault has no basis in fact.
318. I.J. wholly fabricated the Falsely Alleged Sexual Assault.
319. I.J. knew that the Falsely Alleged Sexual Assault was a lie.
320. I.J. intentionally fabricated the Falsely Alleged Sexual Assault.
321. I.J. willfully fabricated the Falsely Alleged Sexual Assault.
322. I.J. fabricated the Falsely Alleged Sexual Assault with the intent to injure Mi.W.
323. The Falsely Alleged Sexual Assault is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
324. During and following the July 1, 2019 Polygraph Test, Mi.W. continued to adhere to the terms of his House Arrest.
325. Under the terms of his House Arrest, Mi.W. was permitted to join Huron High School's football team.
326. Under the terms of his House Arrest, Mi.W. was permitted to attend only mandatory football practices.
327. On or about July 11, 2019, there was a non-mandatory practice for Huron High School's football team. ("July 11, 2019 Football Practice")
328. Mi.W. did not attend the July 11, 2019 Football Practice because it would be in violation of his House Arrest terms.



329. On or about July 11, 2019, during the July 11, 2019 Football Practice, I.J. alleged that Mi.W. and other football players called her a “slut” and “whore” when she rode her bike past the football field. (“Falsely Alleged July 11, 2019 Name-Calling”)
330. Given that Mi.W. did not attend the July 11, 2019 Football Practice, Mi.W. could not have possibly engaged in the Falsely Alleged July 11, 2019 Name-Calling.
331. The Falsely Alleged July 11, 2019 Name-Calling has no basis in fact.
332. I.J. wholly fabricated the Falsely Alleged July 11, 2019 Name-Calling.
333. I.J. knew that the Falsely Alleged July 11, 2019 Name-Calling was a lie.
334. I.J. intentionally fabricated the Falsely Alleged July 11, 2019 Name-Calling.
335. I.J. willfully fabricated the Falsely Alleged July 11, 2019 Name-Calling.
336. I.J. fabricated the Falsely Alleged July 11, 2019 Name-Calling to injure Mi.W.
337. The Falsely Alleged July 11, 2019 Name-Calling is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
338. After the Falsely Alleged July 11, 2019 Name-Calling, Jake Jordan went to Huron Memorial Stadium during the July 11, 2019 Football Practice to confront Sam Hohler, the head football coach at Huron High School. (“July 11, 2019 Hohler-Jake Jordan Confrontation”)
339. Jake Jordan is I.J.’s brother.
340. During the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan appeared aggravated and told Hohler about the Falsely Alleged July 11, 2019 Name-Calling.
341. During the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan insisted that Mi.W. had engaged in the Falsely Alleged July 11, 2019 Name-Calling.



342. During the July 11, 2019 Hohler-Jake Jordan Confrontation, Hohler told Jake Jordan that Mi.W. was not at practice that day.
343. During the July 11, 2019 Hohler-Jake Jordan Confrontation, Hohler told Jake Jordan that he had not heard any football player engage in the Falsely Alleged July 11, 2019 Name-Calling.
344. During the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan became combative and tried to instigate a fight with Hohler.
345. Based on Jake Jordan's behavior during the July 11, 2019 Hohler-Jake Jordan Confrontation, Hohler sent a letter to Huron High School administration on or about July 12, 2019. ("July 12, 2019 Hohler Letter")
346. A true and accurate copy of the July 12, 2019 Hohler Letter is attached as Exhibit E to this Complaint.
347. In the July 12, 2019 Hohler Letter, Hohler relayed the details of the July 11, 2019 Hohler-Jake Jordan Confrontation.
348. In the July 12, 2019 Hohler Letter, Hohler stated that he believed Jake Jordan was lied to, as Mi.W. had not attended practice, or that Jake Jordan came to Huron Memorial Stadium looking for a fight.
349. Based on the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan was aware that Mi.W. was not at the July 11, 2019 Football Practice.
350. Based on the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan was aware that the Falsely Alleged July 11, 2019 Name-Calling had no basis in fact.



351. Despite the July 11, 2019 Hohler-Jake Jordan Confrontation, Jake Jordan chose not to tell his parents, Shawn Jordan and Michelle Jordan, that the Falsely Alleged July 11, 2019 Name-Calling had no basis in fact.
352. Alternatively, Jake Jordan did tell Shawn Jordan and Michelle Jordan that the Falsely Alleged July 11, 2019 Name-Calling had no basis in fact.
353. On or about July 16, 2019, Shawn Jordan and Michelle Jordan emailed Huron High School administration about Mi.W.'s attendance at football practice. ("Football-Practice-Attendance Lie")
354. In the Football-Practice-Attendance Lie, Shawn Jordan and Michelle Jordan falsely alleged that Mi.W. had attended nonmandatory football practices in violation of his House Arrest.
355. Shawn Jordan and Michelle Jordan sent the Football-Practice-Attendance Lie despite being advised by Jake Jordan that Mi.W. had not been attending nonmandatory practices.
356. The Football-Practice-Attendance Lie was another instance in which Shawn Jordan and Michelle Jordan accused Mi.W. of wrongdoing despite having no legitimate evidence to substantiate their allegations.
357. The Football-Practice-Attendance Lie had no basis in fact.
358. Shawn Jordan and Michelle Jordan wholly fabricated the Football-Practice-Attendance Lie.
359. Shawn Jordan and Michelle Jordan knew that the Football-Practice-Attendance Lie was a lie.



360. Shawn Jordan and Michelle Jordan intentionally fabricated the Football-Practice-Attendance Lie.
361. Shawn Jordan and Michelle Jordan willfully fabricated the Football-Practice-Attendance Lie.
362. Shawn Jordan and Michelle Jordan fabricated the Football-Practice-Attendance Lie to injure Mi.W.
363. The Football-Practice-Attendance Lie is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
364. On or about July 25, 2019, Mi.W. admitted delinquency on the Juvenile Charges to put the whole scenario behind him. (“July 25, 2019 Juvenile Delinquent Plea”)
365. In making the July 25, 2019 Juvenile Delinquent Plea, Mi.W. was admitting responsibility for the Second Mi.W. Snapchat and for playing the Flashing Game.
366. The July 25, 2019 Juvenile Delinquent Plea has nothing to do with any allegation of sexual assault, which Mi.W. has denied and continues to deny.
367. In making the July 25, 2019 Juvenile Delinquent Plea, Mi.W. did not admit to the Falsely Alleged Sexual Assault.
368. Following the July 25, 2019 Juvenile Delinquent Plea, the Jordan Defendants began making an increasing number of public accusations about Mi.W.
369. Following the July 25, 2019 Juvenile Delinquent Plea, Mi.W. and his family contacted the Huron Police Department about the ongoing accusations lodged by the Jordan Defendants, believing that the Jordan Defendants were trying to shift blame from I.J. towards Mi.W. because I.J.’s cell phone possessed several pictures of underaged male genitalia, which constitutes a felony.



370. On or about August 27, 2019, Mi.W. and his parents met with Erie County Prosecutors to discuss their concern that the Jordan Defendants' repeated accusations about Mi.W. were to mask I.J.'s wrongdoing.
371. On or about August 29, 2019, Mi.W. provided his cellphone passwords to the Huron Police Department, so they could be forwarded to the Erie County Police Department for them to conduct a full forensic search of Mi.W.'s phone.
372. In early September 2019, Erie County Detective Papineau conducted a forensic analysis of I.J.'s and Mi.W.'s respective cellphones. ("September 2019 Cell Phone Analysis")
373. The September 2019 Cell Phone Analysis revealed that none of the photographs or videos in I.J.'s Collection of Images of Underage Male Genitalia were sent from Mi.W.
374. The September 2019 Cell Phone Analysis reveals that Mi.W. did not send I.J. a video of an ejaculating penis.
375. Based on the September 2019 Cell Phone Analysis, the allegations that Mi.W. sent multiple pictures and videos of his penis have no basis in fact.
376. The September 2019 Cell Phone Analysis revealed that the photographs and videos of male genitalia in I.J.'s Collection of Images of Underage Male Genitalia belonged to individual(s) other than Mi.W.
377. Based on the September 2019 Cell Phone Analysis, I.J.'s Falsely Identifying Mi.W. as The Nude-Images Sender was revealed to have no basis in fact.
378. On or about September 4, 2019, the results of the September 2019 Cell Phone Analysis were revealed.



379. On or about September 5, 2019, Shawn Jordan signed charges against Mi.W., alleging that he had engaged in Gross Sexual Imposition, stemming from the Falsely Alleged Sexual Assault that I.J. described in I.J.'s May 21, 2019 I.J. Sexual Assault False Report. ("False September 5, 2019 Criminal Charges")
380. Shawn Jordan and Michelle Jordan conspired to file the False September 5, 2019 Criminal Charges.
381. The False September 5, 2019 Criminal Charges had no basis in fact.
382. Shawn Jordan and Michelle Jordan wholly fabricated the False September 5, 2019 Criminal Charges.
383. Shawn Jordan and Michelle Jordan knew that the False September 5, 2019 Criminal Charges were lie.
384. Shawn Jordan and Michelle Jordan intentionally fabricated the False September 5, 2019 Criminal Charges.
385. Shawn Jordan and Michelle Jordan willfully fabricated the False September 5, 2019 Criminal Charges.
386. Shawn Jordan and Michelle Jordan fabricated the False September 5, 2019 Criminal Charges to injure Mi.W.
387. The False September 5, 2019 Criminal Charges are such that they directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
388. Shawn Jordan signed the False September 5, 2019 Juvenile Charges to further discredit and attack Mi.W. after the September 2019 Cell Phone Analysis revealed that I.J. had repeatedly lied about who sent her pictures and videos of male genitalia.



389. Shawn Jordan signed the False September 5, 2019 Juvenile Charges to harass and humiliate Mi.W.
390. Shawn Jordan signed the False September 5, 2019 Juvenile Charges without probable cause to believe the allegations.
391. The False September 5, 2019 Juvenile Charges have been dropped for want of evidence.
392. Because the False September 5, 2019 Juvenile Charges have been dropped, the proceedings relating to the False September 5, 2019 Juvenile Charges were terminated in Mi.W.'s favor.
393. On or about June 7, 2021, I.J. stated for the first time that another student, C.M., videotaped the Falsely Alleged Sexual Assault. ("False New Cell-Phone-Recording Allegation")
394. I.J., Shawn Jordan, and Michelle Jordan conspired to make the False New Cell-Phone-Recording Allegation to the police.
395. The False New Cell-Phone-Recording Allegation had no basis in fact.
396. I.J. wholly fabricated the False New Cell-Phone-Recording Allegation.
397. I.J. knew that the False New Cell-Phone-Recording Allegation were lie.
398. I.J. intentionally fabricated the False New Cell-Phone-Recording Allegation.
399. I.J. willfully fabricated the False New Cell-Phone-Recording Allegation.
400. I.J. fabricated the False New Cell-Phone-Recording Allegation to injure Mi.W.
401. The False New Cell-Phone-Recording Allegation is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.



402. Following the False New Cell-Phone-Recording Allegation, Police Chief Bob Lippert conducted a follow up investigation. (“June 7, 2021 Follow Up Investigation”)
403. Notes from the June 7, 2021 Follow Up Investigation are included in the Second Incident Report.
404. During the June 7, 2021 Follow Up Investigation, C.M. “adamantly denied” videotaping the Falsely Alleged Sexual Assault.
405. During the June 7, 2021 Follow Up Investigation, C.M. stated that he was nowhere near the boys’ locker, where the Falsely Alleged Sexual Assault took place, during the time that I.J. alleged the incident to take place.
406. On or about June 10, 2021, Principal Carter provided Chief Lippert with C.M.’s classroom-attendance records, which confirmed that C.M. was not near the locker room during the time in which the Falsely Alleged Sexual Assault was alleged to have taken place.
407. Based on the information relayed in the Second Incident Report, the False New Cell-Phone-Recording Allegation has no basis in fact.
408. The False New Cell-Phone-Recording Allegation is another example of I.J., Shawn Jordan, and Michelle Jordan actively spreading knowing falsehoods about Mi.W.
409. Since 2019, the Sandusky Register has published a significant number of articles about Mi.W., which make multiple representations that have no basis in fact.
410. For instance, the Sandusky Register published an article that stated that Mi.W. sent I.J. “lewd photographs and a video—unsolicited,” when, in reality, Mi.W. sent the First Mi.W. Snapchat and Second Mi.W. Snapchat at I.J.’s request, Mi.W. sent no video, and no other images considered “lewd.”



