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## Public Statement

May 25, 2021

***John Doe v. Saint Edward High School, et al.***  
**Case No. 1:21-cv-01077**  
**U.S. District Court**  
**Northern District of Ohio, Eastern Division**

### ***The Reports to St. Edward High School***

As alleged in the Complaint, the victim was assaulted in a sexual manner on five (5) separate occasions by an older and physically stronger cross-country student while teammates watched and laughed the repeated hazing and bullying. The final assault was planned and filmed by numerous students. This all happened less than one month into the victim's freshman year.

The video became known as "The Rape Video" and was shared over social media multiple times over an 11-month period. The victim hid the assaults and never reported them out of fear of what could happen next. Providentially, The Rape Video was discovered by the victim's parents and immediately reported to St. Edward High School.

Ultimately, the victim and his parents shared the details of the sexual assaults. They also shared revolting social media and text exchanges of members of the cross-country team. Those exchanges included pedophilic images and videos, discussions about requesting nude photographs from incoming freshman students, graphic sexual images and content, sexual threats, audio of nonconsensual male anal sex, and other unconscionable content.

### ***Deception by St. Edward High School***

St. Edward High School assured the victim and his parents that it turned the matter over to the Lakewood Police Department ("LPD") and was cooperating with its ongoing investigation. When the victim's parents contacted the LPD to offer assistance, they learned the LPD was not, in fact, investigating anything. The LPD determined that the incidents reported by St. Edward High School were outside of the LPD's jurisdiction. St. Edward High School was not cooperating with any ongoing law enforcement investigation because there was no ongoing investigation.

Ultimately, the victim and his parents contacted other police departments and the offices of prosecutors, which ultimately resulted in nine (9) charges.

## ***Deliberate Indifference by St. Edward High School***

At the outset of the investigation, the administration sent an email to all cross-country students and parents that it had learned that “some social media use by St. Edward High School students is not in alignment with the school’s mission.” The administration knew that offensive, if not illegal, content had been recorded and shared by members of the cross-country team. The administration promised to reach out to “each of the Cross Country families individually to set up times for in-person meetings.”

At the same time the email was sent, a St. Edward High School official met with the team members and instructed them to delete everything inappropriate off their phones before they went in for their interviews.

St. Edward High School then waited over a week to interview the students. During that delay, there is text evidence that the students reminded each other to delete all evidence of the abuse of the victim. There is text evidence that they acknowledged that this type of incident had happened multiple times previously and instructed each other to delete evidence of all previous wrongdoing. There is text evidence that the students were trying to pressure the victim to lie to prevent discipline against the perpetrators. All of this was shared with St. Edward High School. The students concocted, rehearsed, and delivered a false narrative of “boys being boys,” which the administration was quick to believe.

St. Edward High School has not investigated any of the claims by the victim or any of the additional content provided to the school by the victim and his parents.

### ***St. Edward Response***

At the same time St. Edward High School was conducting its so-called investigation, it informed the victim and his parents that it had instituted remedial measures. However, any notion of discipline disappeared after about a week.

The victim and his parents were outraged. After confronting St. Edward High School officials, the main perpetrator was prohibited from in-school activities for 2 weeks and he was withheld from athletics for the remainder of the cross-country season. The other students were directed to an online training class, where they were left unsupervised and shared group chats making fun of the training, calling it “rape class” in a text exchange that was shared with the victim.

### ***Conclusion***

Within a matter of approximately a month, St. Edward High School opened and closed its investigation into multiple instances of sexual assault, hazing, bullying, and intimidation of the victim, and the pedophilic, bigoted, antagonistic, misogynistic and graphic sexual content exchanged by its students. St. Edward High School never investigated the other instances of similar conduct acknowledged by its students.

Its investigation was the epitome of deliberate indifference, if not a planned cover-up.

The victim suffered physically, emotionally, athletically, and educationally. He has relocated to another school for his safety. He has assisted with law enforcement and the pending charges. He has initiated legal proceedings against St. Edward High School and its officials.

The victim would like to thank all of his supporters. He encourages other victims to speak up. He also encourages anyone associated with St. Edward High School to press for a comprehensive independent investigation. The victim and his family chose St. Edward High School based upon its Mission, its history, its alumni, and its expression of faith. All of those have been compromised, which should infuriate its current students and proud alumni.

Please direct further questions to Brennan Manna & Diamond, LLC, 216.658.2155.