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**FILED**  
Clerk of the Superior Court

**AUG-28-2019**

By: C. BRENNAN, Deputy

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO  
9 (CENTRAL DIVISION)

10 JANE DOE 1,

11 Plaintiff,

12 vs.

13 SAN DIEGO UNIFIED SCHOOL  
DISTRICT, a government entity;  
14 JASON CRAWFORD; AND Does 1  
through 20,

15 Defendants.  
16

CASE NO. 37-2019-00045907-CU-PO-CTL

COMPLAINT FOR:

1. Negligence;
2. Negligent Supervision; Failure to Warn;
3. Negligent Hiring, Supervision or Retention of Employee (Gov. Code § 815.2;)
4. Negligent Failure to Warn Train or Educate;
5. Intentional Infliction of Emotional Distress
6. Sexual Harassment

17  
18  
19 Plaintiff Jane Doe 1 alleges:

**PARTIES**

20 1. Plaintiff Jane Doe ("Jane Doe 1" or "Plaintiff") at all times relevant to the facts giving  
21 rise to this complaint was a minor residing in San Diego County, California.

22 2. Defendant San Diego Unified School District ("SDUSD") is a government entity  
23 providing educational services in San Diego County. Defendant SDUSD is responsible for operating  
24 Lincoln High School ("LHS"), where Plaintiff was injured. At all material times, SDUSD was an  
25 educational institution that received and benefitted from state financial assistance, and enrolled  
26 students who received state financial aid.

27 3. The perpetrator of the sexual abuse in this action, Jason Crawford ("Crawford or  
28

1 “Perpetrator”) was at all times relevant an employee of SDUSD, residing in San Diego County,  
2 California. Perpetrator gained access to Plaintiff through his job-related employment activities with  
3 SDUSD, and was under the direct supervision, employ and control of SDUSD and Does 1 through  
4 20.

5 4. Plaintiff does not know the names of Does 1 through 20.

6 5. The true names and capacities, whether individual or otherwise, of Defendants Does  
7 1 through 20 are unknown to Plaintiff who, therefore, sues them by such fictitious names under CCP  
8 § 474. Plaintiff is informed and believes that each of the defendants is responsible in some manner  
9 for the acts or omissions alleged in this complaint or caused her damages.

10 6. Each of the defendants was an agent or employee of the other defendants and in doing  
11 the acts alleged in this complaint, was acting within the course and scope of such agency and  
12 employment. Each of the defendants engaged in, joined in, conspired, and aided and abetted with  
13 the defendants in carrying out the acts of wrongdoing in this Complaint and each defendant ratified  
14 and authorized the wrongful acts of the other defendants.

15 **BACKGROUND FACTS APPLICABLE TO ALL COUNTS**

16 7. On or about October 4, 2018, Jane Doe 2 was a seventeen-year-old girl who  
17 graduated from Lincoln High School (“LHS”) the year before.

18 8. Some time before that date, Crawford began urging Jane Doe 2 to do a photo shoot  
19 with him and suggested she audition for Wild ‘N Out, a show hosted by celebrity Nick Cannon.  
20 Crawford represented to his students that he was close personal friends with Nick Cannon and could  
21 help them get an audition for his show.

22 9. On or about October 4, 2018, during the middle of a school day, Crawford contacted  
23 Jane Doe 2 at the home of her aunt, where Jane Doe 2 was babysitting. Although Jane Doe 2 had  
24 already graduated from LHS, one or more students from LHS were present with Jane Doe 2 and  
25 truant from school that day.

26 10. On or about October 4, 2018, Crawford phoned Jane Doe 2 and told her that he had  
27 a “homey” he wanted her to meet. He further advised her that she should “stop messing with the little  
28 boys at LHS.” He then told Jane Doe 2 that he had the “homey” with him and that his “homey”

1 wanted to meet her. Crawford asked Jane Doe 2 where she was and Jane Doe 2 told him she was at  
2 her aunt's house and gave him her aunt's address.

