

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

A.S.)	
)	
)	
Plaintiff,)	
)	
vs.)	
)	
THE BOARD OF SCHOOL)	CAUSE NO. 1:15-cv-01861
COMMISSIONERS OF THE CITY OF)	
INDIANAPOLIS d/b/a/ INDIANAPOLIS)	
PUBLIC SCHOOLS; LINDA GAGYI, in)	
her individual and official capacity;)	
JACQUELINE GREENWOOD, in her)	
individual and official capacity; and)	
COREY GREENWOOD, in his individual)	
capacity,)	
)	
Defendants.)	
)	

COMPLAINT FOR DAMAGES AND JURY TRIAL DEMAND

Come now the Plaintiff, A.S., and for her *Complaint for Damages and Jury Trial Demand* against Defendants, The Board of School Commissioners of the City of Indianapolis d/b/a Indianapolis Public Schools (hereinafter “IPS”); Linda Gagyi, in her individual and official capacity (hereinafter “GAGYI”); Jacqueline Greenwood, in her individual and official capacity (hereinafter “DR. GREENWOOD”); and Corey Greenwood, in his individual capacity (hereinafter “GREENWOOD”) states as follows:

I. Nature of Complaint

1. A.S. is a victim of GREENWOOD, who has served as an Assistant Principal, Dean of Students, Athletic Director, and Licensed Teacher for IPS. In 2013, GREENWOOD plead guilty

to Child Seduction for performing sexual intercourse and/or oral sex on A.S., who was at all relevant times a minor child, 16 years old, and a student at George Washington High School.

2. A.S. seeks damages for the harm wrought by the abuse by GREENWOOD, as well for the IPS' unconscionable failure to take reasonable steps to prevent it. IPS had actual knowledge of GREENWOOD's abuses, yet not only failed to address them, but actively endeavored to conceal them, thereby enabling GREENWOOD to continue his predatory sexual behavior.

II. Jurisdiction and Venue

3. This action is brought pursuant to 42 U.S.C. § 1983 and Title IX of the Education Amendments of 1972, 20 U.S.C. §1681, *et seq.* (hereinafter "Title IX"). This Court has original subject matter jurisdiction of the federal questions presented, pursuant to 28 U.S.C. §1331. Plaintiff further invokes the supplemental jurisdiction of this Court to hear and decide Plaintiff's claims arising under state law.

4. Venue is proper in this Court and Division, pursuant to 28 U.S.C § 1391, in that the events giving rise to this action occurred in the County of Marion, State of Indiana, which is located in the Indianapolis Division of the Southern District of Indiana.

III. Parties

5. At all times relevant herein, A.S. was a minor child and a resident and citizen of the City of Indianapolis, County of Marion, and State of Indiana.

6. At all times relevant herein, A.S., was a female student enrolled at George Washington High School which is a public high school in the IPS school district.

7. At all times mentioned herein, the Defendant, The Board of School Commissioners of the City of Indianapolis, was the corporate name as well as the governing body of a public school

corporation created by the State of Indiana pursuant to Indiana Code § 20-25-3 to govern, manage and control various public schools, including George Washington High School, and commonly known as the Indianapolis Public Schools operating within the State of Indiana, County of Marion, City of Indianapolis.

8. At all relevant times herein, Defendant, IPS, was a recipient of federal funds and subject to the terms and conditions of Title IX.

9. At the time GREENWOOD sexually abused Plaintiff as described herein, Defendant, GAGYI, was a teacher licensed in the State of Indiana, and was acting under color of state law and as an agent and employee of IPS, and was Principal of George Washington High School and the direct supervisor of GREENWOOD.

10. At all relevant times herein, Defendant, DR. GREENWOOD, was a teacher and administrator licensed in the State of Indiana, and was acting under color of state law and as an agent and employee of IPS.

11. DR. GREENWOOD began teaching in the Indianapolis Public Schools in 1967 and for 43 years served as a teacher, department head and vice principal at various IPS junior high and high schools. In 1987, DR. GREENWOOD became the first female high school principal in the history of IPS when she was appointed the principal of Arlington High School. For these achievements, DR. GREENWOOD received national recognition.

12. DR. GREENWOOD is the mother of GREENWOOD.

13. In 2007, IPS promoted DR. GREENWOOD to Director of Secondary Education, a position which placed her in charge of her son, his colleagues, and all those, notwithstanding the Superintendent, who might be in a position to discipline him.

