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JANE DOE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, a minor by and through her Guardian  
Ad Litem, JOHN DOE,

Plaintiff,

v.

CLAYTON VALLEY CHARTER HIGH  
SCHOOL, a California public charter school;  
CONTRA COSTA COUNTY OFFICE OF  
EDUCATION, a California public entity; GREG  
SMITH, a minor; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.

**COMPLAINT FOR DAMAGES**

1. Violation of California Education Code § 220;
2. Violation of Section 504 of the Rehabilitation Act;
3. Negligence;
4. Intentional Infliction of Emotional Distress;
5. Negligent Infliction of Emotional Distress;
6. Battery;
7. Assault

**DEMAND FOR JURY TRIAL**

1. Plaintiff JANE DOE a minor, by and through her Guardian Ad Litem, JOHN DOE, brings this action against Defendants CLAYTON VALLEY CHARTER HIGH SCHOOL, CONTRA COSTA COUNTY OFFICE OF EDUCATION, GREG SMITH, a minor, and DOES 1 through 50, inclusive.

***PARTIES***

2. Plaintiff JANE DOE is a sixteen-year-old minor and a current sophomore student at Clayton Valley Charger High School in Contra Costa County, California. Plaintiff brings this action by and through her Guardian Ad Litem.

3. Defendant CLAYTON VALLEY CHARTER HIGH SCHOOL is a California public charter school located at 1101 Alberta Way, Concord, California 94521, in Contra Costa County. Clayton Valley Charter High School is authorized by and operates under the oversight of the Contra Costa County Office of Education and is subject to all applicable state and federal laws governing public schools.

4. Defendant CONTRA COSTA COUNTY OFFICE OF EDUCATION is a California public entity responsible for authorizing, overseeing, and providing support to charter schools within Contra Costa County, including Clayton Valley Charter High School. The Contra Costa County Office of Education is located at 77 Santa Barbara Road, Pleasant Hill, California 94523.

5. Defendant GREG SMITH is a minor, who at all relevant times, was a student at Clayton Valley Charter High School. Defendant uses the pseudonym "GREG SMITH" in this Complaint to protect his identity as a minor.

6. Plaintiff is ignorant of the true names and capacities of Defendants sued herein as DOES 1 through 50, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this Complaint to allege the true names and capacities of these fictitiously named Defendants when such information is ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that Defendants proximately caused Plaintiff's damages as herein alleged.

7. Plaintiff is informed and believes and thereon alleges that each of the Defendants was the agent and/or employee of each of the remaining Defendants and, in doing the things hereinafter alleged, was acting within the course and scope of such agency and employment.

8. Plaintiff is informed and believes and thereon alleges that each Defendant herein ratified, authorized, knew about, should have known about, and condoned the acts of each and every other Defendant.

9. Clayton Valley Charter High School, Contra Costa County Office of Education, Greg Smith, and Does 1 through 50, inclusive, are collectively referred to hereafter as "Defendants."

#### ***JURISDICTION AND VENUE***

10. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331 because it involves claims arising under federal law.

11. Venue is proper in this district pursuant to 28 U.S.C. §1391 because the events giving rise to this action occurred in Contra Costa County, California, and because Defendants Clayton Valley Charter High School and Contra Costa County Office of Education are in and conduct business in Contra Costa County.

### ***GOVERNMENT CLAIM REQUIREMENT***

12. On November 13, 2025, Plaintiff timely filed a government tort claim with Clayton Valley Charter High School and the Contra Costa County Office of Education pursuant to the California Government Claims Act, Government Code sections 900 et seq. The claim was presented in compliance with all applicable requirements of the Government Claims Act.

### ***GENERAL ALLEGATIONS***

13. Throughout middle school and the beginning of her freshman year, Plaintiff regularly attended classes, completed school assignments, and achieved solid grades.

14. Beginning in approximately November 2024, when Plaintiff was fourteen years old and a freshman at Clayton Valley Charter High School, Defendant Greg Smith, then a seventeen-year-old junior, initiated a relationship with Plaintiff.

15. The relationship between Plaintiff and Greg Smith lasted from November 2024 to January 2025. During this time, Greg Smith engaged in manipulative and abusive behavior toward Plaintiff.