411. In an article titled, “Boy remorseful he sent girls porn,” the Sandusky Register published the statement that Mi.W. “acknowledged sending an obscene photo and video of himself . . . unsolicited.” (“Remorseful’ Sandusky Register Article”)
412. The statements in the ‘Remorseful’ Sandusky Register Article about Mi.W.’s sending an unsolicited photo and video have no basis in fact.
413. The Sandusky Register published the ‘Remorseful’ Sandusky Register Article knowing that its statements about Mi.W. were lies.
414. Alternatively, the Sandusky Register published the ‘Remorseful’ Sandusky Register Article with a reckless disregard for the truth of the statements contained therein.
415. The statements in the ‘Remorseful’ Sandusky Register Article are such that they directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
416. In an article titled, “your 2C,” the Sandusky Registered published the statement that Mi.W. “acknowledged sending obscene photos and videos.”
417. The “your 2C” article makes multiple representations indicating Mi.W. engaged in the Falsely Alleged Sexual Assault.
418. The “your 2C” article’s representations have no basis in fact.
419. The Sandusky Register published the “your 2C” article knowing that its statements about Mi.W. were lies.
420. Alternatively, the Sandusky Register published the “your 2C” article with a reckless disregard for the truth of the statements contained therein.
421. The statements in the “your 2C” article are such that they directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.



422. On or about August 5, 2021, the Sandusky Register published a video interview between Westerhold and I.J., Shawn Jordan, and Michelle Jordan, during which each individual made representations about Mi.W. that have no basis in fact. (“August 5, 2021 Between the Lines Video”)
423. During the August 5, 2021 Between the Lines Video, Westerhold states that they are there to discuss a “sexual violence case that happened when [I.J.] was 12-years old,” which Westerhold represents as though the “sexual violence” had happened as a matter of fact. (“Westerhold’s False Representation About Sexual Violence”)
424. Westerhold’s False Representation About Sexual Violence has no basis in fact.
425. Westerhold conspired with I.J., Shawn Jordan, and Michelle Jordan in making Westerhold’s False Representation About Sexual Violence.
426. Westerhold’s False Representation About Sexual Violence departed from journalist standards that require a reporter to identify the accusations as the allegations of a particular party without stating them as purported facts.
427. Westerhold wholly fabricated Westerhold’s False Representation About Sexual Violence.
428. Westerhold knew that Westerhold’s False Representation About Sexual Violence was a lie.
429. Westerhold intentionally fabricated Westerhold’s False Representation About Sexual Violence.
430. Westerhold willfully fabricated Westerhold’s False Representation About Sexual Violence.



431. Westerhold fabricated Westerhold's False Representation About Sexual Violence with the intent to injure Mi.W.
432. Westerhold's False Representation About Sexual Violence is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
433. During the August 5, 2021 Between the Lines Video, Michelle Jordan states that I.J. received "threats" and was intimidated by Mi.W. ("False Accusation of Threats and Intimidation").
434. I.J., Shawn Jordan and Michelle Jordan conspired to make the False Accusation of Threats and Intimidation.
435. The False Accusation of Threats and Intimidation has no basis in fact.
436. The Jordan Defendants wholly fabricated the False Accusation of Threats and Intimidation.
437. The Jordan Defendants knew that the False Accusation of Threats and Intimidation were lie.
438. The Jordan Defendants intentionally fabricated the False Accusation of Threats and Intimidation.
439. The Jordan Defendants willfully fabricated the False Accusation of Threats and Intimidation.
440. The Jordan Defendants fabricated the False Accusation of Threats and Intimidation to injure Mi.W.
441. The False Accusation of Threats and Intimidation are such that they directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.



442. During the August 5, 2021 Between the Lines Video, Westerhold represents as a matter of fact that the interview and lawsuit were about the “sexual assault,” stating that I.J. was “sexually assaulted at school.” (“Westerhold’s False Sexual Assault Statements”).
443. The Westerhold’s False Sexual Assault Statements have no basis in fact.
444. The Westerhold’s False Sexual Assault Statements departed from journalist standards that require a reporter to identify the accusations as the allegations of a particular party without stating them as purported facts.
445. Westerhold recklessly made the Westerhold’s False Sexual Assault Statements without regard to the truth or falsity of the statements.
446. During the August 5, 2021 Between the Lines Video, Michelle Jordan states that there were “4 photos and 2 videos” of Mi.W. (“BTL False Photos and Videos Statement”)
447. I.J., Shawn Jordan and Michelle Jordan conspired to make the BTL False Photos and Videos Statement.
448. The BTL False Photos and Videos Statement had no basis in fact.
449. The Jordan Defendants wholly fabricated the BTL False Photos and Videos Statement.
450. The Jordan Defendants knew that the BTL False Photos and Videos Statement were lie.
451. The Jordan Defendants intentionally fabricated the BTL False Photos and Videos Statement.
452. The Jordan Defendants willfully fabricated the BTL False Photos and Videos Statement.



453. The Jordan Defendants fabricated the BTL False Photos and Videos Statement to injure Mi.W.
454. The BTL False Photos and Videos Statement is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
455. During the August 5, 2021 Between the Lines Video, Michelle Jordan states that the falsely alleged photos and videos have disappeared. (“False Disappearing Evidence Claim”).
456. I.J., Shawn Jordan and Michelle Jordan conspired to make the False Disappearing Evidence Claim.
457. The False Disappearing Evidence Claim has no basis in fact.
458. The Jordan Defendants wholly fabricated the False Disappearing Evidence Claim.
459. The Jordan Defendants knew that the False Disappearing Evidence Claim was a lie.
460. The Jordan Defendants intentionally fabricated the False Disappearing Claim.
461. The Jordan Defendants willfully fabricated the False Disappearing Claim.
462. The Jordan Defendants fabricated the False Disappearing Claim to injure Mi.W.
463. The False Disappearing Claim is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
464. The Jordan Defendants fabricated the False Disappearing Claim to cover up the fact that such evidence never existed in the first place and to cover their many lies.
465. Since the Sandusky Register began publishing articles about Mi.W., many of its readers have published defamatory comments about Mi.W., James West, Sr., Jennifer West, and Jim’s Pizza Box.



466. Allison Ontko has stated that female customers get an “unwanted side of sexual harassment” when they are at Jim’s Pizza Box, which reasonable is read to mean that customers are sexually harassed at Jim’s Pizza Box. (“False Sexual Harassment of Customers Statement”)
467. No customer has ever been sexually harassed at Jim’s Pizza Box.
468. No customer has ever complained about been sexually harassed at Jim’s Pizza Box.
469. The False Sexual Harassment of Customers Statement has no basis in fact.
470. Allison Ontko conspired with the Jordan Defendants in making the False Sexual Harassment of Customers Statement.
471. The False Sexual Harassment of Customers Statement
472. Ontko wholly fabricated the False Sexual Harassment of Customers Statement.
473. Ontko knew that the False Sexual Harassment of Customers Statement was a lie.
474. Ontko intentionally fabricated the False Sexual Harassment of Customers Statement.
475. Ontko willfully fabricated the False Sexual Harassment of Customers Statement.
476. Ontko fabricated the False Sexual Harassment of Customers Statement with the intent to injure Jim’s Pizza Box.
477. The False Sexual Harassment of Customers Statement is such that it directly and proximately caused ridicule, hatred, and/or contempt to Jim’s Pizza Box.
478. Ontko posted on social media that the West Family are “trying to abuse others,” and called the West Family “sexual abusers, emotional abusers, [and] physical abusers.” (“False West Family Abusers Statements”)
479. No on in the West Family is trying to abuse others.
480. No one has ever claimed to be the victim of sexual abuse by James West, Senior.



481. No one has ever claimed to be the victim of emotional abuse by James West, Senior.
482. No one has ever claimed to be the victim of physical abuse by James West, Senior.
483. No one has ever claimed to be the victim of sexual abuse by Jennifer West.
484. No one has ever claimed to be the victim of emotional abuse by Jennifer West.
485. No one has ever claimed to be the victim of physical abuse by Jennifer West.
486. No one has ever claimed to be the victim of sexual abuse by James West, Junior.
487. No one has ever claimed to be the victim of emotional abuse by James West, Junior.
488. No one has ever claimed to be the victim of physical abuse by James West, Junior.
489. No one has ever claimed to be the victim of sexual abuse by Ma.W.
490. No one has ever claimed to be the victim of emotional abuse by Ma.W.
491. No one has ever claimed to be the victim of physical abuse by Ma.W.
492. The False West Family Abusers Statements have no basis in fact.
493. Ontko conspired with the Jordan Defendants in making the False West Family Abusers Statements.
494. Ontko wholly fabricated the False West Family Abusers Statements.
495. Ontko knew that the False West Family Abusers Statements was a lie.
496. Ontko intentionally fabricated the False West Family Abusers Statements.
497. Ontko willfully fabricated the False West Family Abusers Statements.
498. Ontko fabricated the False West Family Abusers Statements with the intent to injure the West Family.
499. Alternatively, Ontko made the False West Family Abusers Statements with reckless disregard for their truth.



500. The False West Family Abusers Statements are such that they directly and proximately caused ridicule, hatred, and/or contempt to the West Family.
501. Ontko posted on social media that Mi.W. “admitted” to sexually assaulting I.J. at school. (“False Statement that Mi.W. Admitted to Sexually Assaulting I.J.”)
502. Mi.W. has never admitted to sexually assaulting I.J.
503. Mi.W. has never admitted to sexually assaulting I.J. because Mi.W. has never sexually assaulted anyone.
504. Ontko conspired with the Jordan Defendants in making the False Statement that Mi.W. Admitted to Sexually Assaulting I.J.
505. Ontko wholly fabricated the False Statement that Mi.W. Admitted to Sexually Assaulting I.J.
506. Ontko knew that the False Statement that Mi.W. Admitted to Sexually Assaulting I.J. was a lie.
507. Ontko intentionally fabricated the False Statement that Mi.W. Admitted to Sexually Assaulting I.J.
508. Ontko willfully fabricated the False Statement that Mi.W. Admitted to Sexually Assaulting I.J.
509. Ontko fabricated the False Statement that Mi.W. Admitted to Sexually Assaulting I.J. with the intent to injure M.W.
510. Alternatively, Ontko made the False Statement that Mi.W. Admitted to Sexually Assaulting I.J. with reckless disregard for its truth.
511. The False Statement that Mi.W. Admitted to Sexually Assaulting I.J. is such that it directly and proximately caused ridicule, hatred, and/or contempt to M.W.



512. Ontko has made multiple Facebook posts and/or comments in which she states that Mi.W. is a “sexual predator.” (“Ontko’s Falsely Stating that Mi.W. Is a ‘Sexual Predator’”)
513. Mi.W. is not a sexual predator.
514. Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator” has no basis in fact.
515. Ontko conspired with the Jordan Defendants in Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator.”
516. Ontko wholly fabricated Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator.”
517. Ontko knew that Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator” was a lie.
518. Ontko intentionally fabricated Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator.”
519. Ontko willfully fabricated Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator.”
520. Ontko fabricated Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator” with the intent to injure Mi.W.
521. Alternatively, Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator” was done with reckless disregard for the truth.
522. Ontko’s Falsely Stating that Mi.W. Is a “Sexual Predator” is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
523. Ontko has also posted on Facebook that James West, Sr. is a “sexual predator.” (“Falsely Labelling James West, Sr. a ‘Sexual Predator’”)
524. No person has ever reported that James West, Sr. has sexually harassed her.
525. No person has ever reported that James West, Sr. has sexually assaulted her.
526. James West, Sr. is not a sexual predator.



