

1 ANTHONY L. LABEL, NO. 205920
STEVEN A. KRONENBERG, NO. 215541
2 THE VEEN FIRM LLP
20 Haight Street
3 San Francisco, California 94102
Telephone: (415) 673-4800
4 Facsimile: (415) 771-5845
AL.Team@VeenFirm.com

5 ATTORNEYS FOR PLAINTIFF
6 JOHN DOE

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SANTA BARBARA**

10
11 JOHN DOE,

12 Plaintiff,

13 v.

14 SANTA BARBARA UNIFIED SCHOOL
DISTRICT, BOARD OF EDUCATION OF
15 THE SANTA BARBARA UNIFIED
SCHOOL DISTRICT, ANDREW GRIMES,
16 ANDREW MITCHELL, MIGUEL
"MICHAEL" ANGEL JUAREZ, AND DOES
17 1-100,

18 Defendants.

CASE NO.

**COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL**

19
20 Plaintiff JOHN DOE complains and alleges against Defendants SANTA BARBARA
21 UNIFIED SCHOOL DISTRICT, THE BOARD OF EDUCATION OF THE SANTA BARBARA
22 UNIFIED SCHOOL DISTRICT, ANDREW GRIMES, ANDREW MITCHELL, MIGUEL
23 "MICHAEL" ANGEL JUAREZ, AND DOES 1-100:

24 **I. GENERAL ALLEGATIONS**

25 1. The entirety of this complaint is pleaded upon information and belief. Each
26 allegation contained here is likely to have evidentiary support after a reasonable opportunity for
27 further investigation or discovery.
28

1 **II. PARTIES**

2 2. Plaintiff JOHN DOE is a special needs student who is enrolled in Dos Pueblos
3 High School within the Santa Barbara Unified School District. Plaintiff’s special needs render him
4 vulnerable to physical and sexual abuse. Plaintiff JOHN DOE is a minor. An application for an
5 order appointing a Guardian ad Litem for JOHN DOE will be filed.

6 3. Defendants ANDREW GRIMES, ANDREW MITCHELL, MIGUEL “MICHAEL”
7 ANGEL JUAREZ, and DOES 1-100 were employed at Dos Pueblos High School by the Santa
8 Barbara Unified School District as special education professionals, paraprofessionals, or staff
9 members.

10 4. Defendant SANTA BARBARA UNIFIED SCHOOL DISTRICT (“SBUSD”) is a
11 public entity organized and existing under the laws of the State of California and operates Dos
12 Pueblos High School, where plaintiff was enrolled as a special needs student. It is vicariously
13 liable for the acts and omissions of its employees under Gov. Code, sec. 815.2, and related
14 authority. At all relevant times, the individually named employee Defendants were liable for their
15 own acts and omissions under Gov. Code, sec. 820.

16 5. Defendant BOARD OF EDUCATION OF THE SANTA BARBARA UNIFIED
17 SCHOOL DISTRICT (the “BOARD”) is a public entity and the governing body responsible for
18 the operation, supervision, and management of the SBUSD. It is vicariously liable for the acts and
19 omissions of its employees under Gov. Code, sec. 815.2, and related authority. At all relevant
20 times, the individually named employee Defendants were liable for their own acts and omissions
21 under Gov. Code, sec. 820.

22 6. Plaintiff alleges that at all times mentioned here, each of the Defendants named,
23 including each Defendant sued under a fictitious name, was the duly authorized agent, servant,
24 and/or employee of each and every other Defendant with respect to the events and transactions
25 herein alleged, and in acting or omitting to act with respect thereto as hereinafter alleged, was
26 within the course, scope and authority of such agency, service, and/or employment, and
27 conducting himself, or itself pursuant to the consent, permission, authorization, and/or ratification
28 of and by each and every Defendant, as aforesaid, when acting as a principal, was negligent in the

1 selection, hiring, and/or supervision of each and every other Defendant as an agent, servant,
2 employee, and/or independent contractor. Each defendant is responsible for plaintiffs' harm
3 directly, indirectly, and/or vicariously.