16. Greg Smith was physically aggressive with Plaintiff and made Plaintiff feel uncomfortable. On at least one occasion, Plaintiff felt forced into engaging in sexual activity with Greg Smith.

17. Plaintiff believed that Greg Smith possessed explicit images of her on his phone that he might use for blackmail or other improper purposes.

#### **A. Plaintiff Reports Sexual Abuse to the School**

18. On February 27, 2025, Plaintiff filed a Student Statement report with Dean Mark Turner, notifying Clayton Valley Charter High School that she had recently been in a manipulative relationship with Greg Smith, who was two years her senior. In her report, Plaintiff disclosed that the relationship lasted from November 2024 to January 2025 and expressed concerns that Greg Smith may have explicit images of her on his phone that he might use for blackmail. The February 27 Student Statement is attached as **Exhibit 1.**

19. Plaintiff's February 27 Student Statement put Dean Turner and the school on notice that Plaintiff was a victim of sexual abuse, that Greg Smith was the abuser, and that Smith possessed what could be explicit photographs of Plaintiff. Since Plaintiff was fifteen years old at the time, those photographs constitute child pornography.

20. Dean Mark Turner and other employees of Clayton Valley Charter High School are mandated reporters under California Penal Code section 11166. Upon receiving Plaintiff's report describing a manipulative and potentially abusive relationship involving a minor and allegations of explicit images, Dean Turner and the school had a legal obligation to immediately report the information to law enforcement and child protective services.

21. Despite receiving this report and despite their mandatory reporting obligations, Dean Turner and Clayton Valley Charter High School failed to report Plaintiff's disclosure to law enforcement or child protective services. The school did nothing in response to Plaintiff's report.

22. Following her report, Plaintiff's attendance began to suffer. Plaintiff could not be in the presence of Greg Smith, her abuser, who continued to attend classes at the school without any consequences or restrictions.

23. On March 19, 2025, the school held a meeting with Plaintiff, her mother, Dean Turner, and Guidance Counselor Ashley Bonnett to address Plaintiff's attendance issues. The school ignored the underlying cause of Plaintiff's poor attendance—the trauma from the sexual abuse and the ongoing presence of her abuser at the school—and instead focused only on the surface problem of low attendance.

24. During the March 19, 2025, meeting, Defendant Administrators stated that Plaintiff was ineligible for a Section 504 plan or Individualized Education Program without providing any reason or explanation for this determination.

25. The March 19, 2025, meeting concluded with all parties signing a contract agreeing that Counselor Bonnett and Plaintiff would follow up the next week to create an action plan regarding Plaintiff's school attendance. That follow-up meeting never occurred, despite Plaintiff's parents following up with Dean Turner.

**B. Plaintiff Files Second Report of Sexual Abuse**

26. On June 18, 2025, Plaintiff filed a second report with the school, explicitly notifying

1 Clayton Valley Charter High School that she was a survivor of sexual abuse. The report stated: "I felt  
2 uncomfortable with him physically" and "He was very aggressive with me" and "There was even a time I  
3 felt forced into doing something." The June 18 report is attached as **Exhibit 2**.

4 27. This second report provided even more explicit information about sexual abuse and should  
5 have triggered an immediate mandatory report to law enforcement under California Penal Code section  
6 11166.

7 28. Once again, Clayton Valley Charter High School and its employees failed to report the  
8 sexual abuse to law enforcement or child protective services. The school took no action to protect Plaintiff  
9 or to remove Greg Smith from campus.

10 **C. The School Retaliates Against Plaintiff and Protects Her Abuser**

11 29. On August 6, 2025, the day before the start of the new school year, Plaintiff had a panic  
12 attack about returning to school where her abuser would be present.

13 30. On August 7, 2025, Plaintiff went to the school office before school started to meet with  
14 Dean of Students Eddie Estrada to follow up on the reports she had filed regarding the sexual abuse.

15 31. On information and belief, Dean Estrada is related to the infant Plaintiff's sexual abuser.

16 32. Instead of providing support or taking action to protect Plaintiff, Dean Estrada interrogated  
17 and blamed Plaintiff. He questioned Plaintiff about her social media account, which allegedly stated that  
18 her ex was a pedophile and weird. Plaintiff did not name Greg Smith in her social media posts.

