

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

J.R., a/k/a “Jojo” a minor, by and through his
parents and next friends Scott Rodgers and Olivia
Rodgers,

Plaintiff,

v.

SCHOOL COMMITTEE OF GLOUCESTER;
BEN LUMMIS; PATTI BERNHEART;
JACLYN SIMOES; and MICHAEL JARVIS,
in their official capacities, and TELENA
IMEL; KALI MARTIN; SAMANTHA VAN
BEEVER; and HOLLY GAGNON, in their
official and personal capacities,

Defendants.

Civil Action No. _____

**COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF AND DAMAGES
UNDER 42 U.S.C. § 1983
(VERIFIED COMPLAINT)
(Jury Trial Demanded)**

RANDAZZA | LEGAL GROUP

INTRODUCTION

Jojo is a five-year-old little boy who was born with autism and cortical vision impairment. Jojo was born prematurely and spent the first month of his life in the hospital until he was finally delivered into the loving arms of Olivia and Scott Rodgers. Olivia and Scott served as Jojo’s foster parents for the first few years of his life. During this time Jojo suffered trauma and anxiety related to visits with his birth parents until Olivia and Scott were able to adopt him and gave him a stable, loving, and safe home. Jojo was finally going to be a “regular kid” when it came time to attend kindergarten at West Parish School in Gloucester, Massachusetts.

But that would not be the case. Instead, the Defendants subjected Jojo to horrors and abuse. “Educators” turned into torturers. When they lost patience with him, they physically abused Jojo and imprisoned him in a torture chamber they called “the quiet room.” This would be horrifying enough for a neurotypical child with perfect vision. But they imprisoned Jojo, alone, without

stimulation, in a state of sensory deprivation. This is not unlike “Room 101” in the novel *1984*, where the government subjected prisoners to their greatest fears until they broke.

This is what West Parish School did to Jojo. Except Jojo is not a grown-up nor fictional Winston Smith. Jojo is a real autistic five-year-old boy. For an autistic child to be sensory deprived is as cruel as placing the cage full of rats on Winston Smith’s face.

After being placed in the “quiet room” previously, Jojo was afraid. He hid under a table from his tormentors. When he refused to come out, they grabbed him by his arms, pulled him out from under the table, dragged him down the hallway, and cast him once again into the pit of the “quiet room.” Jojo did not have the capacity nor the vocabulary to know why this was happening to him. Jojo could not advocate for himself. Jojo was helpless and terrified. Defendants tortured Jojo in West Parish School’s Room 101. And for Jojo, this went on for an eternity.

Jojo’s parents eventually rescued him. And then they learned that this was not just a one-time loss of patience. This was the punishment that West Parish School devised for Jojo and for other atypical children. They tortured this five-year-old autistic boy because he infuriated them.

They tortured Jojo.

This case seeks justice for Jojo.

THE PARTIES

1. Plaintiff J.R., a/k/a “Jojo” is a minor and a student at West Parish School, an institution owned and operated by Defendant School Committee of Gloucester. This action is brought on his behalf by his parents and next friends, Scott Rodgers and Olivia Rodgers.

2. Defendant School Committee of Gloucester is organized pursuant to G.L. c. § 31 and Article 4, Section 4-1(a) of the Code of Ordinance, City of Gloucester, Massachusetts, that exercises control and management of the public schools of the City of Gloucester.

3. Defendant Ben Lummis is the Superintendent of Gloucester Public Schools and, at all relevant times, resided in Massachusetts.

4. Defendant Telena Imel is the Principal of West Parish School and, at all relevant times, resided in Massachusetts.

5. Defendant Patti Bernheart is the Assistant Principal and Special Education Coordinator of West Parish School and, at all relevant times, resided in Massachusetts.

6. Defendant Kali Martin is the Adjustment Counselor of West Parish School and, at all relevant times, resided in Massachusetts.

7. Defendant Samantha van Beever is the Board-Certified Behavior Analyst of West Parish School and, at all relevant times, resided in Massachusetts.