527. Ontko's Falsely Labelling James West, Sr. a "Sexual Predator" has no basis in fact.
528. Ontko conspired with the Jordan Defendants in Falsely Labelling James West, Sr. a "Sexual Predator."
529. Ontko wholly fabricated her Falsely Labelling James West, Sr. a "Sexual Predator".
530. Ontko knew that her Falsely Labelling James West, Sr. a "Sexual Predator" was a lie.
531. Ontko intentionally fabricated her Falsely Labelling James West, Sr. a "Sexual Predator".
532. Ontko willfully fabricated her Falsely Labelling James West, Sr. a "Sexual Predator".
533. Ontko fabricated her Falsely Labelling James West, Sr. a "Sexual Predator" with the intent to injure James West, Sr.
534. Alternatively, Ontko's Falsely Labelling James West, Sr. a "Sexual Predator" was done with reckless disregard for its truth.
535. Ontko's Falsely Labelling James West, Sr. a "Sexual Predator" is such that it directly and proximately caused ridicule, hatred, and/or contempt to James West, Sr.
536. Danielle Fresch has also made false comments about Plaintiffs on social media.
537. Fresch has referred to Mi.W. as a "sexual predator" or a "sexual deviant" in multiple Facebook posts. ("Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant")
538. Mi.W. is not a sexual predator.
539. Mi.W. is not a sexual deviant.
540. Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant have no basis in fact.



541. Fresch conspired with the Jordan Defendants in making Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant.
542. Fresch wholly fabricated Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant.
543. Fresch knew that Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant was a lie.
544. Fresch intentionally fabricated Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant.
545. Fresch willfully fabricated Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant.
546. Fresch fabricated Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant with the intent to injure Mi.W.
547. Alternatively, Fresch made the Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant with a reckless disregard for their truth.
548. Fresch's False Statements that Mi.W. is a Sexual Predator and Deviant is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
549. Fresch has also posted on Facebook statements that accuse Mi.W. of physically assaulting I.J. ("Fresch's False Accusation of Physical Assault")
550. Mi.W. did not physically assault I.J.
551. Fresch's False Accusation of Physical Assault has no basis in fact.
552. Fresch conspired with the Jordan Defendants in making the Fresch's False Accusation of Physical Assault.
553. Fresch wholly fabricated Fresch's False Accusation of Physical Assault.



554. Fresch knew that Fresch's False Accusation of Physical Assault was a lie.
555. Fresch intentionally fabricated Fresch's False Accusation of Physical Assault.
556. Fresch willfully fabricated Fresch's False Accusation of Physical Assault.
557. Fresch fabricated Fresch's False Accusation of Physical Assault with the intent to injure Mi.W.
558. Alternatively, Fresch made Fresch's False Accusation of Physical Assault with a reckless disregard for its truth.
559. Fresch's False Accusation of Physical Assault is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
560. Fresch has also posted on Facebook that Mi.W. sent I.J. obscene videos. ("Fresch's False Statement About Mi.W. Video")
561. As stated above, Mi.W. did not send I.J. any obscene videos.
562. Fresch's False Statement About Mi.W. Video has no basis in fact.
563. Fresch conspired with the Jordan Defendants in making the Fresch's False Statement About Mi.W. Video.
564. Fresch wholly fabricated Fresch's False Statement About Mi.W. Video.
565. Fresch knew that Fresch's False Statement About Mi.W. Video was a lie.
566. Fresch intentionally fabricated Fresch's False Statement About Mi.W. Video.
567. Fresch willfully fabricated Fresch's False Statement About Mi.W. Video.
568. Fresch fabricated Fresch's False Statement About Mi.W. Video with the intent to injure Mi.W.
569. Alternatively, Fresch made the Fresch's False Statement About Mi.W. Video with a reckless disregard for its truth.



570. Fresch's False Statement About Mi.W. Video is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
571. Fresch, in reference to the False Sexual Assault Allegation about Mi.W., stated that the "apple doesn't fall far from the tree." ("Apple-Doesn't-Fall-Far From-The-Tree Comment")
572. In making the Apple-Doesn't-Fall-Far From-The-Tree Comment, Fresch was stating that James West, Sr. and Jennifer West had sexually assaulted others.
573. James West, Sr. has never sexually assaulted anyone.
574. Jennifer West has never sexually assaulted anyone.
575. The Apple-Doesn't-Fall-Far From-The-Tree Comment has no basis in fact.
576. Fresch conspired with the Jordan Defendants in making the Apple-Doesn't-Fall-Far From-The-Tree Comment.
577. Fresch wholly fabricated Apple-Doesn't-Fall-Far From-The-Tree Comment.
578. Fresch knew that Apple-Doesn't-Fall-Far From-The-Tree Comment was a lie.
579. Fresch intentionally fabricated Apple-Doesn't-Fall-Far From-The-Tree Comment.
580. Fresch willfully fabricated Apple-Doesn't-Fall-Far From-The-Tree Comment.
581. Fresch fabricated Apple-Doesn't-Fall-Far From-The-Tree Comment with the intent to injure the West Family.
582. Alternatively, Fresch made the Apple-Doesn't-Fall-Far From-The-Tree Comment with a reckless disregard for its truth.
583. The Apple-Doesn't-Fall-Far From-The-Tree Comment is such that it directly and proximately caused ridicule, hatred, and/or contempt to the West Family.



584. Michelle Jordan has also posted on Facebook that Mi.W. is a “convicted predator.”
 (“False Convicted-Predator Statement”)
585. Mi.W. is not a convicted predator.
586. The False Convicted-Predator Statement has no basis in fact.
587. Michelle Jordan conspired with I.J. and Shawn Jordan in making the False Convicted-Predator Statement.
588. Michelle Jordan wholly fabricated the False Convicted-Predator Statement.
589. Michelle Jordan knew that the False Convicted-Predator Statement was a lie.
590. Michelle Jordan intentionally fabricated the False Convicted-Predator Statement.
591. Michelle Jordan willfully fabricated the False Convicted-Predator Statement.
592. Michelle Jordan fabricated the False Convicted-Predator Statement with the intent to injure Mi.W.
593. The False Convicted-Predator Statement is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
594. Joseph B. Bilgen has also utilized social media to spread malicious lies about Plaintiffs. (“Bilgen Social Media Posts”)
595. On information and belief, Bilgen has used accounts under the name “Jobee Bilgen,” “Walter Williams,” and “Wallace Willard.”
596. The Bilgen Social Media Posts refer to Mi.W. as a “sexual deviant.” (“Bilgen’s False Sexual-Deviant Comment”)
597. As alleged above, Mi.W. is not a sexual deviant.
598. Bilgen’s False Sexual-Deviant Comment has no basis in fact.



599. Bilgen conspired with the Jordan Defendants in making the Bilgen's False Sexual-Deviant Comment.
600. Bilgen wholly fabricated Bilgen's False Sexual-Deviant Comment.
601. Bilgen knew that Bilgen's False Sexual-Deviant Comment was a lie.
602. Bilgen intentionally fabricated Bilgen's False Sexual-Deviant Comment.
603. Bilgen willfully fabricated Bilgen's False Sexual-Deviant Comment.
604. Bilgen fabricated Bilgen's False Sexual-Deviant Comment with the intent to injure Mi.W.
605. Alternatively, Bilgen made the Bilgen's False Sexual-Deviant Comment with a reckless disregard for its truth.
606. Bilgen's False Sexual-Deviant Comment is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
607. The Bilgen Social Media Posts refer to the West Family as a "cult of predators." ("Bilgen's False 'Cult-of-Predators' Comment")
608. Mi.W. is not a predator.
609. James West, Sr. is not a predator.
610. Jennifer West is not a predator.
611. James West, Jr. is not a predator.
612. Ma.W. is not a predator.
613. The West Family is not a "cult of predators."
614. Bilgen's False 'Cult-of-Predators' Comment has no basis in fact.
615. Bilgen conspired with the Jordan Defendants in making Bilgen's False 'Cult-of-Predators' Comment.



616. Bilgen wholly fabricated Bilgen's False 'Cult-of-Predators' Comment.
617. Bilgen knew that Bilgen's False 'Cult-of-Predators' Comment was a lie.
618. Bilgen intentionally fabricated Bilgen's False 'Cult-of-Predators' Comment.
619. Bilgen willfully fabricated Bilgen's False 'Cult-of-Predators' Comment.
620. Bilgen fabricated Bilgen's False 'Cult-of-Predators' Comment with the intent to injure the West Family.
621. Alternatively, Bilgen made the Bilgen's False 'Cult-of-Predators' Comment with a reckless disregard for its truth.
622. Bilgen's False 'Cult-of-Predators' Comment is such that it directly and proximately caused ridicule, hatred, and/or contempt to the West Family.
623. Jeremy J. Yount, a/k/a "Jay Yount," has referred to Mi.W. as a "predator" on Facebook. ("Yount's Falsely Stating That Mi.W. Is a Predator")
624. As alleged above, Mi.W. is not a predator.
625. Yount's Falsely Stating That Mi.W. Is a Predator has no basis in fact.
626. Yount conspired with the Jordan Defendants in Falsely Stating That Mi.W. Is a Predator.
627. Yount wholly fabricated Yount's Falsely Stating That Mi.W. Is a Predator.
628. Yount knew that Yount's Falsely Stating That Mi.W. Is a Predator was a lie.
629. Yount intentionally fabricated Yount's Falsely Stating That Mi.W. Is a Predator.
630. Yount willfully fabricated Yount's Falsely Stating That Mi.W. Is a Predator.
631. Yount fabricated Yount's Falsely Stating That Mi.W. Is a Predator with the intent to injure Mi.W.



632. Alternatively, Yount's Falsely Stating That Mi.W. Is a Predator with a reckless disregard for its truth.
633. Yount's Falsely Stating That Mi.W. Is a Predator is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
634. Kelly Netherland-Gillespie has also posted on Facebook that Mi.W. was convicted for sexually assaulting I.J. ("Netherland-Gillespie False Statement About Mi.W. Conviction")
635. Mi.W. was not convicted for sexually assaulting I.J.
636. The Netherland-Gillespie False Statement About Mi.W. Conviction has no basis in fact.
637. Netherland-Gillespie conspired with the Jordan Defendants in making Netherland-Gillespie's False Statement About Mi.W. Conviction.
638. Netherland-Gillespie wholly fabricated Netherland-Gillespie's False Statement About Mi.W. Conviction.
639. Netherland-Gillespie knew that Netherland-Gillespie's False Statement About Mi.W. Conviction was a lie.
640. Netherland-Gillespie intentionally fabricated Netherland-Gillespie's False Statement About Mi.W. Conviction.
641. Netherland-Gillespie willfully fabricated Netherland-Gillespie's False Statement About Mi.W. Conviction.
642. Netherland-Gillespie fabricated Netherland-Gillespie's False Statement About Mi.W. Conviction with the intent to injure Mi.W.



643. Alternatively, Netherland-Gillespie made the Netherland-Gillespie's False Statement About Mi.W. Conviction with a reckless disregard for its truth.
644. Netherland-Gillespie's False Statement About Mi.W. Conviction is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
645. Netherland-Gillespie has referred to Mi.W. as a "predator" on Facebook. ("Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator")
646. As alleged above, Mi.W. is not a predator.
647. Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator has no basis in fact.
648. Netherland-Gillespie conspired with the Jordan Defendants in making the Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator.
649. Netherland-Gillespie wholly fabricated Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator.
650. Netherland-Gillespie knew that Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator was a lie.
651. Netherland-Gillespie intentionally fabricated Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator.
652. Netherland-Gillespie willfully fabricated Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator.
653. Netherland-Gillespie fabricated Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator with the intent to injure Mi.W.
654. Alternatively, Netherland-Gillespie's Falsely Stating That Mi.W. Is a Predator was done with a reckless disregard for its truth.



655. Netherland-Gillespie's Falsely Stating That Mi. W. Is a Predator is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi. W.
656. Netherland-Gillespie stated on Facebook that James West, Sr. has a "problem," implying that he also has sexually assaulted women. ("Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator")
657. As alleged above, James West, Sr. is not a sexual predator.
658. Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator has no basis in fact.
659. Netherland-Gillespie conspired with the Jordan Defendants in making the Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator.
660. Netherland-Gillespie wholly fabricated Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator.
661. Netherland-Gillespie knew that Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator was a lie.
662. Netherland-Gillespie intentionally fabricated Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator.
663. Netherland-Gillespie willfully fabricated Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator.
664. Netherland-Gillespie fabricated Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator with the intent to injure James West, Sr.
665. Alternatively, Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator was done with a reckless disregard for its truth.