3 11. On or about October 4, 2018, in the middle of the school day, Crawford arrived at  
4 Jane Doe 2's aunt's home in a black Bentley driven by Anthony Bell, aka "Ant," another adult male.  
5 Prior to their arrival, Crawford texted Jane Doe 2 to tell her he would "Be there by 1:30 p.m. Give  
6 you time." Crawford pressured Jane Doe 2 to meet "Ant" and urged her to go "shopping with him"  
7 and that Ant would "buy her stuff." Jane Doe 2 states that it was clear that she would be required to  
8 do something sexual with Ant in exchange for the shopping trip. Jane Doe 2 received a text later in  
9 the day stating "This Ant. Lock me in;" she did not ultimately go "shopping" with him.

10 12. While Crawford and Ant were at still there with the Bentley, Jane Doe 2's aunt arrived  
11 home. She found the circumstances to be very suspicious and believed that the men were up to no  
12 good. Jane Doe 2's aunt contacted Jane Doe 2's mother to tell her what she had witnessed.

13 13. Jane Doe 2's mother contacted San Diego Unified Police Officer Jose Gonzalez to  
14 complain that two adult men, one of them a LHS teacher, was at her cousin's house in the middle  
15 of the day in a Bentley trying to get her minor daughter to do a "photo shoot." Officer Gonzalez told  
16 Jane Doe 2's mom to get her daughter's password, check her phone and bring the phone to him if  
17 she found anything inappropriate.

18 14. Jane Doe 2's mother did as Officer Gonzalez requested and found texts from someone  
19 called "shark," who turned out to be teacher Jason Crawford along with other inappropriate content.  
20 Jane Doe 2's mother contacted Officer Gonzalez to inform him of what she had found; he didn't  
21 return her call. Jane Doe 2's mother filed a complaint with a LHS school administrator, but never  
22 heard anything back from them.

23 15. On or about October 16, 2018, a LHS teacher contacted school psychologist Freddy  
24 Moreno to advise that one of her student's, Jane Doe, had been acting strangely recently. The  
25 normally happy, well-dressed Jane Doe 1 began looking sullen, dressing in hoodies and skipping  
26 class. The teacher was concerned about the change in her behavior and demeanor and wanted  
27 Moreno to talk to her.

28 16. Jane Doe 1 advised Moreno that her teacher Jason Crawford had been trying to

1 convince her to prostitute herself to older men in order to make money. Moreno advised LHS former  
2 principal Jose Soto ("Soto") of what Jane Doe 1 told him and sent Jane Doe 1 to speak to Soto.  
3 When Soto learned of Jane Doe 1's claim against Crawford, he stated "What? Another one?" Soto  
4 did not call the police. When school psychologist Moreno found out he had not done so, Moreno  
5 reported it to San Diego Police Department himself; Moreno also reported the matter to San Diego  
6 Child Welfare Services.

7 17. Jane Doe 1's meeting with Soto lasted less than 10 minutes; he spent most of the  
8 meeting time telling Jane Doe 1 that she needed to "move on."

### 9 EXHAUSTION OF ADMINISTRATIVE REMEDIES

10 18. Pursuant to the California Government Claims Act, Plaintiff submitted a claim to San  
11 Diego Unified School District on April 11, 2019 (See Attachment A), which they promptly rejected  
12 on May 24, 2019.

### 13 FACTS

14 19. In the latter part of the 2017-2018 school year, Crawford began showing Jane Doe  
15 1 some of his photography. Crawford showed her photos of female models, nude and semi-nude, and  
16 told Jane Doe 1 she was prettier than all of them. Crawford told Jane Doe 1 that if she let him do a  
17 photo shoot of her, she would see how much better Crawford could make her look.

18 20. Jane Doe 2 and other minors at LHS have reported similar conduct by Crawford,  
19 claiming Crawford repeatedly bragged about his connection to famous people, including Nick  
20 Cannon, and would also brag that he was the one who selected the girls for Wild 'N Out. Jane Doe  
21 2 recalled Crawford showing her a photo of his penis on his phone at school and telling her that it  
22 was so big that Jane Doe 2 could "never take it."