8. Defendant Michael Jarvis is the Special Education Director of West Parish School and, at all relevant times, resided in Massachusetts.

9. Defendant Jaclyn Simoes is a Kindergarten Teacher at West Parish School and, at all relevant times, resided in Massachusetts.

10. Defendant Holly Gagnon is a Behavior Interventionist at West Parish School and, at all relevant times, resided in Massachusetts.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction over this civil action per 28 U.S.C. § 1331 as this is a civil action arising under 42 U.S.C. § 1983.

12. The Court has general personal jurisdiction over all Defendants because they reside, work, and/or are organized in Massachusetts. The Court has specific personal jurisdiction over all Defendants because all events took place in the Commonwealth of Massachusetts. The Court otherwise has jurisdiction per G.L. c. 223A, § 3(c), by causing injury by act or omission in this Commonwealth.

13. Venue is proper in this District per 28 U.S.C. § 1391(b)(1) & (2) because all parties reside in and/or all events took place in Gloucester, Massachusetts.

FACTUAL BACKGROUND

14. Jojo is a five-year-old boy.

15. Jojo was born with autism, Neonatal Abstinence Syndrome, Nystagmus, and other visual difficulties which cause him lifelong struggles.

16. Jojo was in the foster system for the first few years of his life until Olivia and Scott Rodgers adopted him and gave him a stable, loving, and safe home.

17. Jojo started at West Parish School in September 2025 and was placed in Defendant Simoes's kindergarten class.

18. During his enrollment process, Jojo's parents made sure the school knew Jojo had a history of trauma and trauma related anxiety.

19. Jojo's parents worked continuously with the school to develop Behavioral Support Guidelines ("BSG") and Individualized Education Plans ("IEP") for Jojo to ensure his safety, comfort, and success in the classroom.

20. Jojo's parents put their trust in West Parish School and its employees to uphold these plans and to not further traumatize Jojo, their trust was unfortunately grossly misplaced.

The "Quiet Room" a/k/a The Torture Chamber

21. The West Parish School and the Defendants use what they call a "Quiet Room" for some children who behave in a way that Defendants wish to punish.

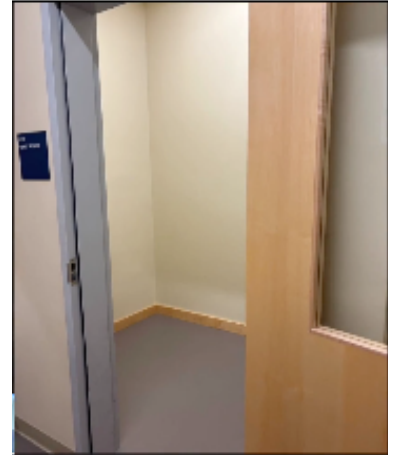
22. The term "Quiet Room" is Orwellian; it is actually a torture chamber.

23. The torture chamber is a tiny closet with no sensory stimulation.

24. Jojo’s parents never approved of the defendants using the “quiet room” to discipline nor torture Jojo, nor did the school keep his parents accurately informed of when they used it on Jojo.

25. On information and belief, the first time they imprisoned Jojo in the “quiet room” was on November 11, 2025.

26. Jojo’s parents were not informed Jojo had been punished with banishment to the “quiet room.”



27. On December 5, 2025, Defendants Bernheart and Martin imprisoned Jojo in the “quiet room.”

28. Jojo’s parents were not made aware Jojo was restrained nor imprisoned on December 5, 2025.

29. Jojo’s parents were first notified that the torture chamber had been utilized during instances when Jojo had been dysregulated on December 18, 2025.

30. Jojo’s parents immediately reached out to the school with their concerns regarding the “quiet room” in a December 18, 2025, email to Defendant Jarvis requesting a copy of the procedural guidelines governing the use of the room, the frequency with which Jojo was placed in the room, and requested an opportunity to view the space in person.

31. On December 22, Defendant Jarvis responded to Jojo’s parents by passing the buck on the issue and referring them to “policies,” but not by responding to their concerns.

