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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF RIVERSIDE**

10
11 JANE DOE, a minor, by and through her
Guardian Ad Litem MADELINE DORATI,

12 Plaintiff,

13 v.

14 MORENO VALLEY UNIFIED SCHOOL
15 DISTRICT, a public entity; and DOES 1
through 10, inclusive,

16 Defendants.

17 Case No.

18 **COMPLAINT FOR DAMAGES**

1. **NEGLIGENCE**
2. **NEGLIGENT HIRING,
SUPERVISION, AND RETENTION**
3. **NEGLIGENT SUPERVISION OF A
MINOR**
4. **NEGLIGENT FAILURE TO
WARN, TRAIN, OR EDUCATE**
5. **BREACH OF MANDATORY DUTY**

19 **DEMAND FOR JURY TRIAL**

20
21 Plaintiff JANE DOE, a minor, by and through her Guardian Ad Litem MADELINE
22 DORATI (hereinafter, “Plaintiff”) hereby complains and alleges against Defendants MORENO
23 VALLEY UNIFIED SCHOOL DISTRICT and DOES 1 through 10, inclusive, and each of them, as
24 follows:

25 **NATURE OF ACTION**

26 1. In 2023, when JANE DOE was a minor student of Defendants MORENO VALLEY
27 UNIFIED SCHOOL DISTRICT and DOES 1 through 10, inclusive, and each of them, in Moreno
28 Valley, California, she was groomed, sexually harassed, and sent a sexually explicit pornographic

1 photo by Richard Feliciano Romero (“Romero”), an employee of Defendants MORENO VALLEY
2 UNIFIED SCHOOL DISTRICT and DOES 1 through 10, inclusive, and each of them. Despite the
3 fact that Defendants MORENO VALLEY UNIFIED SCHOOL DISTRICT and DOES 1 through
4 10, inclusive, and each of them, knew or should have known that Romero was a danger to minors,
5 in that he was likely to use his position with them to groom and sexually abuse children, Defendants
6 failed to take reasonable steps to protect JANE DOE and other children from that danger.

7 **PARTIES**

8 2. The name utilized by JANE DOE in this Complaint is not her real name, but a
9 fictitious named used to protect her privacy as a victim of childhood sexual harassment, molestation,
10 and abuse. (*See Doe v. Lincoln Unified School District* (2010) 188 Cal.App.4th 758.)

11 3. JANE DOE, at all relevant times herein, was a minor who resided in the County of
12 Riverside. JANE DOE is currently seventeen years old.

13 4. Defendant MORENO VALLEY UNIFIED SCHOOL DISTRICT (“MVUSD”) is a
14 public educational agency organized, existing, and conducting business under the laws of the County
15 of Riverside and the State of California. MVUSD operates numerous schools within its school
16 district, including Canyon Springs High School, which is located at 23100 Cougar Canyon Drive,
17 Moreno Valley, California 92557. MVUSD was responsible for the administration, maintenance,
18 operation, and oversight of its schools and employees, including Romero.

19 5. To the extent MVUSD was a different entity, corporation, or organization during the
20 period of time during which Romero used his position with MVUSD to sexually abuse JANE DOE,
21 such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in
22 this lawsuit and is identified in the Complaint as MVUSD or as a “Doe” defendant.

23 6. To the extent MVUSD is a successor to a different entity, corporation, or
24 organization which existed during the period of time during which Romero used his position with
25 MVUSD to sexually abuse JANE DOE, such predecessor entity, corporation, or organization is
26 hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the Complaint
27 as MVUSD or as a “Doe” defendant.

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1 7. The Defendants named in this complaint as DOES 1 through 10 are individuals,
2 corporations, and/or other entities whose true names and capacities are unknown to Plaintiff at this
3 time and are, therefore, identified using fictitious names. Plaintiff will seek leave to amend this
4 Complaint to include their true names when they are ascertained. Plaintiff is informed and believes,
5 and upon such information and belief hereby alleges, that each of the Defendants sued herein as
6 DOES 1 through 10, inclusive, is negligent or in some other manner liable or responsible for the
7 events and happenings alleged in this Complaint and by their conduct directly and substantially
8 caused Plaintiff to sustain the injuries and damages alleged herein.