14. At all times relevant herein, Defendant, GREENWOOD, was a teacher licensed in the State of Indiana, and was acting under color of state law and as an agent and employee of IPS, and was Assistant Principal, Dean of Students and Athletic Director of George Washington High School.

IV. Facts

15. At all relevant times herein, the acts and/or omissions of IPS employees recounted herein were performed and/or omitted by and through IPS' agents, employees, servants and/or representatives acting within the course and scope of their employment and under the color of law.

16. During the 2011-2012 school year, A.S. was a 10th grade student at George Washington High School (hereinafter "GWHS").

17. By any reasonable measure, A.S. was a successful student.

18. A.S. was a 21st Century Scholar, lettered in three (3) varsity sports, and was the only GWHS student nominated (and thereafter selected) as an IPS Athlete of Character. A.S. was selected because she exemplified the IPS Core Values of Excellence, Scholarship, Respect, and Courage while demonstrating what IPS identifies as the 6 Pillars of Character (Caring, Citizenship, Fairness, Respect, Responsibility, and Trustworthiness).

19. As of 2013, 100% of Indiana's 21st Century Scholars attended college with 85% attending Indiana Public Colleges, 12% attending Indiana Private Colleges, and 3% attending out-of-state colleges thanks to a generous college scholarship and support services which continue throughout their university matriculation.

20. A.S.'s success on the field and in the classroom was accomplished despite a difficult home life. A.S. never knew her biological father, and her mother suffered from drug addiction, mental health issues, and a series of poor relationships.

21. IPS teachers and officials, including but not limited to GREENWOOD, were aware of A.S.'s home situation and the complicated circumstances she faced outside of school hours.

GREENWOOD'S HISTORY OF MISCONDUCT AT IPS

22. Upon information and belief, GREENWOOD was initially hired by the IPS as a special education teacher at Frederick Douglas Middle School, School 19.

23. Upon information and belief, during his tenure at Fredrick Douglas Middle School, IPS learned that GREENWOOD was engaging in inappropriate sexual activity on school grounds with a fellow IPS employee who was married.

24. Instead of dismissing GREENWOOD, IPS reassigned and promoted him. Specifically, GREENWOOD was transferred to Emmerich Manual High School ("Manual HS") within the district.

25. In 2004, while employed by IPS at Manual HS, GREENWOOD was again caught engaging in inappropriate sexual activity on school grounds—this time—with a student.

26. Detective Bridget A. Lewis, of IPS Police Investigations, was assigned to investigate allegations of sexual misconduct towards a female student, inappropriate extracurricular relations, and general violations of the IPS' conduct policy by GREENWOOD.

27. The 2004 investigation of GREENWOOD's actions at Manual HS concluded with a report to the IPS's Chief of Human Resources, Carole Craig, on June 7, 2004.

28. The 2004 IPS Manual HS investigation of GREENWOOD uncovered, among other things, that:

- A. GREENWOOD befriended a minor female student, at Manual HS, during her freshman year;
- B. GREENWOOD communicated by cell phone with the female student outside of school hours;
- C. On birthdays and Christmas, GREENWOOD bought the female student gift cards and items of clothing.
- D. On one particular day, May 20, 2004, GREENWOOD allowed the female student to skip five (5) consecutive class periods to allegedly sit in his room and talk;
- E. On May 20, 2004 GREENWOOD discussed with the female student the possibility of having a romantic relationship with T.R. or her mother;
- F. On May 20, 2004, GREENWOOD made comments about the underwear the female student was wearing;
- G. On May 20, 2004, without permission, GREENWOOD, placed his hand inside of the female student's shirt and removed her bra strap;
- H. On May 20, 2004, GREENWOOD tongue kissed the female student while the two were inside of his office, alone, and with the door locked;
- I. GREENWOOD was administered a polygraph by a certified polygraph examiner, wherein GREENWOOD was questioned about the aforementioned incident involving the female student;
- J. The examiner concluded that GREENWOOD was not truthful when he denied the aforementioned sexual misconduct and other inappropriate behavior with female student.

29. GREENWOOD's efforts to befriend the female student included providing gifts, allowing her to skip classes, befriending her family members, apparently with the purpose of establishing an emotional connection so as to lower her inhibitions for sexual abuse. This process in the context of child sexual abuse is commonly referred to as "grooming."

30. The Chief of Human Resources at IPS was part of its "Core Leadership" and had the authority to institute corrective measures to protect students from future acts of abuse by GREENWOOD.