19 33. During this interrogation by Dean Estrada, Plaintiff experienced a panic attack. Rather than  
20 calling Plaintiff's parents or providing appropriate support, the school forced Plaintiff to sign a No Contact  
21 contract promising she would not communicate with Greg Smith in person or online

22 34. The school turned the victim into the alleged perpetrator, gaslighting Plaintiff and treating  
23 her as if she were the problem rather than protecting her from her abuser.

24 35. Dean Estrada told Plaintiff it would not be a good idea to go to the police because her story  
25 would be hearsay and nothing would come of it. Dean Estrada actively discouraged Plaintiff from seeking  
26 help from law enforcement.

36. Dean Eddie Estrada placed his family interest in protecting Greg Smith above his duty as a school administrator and a mandated reporter.

37. Upon information and belief, a teacher at Clayton Valley Charter High School, is also related to Greg Smith, further contributing to the school's failure to take appropriate action to protect Plaintiff.

**D. The School Denies Plaintiff Educational Accommodations**

38. On August 11, 2025, Plaintiff's mother emailed a request that Plaintiff begin independent study so that she could continue her education without being in the presence of her abuser.

39. On August 12, 2025, the school approved only a short-term fourteen-day independent study program for Plaintiff.

40. On August 29, 2025, Plaintiff's father went to the school to turn in schoolwork that Plaintiff had completed and to inquire about extending independent study. Counselor Bonnett stated that the school would need a letter from a doctor to extend independent study.

41. On September 2, 2025, Plaintiff's mother emailed Plaintiff's teachers to request that they continue to post assignments online for Plaintiff so she could continue her education.

42. On September 5, 2025, Dean Turner informed Plaintiff's family that the school planned to hold a mandatory meeting regarding attendance.

43. On September 11, 2025, Dean Turner, Counselor Bonnett, Plaintiff, her father, and Plaintiff's support advocate met. During this meeting, Plaintiff's father requested copies of the reports that Plaintiff had filed regarding the abuse.

44. Dean Turner claimed he did not remember Plaintiff's reports. Dean Turner could not find the reports. When directed to an administrator, only Plaintiff's February 27, 2025, report could be found. Plaintiff's second report from June 18, 2025, explicitly describing sexual abuse, was conspicuously missing.

45. During the September 11, 2025, meeting, Dean Turner only wanted to know when Plaintiff would return to campus. He stated that all work Plaintiff had completed and turned in would not count for her grades because independent study had ended.

1           46.     On September 12, 2025, Plaintiff's father received a notice from a generic Student Support  
2 email account with a truancy notice and mandatory lunch detention.

3           47.     On September 12, 2025, Julie Beach, Plaintiff's therapist, wrote to Dean Turner requesting  
4 immediate action to ensure Plaintiff's safety and access to education for as long as clinically indicated.

5           48.     On September 17, 2025, Dean Turner emailed Plaintiff's family that they would have a  
6 meeting with the school board on September 29, 2025. Meanwhile, Plaintiff received another truancy  
7 notice.

8           49.     Counselor Bonnett requested a Student Study Team meeting regarding grades and  
9 attendance, which Plaintiff's father attended on September 26, 2025.

10          50.     During the September 26, 2025, meeting, Defendant stated that because Julie Beach was an  
11 MFT trainee, her request for independent study for Plaintiff was insufficient. Defendant stated that to  
12 receive independent study, Plaintiff would need to submit a note from a medical doctor. Additionally, the  
13 school requested that Plaintiff release her full therapy records to the school.

14          51.     California Education Code sections governing independent study do not mandate  
15 submission of a doctor's note. The law only requires Individualized Education Program or Section 504 Plan  
16 documentation for individuals with exceptional needs, which should apply to Plaintiff given the trauma  
17 and anxiety she suffers.

18          52.     During the September 26, 2025, meeting, with respect to the substance of Plaintiff's reports  
19 of sexual abuse, Counselor Bonnett represented that the school could not do anything about the situation  
20 because the incident did not occur at school. This contradicted the school's earlier actions in forcing  
21 Plaintiff to sign a No Contact contract on August 7, 2025, regarding alleged social media posts that  
22 occurred outside of school.

23          53.     On September 29, 2025, Plaintiff learned that the school board meeting had been canceled.  
24 The next day, she received another truancy notice.