JURISDICTION AND VENUE

10 8. This Court has jurisdiction over this action pursuant to California Constitution
11 Article VI, section 10, because this case is a cause not given by statute to other trial courts.

12 9. Defendant MVUSD is a public school district organized, existing, and conducting
13 business under the laws of the County of Riverside and the State of California, and is subject to suit
14 as a local public entity pursuant to Government Code Sections 900 et seq., 945. MVUSD and DOES
15 1 through 10, inclusive, and each of them, were responsible for the administration, maintenance,
16 operation, and oversight of its schools and employees, including Romero.

17 10. Venue is proper in the County of Riverside pursuant to Code of Civil Procedure
18 Section 395(a) because a substantial part of the events and omissions giving rise to Plaintiff's claims
19 occurred in the City of Moreno Valley, County of Riverside, California.

EXEMPTION FROM GOVERNMENT TORT CLAIMS ACT

21 11. Government Code section 905(m) exempts the government tort claim presentation
22 requirements of the Government Tort Claims Act for claims made pursuant to Section 340.1 of the
23 Code of Civil Procedure for the recovery of damages suffered as a result of childhood sexual assault.
24 As such, Plaintiff was not required to present a government tort claim to MVUSD.

FACTS APPLICABLE TO ALL COUNTS

26 12. In September 2023, when JANE DOE was a minor, she was a student attending
27 school at Canyon Springs High School and using the services of MVUSD and DOES 1 through 10,
28 inclusive, and each of them.

1 13. During all times relevant to this action, Romero was a campus supervising officer
2 employed by MVUSD and DOES 1 through 10, inclusive, and each of them, to protect and serve
3 students and school employees, including JANE DOE and her family.

4 14. During all times relevant to this action, MVUSD and DOES 1 through 10, inclusive,
5 and each of them, through its respective agents, servants, and employees, held Romero out to the
6 public, to JANE DOE, and to her parents, as their agent and employee.

7 15. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
8 employees, agents, volunteers, or individuals who performed services on behalf of MVUSD, by
9 employing Romero and assigning him to work as a campus supervising officer, represented to the
10 public, including JANE DOE and her parents, that he had been properly vetted, screened, and
11 approved as someone who was safe and could be trusted to work with children.

12 16. JANE DOE and her parents reasonably relied upon the acts and representations of
13 MVUSD through their respective employees, agents, volunteers, or individuals who performed
14 services on behalf of MVUSD and reasonably believed that Romero as an agent or employee of
15 MVUSD, was vetted, screened, and approved by MVUSD and was safe and could be trusted with
16 children.

17 17. JANE DOE and her parents trusted Romero because MVUSD and DOES 1 through
18 10, inclusive, and each of them, held him out as someone who was safe and could be trusted with
19 the supervision, care, custody, and control of children, including JANE DOE.

20 18. JANE DOE and her parents believed that MVUSD and DOES 1 through 10,
21 inclusive, and each of them, would exercise such care as would a parent of ordinary prudence in
22 comparable circumstances when the Defendants assumed supervision, care, custody, and control of
23 JANE DOE, including protecting JANE DOE from the danger of being sexually abused.

24 19. When JANE DOE was a minor, Romero used his positions with the Defendants
25 MVUSD and DOES 1 through 10, inclusive, and each of them, to sexually harass her.

26 20. Based on the representations of MVUSD and DOES 1 through 10, inclusive, and
27 each of them, that Romero was safe and trustworthy, JANE DOE and her parents allowed her to be

1 under the supervision of, and in the care, custody, and control of, MVUSD, including when JANE
2 DOE was sexually harassed by Romero.

3 21. In order to sexually harass JANE DOE, Romero exploited the trust and authority
4 vested in him by Defendants, and by grooming JANE DOE to gain her trust and to obtain control
5 over her.