31. On and after June 7, 2004, numerous IPS officials, including but not limited to the Chief of Human Resources Carole Craig, IPS Police Chief Steve Garner, and DR. GREENWOOD, had knowledge that GREENWOOD had engaged in sexual misconduct with at least one female student, and that GREENWOOD engaged in other inappropriate conduct apparently intended to "groom" this female student and other students; yet IPS failed to take action to prevent such misconduct from happening again.

32. Although IPS conducted an investigation of the incident involving the female student and GREENWOOD which produced evidence corroborating GREENWOOD'S misconduct—and IPS' certain knowledge that GREENWOOD lied when questioned by IPS police—IPS did not submit the information to the Indiana Department of Child Services or the Indianapolis Metropolitan Police Department.

33. At all times relevant to this action, and until she left IPS in 2014 after her contract was not renewed, DR. GREENWOOD exhibited enormous influence within the IPS school district.

34. Upon information and belief, DR. GREENWOOD influenced the investigations into her son's inappropriate behavior at Fredrick Douglas Middle School and Manual HS.

35. In conjunction with other IPS school officials, DR. GREENWOOD secured a transfer and promotion for her son after the 2004 IPS Manual HS investigation.

36. Notwithstanding the fact that IPS had certain knowledge of GREENWOOD's prior instances of sexual misconduct at Fredrick Douglas MS and Manual HS, IPS transferred GREENWOOD to GWHS, assigned GREENWOOD a coveted position as head coach of the GWHS basketball team, and promoted GREENWOOD to Dean of Students at GWHS.

37. Traditionally, Dean of Students is an administrative position requiring the educator to have completed a Master's Degree in Education, a qualification which GREENWOOD did not have.

38. Upon information and belief, and notwithstanding the fact that IPS had knowledge of GREENWOOD's prior instances of sexual misconduct, IPS provided a positive leadership evaluation, references and recommendations, and otherwise supported GREENWOOD's admission into the prestigious Experiential Program for Preparing School Principals (EPPSP), a graduate degree program at Butler University.

39. Upon information and belief, IPS recommended GREENWOOD to Butler's EPPSP program as an educator who, among other things: was innovative; sensitive to others; accepts responsibility; shows tact; and could be trusted with leadership.

40. In 2007, IPS promoted DR. GREENWOOD to Director of Secondary Education, a position which placed her in charge of her son, his colleagues, and all those, notwithstanding the Superintendent, who might be in a position to discipline him.

41. Upon information and belief, in 2007 Dr. GREENWOOD was aware of her son's prior instances of sexual misconduct at Fredrick Douglas MS and Manual HS.

42. Notwithstanding the fact that high ranking IPS officials had knowledge of GREENWOOD's prior instances of sexual misconduct at Fredrick Douglas MS and Manual HS, IPS again promoted GREENWOOD to the position of Vice Principal and Athletic Director at GWHS where he stayed until his suspension in 2012, when his sexual assault of A.S. was disclosed by another female student.

43. Upon information and belief, and notwithstanding the fact that IPS had knowledge of GREENWOOD's prior instances of sexual misconduct, after transferring GREENWOOD to GWHS, IPS named GREENWOOD a "Top Educator" within the district.

SEXUAL ABUSE OF A.S. BY GREENWOOD

44. During A.S.'s freshman and sophomore years at GWHS, GREENWOOD began grooming A.S. to lower her inhibitions for sexual abuse.

45. Specifically, GREENWOOD's grooming activities included but were not limited to: (i) allowing A.S. to skip classes and sit in his office for long periods of time during the school day; (ii) buying shoes and other gifts for A.S.; (iii) communicating with A.S. by text and cell phone outside of school hours; (iv) picking her up and dropping her off at work; (v) nominating her for awards and special recognition; and (vi) allowing her into the building after school hours.

46. On March 24, 2012, GREENWOOD picked up A.S. from her work at the Indianapolis Zoo, and drove her to a fellow IPS employee's apartment in Indianapolis, Indiana.

47. Once inside his colleague's apartment, on March 24, 2012, GREENWOOD engaged in sexual intercourse and deviate sexual conduct with A.S., who was then a minor child (age 16) and a student at GWHS.

48. Over the next two weeks, between March 24, 2012, and April 9, 2012, GREENWOOD took A.S. to the IPS employee's apartment a total of three (3) more times. On

each trip, GREENWOOD engaged in sexual intercourse and/or deviate sexual conduct with A.S., who was at all times a minor child and a student at GWHS.