23 21. Crawford brought various celebrities, including Nick Cannon to LHS. Many of the  
24 visitors were models who Crawford explained had not made the cut for Wild 'N Out. The remainder  
25 of the visitors were men with nice cars who would come directly into the classroom through the back  
26 gate and take photos with the students next to their expensive cars.

27 22. During the start of the 2018-2019 school year, Jane Doe 1 reports that Crawford  
28 became more aggressive and "vulgar" toward her. On one occasion, Crawford began showing videos

1 in class and flipped to a video clip of Crawford having sex. Crawford later showed Jane Doe 1 the  
2 entire video on his cell phone and bragged that he had made full pornographic videos in the past.  
3 Crawford told Jane Doe 1 that she could make a way better porno than the girl he was showing her.  
4 On another occasion, Crawford asked Jane Doe 1 'when he could put the tip in' promising only to  
5 put his tip in her. Crawford was referring to the tip of his penis. Crawford told Jane Doe 1 she was  
6 "fine as fuck" and urged her on one occasion not to wear a certain outfit in front of him, stating  
7 "Don't do that. If you do, I'm going to smash on that."<sup>1</sup>

8 23. Crawford made a point to tell Jane Doe 1 almost every day of her senior year that if  
9 she went with one of the men he knew and "did stuff with them," she could make a lot of money.  
10 He passed along phone numbers of his adult male friends to Jane Doe 1, telling her if she had sex  
11 with him, he would buy her a lot of things. When he was trying to persuade Jane Doe 1 to prostitute  
12 herself, he would tell her stories of girls who made so much money through prostitution, they could  
13 afford to purchase cars, homes and other expensive things. One of the men Crawford tried set Jane  
14 Doe 1 up with was Anthony Bell; Jane Doe 1 did not agree to contact Bell or any of the other men  
15 whose numbers Crawford had given and/or tried to give to her. However, Jane Doe 1 began to  
16 reconsider the idea of prostituting herself when Jane Doe 1's brother was in some trouble with the  
17 law and Jane Doe 1 needed money to help him. Her teacher Mr. Crawford suggested prostitution.

18 24. Crawford often bragged about having lots of friends in law enforcement, so when  
19 Jane Doe 1 went to him to see if he knew anybody who could help her brother, Crawford came up  
20 with another plan. Crawford told Jane Doe 1 that if she really wanted to help her brother, she needed  
21 money, and to get money she could prostitute herself to the men Crawford tried to set her up with.  
22 Jane Doe 1 was so desperate to help her brother that she finally gave in and asked Crawford what  
23 she needed to do. He told her to send him some photos so he could pass them out to any friends  
24 interested in meeting with her. Jane Doe 1 took the photos as Crawford requested; they were not  
25 nude photos but photos of Jane Doe 1 in lingerie. During class on October 1, 2019, she emailed  
26

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27  
28 <sup>1</sup>According to Urban Dictionary, the slang word "smash" means "the action or process of  
fucking someone good."

1 Crawford the photos as he sat next to her. Crawford told her she could do better-better meant  
2 completely nude.

3 25. Jane Doe 1 was humiliated and soon after sending the photos to Crawford, she felt  
4 great shame that she had even considered selling herself for money, even if it was to help her brother.  
5 She began skipping class so she would not see Crawford, she began wearing baggy clothes and  
6 hoodies and hiding from her friends. She would go to the library, pull her hoodie over her head and  
7 cry.

8 26. Also during the start of the 2018-2019 school year, Jane Doe 3 reported to police that  
9 Crawford commonly made sexual jokes and comments to female students. Jane Doe 3 reported that  
10 she heard Crawford ask to "put his tip in" to Jane Doe 1 and that when Crawford did so, he was  
11 standing so close to Jane Doe 1 that his chest was basically touching her chest. Jane Doe 3 reported  
12 that Crawford brought one of his male friends into the classroom on an almost weekly basis. Jane  
13 Doe 3 reported that friend of Crawford's would look at her with "flirty dirty" looks. On one  
14 occasion, Crawford and this "friend" of his pressured Jane Doe 3 into giving Crawford's friend her  
15 phone number. Jane Doe 3 described Crawford's friend as a black male in his late 20's or early 30's,  
16 who dressed fancy and drove a very nice car. Jane Doe 3 described Crawford as "a pervert" to police.