666. Netherland-Gillespie's Falsely Implying that James West, Sr. Is A Sexual Predator is such that it directly and proximately caused ridicule, hatred, and/or contempt to James West, Sr.
667. Jason Werner has also spread false information about Plaintiffs on social media.
668. Werner posted on Facebook that the West Family has been permitted to "sexually assault or harass women." ("Werner's Falsely Stating that the West Family Assaults and Harasses Women")
669. Mi.W. has neither sexually assaulted nor harassed anyone.
670. James West, Sr. has neither sexually assaulted nor harassed anyone.
671. Jennifer West has neither sexually assaulted nor harassed anyone.
672. James West, Jr. has neither sexually assaulted nor harassed anyone.
673. Ma.W. has neither sexually assaulted nor harassed anyone.
674. Werner's Falsely Stating that the West Family Assaults and Harasses Women has no basis in fact.
675. Werner conspired with the Jordan Defendants in Falsely Stating that the West Family Assaults and Harasses Women.
676. Werner wholly fabricated Werner's Falsely Stating that the West Family Assaults and Harasses Women.
677. Werner knew that Werner's Falsely Stating that the West Family Assaults and Harasses Women was a lie.
678. Werner intentionally fabricated Werner's Falsely Stating that the West Family Assaults and Harasses Women.



679. Werner willfully fabricated Werner's Falsely Stating that the West Family Assaults and Harasses Women.
680. Werner fabricated Werner's Falsely Stating that the West Family Assaults and Harasses Women with the intent to injure the West Family.
681. Alternatively, Werner's Falsely Stating that the West Family Assaults and Harasses Women was done with a reckless disregard for its truth.
682. Werner's Falsely Stating that the West Family Assaults and Harasses Women is such that it directly and proximately caused ridicule, hatred, and/or contempt to the West Family.
683. Werner has also posted on Facebook that Mi.W. will "end up on a milk carton" because of his "sexual assault." ("Werner False Milk-Carton Statement")
684. As stated above, Mi.W. did not sexually assault anybody.
685. The Werner False Milk-Carton Statement has no basis in fact.
686. Werner conspired with the Jordan Defendants in making the Werner False Milk-Carton Statement.
687. Werner wholly fabricated the Werner False Milk-Carton Statement.
688. Werner knew that the Werner False Milk-Carton Statement was a lie.
689. Werner intentionally fabricated the Werner False Milk-Carton Statement.
690. Werner willfully fabricated the Werner False Milk-Carton Statement.
691. Werner fabricated the Werner False Milk-Carton Statement with the intent to injure Mi.W.
692. Alternatively, Werner made the Werner False Milk-Carton Statement with a reckless disregard for its truth.



693. The Werner False Milk-Carton Statement is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
694. Werner has also posted on Facebook that Mi.W.'s behavior is the result of multiple generations of "learned abusive behavior." ("Werner's False 'Learned-Abusive-Behavior' Statement")
695. In making Werner's False 'Learned-Abusive-Behavior' Statement, Werner was stating that multiple generations of the West Family had engaged in sexually abusive behavior.
696. No member of the West Family has engaged in sexually abusive behavior.
697. Werner's False 'Learned-Abusive-Behavior' Statement has no basis in fact.
698. Werner conspired with the Jordan Defendants in making Werner's False 'Learned-Abusive-Behavior' Statement.
699. Werner wholly fabricated Werner's False 'Learned-Abusive-Behavior' Statement.
700. Werner knew that Werner's False 'Learned-Abusive-Behavior' Statement was a lie.
701. Werner intentionally fabricated Werner's False 'Learned-Abusive-Behavior' Statement.
702. Werner willfully fabricated Werner's False 'Learned-Abusive-Behavior' Statement.
703. Werner fabricated Werner's False 'Learned-Abusive-Behavior' Statement with the intent to injure the West Family.
704. Alternatively, Werner made Werner's False 'Learned-Abusive-Behavior' Statement with a reckless disregard for its truth.
705. Werner's False 'Learned-Abusive-Behavior' Statement is such that it directly and proximately caused ridicule, hatred, and/or contempt to the West Family.



706. Werner has also posted on Facebook that people get “groped” at Jim’s Pizza Box.
 (“Werner’s False Statement About Groping”)
707. Nobody has been groped at Jim’s Pizza Box.
708. Werner’s False Statement About Groping has no basis in fact.
709. Werner conspired with the Jordan Defendants in making Werner’s False Statement
 About Groping.
710. Werner wholly fabricated Werner’s False Statement About Groping.
711. Werner knew that Werner’s False Statement About Groping was a lie.
712. Werner intentionally fabricated Werner’s False Statement About Groping.
713. Werner willfully fabricated Werner’s False Statement About Groping.
714. Werner fabricated Werner’s False Statement About Groping with the intent to injure
 Jim’s Pizza Box.
715. Alternatively, Werner made the Werner’s False Statement About Groping with a
 reckless disregard for its truth.
716. Werner’s False Statement About Groping is such that it directly and proximately
 caused ridicule, hatred, and/or contempt to Jim’s Pizza Box and the West Family.
717. Werner posted on Facebook that Mi.W. “stuck his hand down [I.J.’s] pants and sent
 videos to multiple girls underage.” (“Werner’s False Statement About Sexual Assault
 and Videos”)
718. Mi.W. never stuck his hand down I.J.’s pants.
719. In making Werner’s False Statement About Sexual Assault and Videos, Werner’s
 reference to “videos” was meant to convey “sexually graphic” videos.
720. Mi.W. has never sent sexually graphic videos.



721. Werner's False Statement About Sexual Assault and Videos has no basis in fact.
722. Werner conspired with the Jordan Defendants in making Werner's False Statement About Sexual Assault and Videos.
723. Werner wholly fabricated Werner's False Statement About Sexual Assault and Videos.
724. Werner knew that Werner's False Statement About Sexual Assault and Videos was a lie.
725. Werner intentionally fabricated Werner's False Statement About Sexual Assault and Videos.
726. Werner willfully fabricated Werner's False Statement About Sexual Assault and Videos.
727. Werner fabricated Werner's False Statement About Sexual Assault and Videos with the intent to injure Mi.W.
728. Alternatively, Werner made Werner's False Statement About Sexual Assault and Videos with a reckless disregard for its truth.
729. Werner's False Statement About Sexual Assault and Videos is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
730. Werner has stated that Mi.W. is a "predator" on Facebook. ("Werner's Falsely Stating that Mi.W. Is a Predator")
731. As stated above, Mi.W. is not a predator.
732. Werner's Falsely Stating that Mi.W. Is a Predator has no basis in fact.
733. Werner conspired with the Jordan Defendants in Falsely Stating that Mi.W. Is a Predator.



734. Werner wholly fabricated Werner's Falsely Stating that Mi.W. Is a Predator.
735. Werner knew that Werner's Falsely Stating that Mi.W. Is a Predator was a lie.
736. Werner intentionally fabricated Werner's Falsely Stating that Mi.W. Is a Predator.
737. Werner willfully fabricated Werner's Falsely Stating that Mi.W. Is a Predator.
738. Werner fabricated Werner's Falsely Stating that Mi.W. Is a Predator with the intent to injure Mi.W.
739. Alternatively, Werner's Falsely Stating that Mi.W. Is a Predator was done with a reckless disregard for its truth.
740. Werner's Falsely Stating that Mi.W. Is a Predator is such that it directly and proximately caused ridicule, hatred, and/or contempt to Mi.W.
741. On information and belief, Jake Jordan has used Snapchat, under the account "ohiosnapz12," to spread malicious lies about James West, Sr. and Mi.W. ("Jake Jordan Snapchats")
742. The Jake Jordan Snapchats state that Mi.W. raped a girl.
743. Mi.W. did not rape a girl
744. The Jake Jordan Snapchats state that James West, Sr. "raped girls" and is a "rapist."
745. James West, Sr. has not raped anyone.
746. James West, Sr. is not a rapist.
747. The Jake Jordan Snapchats have no basis in fact.
748. Jake Jordan conspired with the I.J., Shawn Jordan, and Michelle Jordan in making the Jake Jordan Snapchats.
749. Jake Jordan wholly fabricated the Jake Jordan Snapchats.
750. Jake Jordan knew that the Jake Jordan Snapchats were lies.



751. Jake Jordan intentionally fabricated the Jake Jordan Snapchats.
752. Jake Jordan willfully fabricated the Jake Jordan Snapchats.
753. Jake Jordan fabricated the Jake Jordan Snapchats with the intent to injure Mi.W and James West, Sr.
754. The Jake Jordan Snapchats are such that they directly and proximately caused ridicule, hatred, and/or contempt to Mi.W and James West, Sr.
755. The false statements of Defendants, as described above, have injured Plaintiffs' personal and professional reputations.
756. In making their false statements, Defendants combined and conspired with at least one other of the named Defendants.
757. Defendants' statements, as described above, constitute defamation.
758. Defendants' actions, as described above, were intended to cause Plaintiffs serious emotional distress.
759. As described above, Defendants have repeatedly targeted M.W., a teenager, and described him as a sexual deviant, predator, assaulter, and the like.
760. Targeting a teenager and describing him as a sexual deviant, predator, and assaulter, despite having no firsthand knowledge to support those claims, is extreme and outrageous conduct.
761. As a result of Defendants' conduct, Plaintiffs have suffered and will continue to suffer damages, including emotional distress damages.



COUNT I: LIBEL
(All Defendants)

762. Plaintiffs restate each and every prior paragraph of this Complaint, as if it were fully restated herein.
763. Each Defendant has published false written statements about Plaintiffs.
764. Defendants' statements, as alleged above, were published with at least a reckless disregard for the truth.
765. The Sandusky Register's and Westerhold's false statements were published in contravention of journalistic standards that require a reporter to identify the accusations as the allegations of a particular party without stating them as purported facts.
766. The false statements of Defendants were published to third parties on social media.
767. The false statements of Defendants were published to third parties without the privilege to do so.
768. In publishing false statements about Plaintiffs, Defendants caused Plaintiffs to suffer actual harm.
769. Because Defendants' false statements about Plaintiffs reflect upon the character of Plaintiffs by bringing them into ridicule, hatred, or contempt, and by affecting them injuriously in their trade or profession, Defendants' written statements constitute libel per se.
770. As a direct and proximate result of Defendants' libelous statements, Plaintiffs have suffered and will continue to suffer damages, including economic, emotional distress and physical sickness damages.



COUNT II: SLANDER
(As to Westerhold and Michelle and Shawn Jordan)

771. Plaintiffs restate each and every prior paragraph of this Complaint, as if it were fully restated herein.
772. During the August 5, 2021 Between the Lines Video, Westerhold and Michelle and Shawn Jordan made false statements about Mi.W. with at least a reckless disregard for their truth.
773. The false statements made during the August 5, 2021 Between the Lines Video were published in contravention of journalistic standards that require a reporter to identify the accusations as the allegations of a particular party without stating them as purported facts.
774. By posting the August 5, 2021 Between the Lines Video on Youtube and other media platforms, Michelle and Shawn Jordan's and Westerhold's false statements have been published to third parties without a privilege to do so.
775. The false statements made by Michelle and Shawn Jordan and Westerhold have caused Mi.W. to suffer harm.
776. Because Michelle and Shawn Jordan's and Westerhold's false statements reflect upon the character of Mi.W. by bringing him into ridicule, hatred, or contempt, the statements in the August 5, 2021 Between the Lines Video constitute slander per se.
777. As a direct and proximate result of Michelle and Shawn Jordan's and Westerhold's false statements, Mi.W. has suffered and will continue to suffer damages, including economic, emotional distress and physical sickness damages.