49. On March 28, 2012, GREENWOOD picked up A.S. for a track event which was to take place at GWHS.

50. Instead of taking her to the track, GREENWOOD took A.S. to his office inside GWHS where he engaged in sexual intercourse with A.S. on his desk.

51. GREENWOOD convinced A.S. to allow him to perform intercourse without a condom despite keeping a cache of condoms inside his school desk drawer.

52. Upon ejaculation, GREENWOOD wiped the semen from his penis on a towel belonging to the school.

53. On April 6, 2012, a report was made to IPS that GREENWOOD had been sexually assaulting a female student.

54. Detective Laura Smith of the Indianapolis Metropolitan Police Department was assigned to investigate the case.

55. Detective Smith's investigation of GREENWOOD revealed, among other things, the following information:

- A. Between 2008 and 2012, GREENWOOD engaged in multiple romantic and sexual relationships with teachers at GWHS, including IPS teacher M.E., who provided GREENWOOD access to the apartment where he sexually assaulted A.S.; and IPS teacher M.J., who conspired with GREENWOOD to cover up the allegations by encouraging A.S. to lie and destroy evidence.
- B. GREENWOOD was known by students and teachers at GWHS as someone who showed a disquieting interest in female students;

- C. GREENWOOD would engage in numerous inappropriate text conversations with students which would occur, at times, in the middle of the night;
- D. GREENWOOD, on at least one occasion, procured a hotel room for three female students;
- E. GREENWOOD, on previous occasions, allowed students to live at home with him;
- F. GREENWOOD co-signed a lease for a GWHS student and became romantically involved with the student's roommate in 2008;
- G. GREENWOOD had, on at least one prior occasion while at GWHS, engaged in communications with another female student, wherein he solicited the female student to send nude pictures to his cell phone and meet him at a motel after school hours¹;
- H. Students, on at least one occasion, informed an IPS teacher about suspected sexual misconduct by GREENWOOD, and were told by the teacher there was nothing she could do about it;
- I. A parent, on at least one occasion informed an IPS teacher about suspected sexual misconduct by GREENWOOD, and was told by the teacher, she could not do anything about it;
- J. Instead of reporting child abuse, as was her legal obligation, this IPS teacher informed GREENWOOD about the allegations which allowed him to begin deleting information from his cell phone and encouraging A.S., and perhaps other students, to do the same;

¹ After witnessing how A.S. was treated by the IPS, students, and the community after disclosure of Greenwood's sexual abuse, the female student's parent made the decision not to allow investigators to speak with her daughter about Greenwood's sexual misconduct.

- K. After the allegations regarding the sexual abuse by GREENWOOD against A.S. became known to the school, A.S. was directed to GREENWOOD's IPS office where GREENWOOD met with A.S. and pressured her to lie about the sexual assaults and pornographic text messages exchanged;
- L. A teacher witnessed the meeting between GREENWOOD and A.S. after the abuse had been disclosed but did not mention the encounter to the school or authorities;
- M. M.J., a teacher at GWHS, repeatedly contacted A.S. to encourage her to lie and destroy evidence after GREENWOOD was suspended;
- N. M.J. and GREENWOOD told A.S. that if she ever told the truth about the sexual abuse, GREENWOOD "would lose custody his child forever;"
- O. After GREENWOOD's suspension, GREENWOOD and M.J. solicited the help of GWHS students to contact A.S. in an effort to cover up the sexual abuse;
- P. The Indianapolis-Marion County Forensic Services Agency ("Crime Lab") positively identified GREENWOOD's seminal fluid and A.S.'s DNA in mixtures found in GREENWOOD's office at GWHS on the aforementioned towel;
- Q. GREENWOOD sent multiple pictures of his genitalia to a minor child who was a student at GWHS;
- R. GREENWOOD solicited and received multiple pornographic pictures of A.S. while she was a minor child;
- S. Among the text message conversations uncovered, it was learned that GREENWOOD communicated to A.S. that he intended to videotape himself

having sexual intercourse with her during one of the crimes committed at his co-worker's apartment;

T. It was commonly known among students and staff at GWHS that GREENWOOD would allow A.S. and other female students to spend time in his office during the school day, communicate with female students outside of school hours, and purchase gifts for female students which were given outside of school hours.