17 27. Jane Doe 4 was also a minor at the start of the 2018-2019 school year. Jane Doe 4  
18 reported to police that she heard Crawford ask Jane Doe 1 to "let me put the tip in" and told police  
19 she understood that clearly to mean Crawford was referring to putting his penis in Jane Doe 1's  
20 vagina.

21 Jane Doe 4 also reported to police that on one occasion, she alerted Crawford to the fact that his  
22 zipper was down. Jane Doe 4 told police Crawford responded to her saying, "I bet you want to zip  
23 it up for me too.

24 28. Jane Doe 5 was also a minor at the start of the 2018-2019 school year. Jane Doe 5  
25 also reported inappropriate, sexually charged comments to her by Crawford. Jane Doe 5 reported that  
26 most of Crawford's classroom "guests" were men who tried to hit on female students and staff.  
27 Jane Doe 5 reported that she witnessed several sexually inappropriate interactions between Crawford  
28 and minor female students at LHS.

**FIRST CAUSE OF ACTION**  
**(Negligence, Government Code §§ 815.2, 820 Against All Defendants)**

29. Plaintiff realleges paragraphs 1 through 28.

30. Defendants, acting through managing agents and school administrators, had a duty to protect the minor Plaintiff entrusted to their care by Plaintiff's parents and/or guardians. Plaintiff's care, welfare, and/or physical custody was temporarily entrusted to Defendants and Defendants voluntarily accepted the entrusted care of the minor Plaintiff. As such, Defendant owed this minor child, a special duty of care, in addition to a duty of ordinary care, and owed the minor Plaintiff the higher duty of care that adults dealing with children owe to protect them from harm.

31. Defendants, by and through their agents, servants and employees knew or reasonably should have known of the Perpetrator's dangerous and exploitive propensities and/or the Perpetrator was an unfit agent. It was foreseeable that if Defendants did not adequately exercise or provide the duty of care owed to children in their care, including but not limited to Plaintiff, the children entrusted to Defendant's care would be vulnerable to sexual abuse by the Perpetrator.

32. Defendants, acting through managing agents and school administrators, breached their duty of care to the minor Plaintiff; by failing to investigate or otherwise confirm or deny such facts about the Perpetrator; by failing to tell or concealing from Plaintiff's parents, guardians or law enforcement officials that Plaintiff was or may have been sexually abusing minors; by failing to tell or concealing from Plaintiff's parents guardians, or law enforcement officials that Plaintiff was or may have been sexually abused after Defendants knew or had reason to know that the Perpetrator may have sexually abused the Plaintiff.

33. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and will continue to be prevented from performing Plaintiff's daily activities and obtaining full enjoyment of life; has sustained and will continue to sustain loss of earning and earning capacity; and/or has incurred and will continue to

1 incur expenses for medical and psychological treatment, therapy and counseling.

2  
3 **SECOND CAUSE OF ACTION**  
4 **(Negligent Supervision/Failure to Warn Government Code §§ 815.2 & 820 Against All Defendants)**

5 34. Plaintiff realleges paragraphs 1 through 33.

6 35. Defendants, acting through managing agents and school administrators, had a duty  
7 to provide reasonable supervision of the Perpetrator, to use reasonable care in investigating the  
8 Perpetrator, and to provide adequate warning to the Plaintiff, the Plaintiff's family, and minor  
9 students of the Perpetrator's dangerous propensities and unfitness. Defendants further failed to take  
10 reasonable measures to prevent future sexual abuse.

11 36. As a result of the above-described conduct, Plaintiff has suffered and continues to  
12 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional  
13 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has  
14 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from  
15 performing Plaintiff's daily activities and obtaining the full enjoyment of life; has sustained and will  
16 continue to sustain loss of earnings and earning capacity; and/or has incurred and will continue to  
17 incur expenses for medical psychological treatment, therapy and counseling.