25          54.     On October 13, 2025, Plaintiff's father received three separate emails from the Discipline  
26 Department notifying him of Plaintiff's alleged truancy and requiring lunch detention and Saturday school.

27 //

28 //

**E. Plaintiff's Ongoing Trauma and Inability to Attend School**

55. As a direct result of the sexual abuse by Greg Smith and the school's failure to protect her, Plaintiff has been unable to attend school since the fall semester began in August 2025.

56. Plaintiff is currently receiving therapy to address the trauma she suffered from the sexual abuse and the school's response.

57. When Plaintiff leaves her house, she feels scared and paranoid. She avoids going to areas where Greg Smith frequents, including the school. She stays on guard and watches for cars she fears might belong to Greg Smith. When she has seen Greg Smith, she experiences panic attacks and immense anxiety.

58. The trauma Plaintiff has experienced constitutes a disability that substantially limits a major life activity—attending school and receiving an education.

59. Despite clear signs that Plaintiff was suffering from trauma that affected her ability to attend school, Clayton Valley Charter High School failed to evaluate Plaintiff for a Section 504 plan or to provide appropriate accommodations under the California Code of Education.

60. Greg Smith continues to attend Clayton Valley Charter High School without any consequences or restrictions, while Plaintiff has been effectively denied her education.

61. The school has had actual knowledge of the sexual abuse and Plaintiff's resulting trauma for over nine months yet has deliberately chosen to refuse to provide education to Plaintiff while continuing to suggest she simply show up at school where her abuser attends.

***FIRST CAUSE OF ACTION******Violation of California Education Code §220******(Against Defendants Clayton Valley Charter High School and******Contra Costa County Office of Education)***

62. Plaintiff re-pleads, re-alleges, and incorporates by reference each allegation set forth in this Complaint.

63. California Education Code section 220 provides that no person shall be subjected to discrimination on the basis of gender in any program or activity conducted by an educational institution that receives, or benefits from, state financial assistance or enrolls students who receive state student financial aid.



64. Clayton Valley Charter High School and Contra Costa County Office of Education are educational institutions that receive state financial assistance and are subject to California Education Code section 220.

65. Sexual abuse and sexual assault constitute sex-based discrimination under Education Code section 220.

66. Defendants had actual knowledge of the sexual abuse Plaintiff experienced. Plaintiff explicitly reported the abuse to school officials on February 27, 2025, and again on June 18, 2025.

67. Despite having actual knowledge of sex-based violence against Plaintiff, Defendants responded with deliberate indifference.

68. Defendants failed to undertake a timely investigation of Plaintiff's complaints of sexual abuse. The failure of school officials to undertake a timely investigation of a complaint of discrimination amounts to deliberate indifference.

69. Defendants failed to take timely and reasonable measures to end the known harassment and abuse. School officials must take timely and reasonable measures to end known harassment, and a response is clearly unreasonable if school officials ignore a complaint of discrimination or if the initial measures chosen to respond to the harassment are ineffective.

70. Defendants took no action whatsoever to protect Plaintiff from her abuser. Defendants did not remove Greg Smith from school, did not implement any safety measures, did not investigate the abuse, and did not report the abuse to law enforcement as required by California law.

71. Instead of protecting Plaintiff, Defendants blamed the victim, forced her to sign a No Contact contract while experiencing a panic attack, and effectively denied her access to education by refusing to provide appropriate accommodations while allowing her abuser to continue attending school without consequences.

72. Defendants' failure to take any meaningful action despite actual knowledge of sex-based violence for over nine months constitutes deliberate indifference in violation of Education Code section 220.

73. Defendants' deliberate indifference was so clearly unreasonable in light of known circumstances that it effectively denied Plaintiff equal access to educational opportunities and benefits.

74. As a direct and foreseeable result of Defendants' actions, Plaintiff has suffered and continues to suffer losses and damages, including, but not limited to, lost educational opportunities, academic harm, denial of equal access to education, and lost educational benefits.

75. Plaintiff has suffered, and will continue to suffer, mental and psychological damages in the form of worry, humiliation, embarrassment, mental anguish and emotional distress, in amounts to be proved at trial.