4 7. Other than the named defendants identified above, the name(s) of the public
5 employee(s), agent(s), or contractor(s) causing Plaintiff's injuries and damages under the
6 described circumstances are not known to Plaintiff. The true names or capacities, whether
7 individual, corporate, associate or otherwise, of the Defendants sued herein as DOES, are
8 unknown to Plaintiffs, who therefore sue said Defendants by such fictitious names, pursuant to
9 Section 474 of the Code of Civil Procedure. Plaintiffs allege that each of said Defendants
10 designated by such fictitious names is responsible and legally obligated to Plaintiff in contract, in
11 tort, or by statute, for the events and happenings herein referred to, and for the damages legally
12 caused to Plaintiffs. Plaintiffs therefore pray for leave to amend this complaint to insert the true
13 names and capacities of said Defendants when they have been ascertained.

14 8. Plaintiff alleges that certain of the Defendant DOES are the successors in interest to
15 each of the remaining Defendants and on that basis, are liable for any act, or omission of said
16 Defendants alleged in this complaint.

17 **III. JURISDICTION AND VENUE**

18 9. Venue is proper in this Court, because the acts and omissions giving rise to this
19 action occurred in the City of Goleta, County of Santa Barbara, California. The school at issue is
20 located at 7266 Alameda Ave, Goleta, CA 93117.

21 10. This Court has jurisdiction over this action, because the amount in controversy
22 exceeds the minimum jurisdictional limits of this Court for unlimited civil cases.

23 **IV. GOVERNMENT TORT CLAIMS ACT COMPLIANCE**

24 11. Plaintiff complied with the Tort Claims Act and timely presented claims pursuant
25 to Gov. Code, sec. 910, on October 22, 2025.

26 12. Plaintiff amended the claim on November 13, 2025.

27 13. On November 19, 2025, SBUSD rejected the claim. This action is therefore timely
28 pursuant to Gov. Code, sec. 945.6.

1 Defendant Miguel “Michael” Angel Juarez for sexual battery; [https://www.sbsheriff.org/suspect-](https://www.sbsheriff.org/suspect-arrested-for-sexual-battery-additional-survivors-sought/)
2 [arrested-for-sexual-battery-additional-survivors-sought/.](https://www.sbsheriff.org/suspect-arrested-for-sexual-battery-additional-survivors-sought/))

3 34. The abuse occurred at Dos Pueblos High School, including but not limited to
4 private areas like restroom facilities where the defendants attempted to conceal their wrongdoing,
5 while the defendants supervised and purported to assist Plaintiff with toileting and hygiene.

6 35. Due to the nature and extent of Plaintiff’s special needs, including speech/
7 communication disabilities, related developmental disabilities, and the effects of the abuse,
8 Plaintiff cannot fully describe all details of the abuse. Plaintiff understands that this information is
9 more known to the defendants than to Plaintiff.

10 **VII. CAUSES OF ACTION**

11 **A. FIRST CAUSE OF ACTION FOR SEXUAL BATTERY (AGAINST ANDREW**
12 **GRIMES, ANDREW MITCHELL, MIGUEL “MICHAEL” ANGEL JUAREZ, AND**
13 **DOES 1-50)**

14 36. Plaintiff realleges and incorporates by reference each and every allegation
15 contained in the preceding paragraphs of this Complaint as though fully set forth here.

16 37. Pursuant to Civ. Code, sec. 1708.5, a sexual battery occurs when a person acts with
17 the intent to cause a harmful or offensive contact with an intimate part of another, and a sexually
18 offensive contact with that person directly or indirectly results.

19 38. As alleged here, Defendants, while acting under color of their authority as a school
20 agent or employee entrusted with the care, custody, and supervision of Plaintiff, intentionally
21 engaged in sexually offensive conduct with Plaintiff, including harmful and offensive contact with
22 Plaintiff’s intimate parts, including but not limited to Plaintiff’s genitals, during times when
23 Plaintiff was particularly vulnerable, including while being assisted with toileting and hygiene.

24 39. Defendants acted with the intent to cause harmful or offensive contact with
25 Plaintiff’s intimate parts and for the purpose of sexual arousal, gratification, or abuse. A sexually
26 offensive contact directly or indirectly resulted, which would offend a reasonable sense of
27 personal dignity.