18 **THIRD CAUSE OF ACTION**  
19 **(Negligent Hiring/Retention, Government Code §§ 815.2 & 820 Against All Defendants)**

20 37. Plaintiff realleges paragraphs 1 through 36.

21 38. Defendants, acting through managing agents and school administrators, had a duty  
22 to not hire and/or retain the Perpetrator, and other employees, agents, volunteers, and other  
23 representatives, given the Perpetrator's dangerous and exploitive propensities.

24 39. Defendants, by and through their agents, servants and employees, knew or reasonably  
25 should have known of the Perpetrator's dangerous and exploitive propensities and/or that the  
26 Perpetrator was an unfit agent. Despite such knowledge, Defendants negligently hired and/or retained  
27 the Perpetrator in the position of trust and authority as a school teacher, counselor, surrogate parent,  
28 emotional mentor, and/or other authority figure, where he was able to commit wrongful acts against



1 the Plaintiff and others. Defendants failed to use reasonable care in investigating the Perpetrator and  
2 failed to provide adequate warning to Plaintiff and Plaintiff's family of the Perpetrator's dangerous  
3 propensities and unfitness. Defendants further failed to take reasonable measures to prevent further  
4 sexual abuse.

5 40. As a result of the above-described conduct, Plaintiff has suffered and continues to  
6 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional  
7 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has  
8 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from  
9 performing Plaintiff's daily activities and obtaining full enjoyment of life; has sustained and will  
10 continue to sustain loss of earning and earning capacity; and/or has incurred and will continue to  
11 incur expenses for medical and psychological treatment, therapy and counseling.

12 **FOURTH CAUSE OF ACTION**  
13 **(Negligent Failure to Warn, Train or Educate Against SDUSD and Does 1 through 20)**

14 41. Plaintiff reallege paragraphs 1 through 40.

15 42. Defendants, acting through managing agents and school administrators, breached their  
16 duty to take reasonable protective measures to protect Plaintiff and other minor students from the  
17 risk of childhood sexual abuse by the Perpetrator, such as the failure to properly warn, train, or  
18 educate Plaintiff and other minor students about how to avoid such a risk.

19 43. As a result of the above-described conduct, Plaintiff has suffered, and continues to  
20 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional  
21 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has  
22 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from  
23 performing Plaintiff's daily activities and obtaining the full enjoyment of life; has sustained and will  
24 continue to sustain loss of earnings and earning capacity; and/or has since incurred and will continue  
25 to incur expenses for medical and psychological treatment, therapy, and counseling.

26 **FIFTH CAUSE OF ACTION**  
27 **(Intentional Infliction of Emotional Distress,**  
28 **Government Code §§ 815.2 & 820 Against All Defendants)**

1           44.     Plaintiff reallege paragraphs 1 through 43.

2           45.     Defendants' conduct by way of managing agents and school administrators was  
3 extreme and outrageous and was intentional or done recklessly.

4           46.     As a result of Defendants' conduct, Plaintiff experienced and continues to experience  
5 extreme emotional distress resulting in bodily harm.

6           47.     As a result of the above-described conduct, Plaintiff has suffered, and continues to  
7 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional  
8 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has  
9 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from  
10 performing Plaintiff's daily activities and obtaining the full enjoyment of life; has sustained and will  
11 continue to sustain loss of earnings and earning capacity; and/or has incurred and will continue to  
12 incur expenses for medical and psychological treatment, therapy, and counseling.

13  
14                               **SIXTH CAUSE OF ACTION**  
15                               **(Sexual Harassment, Civil Code § 51.9 Against All Defendants)**

16           48.     Plaintiff reallege paragraphs 1 through 47.

17           49.     During Plaintiff's time as a student at LHS, Perpetrator intentionally, recklessly, and  
18 wantonly made sexual advances, sexual solicitations, sexual comments and sexual requests and  
19 engaged in other visual, verbal or physical conduct of a sexual nature based on Plaintiff's gender that  
20 were unwelcome, pervasive, and severe, including, but not limited to engaging in sexual talk with  
21 Plaintiff and touching Plaintiff in a sexually motivated and illegal manner all while Perpetrator was  
22 acting within the course and scope of his agency with LHS, SDUSD, and Does 1 through 20.