6 22. Romero used his positions of trust and authority as a campus supervising officer of
7 MVUSD and DOES 1 through 10, inclusive, and each of them, to groom JANE DOE and to sexually
8 harass her, including when JANE DOE was under the supervision of, and in the care, custody, or
9 control of MVUSD and Romero.

10 23. The sexual harassment of JANE DOE by Romero occurred using the tasks, premises,
11 or instrumentalities that the Defendants entrusted to Romero.

12 24. Romero's sexual harassment of JANE DOE occurred during activities that were
13 sponsored, or were a direct result of activities sponsored, by MVUSD and DOES 1 through 10,
14 inclusive, and each of them.

15 25. Romero's sexual harassment of JANE DOE, which includes sending JANE DOE a
16 sexually explicit pornographic photo, was unlawful and constitutes childhood sexual assault under
17 California law, including California Code of Civil Procedure Section 340.1.

18 26. At all relevant times MVUSD and DOES 1 through 10, inclusive, and each of them,
19 through its agents, servants, and employees, knew or should have known that Romero was a danger
20 to children, in that he was likely to sexually harass and abuse them.

21 27. Both during, and directly following regular school hours of MVUSD and DOES 1
22 through 10, inclusive, and each of them, Romero used his positions of trust and authority as well as
23 his access to premises of Canyon Springs High School to perpetrate his sexual harassment of JANE
24 DOE.

25 28. It was reasonably foreseeable to Defendants, through their agents, servants, and
26 employees, that Romero's sexual harassment and abuse of children would likely result in injury to
27 others, including the sexual harassment of JANE DOE.

28 / / /

1 29. MVUSD and DOES 1 through 10, inclusive, and each of them, through its agents,
2 servants, and employees, knew or should have known that Romero was sexually harassing and
3 abusing students at Canyon Springs High School, including JANE DOE.

4 30. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
5 agents, servants, and employees, knew or should have known before and during Romero's sexual
6 harassment of JANE DOE that employees, volunteers, and/or other persons serving Canyon Springs
7 High School had used their positions with the Defendant to groom and to sexually harass and abuse
8 children.

9 31. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
10 agents, servants, and employees, concealed the sexual harassment and abuse of children by Romero
11 in order to conceal their own bad acts in failing to protect children from him, to protect their
12 reputations, and to prevent victims of such sexual harassment and abuse from coming forward,
13 despite knowing that Romero would continue to molest children.

14 32. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
15 agents, servants, and employees, consciously and recklessly disregarded their knowledge that
16 Romero would use his positions with the Defendants to sexually harass and abuse children,
17 including JANE DOE.

18 33. MVUSD and DOES 1 through 10, inclusive, and each of them, through their
19 employees, agents, volunteers, or those who provided services on behalf of MVUSD, acted in
20 concert with each other and/or with Romero to enable Romero to sexually harass and abuse children,
21 including JANE DOE.

22 34. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
23 agents, servants, and employees, knew that its negligent, reckless, and outrageous conduct would
24 inflict severe emotional and psychological distress, as well as personal physical injury on others,
25 including JANE DOE, and JANE DOE did, in fact, suffer severe emotional and psychological
26 distress and personal physical injury as a result of their wrongful conduct.

27 35. MVUSD and DOES 1 through 10, inclusive, and each of them, through its respective
28 agents, servants, and employees, concealed the sexual harassment and abuse of children by teachers,

1 school administrators, volunteers, school safety offices, and others, including Romero, in order to
2 conceal its own bad acts in failing to protect children from being abused, to protect its reputations,
3 and to prevent victims of such sexual harassment and abuse from coming forward that allows JANE
4 DOE to pursue her claim now, despite knowing that those teachers, school administrators,
5 volunteers, school safety officers, and other persons would continue to molest children.