28 40. Plaintiff did not consent to such contact and, as a minor with developmental

1 disabilities, lacked the capacity to provide meaningful consent.

2 41. As a direct and proximate result of Defendants' conduct, Plaintiff suffered and
3 continues to suffer severe emotional distress, humiliation, psychological trauma, fear, anxiety, loss
4 of trust, and other injuries, including physical and emotional harm, and has incurred and will
5 continue to incur expenses for medical care, psychological treatment, therapy, and counseling, all
6 according to proof.

7 42. The conduct of Defendants was willful, malicious, oppressive, and despicable, and
8 was carried out with a conscious disregard for the rights and safety of Plaintiff, thereby
9 constituting malice, oppression, or fraud within the meaning of Civ. Code, sec. 3294. Accordingly,
10 Plaintiff seeks punitive and exemplary damages against the individual Defendants, including DOE
11 Defendants. Plaintiff does not seek punitive damages against any public entity Defendant.

12 **B. SECOND CAUSE OF ACTION FOR BATTERY (AGAINST ANDREW GRIMES,**
13 **ANDREW MITCHELL, MIGUEL "MICHAEL" ANGEL JUAREZ, AND DOES 1-**
14 **50)**

15 43. Plaintiff realleges and incorporates by reference each and every allegation
16 contained in the preceding paragraphs of this Complaint as though fully set forth here.

17 44. Defendants intentionally and unlawfully touched Plaintiff in a harmful and
18 offensive manner.

19 45. Plaintiff did not consent to such conduct and, as a minor with developmental
20 disabilities, lacked the capacity to consent.

21 46. Defendants' conduct was a substantial factor in causing harm to Plaintiff.

22 47. As a direct and proximate result of Defendants' conduct, Plaintiff suffered injuries
23 and damages, including physical injury, emotional distress, and other economic and noneconomic
24 harm and damages, in an amount according to proof. Defendants committed battery upon Plaintiff,
25 in violation of Civ. Code, secs. 1708.5, 1708.9, and related authority.

26 48. The conduct of the individual Defendants, including DOE Defendants, was willful,
27 malicious, oppressive, and despicable, and was carried out with a conscious disregard for the
28 rights and safety of Plaintiff. Accordingly, Plaintiff seeks punitive and exemplary damages against

1 the individual Defendants, including DOE Defendants, pursuant to Civil Code section 3294.

2 Plaintiff does not seek punitive damages against any public entity Defendant.

3 **C. THIRD CAUSE OF ACTION FOR NEGLIGENT HIRING, SUPERVISION, AND**
4 **RETENTION OF UNFIT EMPLOYEE(S) (AGAINST SBUSD, THE BOARD, and**
5 **DOES 51-100)**

6 49. Plaintiff realleges and incorporates by reference each and every allegation
7 contained in the preceding paragraphs of this Complaint as though fully set forth here.

8 50. Defendants negligently hired, supervised, and retained the unfit named defendants
9 and DOES 1-50. (Gov. Code, §§ 815.2(a), 820.) They had the responsibility and duty under Gov.
10 Code, secs. 815.2(a) and 820, to adequately and properly investigate, hire, train, and supervise
11 their agents and employees who would be working with minors, including special needs students,
12 to protect the minors and students in their care, custody, and control from harm caused by unfit
13 and dangerous individuals hired as professionals and paraprofessionals. By failing to adequately
14 supervise, monitor, or investigate the named Defendants and DOES 1-50, Defendants allowed
15 them to continue their predatory conduct toward Plaintiff, in violation of their mandatory duties,
16 including the mandatory duty to report such conduct. (*See, e.g.*, Penal Code, sec. 1116.5.)

17 51. Had these Defendants properly investigated, supervised, trained, and monitored the
18 named defendants and DOES 1-50, they would have discovered that the named defendants and
19 DOES 1-50 were unfit to be employed as teachers and supervisors of minor students. By failing to
20 adequately supervise, monitor, or investigate, Defendants allowed the named defendants and
21 DOES 1-50 to continue, unhindered, with their predatory conduct directed towards underage,
22 special needs students, including Plaintiff.