23           50.     The incidents of sexual misconduct and sexual harassment outlined herein took place  
24 while Plaintiff was under the control of the Perpetrator, in his capacity as a teacher at LHS, SDUSD  
25 and Does 1 through 20.

26           51.     During Plaintiff's time as a student at LHS, Perpetrator intentionally, recklessly, and  
27 wantonly did acts which resulted in harmful and offensive contact with Plaintiff's person.  
28 Perpetrator used his position as a teacher to persuade Plaintiff to give in to his sexual suggestions,  
and use his authority and position of trust to exploit Plaintiff physically, sexually, and emotionally.



- c. Civil penalties pursuant to Civil Code § 52(b)
- c. Attorney's fees pursuant to Civil Code § 52(b);
- d. Costs of court; and
- e. Other further relief.

Dated: August 28, 2019

The Dell'Anno Law Firm



Marlea F. Dell'Anno, Attorneys for  
Plaintiff

# ATTACHMENT

## A

**CLAIM AGAINST THE  
SAN DIEGO UNIFIED SCHOOL DISTRICT**

Please be sure your claim is against the San Diego Unified School District, not another public entity or school district.  
Completed claims must have an original signature and be mailed or hand-delivered to Risk Management, San Diego Unified School District, Revere Center, Room 7, 6735 Gifford Way, San Diego, 92111, Telephone (858) 627-7346. Where space is insufficient, please use additional paper and identify information by paragraph number. Any supporting documentation should be attached.

The undersigned submits the following claim and information:

1. Name of Claimant Claimant is a 17 year old female student who disclosed SDUSD and SDPD on 10/16/18 that her teacher Jason Crawford had attempted to pimp her out.
2. Address of Claimant \_\_\_\_\_ City \_\_\_\_\_ Zip Code \_\_\_\_\_  
Email Address: \_\_\_\_\_ Home Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_
3. Name, telephone number, address to which claimant desires notices to be sent if other than above:  
C/O Marlea Dell'Anno, Dell'Anno Law Firm, APC 1320 Columbia St., Ste. 300 San Diego, CA 92101  
619.302.5711
4. Claimant's Driver's License Number: \_\_\_\_\_ State: \_\_\_\_\_  
Social Security Number: \_\_\_\_\_ Date of Birth: \_\_\_\_\_
5. Claimant's Insurance Liability Carrier Name/Address (if applicable):  
\_\_\_\_\_  
Carrier's Phone Number: \_\_\_\_\_ Policy Number(s): \_\_\_\_\_
6. Occurrence or event from which the claim arises:  
Date: 10/16/18 Time: \_\_\_\_\_  
Place (specific location): Lincoln High School
7. Specify the particular occurrence, event, act or omission which is the basis for your claim:  
Please see Attachment A.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. State how the San Diego Unified School District or its employees are alleged to be at fault:  
Please see Attachment A.  
\_\_\_\_\_  
\_\_\_\_\_

9. Describe the nature of your loss, injury, or property damage, so far as is known at the time of this claim. If your claim involves a vehicle, include license, year, make, and model:

Include, but are not limited to, emotional distress, sleeplessness, fear, physical manifestations of emotional distress.

10. Give the name(s) of the School District employee(s) causing the damage or injury:

Jose Soto, Myeshia Whigham, Jason Crawford and others in positions of authority and review .

11. Name and address of any other person suffering a loss or injury (if applicable):

Names of other victims will be forthcoming.

12. Name and address of the owner of any damaged property (if applicable):

13. DAMAGES CLAIMED:

Amount claimed if it totals less than \$10,000: \_\_\_\_\_

Basis for computation of amounts claimed (please attach copies of all bills, invoices, estimates, etc.):

14. Names and addresses of all witnesses known to you who may have information related to this claim:

Jose Soto, Myeshia Whigham, Jason Crawford and others in positions of authority and review

There are numerous student witnesses known to LHS Administration.