## ***SECOND CAUSE OF ACTION***

### *Violation of Section 504 of the Rehabilitation Act*

#### *(Against Defendants Clayton Valley Charter High School and*

#### *Contra Costa County Office of Education)*

76. Plaintiff re-pleads, re-alleges, and incorporates by reference each allegation set forth in this Complaint.

77. Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, provides that no otherwise qualified individual with a disability shall, solely by reason of her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

78. Defendants Clayton Valley Charter High School and Contra Costa County Office of Education are recipients of federal financial assistance and are subject to Section 504.

79. As a result of the sexual abuse and trauma Plaintiff suffered, Plaintiff has a disability within the meaning of Section 504. The trauma, anxiety, panic attacks, and post-traumatic stress Plaintiff experiences substantially limit the major life activity of attending school and learning.

80. Federal regulations at 34 C.F.R. Part 104.32 require that school districts have an affirmative duty to locate and identify students who may be in need of a Section 504 plan.

81. Defendants knew or should have known that Plaintiff had a disability that required evaluation and accommodations under Section 504. Plaintiff reported sexual abuse twice to school officials. Plaintiff's attendance dramatically declined. Plaintiff experienced panic attacks at school. Plaintiff's therapist wrote to the school requesting accommodations. All of these circumstances put

1 Defendants on notice that Plaintiff had a disability affecting her education.

2 82. Despite clear signs that Plaintiff needed evaluation and accommodations, Defendants failed  
3 to evaluate Plaintiff for a Section 504 plan. On March 19, 2025, Counselor Bonnett stated without  
4 explanation that Plaintiff was ineligible for a Section 504 plan.

5 83. Defendants failed to provide Plaintiff with a free appropriate public education as required  
6 by Section 504. Plaintiff has been effectively denied access to education because Defendants refused to  
7 remove her abuser from campus or provide appropriate alternative educational arrangements.

8 84. Defendants discriminated against Plaintiff on the basis of her disability by denying her equal  
9 access to education, refusing to evaluate her for needed services, and failing to provide reasonable  
10 accommodations.

11 85. Defendants' violations of Section 504 were intentional and with deliberate indifference to  
12 Plaintiff's rights.

13 86. As a direct and foreseeable result of Defendants' actions, Plaintiff has suffered and continues  
14 to suffer losses and damages, including, but not limited to, lost educational opportunities, academic harm,  
15 denial of equal access to education, and lost educational benefits.

16 87. Plaintiff has suffered, and will continue to suffer, mental and psychological damages in the  
17 form of worry, humiliation, embarrassment, mental anguish and emotional distress, in amounts to be  
18 proved at trial.

19 ***THIRD CAUSE OF ACTION***

20 *Negligence*

21 *(Against Defendants Clayton Valley Charter High School and*

22 *Contra Costa County Office of Education)*

23 88. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set  
24 forth in this Complaint.

25 89. Defendants owed Plaintiff a duty of care to provide a safe educational environment free  
26 from sexual abuse and harassment.

27 90. Defendants owed Plaintiff a mandatory duty under California Penal Code section 11166 to  
28

1 report known or reasonably suspected child abuse, including sexual abuse, to law enforcement and child  
2 protective services.

3 91. School employees, including Dean Mark Turner, Dean Eddie Estrada, Counselor Ashley  
4 Bonnett, and other employees at Clayton Valley Charter High School, are mandated reporters under  
5 California law.

6 92. Defendants breached their duty of care and their mandatory duty to report in multiple ways,  
7 including but not limited to:

- 8 a. Failing to report Plaintiff's disclosure of sexual abuse to law enforcement and child  
9 protective services as required by California Penal Code section 11166;
- 10 b. Failing to investigate Plaintiff's reports of sexual abuse;
- 11 c. Failing to take any action to protect Plaintiff from her abuser;
- 12 d. Failing to remove Greg Smith from school or implement any safety measures;
- 13 e. Allowing Greg Smith to continue attending school without consequences while denying  
14 Plaintiff access to education;
- 15 f. Blaming the victim and retaliating against Plaintiff for reporting abuse;
- 16 g. Discouraging Plaintiff from reporting the abuse to law enforcement;
- 17 h. Failing to provide Plaintiff with appropriate educational accommodations; and
- 18 i. Allowing conflicts of interest to interfere with the proper handling of Plaintiff's reports,  
19 including having school officials related to Greg Smith involved in responding to Plaintiff's  
20 complaints.  
21

22 93. Defendants' breaches of duty were the actual and proximate cause of harm to Plaintiff.