23 52. Defendants negligently hired, supervised, retained, monitored, and otherwise
24 employed the named defendants and DOES 1-50 and negligently failed to ensure the safety of
25 minor special needs students, including Plaintiff, who were entrusted to Defendants' custody, care,
26 and control.

27 53. Defendants also failed to adequately implement or enforce any procedures or
28 policies that were aimed at preventing, detecting, or deterring the physical and sexual abuse,

1 grooming, or harassment of minors and students by their personnel.

2 54. As a direct and legal result of the Defendants' acts and omissions, Plaintiff suffered
3 physical and emotional injuries and other harm, including economic and non-economic damages
4 in amounts to be determined but which exceed the minimum jurisdictional limits of the Superior
5 Court.

6 **D. FOURTH CAUSE OF ACTION FOR NEGLIGENT FAILURE TO WARN, TRAIN,**
7 **AND EDUCATE (AGAINST ALL DEFENDANTS)**

8 55. Plaintiff realleges and incorporates by reference each and every allegation
9 contained in the preceding paragraphs of this Complaint as though fully set forth here.

10 56. Defendants had a duty to warn, train, and educate the students in their custody,
11 care, and control, like Plaintiff, on known and knowable dangers posed by its faculty and staff
12 pursuant to Gov. Code, secs. 815.2(a), 820. The Public Entity Defendants also had a duty to warn,
13 train, and educate their faculty, staff, students, and parents on student privacy and protection
14 policies, sexual harassment prevention policies, physical and sexual abuse prevention policies,
15 policies on inappropriate boundary crossing with students, and mandatory duties to report such
16 conduct. (*See, e.g.*, Penal Code, secs. 1116.5, 11165.7 and related authority; Educ. Code, § 44691
17 et seq.)

18 57. Defendants breached their duty to Plaintiff by failing to warn him of known and
19 knowable dangers posed by faculty and staff, including but not limited to ANDREW GRIMES,
20 ANDREW MITCHELL, AND MIGUEL "MICHAEL" ANGEL JUAREZ, and DOES 1-100; by
21 failing to inform and educate Plaintiff and his parents regarding these dangers, the policies
22 intended to address them, and the defendants' mandatory duty to report the conduct at issue.

23 58. As a result of the Defendants' breach of duty, Plaintiff suffered physical and
24 emotional injuries and other harm, including economic and non-economic damages according to
25 proof.

26 **E. FIFTH CAUSE OF ACTION FOR NEGLIGENT SUPERVISION OF A MINOR**
27 **(AGAINST ALL DEFENDANTS)**

28 59. Plaintiff realleges and incorporates by reference each and every allegation

1 contained in the preceding paragraphs of this Complaint as though fully set forth here.

2 60. Defendants had a special relationship with the minors on their campus and were
3 responsible for the care, custody, control, supervision, and protection of the minors entrusted to
4 them. This is especially true for vulnerable special education students like Plaintiff, who cannot
5 understand and articulate their concerns to the same extent as students who do not have special
6 needs.

7 61. Defendants had a duty to adequately and properly supervise, monitor, and protect
8 Plaintiff from known and knowable dangers, like the faculty and staff at issue, including but not
9 limited to ANDREW GRIMES, ANDREW MITCHELL, AND MIGUEL “MICHAEL” ANGEL
10 JUAREZ, and DOES 1-100. (Gov. Code, secs. 815.2(a), 820.)

11 62. Defendants breached their duty to properly and adequately supervise, monitor, and
12 protect Plaintiff by, in part, ignoring clear and obvious signs that faculty and staff, including but
13 not limited to ANDREW GRIMES, ANDREW MITCHELL, AND MIGUEL “MICHAEL”
14 ANGEL JUAREZ, and DOES 1-100 were engaged in wrongful and unlawful physical and sexual
15 abuse of Plaintiff. The Public Entity Defendants also failed to implement and/or enforce policies
16 or procedures to prevent, detect, and report this conduct.

17 63. As a result of the Public Entity Defendants’ breach of duty, Plaintiff suffered
18 physical and emotional injuries and other harm, including economic and non-economic damages
19 in amounts according to proof.