6 36. On December 11, 2025, Romero was arrested and booked at the Cois Byrd Detention
7 Center for sodomy by force, solicitation of child sexual abuse material, and multiple additional child
8 sexual abuse charges.

9 37. Based on information and belief, MVUSD and DOES 1 through 10, inclusive, and
10 each of them, through their employees, agents, volunteers, or those who provided services on behalf
11 of MVUSD, allowed the sale of drugs, tobacco products, and other illicit substances on the campus
12 of Canyon Springs High School by students and other individuals while Plaintiff was attending
13 Canyon Springs High School.

14 38. By reason of the wrongful acts of MVUSD as detailed herein, JANE DOE has
15 sustained severe emotional and physical injuries and other harms. Some or all of JANE DOE's
16 injuries are of a permanent and lasting nature, and JANE DOE has or will become obligated to
17 expend sums of money for treatment.

FIRST CAUSE OF ACTION

NEGLIGENCE

(Against all Defendants)

21 39. Plaintiff reasserts and realleges each and every allegation contained in the above
22 paragraphs and incorporates the same by reference as though fully set forth herein.

23 40. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, are
24 persons or entities who owed a duty of care to JANE DOE, or had a duty to control the conduct of
25 Romero, by way of the special relationship existing between those individuals.

41. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, knew or
should have known of Romero's misconduct and sexually predatory behavior of Romero directed
at minor students he interacted with as a teacher for MVUSD.

1 42. Despite having knowledge of Romero's misconduct and sexually predatory behavior,
2 Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, failed to take any
3 preventative action to control, curb, or prevent that conduct, and failed to warn JANE DOE, her
4 parents, or anyone else, of that wrongful conduct, despite having a legal duty to do so.

5 43. As a direct and legal result of the negligence of Defendants MVUSD and DOES 1
6 through 10, inclusive, and each of them, JANE DOE was sexually harassed by Romero.

7 44. Had Defendants MVUSD and DOES 1 through 10, inclusive, and each of them,
8 fulfilled their duties and responsibilities, JANE DOE would not have been subject to all or most of
9 the misconduct perpetrated against her by Romero.

10 45. As a direct and legal result of Defendants MVUSD and DOES 1 through 10,
11 inclusive, and each of them, having breached their duty to properly supervise and/or warn JANE
12 DOE, her parents, or anyone else, of Romero's wrongful conduct, JANE DOE has been severely
13 damaged emotionally and physically, and otherwise, in amounts to be proven at the time of trial.

SECOND CAUSE OF ACTION

NEGLIGENT HIRING, SUPERVISION, AND RETENTION

(Against all Defendants)

17 46. Plaintiff reasserts and realleges each and every allegation contained in the above
18 paragraphs and incorporates the same by reference as though fully set forth herein.

19 47. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, had the
20 responsibility and mandatory duty to adequately and properly investigate, hire, train, and supervise
21 their agents, employees, volunteers, or other individuals who performed services on behalf of
22 MVUSD and to protect their students from harm caused by unfit and dangerous individuals hired as
23 staff.

24 48. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, knew or
25 should have known that Romero was unfit to be employed as their teacher.

26 49. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, breached
27 their mandatory duty to properly and adequately investigate, hire, train, and supervise Romero.

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1 50. Had Defendants MVUSD and DOES 1 through 10, inclusive, and each of them,
2 properly investigated, supervised, trained, and monitored the conduct and actions of Romero, as
3 teacher and staff member, they would have discovered that he was unfit to be so employed. By
4 failing to adequately supervise, monitor, or investigate, MVUSD and DOES 1 through 10, inclusive,
5 and each of them, allowed Romero to continue, unhindered, with his predatory conduct directed
6 towards underage students, including JANE DOE.

7 51. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them,
8 negligently hired, supervised, retained, monitored, and otherwise employed Romero, and
9 negligently failed to ensure the safety of a minor student, JANE DOE, who was entrusted to
10 Defendants' custody, care, and control.

52. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, negligently failed to adequately implement or enforce any districtwide procedures or policies that were aimed at preventing, detecting, or deterring the sexual harassment or abuse of students by teachers, supervisors, or others.