COUNT III: MALICIOUS PROSECUTION
(As to Shawn Jordan only)

778. Plaintiffs restate each and every prior paragraph of this Complaint, as if it were fully restated herein.
779. In signing the False September 5, 2019 Juvenile Charges, Shawn Jordan instituted criminal charges against Mi.W.
780. Shawn Jordan signed the False September 5, 2019 Juvenile Charges without probable cause.
781. Shawn Jordan signed the False September 5, 2019 Juvenile Charges without probable cause out of his malice towards Mi.W.
782. As a result of Shawn Jordan's signing the False September 5, 2019 Juvenile Charges, Mi.W. was deprived of his liberty when he was required to participate in the juvenile proceedings against him.
783. The False September 5, 2019 Juvenile Charges were dropped for want of evidence, meaning that Mi.W. received a favorable termination of the charges.
784. As a result of Shawn Jordan's malicious prosecution of charges against Mi.W., Mi.W. has suffered damages.

COUNT IV: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(All Defendants)

785. Plaintiffs restate each and every prior paragraph of this Complaint, as if it were fully restated herein.
786. Defendants intended to cause Plaintiffs emotional distress and/or knew that their acts or omissions would result in serious emotional distress to Plaintiffs.



787. Defendants' conduct was so extreme and outrageous as to go beyond all possible bounds of decency and was such that it could be considered as utterly intolerable in a civilized community.

788. As a direct and proximate result of Defendants' acts and omissions as set forth above, Plaintiffs have suffered mental anguish of such a serious nature that no reasonable person could be expected to endure it.

789. As a direct and proximate result of Defendants' conduct and the resulting emotional distress, Plaintiffs have suffered and will continue to suffer damages, including economic, emotional distress, and physical sickness damages.

COUNT V: CIVIL CONSPIRACY
(All Defendants)

790. Plaintiffs restate each and every prior paragraph of this Complaint, as if it were fully restated herein.

791. Defendants maliciously combined and conspired to defame Plaintiffs by publishing false statements about Plaintiffs with at least a reckless disregard for the truth of those statements.

792. Defendants maliciously combined and conspired to cause Plaintiffs emotional distress through Defendants' outrageous conduct.

793. As a result of Defendants' civil conspiracy, Plaintiffs have sustained losses and damages for which all Defendants are jointly and severally liable.



PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief from Defendants as follows:

- (a) An award against each Defendant of compensatory and punitive damages in an amount in excess of \$1,000,000 per claim to be proven at trial;
- (b) An order requiring each Defendant to cease and desist from making any further defamatory statements about Plaintiffs;
- (c) An award of reasonable attorneys' fees and non-taxable costs for Plaintiffs' claims as allowable under law;
- (d) An award of the taxable costs of this action;
- (e) An award of such other relief as this Court may deem necessary and proper.

Respectfully submitted,



Brian D. Spitz (0068816)

Rocco J. Screnci (0100333)

Attorneys for Plaintiffs

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JURY DEMAND

Plaintiffs demand a trial by jury by the maximum number of jurors permitted.



Brian D. Spitz (0068816)
Attorney for Plaintiffs



HURON POLICE

Incident Number

20-190309

Page # 2

Persons Involved with Incident

Incident #: 20190309 Relation: SUS Arrest #: CAD #: Date of Contact: 03/21/2019 Phone:
First Name: M Middle: Last Name: W Til: DOB: SSN: Pager:
Street #: 9607 Street Name: S.R. 13 Apt: City: HURON St: OH Zip: 44839 Cell Phone: Employee Phone:
Hgt: Wgt: Hair: Eyes: Race: Sex: Physical Marks:
W M
Offenses: [REDACTED]

Resident Class: Suspected of using: / / Victim Type:

Incident #: 20190309 Relation: VIC Arrest #: CAD #: Date of Contact: 03/21/2019 Phone:
First Name: Middle: Last Name: Til: DOB: SSN: Pager:
Street #: Street Name: Apt: City: St: Zip: Cell Phone: Employee Phone:
Hgt: Wgt: Hair: Eyes: Race: Sex: Physical Marks:
W F
Offenses: [REDACTED]

Resident Class: Resident Suspected of using: / / Victim Type: Individual

Incident #: Relation: Arrest #: CAD #: Date of Contact: 03/21/2019 Phone:
First Name: E Middle: Last Name: C Til: DOB: SSN: Pager:
Street #: Street Name: Apt: City: St: OH Zip: 44839 Cell Phone: Employee Phone:
Hgt: Wgt: Hair: Eyes: Race: Sex: Physical Marks:
W F
Offenses: 3605 INDECENT EXPOSURE/PUBLIC INDECENCY
3707 PANDERING OBSCENITY INVOLVING A MINOR

Resident Class: Other Suspected of using: / / Victim Type: Individual

Reviewing Supervisor:

Bureau Supervisor:

Officer:

HURON POLICE

Incident Number

Investigative Report

Title / Subject: INDECENT EXPOSURE

20-190309

Shawn and Michelle Jordan came on station to speak with me, regarding photos a male student sent to their daughter. Mrs. Jordan advised it was brought to their attention by their daughter, [REDACTED] E [REDACTED]. She continued that [REDACTED] told her that M [REDACTED] W [REDACTED] sent her several pictures and videos of his penis. She advised the pictures and videos are still on her phone. I advised Mrs. Jordan I would need to get the images from E [REDACTED] phone, which she turned over to me. Mrs. Jordan also advised they have also spoken with Mi [REDACTED] parents about this and that M [REDACTED] admitted to sending the photos to E [REDACTED] and apologized for his actions. They advised they agreed not to contact our agency if nothing further was said about the incident, however E [REDACTED] and E [REDACTED] C [REDACTED] went to school the next day and several boys were asking them about the pictures. Ms. Jordan advised after hearing this they decided to contact our agency. After our conversation we responded to McCormick Middle School, so I could speak with [REDACTED].

Upon my arrival at McCormick Middle School, I spoke with the Principal, Chad Carter, and advised him of the investigation. Mr. Carter had E [REDACTED] called down to the office and she was brought into an empty office. E [REDACTED]'s parents and Mr. Carter were also present during the interview. I asked E [REDACTED] to tell me when everything began, which she advised it all started approximately three weeks earlier. She advised she was in fifth period English class with M [REDACTED]. E [REDACTED] advised M [REDACTED] said "hey N [REDACTED] look at this" and she turned around to look and M [REDACTED] penis was sticking out the bottom of his shorts. She advised M [REDACTED] claimed he didn't mean for them to see it, [REDACTED].

I then asked E [REDACTED] if M [REDACTED] had done anything else like this, which she advised he did. She advised on March 02nd, 2019 she was at the Crabtree residence. She advised she and E [REDACTED] were having a Snapchat conversation with M [REDACTED]. E [REDACTED] advised M [REDACTED] asked if they wanted to see something, which they said yes. She advised M [REDACTED] then sent them a picture of his penis. When asked to describe the picture, E [REDACTED] advised his penis was erect. I asked E [REDACTED] if they responded to M [REDACTED], which she advised they told him to stop. E [REDACTED] advised M [REDACTED] responded by sending a picture of a male penis that was ejaculating. She was not sure if it was M [REDACTED] penis or not. E [REDACTED] advised she told M [REDACTED] she was going to block him. [REDACTED]. She advised he continued that he has seen her vagina. She advised he told her that she wore a skirt to school and that he underwear was moved.

I asked E [REDACTED] if there were any other instances where M [REDACTED] exposed himself to her. She advised on March 5th, 2019 they were in third period math class. She advised M [REDACTED] told her and C [REDACTED] to come over to him. She advised when they walked over he showed them a picture of his penis that was on his phone. E [REDACTED] was asked if there was anything else I needed to know about, which she advised M [REDACTED] [REDACTED]. E [REDACTED] added that she doesn't know if it true or not. [REDACTED].

Next I spoke with E [REDACTED] C [REDACTED] and her parents. They were already aware of the allegations, as they also spoke with Mr. and Mrs. West over the phone about the matter. I asked E [REDACTED] to tell me exactly what she has seen and what was sent to her.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] She advised the week before she was in fifth period English class with M [REDACTED]. She advised she turned around towards M [REDACTED] direction and saw his penis sticking out the bottom of his shorts. She advised he had his shorts pulled up, so it would stick out the bottom. E [REDACTED] advised she immediately turned around and M [REDACTED] made the comment that she wasn't supposed to see that. She advised he then asked her if they were good.

By: [REDACTED]

Date: 03/21/2019 Time: 08:00:0 No. 001 Page #: 4

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

20-190309

Investigative Report

Title / Subject: INDECENT EXPOSURE

E [redacted] advised there was one other instance where M [redacted] sent pictures of his penis to E [redacted]. She advised on March 2nd, 2019 B [redacted] was staying the night at her residence. She advised M [redacted] and E [redacted] were texting each other through Snapchat. She advised M [redacted] sent several photos of his penis and a couple of photos where his hand was covering his penis up. E [redacted] advised she didn't see the conversation leading up to the pictures being sent and did not know if B [redacted] asked for the pictures to be sent to her or not.

I then had N [redacted] L [redacted] called down to the office. B [redacted] advised N [redacted] had seen M [redacted] pull his penis out while in class. N [redacted] was advised of the investigation and asked if he was aware of M [redacted] doing this. N [redacted] advised M [redacted] was in fact pulling his penis out in fifth period english class. He advised M [redacted] would do it to him as a joke. He advised he didn't believe M [redacted] was doing this for anyone else to see.

At 15:40 hrs. I met with Mr. West on station and he turned over M [redacted] cell phone. A search warrant will be prepared, so I can review the contents on M [redacted]'s phone.

By: [redacted]

Date: 03/21/2019 Time: 08:00:0 No. 001 Page #: 5

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

Investigative Report

Title / Subject: SEARCH WARRANT

20-190309

On this date I prepared a search warrant for [REDACTED] cell phone. Once the search warrant was completed. I presented it to Judge [REDACTED]. Judge [REDACTED] reviewed and signed the warrant.

I then removed [REDACTED] phone from the evidence room and transported it to the Erie County Sheriff's Office. I turned the phone over to [REDACTED], so the contents of the phone could be reviewed.

By: [REDACTED]

Date: 04/12/2019 Time: 15:00:0 No. 002 Page #: 1

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

Investigative Report

Title / Subject: CELL PHONE

20-190309

On this date I was contacted by [REDACTED] over the phone. He advised the Cell Brite system was requesting an Itunes password to download the contents of the phone. I advised Det. Sgt. Papineau I did not have the password, at which time he advised he would be unable to perform the download. He advised I would have to visually go through the phone to look for any further evidence.

A short time later I responded to the Sheriff's Office and met with Det. Sgt. Papineau. He turned [REDACTED] cell phone back over to me and I returned to station. I reviewed the contents of [REDACTED] phone and was unable to locate anything of value. [REDACTED] phone was then placed back into the evidence room and will ultimately be returned to [REDACTED].

By: [REDACTED]

[REDACTED]

Date: 05/02/2019 Time: 11:00:0 No. 003 Page #: 1

Reviewing Supervisor: _____

Date: _____

Jordan/Crabtree- (March 20) approx 6:45pm

- made aware of potential issue
- talked briefly to both parents before the choir concert about m [redacted] texting to b [redacted] and e [redacted]

Jordan (march 21)-

- texted with mrs. jordan... she informed me that her and husband would be in next morning at 8am

Meeting with B [redacted] (March 21) approx 8am

- Mom, dad, Detective [redacted], B [redacted], myself were in the guidance office for this discussion
- when asked when did these things happen?
 - About three weeks ago....so it would have been early March
- what happened?
- M [redacted] said to N [redacted] L [redacted] while in ELA-class:

[redacted]
 M [redacted] penis was exposed
 B [redacted] turned and looked
 M [redacted] then said to E [redacted] "oh no, you weren't supposed to see it"
 [redacted]
 [redacted]

- only happened once in class that B [redacted] saw

B [redacted] then told us [redacted] about the snapchat text/pictures of his penis to E [redacted] while she was spending the night at E [redacted] C [redacted] house

- [redacted]
- [redacted]

B [redacted] about what happened in Math class on 3-5-19-

- In math class B [redacted] was sitting with C [redacted] at the end of the period waiting for the bell.
- M [redacted] showed a picture of his penis that was on his phone to B [redacted] and C [redacted]
- [redacted]
- No one told the teacher or anyone at school

[redacted]
 [redacted]
 [redacted]

On March 21-

- In the gym before school while waiting for the 720am bell N [redacted] Z [redacted] said something to her about it again
 - I asked E [redacted] if she was for sure it was N [redacted] Z [redacted] and it was in the gym and was today...she said yes
 - <****N [redacted] Z [redacted] was absent on March 21****>
 - <****when parents were leaving I told mom that N [redacted] was absent this morning and mom said that she didn't think she would make it up**>

Meeting with E [redacted] C [redacted] (March 21) approx 8:30am

- Mom, dad, [redacted], E [redacted], myself were in the guidance office for this discussion
- asked E [redacted] to tell me what was going on here at school

[redacted]
[redacted]
[redacted]

[redacted]
[redacted]

[redacted]
[redacted]
[redacted]

- Early last week (so around March 14) while in ELA class M [redacted] exposed the tip of his penis through the end of his shorts.
 - When E [redacted] saw it and M [redacted] noticed that she did, M [redacted] said "You weren't supposed to see that"
 - E [redacted] said that M [redacted] was trying to show it to N [redacted] L [redacted]

[redacted]
[redacted]

[redacted]
[redacted]
[redacted]

[redacted]
[redacted]
[redacted]
[redacted]

[redacted]
[redacted]

N L (March 21) approx 920am

- Did M ever expose himself in class?