23 94. Defendants' failure to take action caused Plaintiff ongoing trauma and fear.

24 95. As a direct and foreseeable result of Defendants' negligence, Plaintiff has suffered and  
25 continues to suffer losses and damages, including, but not limited to, severe emotional distress, mental  
26 anguish, anxiety, panic attacks, post-traumatic stress, lost educational opportunities, and harm to her  
27 academic progress and future educational prospects.  
28



***FIFTH CAUSE OF ACTION***

***Negligent Infliction of Emotional Distress***

***(Against All Defendants)***

104. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

105. Defendants owed Plaintiff a duty of care to provide a safe educational environment and to respond appropriately to reports of sexual abuse.

106. Defendants breached their duty of care through the acts and omissions described above.

107. Defendants' breach of duty caused Plaintiff to suffer serious emotional distress.

108. A reasonable person in Plaintiff's position would have suffered serious emotional distress as a result of Defendants' conduct.

109. As a direct result of Defendants' breach of duty, Plaintiff has suffered and continues to suffer severe emotional distress, including but not limited to anxiety, panic attacks, post-traumatic stress, fear, humiliation, embarrassment, and mental anguish, in amounts to be proved at trial.

***SIXTH CAUSE OF ACTION***

***Battery***

***(Against Defendant Greg Smith)***

110. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

111. Defendant Greg Smith intentionally touched Plaintiff in a harmful and offensive manner without her consent.

112. Defendant Greg Smith was physically aggressive with Plaintiff and caused Plaintiff to feel uncomfortable. On at least one occasion, Plaintiff felt forced into engaging in sexual activity with Defendant Greg Smith.

113. Defendant Greg Smith's conduct constituted sexual battery.

114. Plaintiff did not consent to Defendant Greg Smith's conduct.

115. As a direct result of Defendant Greg Smith's battery, Plaintiff has suffered and continues to

suffer severe physical, emotional, and psychological harm, including but not limited to anxiety, panic attacks, post-traumatic stress, fear, humiliation, embarrassment, and mental anguish.

116. Plaintiff has suffered, and will continue to suffer, mental and psychological damages in the form of worry, humiliation, embarrassment, mental anguish and emotional distress, in amounts to be proved at trial.

117. Defendant Greg Smith committed the unlawful acts described above with oppression, fraud and/or malice justifying punitive damages. Defendant Greg Smith was despicable and acted towards Plaintiff with malice, oppression, fraud, and with a willful and conscious disregard of Plaintiff's rights, entitling Plaintiff to punitive damages.

### ***SEVENTH CAUSE OF ACTION***

#### ***Assault***

#### ***(Against Defendant Greg Smith)***

118. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

119. Defendant Greg Smith intentionally engaged in conduct that caused Plaintiff to reasonably apprehend imminent harmful or offensive contact.

120. Defendant Greg Smith was physically aggressive with Plaintiff and made Plaintiff feel uncomfortable and fearful.

121. Plaintiff reasonably believed that Defendant Greg Smith would imminently harm her or make harmful or offensive contact with her person.

122. As a result of Defendant Greg Smith's conduct, Plaintiff was placed in reasonable apprehension of imminent harmful or offensive contact.

123. As a direct result of Defendant Greg Smith's assault, Plaintiff has suffered and continues to suffer severe emotional and psychological harm, including but not limited to anxiety, panic attacks, post-traumatic stress, fear, humiliation, embarrassment, and mental anguish.

124. Defendant Greg Smith committed the unlawful acts described above with oppression, fraud and/or malice justifying punitive damages. Defendant Greg Smith was despicable and acted towards Plaintiff with malice, oppression, fraud, and with a willful and conscious disregard of Plaintiff's rights,

entitling Plaintiff to punitive damages.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for judgment against the Defendants, and each of them, as follows:

1. Compensatory damages including emotional distress damages and lost educational opportunities in a sum according to proof;
2. Interest on judgment, including prejudgment interest, at the legal rate;
3. Emotional distress damages;
4. Punitive damages against Defendants in a sum according to proof;
5. Injunctive relief as follows:
  - a. An order requiring Defendants to immediately remove Defendant Greg Smith from Clayton Valley Charter High School;
  - b. An order requiring Defendants to provide Plaintiff with independent study or alternative educational arrangements until Defendant Greg Smith is removed from campus;
  - c. An order requiring Defendants to remove all disciplinary actions and truancy notices from Plaintiff's record;
  - d. An order requiring Defendants to report the sexual abuse to appropriate law enforcement and child protective services;
6. Attorney's fees and costs; and
7. For any further legal and equitable relief, the Court deems proper.