20 **F. SIXTH CAUSE OF ACTION FOR VIOLATION OF RIGHT TO PRIVACY**
21 **UNDER CALIFORNIA CONSTITUTION, ART. I, SEC. 1 (AGAINST ALL**
22 **DEFENDANTS)**

23 64. Plaintiff realleges and incorporates by reference each and every allegation
24 contained in the preceding paragraphs of this Complaint as though fully set forth here.

25 65. Defendants violated Plaintiff’s inalienable right to privacy guaranteed under the
26 State Constitution. Their faculty and staff, including but not limited to ANDREW GRIMES,
27 ANDREW MITCHELL, AND MIGUEL “MICHAEL” ANGEL JUAREZ, and DOES 51-100,
28 viewed Plaintiff’s genitalia and private body parts.

1 **H. EIGHTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF**
2 **EMOTIONAL DISTRESS (AGAINST ANDREW GRIMES, ANDREW**
3 **MITCHELL, MIGUEL “MICHAEL” ANGEL JUAREZ, AND DOES 1-50)**

4 75. Plaintiff realleges and incorporates by reference each and every allegation
5 contained in the preceding paragraphs of this Complaint as though fully set forth here.

6 76. A person is liable for intentional infliction of emotional distress if his, her or its
7 conduct is outrageous; intended to cause another emotional distress or acted with reckless
8 disregard of the probability that the other person would suffer emotional distress; the other person
9 suffered severe emotional distress; and the conduct was a substantial factor in causing the
10 emotional distress.

11 77. Defendants engaged in extreme and outrageous conduct against Plaintiff including,
12 but not limited to, physical and sexual abuse and invasion of privacy.

13 78. Defendants intended to cause, or acted in reckless disregard of the probability of
14 causing, emotional distress to Plaintiff.

15 79. Defendants’ conduct proximately caused Plaintiff to suffer severe emotional
16 distress.

17 80. As a direct and legal result of the acts and omissions of Defendants, Plaintiff
18 suffered emotional injuries and other harm, including economic and non-economic damages in
19 amounts according to proof.

20 81. The conduct of the individual Defendants, including DOE Defendants, was willful,
21 malicious, oppressive, and despicable, and was carried out with a conscious disregard for the
22 rights and safety of Plaintiff. Accordingly, Plaintiff seeks punitive and exemplary damages against
23 the individual Defendants, including DOE Defendants, pursuant to Civil Code section 3294.
24 Plaintiff does not seek punitive damages against any public entity Defendant.

25 **VIII. PRAYER FOR RELIEF**

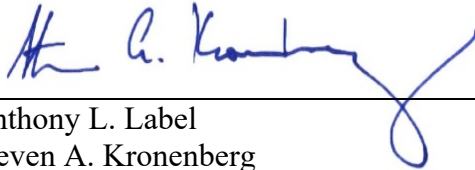
26 WHEREFORE, Plaintiff prays for judgment against Defendants and each of them, as
27 follows:

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1. For an award of general damages and special damages against Defendants according to proof;
2. For an award of punitive damages against ANDREW GRIMES, ANDREW MITCHELL, MIGUEL ANGEL JUAREZ, and DOE Defendants other than public entities;
3. For statutory damages, according to proof;
4. For prejudgment interest;
5. For costs of suit incurred herein; and
6. For such other and further relief as the Court deems just and proper.

DATED: May 14, 2026

THE VEEN FIRM LLP

By: 

Anthony L. Label
Steven A. Kronenberg
Brian Ceglio
Attorneys for Plaintiff

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PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the City and County of San Francisco, State of California. My business address is 20 Haight Street, San Francisco, CA 94102.

On October 23, 2025, I served true copies of the following document(s) described as **ATTACHMENT TO CLAIM FOR PERSONAL INJURIES/WRONGFUL DEATH (Gov. Code, § 910)** on the interested parties in this action as follows:

**Santa Barbara Unified School District
Attention: Clerk, Secretary or Auditor
720 Santa Barbara Street
Santa Barbara, CA 93101**

BY CERTIFIED MAIL – RETURN RECEIPT REQUESTED: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing via Certified Mail, Return Receipt Requested, following our ordinary business practices. I am readily familiar with the practice of The Veen Firm LLP for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at San Francisco, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 23, 2025, at San Francisco, California.

Margo Luppino

SERVICE LIST

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