32. With no clear or substantive response by Defendant Jarvis, nor anyone else at West Parish, to the December 18 requests, Mrs. Rodgers again sent an email on December 30, 2025, stating in part:

The mention of a **“quiet room” is concerning, as it is not part of [Jojo’s] IEP nor something we have agreed to.** As parents, we are entitled to clear information about what this space is, the regulations governing its use, and the opportunity to view it. These requests do not require a Team meeting and should be accommodated upon request.

(emphasis added).

33. On December 30, 2025, Defendant Jarvis responded to the email, in part stating:

The use of a quiet room would be spelled out in your child’s IEP and thus this would go through the team process. Any alternative space are typically used in a specific way for a child. The district does not have a broad description of any alternative space. The IEP needs to describe the support design as it correlates to your child's goal(s) outlined in your child’s IEP.

(emphasis added).

34. Jojo’s mother specifically stated in her December 30, 2025, email that a torture chamber and imprisonment was not a part of his IEP or BSG, nor something she had agreed to.

35. Defendant Jarvis confirmed that the use of the chamber would be identified in Jojo’s IEP if it was to be used.

36. Neither Jojo’s IEP nor BSG include, and have never included, any regulation, description, or even *mention* of the use of a torture chamber or a “quiet room,” nor any other form of imprisonment.

37. And yet, despite this assurance from Defendant Jarvis, Defendants Gagnon, Imel, and van Beever locked Jojo in the torture chamber on multiple occasions, once for nearly half an hour, which is an eternity to a sensory deprived autistic child.

38. Jojo’s parents had no reason to believe he would be imprisoned again, nor the extent of the abuse inflicted upon Jojo, after specifically confirming that they did not agree to it. And Defendant Jarvis specifically stated that if used, it would be defined in his IEP.

39. Since then, Defendants have had shifting narratives, drafted after-the-fact false reports, and have scrambled to try and redraft the narrative, but discovery will show that their

forged and faked reports are a cover up attempt. This shows that they not only did wrong, but knew that they did wrong.

Physical Restraint

40. No physical restraint beyond “a light physical guide if necessary” to prevent elopement (as stated in Jojo’s BSG) was approved for use on Jojo.

41. Despite this, Defendants subjected Jojo to unauthorized incidents of physical restraint at least five times.

42. Jojo’s parents never approved of anyone using the “quiet room” nor physical restraint on Jojo, nor did the school keep his parents informed of when they did use these punishments on Jojo.

43. On the morning of February 4, 2026, Defendant Gagnon forced Jojo into the “student support room”.

44. Jojo tried to open the door to leave the support room but was not allowed to leave.

45. That afternoon, Defendants Gagnon, van Beever, and Imel again forced Jojo into the “student support room”.

46. Defendants did not inform Jojo’s parents that Jojo was restrained nor imprisoned twice on February 4, 2026.

47. On February 5, 2026, Jojo was left without his glasses for part of the day.

48. Jojo has a serious visual impairment and should *never* be left without his glasses for any length of time.

49. In addition to being deprived of his glasses, Defendants Imel and Gagnon dragged Jojo backwards down the hallway leading to the torture room.

50. Defendants Imel and Gagnon then again imprisoned Jojo in the torture room.

51. Nobody informed Jojo’s parents that they restrained and imprisoned Jojo on February 5, 2026.

52. On February 6, 2026, Defendants Imel and Gagnon again dragged Jojo backwards down the hallway leading to the torture room.

53. Imel and Gagnon again imprisoned Jojo in the torture chamber to punish him.

54. Defendants did not inform Jojo’s parents that they restrained and imprisoned Jojo on February 6, 2026.

55. On February 9, 2026, Jojo was afraid of the adults who had been locking him away in the torture room and hid under a table in his classroom.

56. At 9:10 A.M., Jojo was hiding under the table. Defendant Imel was present, and Defendant Gagnon entered the room.

57. Defendant Imel asked Jojo to pick up chairs or lose time from his free choice activity later.

58. Jojo was doing what his tormentor asked and began picking up chairs when Defendant Imel asked him to pick up a caddy.

