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**U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

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2:09-cv-00828
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. COLUMBUS

**Stephanie N. Slattery
11 Estates Lane
Shoreham, New York 11786**

CASE NO.

Plaintiff,

**JUDGE WATSON
MAGISTRATE JUDGE KING**

v.

**JURY DEMAND
ENDORSED HEREON**

**Antioch Education Abroad
Antioch University
150 E. University St.
Yellow Springs, OH 45387**

and

**John Doe
(Name and address
currently unknown)**

Defendants.

COMPLAINT

Jurisdiction and General Allegations

1. At all pertinent times stated herein, Plaintiff, Stephanie N. Slattery, was a resident of Mt. Morris, Michigan, attending Eastern Michigan University.
2. At all pertinent times stated herein, Defendant, Antioch Education Abroad, Antioch University, was and is a duly licensed corporation in the State of Ohio, engaged in operating an education abroad program.
3. At all pertinent times stated herein, Defendant, John Doe, was and is believed to be a duly licensed corporation in the State of Ohio, which jointly operated the Program with Defendant, Antioch Education Abroad, Antioch University.

4. In 2007, Defendant, Antioch Education Abroad, Antioch University (hereinafter referred to as Antioch Education Abroad) organized, marketed and operated an education abroad study program for college students.

5. Defendant, Antioch Education Abroad, was responsible for and in control of making all arrangements for housing, food, educational experiences and transportation for the study abroad program.

6. As part of the study abroad program, Defendant, Antioch Education Abroad, advised and encouraged the students to speak and interact with the local population to learn the language and cultural differences.

7. Defendant, Antioch Education Abroad, contracted with and delegated its duties to a local Mali resident to house, feed and hire a bus driver for the students, among other functions.

8. Upon information and belief, Defendant, Antioch Education Abroad's agent, hired a bus driver by the name of Dramane Coulibaly who, unknown to Plaintiff and other students, had multiple illegitimate children by multiple women, among other disqualifying aspects.

9. On September 29, 2007 Plaintiff, Stephanie Slattery, was invited by Dramane Coulibaly and his assistant, to have a cup of tea in their room, during which time Dramane Coulibaly spoke to his assistant in a foreign tongue, after which the assistant left the room. Dramane Coulibaly then forcefully assaulted and raped Plaintiff, Stephanie Slattery.

10. Afterward, Plaintiff, Stephanie Slattery, was flown to Paris, France for medical treatment and upon return to her student group in Mali, the students were

informed and warned by Defendant, Antioch Education Abroad, for the first time "to never be alone with a male in his room because in Malian culture it is considered to be implied consent to have sexual intercourse".

11. Jurisdiction of this Court is based upon diversity of citizenship, Title 28, U.S.C. §1332, and the amount in controversy exceeds the jurisdictional limits of \$75,000.

COUNT ONE

PLAINTIFF STEPHANIE SLATTERY v. DEFENDANT ANTIOCH EDUCATION ABROAD, ANTIOCH UNIVERSITY

12. Plaintiff, Stephanie Slattery hereby incorporates by reference Paragraphs 1 through 11, as if fully restated herein.

13. Defendant, Antioch Education Abroad, delegated its hiring duties to their agent in Mali, which resulted in the negligent hiring and supervision of Dramane Coulibaly, whose history of fathering multiple, illegitimate children with multiple women, and other disqualifying aspects, were known or should have been known by Defendant's hiring agent.

14. Defendant, Antioch Education Abroad's negligent hiring and supervision practices, through its agent, directly and proximately caused Plaintiff, Stephanie Slattery, to be exposed to the assault and rape by Defendant's bus driver, Dramane Coulibaly.

15. Defendant, Antioch Education Abroad's negligent hiring and supervision practices, through its agent, directly and proximately caused physical harm,

hospitalization, medical treatment and expenses, and severe, permanent emotional damage, pain and suffering to Plaintiff, Stephanie Slattery.

COUNT TWO

**PLAINTIFF STEPHANIE SLATTERY
v. DEFENDANT
ANTIOCH EDUCATION ABROAD, ANTIOCH UNIVERSITY**

16. Plaintiff, Stephanie Slattery, hereby incorporates by reference Paragraphs 1 through 15, as if fully restated herein.

17. Defendant, Antioch Education Abroad, actively advised, instructed and encouraged the program's students to interact with the local population, to learn the language and cultural differences, but negligently failed to advise Plaintiff, Stephanie Slattery, and others of the cultural belief in Mali that having tea alone in a man's apartment was considered implied consent to engage in sexual intercourse.

18. Defendant, Antioch Education Abroad's negligent failure to inform and warn of this cultural difference directly and proximately caused physical harm, hospitalization, medical treatment and expenses, and severe, permanent emotional damage, pain and suffering to Plaintiff, Stephanie Slattery.

COUNT THREE

**PLAINTIFF STEPHANIE SLATTERY
v. DEFENDANT JOHN DOE**

19. Plaintiff, Stephanie Slattery, hereby incorporates by reference Paragraphs 1 through 18, as if fully restated herein.

20. Defendant, John Doe, being in a joint venture or principal/agent relationship with Defendant, Antioch Education Abroad, is jointly responsible for the negligence of Defendant, Antioch Education Abroad.

WHEREFORE, Plaintiff, Stephanie Slattery, demands judgment against Defendant, Antioch Education Abroad, Antioch University and/or against John Doe, as follows:

(A) Against Defendant, Antioch Education Abroad, Antioch University, in an amount in excess of jurisdictional limits, together with her costs; and

(B) Against Defendant, John Doe, in an amount in excess of jurisdictional limits, together with her costs.

Respectfully submitted,



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ATTORNEYS FOR PLAINTIFF

JURY DEMAND

It is respectfully requested that the issues in the above-styled action be tried before a jury.



Attorney for Plaintiff