15 53. Pursuant to Government Code Sections 815.2 and 820, Defendants MVUSD and
16 DOES 1 through 10, inclusive, and each of them, are vicariously liable for injuries to JANE DOE
17 caused by the acts, omissions, and breach of the duty of care of their employees. (*C.A. v. William S.*
18 *Hart Union High School District* (2012) 53 Cal.4th 861.)

19 54. Had Defendants MVUSD or DOES 1 through 10, inclusive, and each of them,
20 performed their mandatory duties and responsibilities to monitor, supervise, and/or investigate
21 Romero, then JANE DOE would not have been subject to the sexual harassment and other harmful
22 conduct inflicted upon her.

23 55. As a direct and legal result of the acts and omissions of Defendants MVUSD and
24 DOES 1 through 10, inclusive, and each of them, JANE DOE suffered physical and emotional
25 injuries and other harm, including economic and non-economic damages in amounts to be
26 determined but which exceed the jurisdictional minimum of the Superior Court.

THIRD CAUSE OF ACTION

NEGLIGENCE SUPERVISION OF A MINOR

(Against all Defendants)

56. Plaintiff reasserts and realleges each and every allegation contained in the above paragraphs and incorporates the same by reference as though fully set forth herein.

57. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, were responsible for the care, custody, control, supervision, and protection of minor students entrusted to them, including JANE DOE. Defendants had a duty to adequately and properly supervise, monitor, and protect Plaintiff from known and knowable dangers, such as those posed by Romero.

58. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, have a duty to protect their students from sexual abuse by school employees even without actual knowledge of a particular employee's history of committing, or propensity to commit, such abuse. (*Doe v. Lawndale Elementary School* (2021) 72 Cal.App.5th 113.)

59. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, breached their duty to properly and adequately supervise, monitor, and protect JANE DOE, in part by ignoring clear and obvious signs that Romero was engaged in an inappropriate and harassing relationship with JANE DOE; allowing JANE DOE to spend unsupervised time with Romero; and allowing Romero to sexually harass JANE DOE.

60. Had Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, adequately and properly supervised, monitored, and protected its students, JANE DOE would not have been harmed.

61. Pursuant to Government Code Sections 815.2 and 820, Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, are vicariously liable for injuries to JANE DOE caused by the acts, omissions, and breach of the duty of care of their employees. (*C.A. v. William S. Hart Union High School District* (2012) 53 Cal.4th 861.)

62. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, recklessly and negligently failed to implement and/or enforce policies and procedures that were aimed at preventing or detecting sexual abuse of its students.

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1 63. Had Defendants MVUSD and DOES 1 through 10, inclusive, and each of them,
2 adequately performed their duty and responsibility, then Plaintiff would not have been subject to
3 the sexual harassment as alleged herein.

4 64. As a direct and legal result of the acts and omissions of Defendants MVUSD and
5 DOES 1 through 10, inclusive, and each of them, JANE DOE suffered physical and emotional
6 injuries and other harm, including economic and non-economic damages in amounts to be
7 determined but which exceed the jurisdictional minimum of the Superior Court.

FOURTH CAUSE OF ACTION

NEGLIGENCE FAILURE TO WARN, TRAIN, OR EDUCATE

(Against all Defendants)

11 65. Plaintiff reasserts and realleges each and every allegation contained in the above
12 paragraphs and incorporates the same by reference as though fully set forth herein.

13 66. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, had a
14 duty to warn, train, and educate the student in its custody, care, and control, like JANE DOE, on
15 known and knowable dangers posed by its employees, agents, volunteers, or other individuals who
16 performed services on behalf of MVUSD. Defendants also had a duty to warn, train, and educate its
17 employees, agents, volunteers, or other individuals who performed services on behalf of MVUSD
18 on its sexual harassment policy and inappropriate boundary crossing with students.