- M would expose his penis in ELA...M did it about 3-4 times

- Anything else?

- One time when E saw it, M said, "Oh my god, I didn't want you to see that"

- Anyone say anything to teacher?

- no

Jordan (March 22) text message-

-text messaging with mrs. jordan regarding incident

Jordan (March 31) text message-

M [REDACTED] (April 1) approx 9am

- Tell me about the picture that was seen on your phone?
 - When in math class it was near the end of the period and we were all finished with work and talking with friends
 - I had my phone out and E [REDACTED] took my phone
 - E [REDACTED] then went in to where my picture vault is and unlocked it and shared it C [REDACTED]
- Tell me about what you did in ELA....
 - in ELA class N [REDACTED] L [REDACTED] and I try to make each other laugh and joke around
 - I pulled up my shorts to the side and exposed myself
 - M [REDACTED] claims the intent was to make N [REDACTED] laugh
 - How long ago did this happen?
 - about 2-3 weeks ago
 - What classes has this happened in other class?
 - No
- Served m [REDACTED] his papers to suspend him....he left with parents and started suspension

Jordan (April 1)- text message

-in a brief text to her, i sent the message "FYI...M [REDACTED] won't be at school for a while" she replied thanks for the update

Jordan (april 8) text message-

- michelle texted me to see if i could talk, i couldn't because [REDACTED] was with me.... Called her about 6pm..... She told me that a couple people have made remarks to her, but she was going to talk to b [REDACTED] to see if she wanted me to intervene.... Texted her at 920pm to ask if b [REDACTED] wanted me to intervene and she said she wants to wait and see how the day starts and if needed she will come to my office.... I told her i would be in school all day tomorrow.

met with E [REDACTED] on 4-8-19 at approx 1:20pm [REDACTED]

- discussed how things were going regarding m [REDACTED] coming back to school
- she said no issues
- she did say the only classes they have together is ELA and his seat has been moved
- she feels slightly uncomfortable with him in class, but said it will be fine.
- no one has said anything to her about anything.....b [REDACTED] has had things said to her
- followed up with a call to dad

April 9 met with M [REDACTED] today at approx 820am (M [REDACTED] I)

- asked m [REDACTED] how his return has been...he said great.

2019 West/Jordan/Crabtree Notes

- asked him if E [redacted] or B [redacted] has talked to him, he said just E [redacted] when he had his report card and she asked how he did.
- talked to him about not talking about the situation with anyone as it is still be investigated by the police and the school portion is completed.
- told him I was going to have his seat moved in ELA away from the girls and N [redacted] L [redacted]...he was ok with that.
- mic [redacted] said that b [redacted] was telling people he was suspended for 10 days to a month and was going to the DH...didn't say it to him, but to others. - called mom to update on m [redacted] return

met with B [redacted] on 4-9-19...9:45am

- during math class someone threw a pencil at her...either [redacted] or M [redacted]... [redacted] saw it.
- talked to [redacted]....he didn't see it, but has to be braxton or m [redacted] based on where they sit
- [redacted] found pencil on desk, didn't work, he broke it, tossed it at m [redacted], m [redacted] moved and it hit b [redacted]....he was aiming for m [redacted], not b [redacted]
- m [redacted]'s story lines up with [redacted]

met with B [redacted] on 4-9-19...second time at 2:30pm

- called b [redacted] back down to explain, she was ok with it.
- she said that 4-9 is better then 4-8
- on 4-8 (Monday) b [redacted] said that m [redacted] told her "you know you sent pictures too" directly to her after school dismissal in the 2nd floor hallway near science classroom
- kids were saying things to her about m [redacted] getting in to trouble.

April 10- [redacted] approx 1:45pm

- called dad at 145pm to update on school
- no issues with e [redacted] and m [redacted]
- he said he/they are satisfied with the seat change in ELA
- all quiet for e [redacted]... [redacted]

4-10-19 (E [redacted])...approx 2:10pm

- no issues in math
- no issues in ELA
- [redacted]
- Nothing was said from M [redacted] today
- Confirmed with B [redacted]....Monday (4-8-19) M [redacted] W [redacted] said something to her after school 9th period m [redacted] said you know you sent pictures too....no one was around.
- confirmed with E [redacted] that the pencil incident from yesterday was not directed towards her, but [redacted] throwing it at m [redacted]
- confirmed seating is ok in ELA and Math is now moved.

2019 West/Jordan/Crabtree Notes

<< I looked at the video of after school when E [redacted] claimed that M [redacted] said something to her at her locker after school....I can find no evidence of M [redacted] being at her locker; E [redacted] has journalism last period on 2nd floor while M [redacted] has PE in the gym....after school M [redacted] leaves the gym and goes down the north hall past the art room then out of the front doors (never went upstairs) while E [redacted] left Mrs. Brown's room went through the cafeteria and then down the health hallway to her locker on the second floor to her locker. E [redacted] later left the building, M [redacted] was never upstairs and left building minutes prior to her leaving... I can't place them in the same location/floor at the same time during the time E [redacted] said it happened. (copy of video is on my computer)>>

4-10-19- (E [redacted] ...about 2:50pm

- called b [redacted]'s father on cell at work. went to voicemail. left message to call me back to follow-up on b [redacted]'s issues at school
- finally connected with Mr. Jordan
- talked to him about my check-ins with E [redacted]
- Shared with him about her claim that E [redacted] said that M [redacted] approached her after school by her locker...I told dad I couldn't place them in the same place at the same time when she said it happened.....Dad said he didn't think she would be making it up and then went on to talk about other concerns he had

April 11- (M [redacted]) approx 820am

met with m [redacted] again today. he said everything going well. no issues with anyone. No one is saying anything to him. once again e [redacted] hasn't said anything, b [redacted] was telling people that he was going to be out 2 weeks to a month...b [redacted] never said anything to him directly, he never said anything to her directly.

April 11- (M [redacted] I) approx 10am

called mom to check in. i let her know that i met with m [redacted] on tuesday and thursday to see how things are going. she did say that m [redacted] went home on Monday and said that b [redacted] was telling people that he was supposed to be suspended for 10 days and go to the DH and go to a sexual predator class. mom inquired about if b [redacted] was reprimanded for the lie regarding the phone being passed to her with the pic already loaded on the phone when she really unlocked the pic app and found the pic herself... [redacted]

April 17- (E [redacted]) approx 11am

- all good
- no issues
- no one saying anything

2019 West/Jordan/Crabtree Notes

- called parent to update

April 17 (E [REDACTED]) approx 11am

- nothing new with m [REDACTED]
- no issues
- called dad to update

4-25-19 (check in with E [REDACTED]) approx 10am

- no issue
- everything has died down
- all good
- no issue with m [REDACTED]

April 25 (E [REDACTED]) approx 10am

- checked with E [REDACTED]
- no issues
- everything has died down
- no issues with M [REDACTED]
- all good

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

May 22 (E [REDACTED] allegation against M [REDACTED]) approx 745am

- Before E [REDACTED] came in the office...mom believes it happened in gym class 9th period before spring break, it came out when she was at the prosecutor's office earlier in the week
- Present....mom, dad, [REDACTED], E [REDACTED] and Mr. Carter
- E [REDACTED] didn't want dad in here while

2019 West/Jordan/Crabtree Notes

- this allegation happened when B [redacted] was in PE class 3rd quarter (before spring break)
- 9th period mr. demos asked b [redacted] to get a ball.
- B [redacted] went in the locker room around 202pm (shortly after the bell rang at 1:59pm)
- M [redacted] was in the boys locker room alone when b [redacted] entered
- M [redacted] was by the drinking fountain just standing there
- The volleyball cart was by the corner where the office/cage is
- B [redacted] walked up to the ball cart to get a ball
- M [redacted] walked over to B [redacted]
- then M [redacted] said "no questions should be asked" and he placed his hands on b [redacted] waste
- B [redacted] was facing M [redacted] - M [redacted] next put his forearm against b [redacted] stomach area
- m [redacted] pulled her leggings and placed his hand down her pants
- his hand was on top of her underwear
- b [redacted] kneed him in the crotch
- m [redacted] fell to the ground and b [redacted] ran out
- b [redacted] believes it was around march 13.....had to be a wednesday (c [redacted] wasn't in the gym in that day)
- why no c [redacted] stick out....b [redacted] said that if c [redacted] was there she would have gone in the locker room with her to get the ball
- when i got back in the gym k [redacted] asked are you ok...b [redacted] said that she didn't feel well.
- then b [redacted] went towards the girls lockerroom and didn't see m [redacted] leave.
- after the incident m [redacted] just went on like nothing happened while in classes and school together.

May 22 (M [redacted] approx 12:30pm

- mom and dad came in when m [redacted] was questioned by myself.... [redacted] was not there as they would like their attorney present when m [redacted] speaks to the PD.
- 3rd quarter m [redacted] was in current events (b [redacted] was in 3rd quarter in gym class)
- only time both M [redacted] and B [redacted] were was recently in same locker room together was when they putting away equipment in ELA class.... nothing was said between... J [redacted], T [redacted] W [redacted] a [redacted] s [redacted], a [redacted] k [redacted], n [redacted] d [redacted], a [redacted] was in there and saw nothing....5-20-19
- usually used the restroom when in mr schoenherr's class at the beginning... only 2 times during that class....didn't sign out but got teacher permission
- would take about 3mins to go to the restroom
- ever use the locker room restroom?...no,,,,,only used the restroom upstairs
- no one was in the restroom or hallway
- never put himself in a spot where just B [redacted] and M [redacted]
- m [redacted] has never said anything to b [redacted] since suspension

May 22 (K [redacted] W) approx 1:30pm

- knew B [redacted] was in a bad mood recently
- didn't see much going on in extra gym class
- Random kids come in to gym class..... just c [redacted] ...never seen m [redacted] in gym class
- Thursdays or Fridays would be the open gym type class

May 22 (Demos) approx 2:10pm

- only kid in there not in his class would be c [redacted] g [redacted]
- never seen m [redacted] w [redacted] in there
- friday is the "free day"

May 22 (Schoenherr) approx 2:20pm

- m [redacted] would ask to go to restroom 9th period....not often
- when he was using RR, he wouldn't take long
- doesn't remember much that stands out

PE class witnesses (May 23)...approx 9am

When asked if they remember seeing anyone in their 3rd quarter PE class that wasn't assigned to be in there....