56. Despite the direct and circumstantial evidence readily apparent to IPS teachers and administrators including his direct supervisor at GWHS, Defendant GAGYI, and notwithstanding the fact that IPS had knowledge of GREENWOOD's prior instances of sexual misconduct, no corrective action was taken to prevent GREENWOOD from inappropriately communicating with and/or interacting with minor students such as A.S. and otherwise grooming his victims for sexual abuse.

57. To the contrary, IPS created an environment wherein it was apparent that rules and boundaries did not apply to GREENWOOD.

58. On or about May 03, 2012, the State of Indiana filed an Affidavit of Probable Cause against IPS teacher M.J. alleging one (1) count of Obstruction of Justice, a Class D Felony, and one (1) count of Assisting a Criminal, a Class A Misdemeanor, in the Marion Superior Court.

59. The Marion Superior Court found probable cause and issued a warrant for the arrest of M.J.

60. On or about April 13, 2012, the State of Indiana filed an Affidavit of Probable Cause against GREENWOOD alleging five (5) counts of Child Seduction, Class D Felonies, and one (1) count of Dissemination of a Matter Harmful to a Minor, a Class D Felony, in the Marion Superior Court.

61. The Marion Superior Court found probable cause and issued a warrant for the arrest of GREENWOOD.

62. On or about April 19, 2013, GREENWOOD pled guilty and was convicted of Child Seduction for engaging in sexual intercourse A.S., while she was a minor child and student at IPS.

63. GREENWOOD served only fourteen (14) days in jail as a result of his conviction.

V. Claims

COUNT I - TITLE IX CLAIM AGAINST IPS

64. Plaintiff hereby repeats and alleges paragraphs one (1) through sixty-three (63) and incorporates the same as if fully set forth herein.

65. A.S. belonged to a protected group under Title IX.

66. As described herein, A.S. was subjected to sexual harassment and abuse because of her gender.

67. The harassment, sexual abuse, and its aftermath, were so pervasive that it altered the conditions of A.S.'s education.

68. Multiple IPS officials, including the Director of Secondary Education, the Chief of Human Resources, the IPS Police Chief, and the principal of GWHS, had actual knowledge of GREENWOOD's misconduct, but were deliberately indifferent to it.

69. Multiple IPS officials, including the Director of Secondary Education, the Chief of Human Resources, the IPS Police Chief, and the principal of GWHS, had actual knowledge of GREENWOOD's misconduct and had authority to institute corrective measures but failed to do so.

70. Multiple IPS officials, including the Director of Secondary Education, the Chief of Human Resources, the IPS Police Chief, and the principal of GWHS, had notice of GREENWOOD's misconduct, but allowed it to continue.

71. As a result of the aforementioned wrongful conduct, A.S. experienced extreme emotional distress, severe mental anguish, humiliation, depression, difficulty sleeping, underwent counseling and incurred expenses for the same, suffered the loss of academic and career opportunities, and suffered other injuries and damages, some of which are permanent in nature.

**COUNT II - 42 U.S.C. § 1983 CLAIMS AGAINST
GREENWOOD, IPS, GAGYI, AND DR. GREENWOOD**

72. Plaintiff hereby repeats and alleges paragraphs one (1) through seventy-one (71) and incorporates the same as if fully set forth herein.

73. GREENWOOD sexually abused, harassed, and otherwise discriminated against A.S. based on her gender and in violation of the A.S.'s right to equal protection and right to be free from unlawful seizure pursuant to the Fourth and Fourteenth Amendments to the United States Constitution.

74. At all relevant times herein, A.S. had a clearly established right to equal access to the benefits and privileges of a public education as well as a right to be free from unlawful bodily seizure and offensive sexual harassment and contact at school.

75. GREENWOOD'S differential treatment of A.S. and his unlawful seizure of her person were intentional, malicious, and showed a reckless indifference to her rights.

76. The differential treatment of A.S. described herein was not rationally related to any government interest.

77. Defendants GAGYI, DR. GREENWOOD and IPS also victimized A.S.

78. Defendants GAGYI and DR. GREENWOOD were supervisors of GREENWOOD and, along with other IPS officials as described herein, had actual knowledge of GREENWOOD'S sexual misconduct and facilitated, condoned, or turned a blind eye to it.

79. Defendant IPS, for its part, had a *de facto* unconstitutional policy and practice, as seen by the actions and inactions of the IPS Director of Secondary Education, IPS principals, and IPS teachers, all acting under the color of law, of ignoring GREENWOOD's inappropriate—and in some cases illegal— behavior with female students and faculty alike, conduct which violated Plaintiff's constitutional rights.