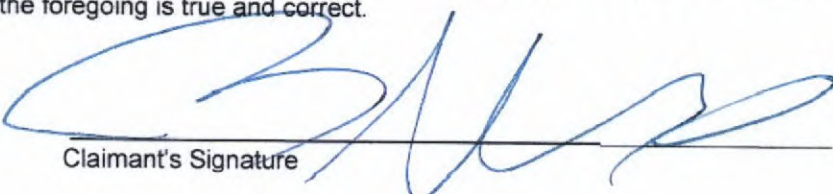
15. Any additional information that might be helpful in considering claim:

**WARNING: IT IS A CRIMINAL OFFENSE TO FILE A FALSE CLAIM (Penal Code § 72).**

I have read the matters and statements made in the above claim and I know the same to be true of my own knowledge, except as to those matters stated upon information or belief as to such matters I believe the same to be true. I declare under penalty of perjury that the foregoing is true and correct.

April 11, 2019

Date

  
Claimant's Signature

# ATTACHMENT

## A



7. On 10/16/18, complainant ("V1"), as 17-year-old girl, disclosed to Mr. Moreno, the school psychologist, that her teacher, Jason Crawford, had propositioned her to commit acts of prostitution and made ongoing inappropriate sexual comments towards her. Prior to complainant's disclosure, Mr. Moreno had spoken to several other students about an incident involving Mr. Crawford and an inappropriate "photo shoot."

Prior to V1's disclosure, another parent had complained to SDUSD police regarding Mr. Crawford's arrival in the middle of a school day at the location where her 17-year-old daughter ("V2") was babysitting for a cousin. The mother advised that Mr. Crawford, along with another black male adult, arrived at her cousin's home in a Bentley or some other similar expensive vehicle. Two other students (V3 and V4) from LHS were present at the house and truant from school. Mr. Crawford solicited V2 to have sex with the other male in his car and wanted all the girls to take pictures on the car. V2 told her cousin that Mr. Crawford said her cousin had a really good body and wanted to take photos of her. The cousin declined, but did phone V1's mother to tell her that something inappropriate was going on between the teacher, this other adult male and the girls.

The mother of V2 called SDPD to report the incident and was told by SDPD to call SDUSD Police. Mother reported the incident SDUSD police officer Julian Gonzalez who told mother to get V2's phone and password. Mother did as Gonzalez requested and found numerous sexually inappropriate photos of V2 and V3 on the phone, as well as YouTube Videos on how to perform lap dances. V2's mother also found an incriminating text string between Mr. Crawford and her daughter in V2's phone on the day Mr. Crawford showed up in the Bentley. According to V2's mother, she called Officer Gonzalez to advise what she had found on V2's phone. V2's mother said she never heard from Officer Gonzalez again.

V1 was a student in Mr. Crawford's photography/mixed media class. Throughout her junior year, Mr. Crawford would repeatedly show V1 photographs of girls he had taken in the past; some of the girls were in lingerie and others were nude or partially nude. Some of the photographs were taken from Crawford's bedroom. Crawford repeatedly asked V1 to do photoshoots with him; she declined. When senior year started, Crawford became more vulgar and approached V1 several times asking if he could see her naked. Crawford would also ask V1 to "let me put the tip in" or "when are you going to let me put the tip in?" Another student, V4 witnessed one of these exchanges and said that while Crawford was asking V1 to let him "put the tip in," he was standing so close to her that his chest was touching hers. V4 stated Crawford had asked her if she "wanted to see his cookie." V4 stated she had heard Crawford talking to V5 about "cookies" and that the conversation was sexual in nature. On another occasion, V4 told V1, who was wearing a dress over her jeans, that she should take the jeans off and just wear the dress because it was such a cute outfit. V4 said Crawford overheard their conversation in class and said "Oh no, don't do that...if she does that, I'm fucking, I'm smashing." V5, who also heard Crawford's vulgar remark described "smashing" to be a slang term used to refer to having sex.