- K [redacted] A [redacted] r- C [redacted] g [redacted] would stop by for random reason, no to m [redacted]
- A [redacted] B [redacted] - doesn't remember anyone other then C [redacted]
- S [redacted] C [redacted] - doesn't remember anyone
- K [redacted] C [redacted] r- doesn't remember anyone
- O [redacted] C [redacted] - doesn't remember anyone other then C [redacted]
- E [redacted] C [redacted] - doesn't remember anyone
- A [redacted] D [redacted] - doesn't remember anyone other then C [redacted]
- A [redacted] D [redacted] - doesn't remember anyone other then C [redacted]
- A [redacted] H [redacted] - c [redacted] walk through to get from choir to other class
- J [redacted] H [redacted] - doesn't remember anyone other then C [redacted]
- J [redacted] J [redacted] - c [redacted] once or twice
- J [redacted] L [redacted] - don't remember anyone
- S [redacted] L [redacted] - don't remember anyone, could have large number
- C [redacted] M [redacted] - don't remember anyone
- A [redacted] M [redacted] - doesn't remember anyone other then C [redacted]
- M [redacted] H [redacted] - c [redacted] g [redacted]
- C [redacted] N [redacted] - don't remember anyone
- E [redacted] P [redacted] - c [redacted] g [redacted] it came by twice, one time Lacrosse/demos classes combined
- B [redacted] R [redacted] - don't remember
- C [redacted] S [redacted] r- c [redacted] g [redacted] don't remember anyone else
- E [redacted] R [redacted] - c [redacted] g [redacted] usually towards the end
- T [redacted] W [redacted] - c [redacted] g [redacted] twice, lacrosse would send people to get equipment
- F [redacted] W [redacted] - only assigned students
- N [redacted] Z [redacted] - c [redacted] g [redacted] thats all he remembers

[redacted]

[redacted]

[redacted]

M [redacted] (May 23)...approx 1pm

- never in the gym 3rd quarter....100% not go in the gym when i wasn't supposed to be there

2019 West/Jordan/Crabtree Notes

- never been in same place with b [redacted] solo
- never touched her ever..... high five or fist bump long before when they were friends
- up until march they were casual friends

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[REDACTED]
[REDACTED]
[REDACTED]

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[REDACTED]
[REDACTED]
[REDACTED]

May 28- (M) [REDACTED] 745am

mom asked that I call her.

called mom at 745am

mom and dad were on the phone and mom said that M [REDACTED] was in the DH for the offenses from back in march/april with sending pics on phone and exposing self in class. mom also informed me that there is a civil protection order against m [REDACTED] from the girls that he can't be within 35 feet of them anywhere, including school. We discussed his absences and time he has missed from school and then they told me that they were going to keep m [REDACTED] home from

school if/when he is released from the DH so there won't be any accusations against m [REDACTED] at school... I told them that I would relay that to secretary so she knows where m [REDACTED] is for attendance reasons.

5-28-19 (E [REDACTED])....1040am

- called mom at work around 1040am
- checked to see if things were going ok for E [REDACTED] over the weekend and if she felt comfortable being here at school.....she said yes.
- mom said that b [REDACTED] texted her that "he" wasn't at school and then mom said that E [REDACTED] will be fine as long as he isn't at school

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6-13-19 (Cheryl Goodrum)

-Cheryl called my cell phone and wanted to know if there was a time when her, her investigator, E [REDACTED] and parents and Detective Jacobs could come to the school to get a layout of the building. I told her that they gym would be in use from 9am-2pm Mon-Thur the next two weeks but she is more than welcome to come. She said that she would let me know....it would be in the next week or two.

6-19-19 (Cheryl Goodrum)

-I called Cheryl's office to see if she was still planning on coming to the school. She wasn't available to speak so I had to leave a voicemail. In the message I told to her that I was going to be out of the office on Friday, June 21, and also Monday, June 24, but if those were dates that worked for her to just let me know as I am just around the corner and would be able to meet her/them here without any issues.

7-23-19 (Cheryl Goodrum)

- Cheryl called my cell phone at approximately 9:45am. I answered the call on my watch phone and asked her to call my office line, she did. Cheryl called my office line. She asked if I was available on Friday morning (July 26) to do a walk through at the school with her and the Jordans. I didn't ask where, but I am assuming the walk through will be of the locker room where the alleged alligation from E [REDACTED] against M [REDACTED] occurred. I told Cheryl that my calendar was open and I am available. She said she needed to confirm day/time with the Jordans. I told her to call my cell phone when she knew the time for sure.

7-25-19 (Goodrum and Jordan) 8am

-Cheryl, E [REDACTED], Detective Jacobs and myself met to go to the locker room in the school. Cheryl wanted to get a lay out of the space. We visited the locker room, upstairs by Schoenherr's room and the restroom by Schoenherr's room. Most of the conversation with between Cheryl and E [REDACTED] regarding where things happened in the locker room.

8-6-19 (Goodrum) 8:44am

-Cheryl called me today. She thanked me for allowing them to take a walkthrough the other day with E█. Cheryl asked how she could get in touch with Mr. Schoenherr and Mr. Demos; I gave her both of their cell phone numbers.

HURON POLICE

417 MAIN ST HURON, OHIO 419-433-4114

Incident Number

20-190627

Incident / Offense Report

Offense	Method Received T	Time Received 05/21/2019 11:54:00	Time Dispatched 05/21/2019 11:54:00	Time Arrived 11:54:00	Time Cleared: 05/28/2019 12:30:00
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Report Date / Time	Incident Occurred From	Incident Occured To
Date Time	Date Time	Date Time
Tuesday 05/28/2019 14:27:13	Tuesday 05/21/2019 12:30:00	

Location of the Incident (Street #, Street, Apt. #, City, State, Zip)

325 OHIO ST HURON OH 44839

Zone

NW

Persons Involved:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Property:

Amount:

Type:

Units: Officers:

1st: [REDACTED]
2nd:
3rd:
4th:
5th:

Photos:

Codes:

Descriptions:

OFFENSES

[REDACTED] [REDACTED]

[REDACTED]

Weapons Used:
NONE

Trade Marks:

Hate Bias

Entry:

Location Type:
School (not College)

Refer to Arrest:

Incident #:

Tow#:

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Case Status:

Cleared Date: 05/28/2019

[REDACTED] [REDACTED]

Narrative: 20-190627 Page: 1

Report of female student being touched inappropriately by another student.

Reviewing Supervisor:

Bureau Supervisor:

Officer:

[REDACTED]

On this date I was contacted by Erie County Juvenile Prosecutor Cheryl Goodrum. During our conversation Prosecutor Goodrum advised [REDACTED] (E [REDACTED]) [REDACTED] disclosed M [REDACTED] W [REDACTED] had cornered her in the locker room area at McCormick Junior High. She continued that E [REDACTED] told her that M [REDACTED] pushed her up against a locker and put his hand down her pants and touched her vagina over top her underwear. Prosecutor Goodrum advised this was to have happened sometime around spring break. I advised Prosecutor Goodrum I would begin investigating the matter and that I would inform her of my findings.

I then responded to McCormick Junior High and met with Principal Carter. I requested he check for how far back the schools security cameras would save. After checking, Principal Carter advised they would only go back two weeks. Due to this allegation happening near the end of March, no camera footage was able to be obtained. Principal Carter and I set up to begin interviewing person's involved on 05/22/19.

On 5/22/19 I contacted Michelle Jordan over the phone and advised her I would be looking into her daughter's, E [REDACTED], allegations. I asked if she would be available to meet with myself and Principal Carter at the junior high, so we could speak with E [REDACTED]. Ms. Jordan advised she would be able to meet and a time was set up for 10:15 hrs.

At 10:15 hrs. I arrived at the junior high and met with Principal Carter and Mr. and Mrs. Jordan. We spoke first about the allegations and then called E [REDACTED] down to the office. Mrs. Jordan was present during the interview with Mr. Carter and myself.

I asked E [REDACTED] to tell me what happened. She advised she was in ninth period Get Moving class with Mr. Demos. She advised they were in the gym and at the beginning of class she asked Mr. Demos if she could get a volleyball out of the boys locker room. It should be noted this class does not change clothes and therefore nobody would be changing in the locker room. Further this is where equipment is stored. E [REDACTED] advised Mr. Demos allowed her to get a volley ball, so she went into the locker room. She advised upon entering the locker room and walking to the bins holding the balls, she looked over and observed M [REDACTED] W [REDACTED] standing next to the drinking fountain, which is outside the bathrooms. E [REDACTED] was asked if M [REDACTED] followed her into the locker room, which she advised he was already in the locker room when she went in. E [REDACTED] advised M [REDACTED] then walked over to her and said "no questions should be asked". She advised he then pushed her up against the lockers by her hips and put his forearm into her stomach area. E [REDACTED] advised she and M [REDACTED] were face to face and M [REDACTED] pulled out her leggings and put his hand down her pants, but over top her underwear. She advised his hand was on top of her vagina. I asked E [REDACTED] if he did anything with his hand, which she advised he didn't. I asked E [REDACTED] what happened next, which she advised she then kneed him in the groin area and M [REDACTED] fell to the ground. She advised she then ran out of the locker room.

E [REDACTED] was asked if she knew the date when this happened. She advised it happened on a Wednesday, because it was a free day in her class. She advised Wednesday was the day they have free days. She also advised she thought it was the week before she reported M [REDACTED] for sending Snapchat photos to her of his penis (CR # 20190309). [REDACTED]

E [REDACTED] was then asked what she did after she ran out of the locker room. She advised K [REDACTED] W [REDACTED] asked her what was wrong, because she looked upset. She advised she told K [REDACTED] that she just didn't feel good. I asked E [REDACTED] if she saw M [REDACTED] leave the gym, which she advised she never saw him leave. She advised after getting out of the locker room she went to the other side of the gym. The interview was then concluded and E [REDACTED] was sent back to class.

Principal Carter then called K [REDACTED] W [REDACTED]s down to speak with us. K [REDACTED] was advised we were looking into an incident that happened during her Get Moving class. I asked K [REDACTED] if she ever remembered a time where she spoke with E [REDACTED] after seeing E [REDACTED] look sad or upset. K [REDACTED] advised she didn't remember ever

By: [REDACTED]

Date: 05/21/2019 Time: 14:53:1 No. 001 Page #: 2

Reviewing Supervisor: _____

Date: _____

Investigative Report

Title / Subject: [REDACTED]

having a conversation with E [REDACTED] about her being or looking sad or upset. K [REDACTED] was then asked if she ever observed M [REDACTED] W [REDACTED] come into or leave the class at any time. K [REDACTED] again advised she doesn't remember ever seeing M [REDACTED] come into the gym during their class. K [REDACTED] was then asked what day they had free day in that class, which she advised it was either Thursday or Friday and it depended on how the class behaved. K [REDACTED] was then sent back to Class.

Mr. Demos was then called down to speak with Mr. Carter and myself. Mr. Demos was the teacher in the Get moving class that E [REDACTED] was in. Mr. Demos was asked if he ever saw M [REDACTED] W [REDACTED] come in or leave his class. Mr. Demos advised he did not remember ever seeing M [REDACTED] in the gym. He advised the only student that would ever come in the gym during his class was C [REDACTED] G [REDACTED]. Mr. Demos was asked what day he did open gym, which he advised Friday's was his normal open gym day.

Mr. Schoenherr was called down to the Office. Mr. Schoenherr was M [REDACTED]'s teacher during 9th period. Mr. Schoenherr was asked about M [REDACTED] leaving his class room. Mr. Schoenherr advised he didn't remember M [REDACTED] leaving his class often or at least it wasn't to the point that it was a problem. He advised he also never remembered M [REDACTED] being out for an extended period of time where it was obvious he was gone for a long time.

Due to the end of the school day no other students were talked to on this day.

By: [REDACTED]

Date: 05/21/2019 Time: 14:53:1 No. 001 Page #: 3

Reviewing Supervisor: [REDACTED]

Date: [REDACTED]

HURON POLICE

Incident Number

Investigative Report

Title / Subject: [REDACTED]

20-190627

On this date I responded back to McCormick Junior high to speak with students that were in B [REDACTED]'s Get Moving class. Principal Carter provided a class list and we went down the list of students in the class. [REDACTED]

[REDACTED] All students were asked if they remembered seeing anyone come into the gym that didn't belong. They were explained that it could have been at any point during class. below are each students name and what they remembered seeing.

K [REDACTED] A [REDACTED] - remembered seeing C [REDACTED] G [REDACTED] come into the class, but no one else.

