



STATE OF OKLAHOMA } S.S.
 DISTRICT COURT OF CLEVELAND COUNTY
 CLEVELAND COUNTY OF OKLAHOMA

FILED
 MAR 9 2017

DANIEL ALBERT, as parent and next friend
 of C.A., a minor,

Plaintiff,

v.

BOARD OF EDUCATION OF
 INDEPENDENT SCHOOL DISTRICT NO. 29
 OF CLEVELAND COUNTY, OKLAHOMA,
 d/b/a NORMAN PUBLIC SCHOOLS,
 Defendant.

In the office of the
 Court Clerk MARILYN WILLIAMS

Case No.: CJ-2017- 291

PETITION

Plaintiff alleges:

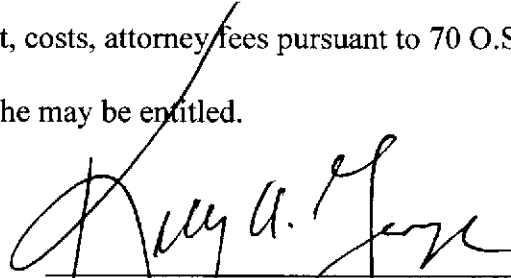
1. In January 2016, Plaintiff Daniel Albert's son, C.A., was a 12-year old student in the Norman Public Schools system and was a member of his school's wrestling team..
2. On January 9, 2016, after a school-sanctioned wrestling event, C.A. was sexually assaulted by four members of the Norman North High School wrestling team while on a district-owned bus travelling back to Norman North High School from the event.
3. As they were departing the district's bus, the four members of the school sponsored wrestling team sexually assaulted C.A. again in the school parking lot.
4. Although the defendant school district had assigned coaches/employees and/or other agents to supervise the members of the wrestling team on their school-sanctioned event, the district's agents negligently failed to adequately supervise them and negligently failed to provide adequate protection to C.A.
5. Although the defendant school district had assigned coaches/employees and/or other agents to supervise the members of the wrestling team on their school-sanctioned event, the

defendant district failed to adequately train its agents to supervise the students and to protect to protect students such as C.A.

6. As a direct and proximate cause of the defendant district's negligence, C.A. was sexually assaulted 3 separate times.

7. As a direct and proximate result of the events that the district negligently allowed to happen, C.A. sustained both bodily harm and emotional distress.

WHEREFORE, plaintiff Daniel Albert, on behalf of C.A., prays for judgment in his favor against the defendant in an amount in excess of the amount required for diversity jurisdiction pursuant to 28 U.S.C. § 1332, for interest, costs, attorney fees pursuant to 70 O.S. § 6-149.5, and for such other and further relief to which he may be entitled.



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