19 67. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, breached
20 their duty to JANE DOE by failing to warn her of known and knowable dangers posed by its
21 employees, agents, volunteers, or other individuals who performed services on behalf of MVUSD,
22 including Romero; by failing to inform and educate JANE DOE on its sexual harassment policies
23 and the methods to identify, report, and respond to inappropriate sexual harassment by teachers and
24 by failing to train its employees, agents, volunteers, or other individuals who performed services on
25 behalf of MVUSD, including Romero, on MVUSD's sexual harassment policies.

68. As a direct and legal result of the negligence of MVUSD and DOES 1 through 10,
inclusive, and each of them, JANE DOE was groomed, manipulated, and ultimately sexually
harassed by Romero.

69. Had Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, fulfilled their duties and responsibilities, JANE DOE would not have injured.

70. As a direct and legal result of the acts and omissions of Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, JANE DOE suffered physical and emotional injuries and other harm, including economic and non-economic damages in amounts to be determined but which exceed the jurisdictional minimum of the Superior Court.

FIFTH CAUSE OF ACTION

BREACH OF MANDATORY DUTY: FAILURE TO REPORT SUSPECTED CHILD

ABUSE (GOVERNMENT CODE SECTION 815.6)

(Against all Defendants)

71. Plaintiff reasserts and realleges each and every allegation contained in the above paragraphs and incorporates the same by reference as though fully set forth herein.

72. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, were at all relevant times herein subject to the provisions of the Child Abuse and Neglect Reporting Act. (Penal Code section 11164, et seq.)

73. Defendants MVUSD and DOES 1 through 10, inclusive, and each of them, acting through its employees and agents, were at all times "mandated reporters" pursuant to the provisions of Penal Code section 11164, et seq. As mandated reports of suspected child abuse, Defendants were legally obligated to personally report reasonably suspected incidents of child abuse to a law enforcement agency or child protective services within a very short period of time.

74. MVUSD, acting through its employees and agents, knew or reasonably suspected that Romero was acting inappropriately with minor students. And yet, not one reported the suspected sexual abuse as required by their employment with MVUSD and mandated by the Child Abuse and Neglect Reporting Act.

75. MVUSD, acting through its employees and agents, failed to report suspected child abuse to a law enforcement or child protective services as required by their employed with MVUSD and mandated by the Child Abuse and Neglect Reporting Act.

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1 76. When MVUSD employees and agents violated the Child Abuse and Neglect
2 Reporting Act, they were acting within the course and scope of their employment, and MVUSD is
3 vicariously liable for their failure.

4 77. By failing to report suspected child abuse, Defendants allowed Romero to continue,
5 unhindered, in his sexual harassment and abuse of minor children, including JANE DOE.

6 78. As a direct and legal result of Defendants MVUSD and DOES 1 through 10,
7 inclusive, and each of them, having breached their duty to properly supervise and/or warn JANE
8 DOE, her parents, or anyone else, of Romero's wrongful conduct, JANE DOE has been severely
9 damaged emotionally and physically, and otherwise, in amounts to be proven at the time of trial.

PRAAYER FOR RELIEF

11 WHEREFORE, Plaintiff prays for judgment against Defendants MVUSD and DOES 1
12 through 10, inclusive, and each of them as follows:

13 1. For special and general damages according to proof against all defendants;
14 2. For reasonable attorney's fees as allowable by statute;
15 3. For costs of suit incurred herein;
16 4. For prejudgment interest as may be allowed;
17 5. For an award of up to treble damages as provided in California Code of Civil
18 Procedure §340.1(b)(1) against all defendants;
19 6. For such other and further relief as the Court deems just and proper.

21 | DATED: January 15, 2026

PANISH | SHEA | RAVIPUDI LLP

By:

U. Sean Maneewongwathan
Attorneys for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all causes of action.

DATED: January 15, 2026

PANISH | SHEA | RAVIPUDI LLP

By:

U. Sean Maneewongwathan
Attorneys for Plaintiff

PANISH | SHEA | RAVIPUDI LLP