Dated: December 1, 2025.

**RATNER MOLINEAUX, LLP**

*/s/ Shelley A. Molineaux*

David S. Ratner  
Shelley A. Molineaux  
Rebecca Wildman-Tobriner  
Attorneys for Plaintiff Jane Doe



**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial of his claims by jury to the extent authorized by law.

Respectfully submitted,

Dated: December 1, 2025.

**RATNER MOLINEAUX, LLP**

*/s/ Shelley A. Molineaux*

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David S. Ratner  
Shelley A. Molineaux  
Rebecca Wildman-Tobriner  
Attorneys for Plaintiff Jane Doe

# **EXHIBIT 1**



## Student Statement

Student Name: [REDACTED]	Date: 2/27/25
Student ID#: [REDACTED]	Grade: 9
Approximate Time of Incident: October - February	Location of Incident: all of the above

Describe in sequence the course of events that took place with as much detail as possible. State the facts only and use multiple pages if needed.

Beginning of October I began talking to [REDACTED] and we dated from November 28 - January 9. He is a Junior and our relationship was a secret due to the worry of his friend's [REDACTED] and [REDACTED] finding out and dropping him as their friend. Over the course of our relationship he manipulated, gaslit, and guilttripped me in various different ways. He hid me from his friends and told me they disliked me and were talking bad about me to the point where I did not like them as well and spoke bad about them too. On January 27th I told [REDACTED] and [REDACTED] everything. [REDACTED] younger sister knew we were together. [REDACTED] has a folder with [REDACTED] and [REDACTED] name I know for sure, there could be one of me and [REDACTED] too. It contains screenshots of out of context "blackmail" (turn over for additional space)

I have read this declaration and do declare, under penalty of perjury, under the laws of the state of California, that this statement is true and correct to the best of my knowledge.

Student Signature: [REDACTED] Date: 2 / 27 / 25

Notes: \_\_\_\_\_

Next Step: All messages, inappropriate pictures, screenshots deleted off his phone.

Administrator Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

against us. What I want from this situation is mine and everyone's messages, photos, screenshots deleted in front of me off his phone. Especially photos of me in my undergarments. I also would like to add that when I would get upset he would physically try to pull me toward him to the point where it would hurt my head when he would grip it tightly. He would also pin my arms down and wouldn't get off of me at certain points. This was a very hurtful and traumatizing situation.

# **EXHIBIT 2**





**CLAYTON  
VALLEY  
CHARTER  
HIGH  
SCHOOL**

## Student Statement

Student Name: [REDACTED]	Date: June 18, 2025
Student ID#: [REDACTED]	Grade: Sophomore
Approximate Time of Incident: February - today	Location of Incident: School, home, online

Describe in sequence the course of events that took place with as much detail as possible. State the facts only and use multiple pages if needed.

Yesterday I got a message from my ex boyfriend's new girlfriend. ~~My~~  
His name is [REDACTED] she doesn't go to our school. she explained  
that he claimed I hit him and sexually assaulted him. I never did or  
would hurt him in any kind of physical way. There was even a time at  
his house I felt uncomfortable with him physically. He was very aggressive  
with me and there was even a time I felt forced into doing something.  
She also came to me and said he sent her unsolicited nude photos  
and voice messages as well as asking for nude selfies of her. she  
also explained how he sexualized her often which he also did with  
me. I also want to add he lied to me about his past girlfriends in the  
same exact way he's lying about me now.

(turn over for additional space)

I have read this declaration and do declare, under penalty of perjury, under the laws of the state of California, that this statement is true and correct to the best of my knowledge.

Student Signature: [REDACTED] Date: 07 / 18 / 25

Notes:

Next Step: I would like his parents to be hopefully informed of the gross  
ways he is speaking of me and others and maybe even an apology.

Administrator Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