A [REDACTED] B [REDACTED] - C [REDACTED] G [REDACTED] was the only person she ever saw come in the class that didn't belong.

S [REDACTED] C [REDACTED] - didn't remember anyone being in the class that shouldn't be there.

K [REDACTED] C [REDACTED] - didn't remember seeing anyone in class that shouldn't be there.

O [REDACTED] C [REDACTED] - C [REDACTED] G [REDACTED] would come in at beginning of class, she never saw anyone else.

E [REDACTED] C [REDACTED] - didn't remember seeing anyone come into the class.

A [REDACTED] D [REDACTED] - C [REDACTED] G [REDACTED] would stop in, but she never saw anyone else.

Ay [REDACTED] D [REDACTED] C [REDACTED] G [REDACTED] would walk through, but never saw anyone else.

A [REDACTED] H [REDACTED] - C [REDACTED] would come through to go to his next class, never saw anyone else.

J [REDACTED] H [REDACTED] - C [REDACTED] G [REDACTED] would come in to class, but never saw anyone else.

J [REDACTED] J [REDACTED] - C [REDACTED] G [REDACTED] would walk through, but never saw anyone else.

J [REDACTED] L [REDACTED] - didn't remember seeing anyone come into the class.

S [REDACTED] L [REDACTED] didn't remember seeing anyone, due to large class size.

C [REDACTED] M [REDACTED] - didn't remember seeing anyone come into the class.

A [REDACTED] M [REDACTED] - C [REDACTED] G [REDACTED] would walk through, but doesn't remember seeing anyone else.

M [REDACTED] H [REDACTED] - C [REDACTED] G [REDACTED] would come in, but didn't remember seeing anyone else.

C [REDACTED] N [REDACTED] - didn't remember seeing anyone come into class.

E [REDACTED] P [REDACTED] - C [REDACTED] G [REDACTED] came in twice, didn't remember seeing anyone else.

E [REDACTED] R [REDACTED] - didn't remember seeing anyone come into the class.

By: [REDACTED]

Date: 05/22/2019 Time: 15:00:0 No. 002 Page #: 1

Reviewing Supervisor: [REDACTED]

Date: [REDACTED]

HURON POLICE

Incident Number

Investigative Report

Title / Subject: [REDACTED]

20-190627

C [REDACTED] S [REDACTED] - C [REDACTED] G [REDACTED] came in, but didn't remember seeing anyone else.

E [REDACTED] R [REDACTED] - O [REDACTED] G [REDACTED] would come in toward the end of class, didn't remember seeing anyone else.

T [REDACTED] W [REDACTED] - O [REDACTED] G [REDACTED] would come in, but doesn't remember seeing anyone else.

F [REDACTED] W [REDACTED] - did remember seeing anyone that didn't belong.

N [REDACTED] Z [REDACTED] - O [REDACTED] G [REDACTED] came in once, didn't remember seeing anyone else.

[REDACTED]

By: [REDACTED]

Date: 05/22/2019 Time: 15:00:0 No. 002 Page #: 2

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

Investigative Report

Title / Subject: [REDACTED]

20-190627

On this date I received a fax from Attorney Troy Wischart, regarding M [REDACTED] I W [REDACTED]. In looking at the fax, I found it was the results of a polygraph examination conducted by Forensic Psychophysiological, Larry J. Silcox. The date of the examination was documented as July 1st, 2019. The following is the list of questions asked to M [REDACTED]. His answer is listed afterwards.

1. In the locker room at school, did you push [REDACTED] against a locker? Ans. No
2. At school, in the locker room, did you touch [REDACTED] in a sexual way? Ans. No
3. At school, in the locker room, did you put your hand inside [REDACTED]'s pants? Ans. No
4. At school, in the locker room, did you touch [REDACTED]'s vagina? Ans. No

The report then states that as a result of testing, the examiner found no specific reactions indicative of deception appeared on the subjects' charts, when questions related to the investigation were asked during the examination.

By: [REDACTED]

Date: 07/10/2019 Time: 13:37:1 No. 003 Page #: 1

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

20-190627

Investigative Report

Title / Subject: CELL PHONE

Prosecutor Goodrum requested I have Erie County Sheriffs Office re exam M [REDACTED]'s cell phone. I contacted Jen West and requested all passwords for M [REDACTED] phone, which she agreed to give me. She was also advised I would need her to sign a consent to search form. Mrs. West agreed and a later responded to the police department to sign the consent to search form and turn over all passwords,

M [REDACTED]'s phone was turned over to [REDACTED] for the forensic dump of the phone. [REDACTED]
[REDACTED]
[REDACTED]

On this date I recieved the content of the phone analysis from M [REDACTED] phone. After reviewing all the content I was unable to locate anything of evidentiary value.
[REDACTED]
[REDACTED]
[REDACTED]

By: [REDACTED] [REDACTED]

Date: 08/29/2018 Time: 09:50:3 No. 004 Page #: 1

Reviewing Supervisor: _____

Date: _____

HURON POLICE

Incident Number

Investigative Report

Title / Subject: [REDACTED]

20-190627

Monday June 7, 2021:

I received a voice mail from the law office of attorney Leslie Murray requesting my email address so that a letter could be sent to me. I provided the information and shortly thereafter I received an email with the aforementioned letter. I also learned that an email was sent to the department's general inbox.

The letter indicated that [REDACTED] told her parents that "C [REDACTED] M [REDACTED] ([REDACTED]) [REDACTED] videotaped the incident in which she reported that she was sexually assaulted by M [REDACTED] W [REDACTED] in the boy's locker room at McCormick Junior High School. The parents reported this information to Leslie Murray, their attorney.

[REDACTED]

On the above listed date at about 11:00 a.m., I met with Mrs. [REDACTED] M [REDACTED] at her residence. We later joined by [REDACTED] C [REDACTED] I explained the situation to all of them. C [REDACTED] adamantly denied videotaping the incident and said that he was not near the boy's locker room at the time the incident was reported.

I sent this information to Leslie Murray via email.

Thursday June 10; 1400:

I talked to Chad Carter regarding this new information. The school has classroom attendance records that indicate [REDACTED] was in a classroom nowhere near the boys locker room on the day in question.

By: Chief Robert J Lippert [REDACTED]

Date: 06/09/2021 Time: 14:48:1 No. 005 Page #: 1

Reviewing Supervisor: _____

Date: _____

TRUTHGRAPH LTD

Larry J. Silcox ACP
Forensic Psychophysicologist

PO Box 998
Norwalk, OH 44857

419-668-0961 (voice/fax)
truthgraph@hotmail.com

July 1, 2019

[REDACTED]

Re.: Polygraph examination of M [REDACTED] W [REDACTED]
Date of examination: July 1, 2019
Report #: 19-206-001

Pretest information: Sexual Activity

During the pretest interview M [REDACTED] W [REDACTED] stated the following: he denied pushing [REDACTED] against a locker in the locker room at school. He denied putting his hand inside [REDACTED] pants. He denied touching [REDACTED] s vagina; he further denied touching [REDACTED] in a sexual way.

The following is a list of the relevant questions asked and M [REDACTED] W [REDACTED]'s answers during the polygraph examination.

1. In the locker room at school, did you push [REDACTED] against a locker? Ans. No
2. At school, in the locker room, did you touch [REDACTED] in a sexual way? Ans. No
3. At school, in the locker room, did you put your hand inside [REDACTED] s pants? Ans. No
4. At school, in the locker room, did you touch [REDACTED] s vagina? Ans. No

The person named above was examined on the polygraph; an instrument that records on continuous charts, the psychological reactions to questions or other stimuli used during the tests. The examiner formed an opinion of truth or deception from analyzing the nature of the recorded reactions resulting from questions of relevancy compared with irrelevant questions, controls or other techniques.

As a result of testing this person, the examiner found;

No specific reactions indicative of deception appeared on the subjects' charts when questions related to the investigation were asked during the examination. It is to be considered, therefore, that the subject told the substantial truth during the examination.



Larry J. Silcox, ACP
Forensic Psychophysicologist

July 12, 2019

To Whom It May Concern,

Regarding an incident that occurred on July 11, 2019 at Huron Memorial Stadium.

Head Football Coach Sam Hohler arrived at the Stadium at 5:20pm to prep for football camp which started at 6pm. I got equipment out and supervised players as they arrived.

Just before practice at 5:50pm a young man approached me at the gate by the home stadium bleachers. Unfortunately, I did not recognize him at first. He seemed agitated. Our exchange was the following:

"Coach, can I have a word with you?"

"Yes, what do you need?" and we stepped away from the players and coaches a bit.

"Some of the players on your team are saying derogatory things about my sister."

"Can you tell me what happened?"

"My sister rode her bike by the stadium and some of the players called her a slut and a whore."

I had been at the Stadium since 5:20pm and did not witness this behavior from anyone.

I asked, "Who said that to your sister and when?"

The person pointed his finger at me and said, "M [REDACTED] W [REDACTED] and his classmates about 10 minutes ago." He appeared to get more upset as the conversation continued and I feared he wanted to fight someone.

The freshman team did not have camp or conditioning that day. M [REDACTED] W [REDACTED] was not present at the Stadium at all that day. I was working all day and never saw him at the Stadium. Obviously, the information this person got was incorrect. It appeared to me that he came by to confront some football players and/or coaches for his sister.

I asked the person his name and he replied "Jake Jordan." I then recognized that I had taught Jake a few years ago and who he was. I also realized that there has been an ongoing situation involving Jake's family and the West family.

I responded to Jake, "M [redacted] W [redacted] has not been here at all today so it could not have been him." Also, the freshman did not practice today so it could not be any of his classmates either."

Jake responded, "I know you run a somewhat decent program and thought I would come up here to resolve this." He said this in a condescending manner and a tone which I did not like. I felt he was baiting me into a confrontation.

I began to get angry due to what Jake was after and responded, "I am sorry for your sister and the situation your family is in, but don't come up here looking for a confrontation. These kids had nothing to do with that. This football program has nothing to do with that. If you have a problem, go talk to the administration over at the school. Don't drag us into that situation. If you're going to challenge these players or me on that, you can get the hell out of here!"

Jake immediately got on his cellphone and began walking toward his car.

I advised my coaches to get practice started without me and followed him out there. My goal was to calm down a bit, resolve the situation, and make sure things ended in a more positive fashion.

I ran out to Jake in the parking lot and asked him to put his phone away. He eventually did.

I again reiterated to him in a calmer voice, "This football program has nothing to do with that war between your families. Please do not bring that stuff up here anymore. If you have a problem with any of these kids, take it to the administration at the high school and let them handle it."

Jake agreed with me. I shook his hand and he left.

Why would a 20 year-old kid show up at football practice to speak with a coach about this? I believe Jake was given bad information or lied to and he came by the Stadium looking for a fight or to get someone in trouble. He had a preconceived notion that somehow Huron Tiger Football was involved in his sister's situation and he wanted to take care of it. The accusations he made were totally unfounded. Why wouldn't Jake's parents contact me or an administrator first? Why is the older brother of this girl doing this? Was Jake sent up to the Stadium to start trouble and bring the football program into this mess? I am totally confused as to why this even had to happen in the first place. I personally have nothing at stake in this situation and neither does our football program.

Unfortunately, I had to deal with issues surrounding Mi [REDACTED] W [REDACTED] on two separate occasions on July 11, 2019. A cheerleader accused him of being on the field at a football camp in the morning and violating a protection order. She called her mom crying and told the cheerleading advisor. I assured them that Mi [REDACTED] was not there. Then I had to deal with Jake Jordan being upset that evening and accusing Mi [REDACTED] of saying things about his sister. Again, Mi [REDACTED] W [REDACTED] did not set foot at Huron Memorial Stadium on July 11, 2019.

This is an unfortunate situation that has affected many good families in our community. This needs to be resolved by the court and school system, not with social media or by making wild accusations about a football program that has nothing to do with this incident. Had one of our players actually yelled something inappropriate at a girl on their bike, I would have immediately handled the situation. But when somebody makes false allegations against kids on our team, I will defend them accordingly.

Sincerely,

Sam Hohler
Science Teacher
Head Football Coach
Huron Tigers

"Respect All, Fear None 2019"