In the beginning of her senior year, V1 went to Crawford because her older brother had left the halfway house he was living in and no one could find him; V1 wanted desperately to

find her brother and help him. She also confided in Crawford that although she was working and earning money, she had been getting less hours and had less money to help her family. V1 went to Crawford because she remembered him bragging that he had friends in law enforcement and V1 thought one of his friends might be able to help her find her brother. Instead, Crawford told her "You want to make money, right? You want to help your brother? The quickest way is to go with this person to make money." Crawford told V1 to email him photographs of her. Desperate to help her brother, V1 sent Crawford the photographs he requested- provocative photographs of V1 in lingerie. Crawford told V1 she could do better and again offered to take the photographs for her. V1 did not accept.

Crawford would often bring rich men with expensive cars to Lincoln High School. Crawford would tell V1 that she should go "shopping" with the men to make money. On one of these occasions, Crawford gave another student (V4) the phone number of one of the men who visited the school so she could "get a job" with him. Crawford would tell that student that she had "the best cookie in school;" "Cookie" was a slang term used in Crawford's class to refer to sexual organs.

On approximately 20 occasions, Crawford tried to convince V1 to prostitute herself for money. On each occasion, it was someone Crawford had brought onto campus. Crawford would introduce the men to the class, but would later approach V1 to make personal introductions between her and the men. Crawford would tell her "I could hook you up, you go with the one guy who came to class, he has money. He could take you shopping and if things happen, you could make money out of it."

The fact that V1 had considered prostituting herself for money became overwhelming for V1. She started missing Crawford's class to avoid him; she began wearing baggy pants and hoodies to school; she would hide in the library and cry during her other classes. Ultimately, a teacher became concerned and referred her to the school psychologist. Because of the trauma she experienced, V1 left LHS and finished her senior year doing self-study.

8. V1 is informed and believes that SDUSD administrators did not do a proper background check on Crawford and therefore were negligent in their hiring of Crawford. It should be noted that Crawford claimed to have been a former gang member to students and also told them that he had done time in prison with one of his student's fathers.

SDUSD failed to adequately supervise and protect their students. SDUSD did not properly supervise visitors brought on campus by Crawford. SDUSD provided a school environment that subjected female students to repeated sexual harassment by their own teacher. SDUSD presided over a school where a teacher was teaching young girls to sell themselves for money. SDUSD knew or should have known that Crawford was not suited to be a teacher.

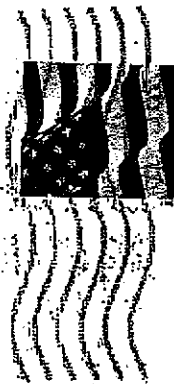
SDUSD administration turned a blind eye to what was going on right under their noses; Crawford's classroom was right next to the principal's office.

SDUSD administration and school police failed to take adequate measures to investigate previous complaints regarding Crawford, which allowed for ongoing victimization of female students.



**San Diego Unified**  
SCHOOL DISTRICT

**Risk Management Department**  
Revere Center, Room 7  
4100 Normal Street  
San Diego, CA 92103-2682

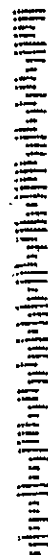


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92101-343650





**San Diego Unified**  
SCHOOL DISTRICT

**RISK MANAGEMENT**  
858-627-7345  
Fax 858-627-7353

May 24, 2019

Marlea Dell'Anno, Esq.  
Dell'Anno Law Firm, APC  
1320 Columbia Street, Suite 200  
San Diego, CA 92101

Re: Claim of "V1", a 17 year old

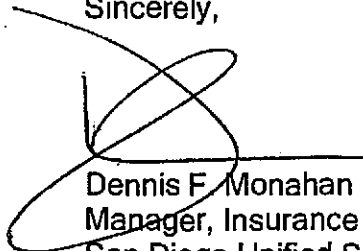
Dear Ms. Dell'Anno:

Notice is hereby given that the claim submitted to the San Diego Unified School District and received by this department on April 11, 2019 is rejected.

**WARNING**

Subject to certain exceptions, you have six months from the date this notice was personally delivered or deposited in the mail to file a court action on this claim. (See Government Code section 945.6) This notice was deposited in the mail on the above-stated date of this letter.

Sincerely,



Dennis F. Monahan  
Manager, Insurance & Risk Services  
San Diego Unified School District

DFM:cck