80. The *de facto* unconstitutional policy and practice described herein was also the result of a culture of rampant nepotism and cronyism within IPS.

81. Indeed, there is no rational reason why students were not protected from GREENWOOD after an internal investigation revealed that he not only had inappropriate sexual contact with a minor student, but lied about it during a polygraph examination.

82. GREENWOOD's subsequent promotion by IPS to a position for which he was not qualified is further evidence of the nepotism and cronyism which forms the basis of the *de facto* unconstitutional policy and practice that allowed A.S. and others to be victimized by GREENWOOD.

83. The misconduct described in this count was undertaken with malice, willfulness, and reckless disregard to A.S.'s rights, and the rights of others.

84. As a result of the aforementioned wrongful conduct, A.S. experienced extreme emotional distress, severe mental anguish, humiliation, depression, difficulty sleeping, underwent counseling and incurred expenses for the same, suffered the loss of academic and

career opportunities, and suffered other injuries and damages, some of which are permanent in nature.

COUNT III – NEGLIGENT HIRING, RETENTION AND SUPERVISION AGAINST IPS

85. Plaintiff hereby repeats and alleges paragraphs one (1) through eighty-four (84) and incorporates the same as if fully set forth herein.

86. At all relevant times herein, Defendant IPS had a duty not to hire employees whom IPS knew had a propensity toward committing unlawful acts against minor students.

87. At all relevant times herein, Defendant IPS had a duty to properly train and supervise its teachers and staff to be on the lookout for teachers, coaches, or administrators who have a propensity toward committing unlawful acts against minor students.

88. At all relevant times herein, Defendant IPS had a duty not to continue to employ teachers, coaches or administrators whom IPS knew had acted inappropriately with minor students and who demonstrated a propensity toward committing unlawful acts against minor students.

89. IPS breached its duties as described herein and said breach constitutes negligence.

90. IPS knew that GREENWOOD was a danger to A.S. and other minor female students, yet continued to not only employ him, but to promote him to positions which afforded greater access to his victims.

91. It was reasonably foreseeable to IPS that GREENWOOD would continue to groom minor female students, foster inappropriate relationships with minor female students, and eventually sexually assault minor female students such as A.S.

92. IPS negligently hired, supervised and retained GREENWOOD.

93. As a result of IPS' negligence, A.S. experienced extreme emotional distress, severe mental anguish, humiliation, depression, difficulty sleeping, underwent counseling and incurred expenses for the same, suffered the loss of academic and career opportunities, and suffered other injuries and damages, some of which are permanent in nature.

**COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
AGAINST GREENWOOD, DR. GREENWOOD AND IPS**

94. Plaintiff hereby repeats and alleges paragraphs one (1) through ninety-three (93) and incorporates the same as if fully set forth herein.

95. As described herein, Defendant GREENWOOD engaged in extreme and outrageous conduct which intentionally or recklessly caused A.S. severe emotional distress.

96. Likewise, by continuing to employ GREENWOOD and place him in a position to victimize other minor students, Defendants DR. GREENWOOD and IPS engaged in extreme and outrageous conduct which intentionally or recklessly caused A.S. severe emotional distress.

97. As a result of the aforementioned wrongful conduct, A.S. experienced extreme emotional distress, severe mental anguish, humiliation, depression, difficulty sleeping, underwent counseling and incurred expenses for the same, suffered the loss of academic and career opportunities, and suffered other injuries and damages, some of which are permanent in nature.

V. Relief Requested

98. Plaintiff, A.S., hereby seeks all relief available under the law, including compensatory damages, punitive damages, attorney fees and costs pursuing this action, trial by jury, and all other relief just and proper on the premises.

Respectfully submitted,

WAGNER REESE LLP & DENSBORN BLACHLY LLP

/s/ Stephen M. Wagner

Stephen M. Wagner, Attorney No. 18248-49

Attorney for Plaintiff

WAGNER REESE, LLP

11939 North Meridian Street

Carmel, Indiana 46032

Telephone: (317) 569-0000

Facsimile: (317) 569-8088

E-Mail: SWagner@wagnerreese.com

/s/ Eric D. Schmadeke

Eric D. Schmadeke, Attorney No. 27329-49

Attorney for Plaintiff

DENSBORN BLACHLY LLP

500 E. 96th Street, Suite 100

Indianapolis, IN 46240

Telephone: (317) 669-0129

Facsimile: (317) 218-3919

E-mail: eschmadeke@dblaw.us