59. Jojo was scared of his torturer and tried to climb back under the table.

60. While Jojo was trying to hide under a table and not physically interacting with any students or teachers, Defendants Imel and Gagnon decided Jojo must be physically restrained.

61. Defendants Imel and Gagnon forcefully removed Jojo, a scared five-year-old boy, from his classroom.

62. Defendants Imel and Gagnon dragged Jojo backwards (which they describe in Orwellian terms as a “reverse escort”) down the hallway to the “student support room.”

63. Jojo was terrified and attempted to escape.

64. Jojo escaped the restraint at one point and flopped on the floor.

65. Defendants Imel and Gagnon's reaction to Jojo's trauma response was to drag him back off the floor, into the air, and start the "reverse escort" again.

66. Jojo was forced into the support room at 9:15 A.M.

67. Jojo was upset and anxious inside the support room.

68. At 9:21 A.M., Defendant Imel called Defendant van Beever for additional support.

69. Defendants Imel and van Beever again physically restrained Jojo and forced him into the torture chamber.

70. Jojo was left in the torture chamber with no stimulation.

71. Jojo was simply thrown into this empty cell to punish him.

72. Jojo was alone, scared, and imprisoned.

73. Jojo was terrified and began hitting the door/window upon being placed in the "quiet room" desperate to be released or at least to have sensory stimulation.

74. Jojo finally gave up and retreated to the corner of the room and put his hood over his head. This was at 9:24 A.M.

75. Despite being calmed down, Jojo was not let out of the "quiet room."

76. Jojo sat in the corner, silent and terrified.

77. Jojo then tried to open the door to escape the confines of the "quiet room" and realized the door would not open.

78. The door would not open because Defendants Imel, van Beever, Gagnon, and Martin physically held the door shut.

79. When Jojo threw himself against the door, it budged ever so slightly.

80. This budging informed Jojo that he was not just locked in this room, but there were adults on the other side of that door who were exercising sustained aggression toward him, barricading the door shut.

81. Upon realizing he was trapped in the room, Jojo banged his fists on the door.

82. Jojo then went back to the corner.

83. Jojo began doing wall push-ups, attempting to stay as calm as he could while trapped in isolation.

84. Jojo then began cycling between doing wall push-ups, trying to open the door, realizing he was still trapped, hitting the window to get out, and going back to the corner.

85. Jojo was finally freed from the torment of the “quiet room”, but Jojo was traumatized by the experience.

86. Defendants Imel, van Beever, Martin, and Gagnon all took part in barricading Jojo in the torture chamber for nearly 30 minutes (which is an eternity to a sensory deprived autistic child) until they finally released him into the care of his vision teacher, Janet Sacca.

87. For Jojo, even seconds can feel like hours.

88. Defendant Imel verbally acknowledged that the door was held shut by herself and the above-listed Defendants to Jojo’s parents, in the presence of the District Special Education Coordinator, Defendant Jarvis.

89. Every instance of physical restraint or seclusion forced upon Jojo Plaintiff knows of involved Defendant Imel.

90. Defendant Imel admitted in a meeting on February 27, 2026, that she was not aware of Jojo’s IEP or BSG at the time of these interventions.

91. Jojo continues to suffer the emotional damage that was inflicted upon him by Defendants Imel, van Beever, Martin, Bernheart, and Gagnon.

92. Jojo is incapable of perceiving the world visually and mentally the way that neurotypical people do.

93. Jojo is a five-year-old boy with autism and vision problems who had been unnecessarily and improperly physically restrained no less than five times and confined in a sensory deprivation torture chamber on at least four different occasions.

94. This is the school's policy on how to deal with Jojo and other special needs students.

95. By February 13, 2026, Jojo's trauma as a result of Defendants' actions was so severe his doctor concluded he had to stay home for at least 14 days to recover.

96. Jojo's trauma was so severe that by March 15, his doctor had determined Jojo would not be able to return to school until at least July 1, and that he would require a new classroom placement and trauma-informed staff working with him.

97. Defendants had never informed Jojo's parents that they had decided to imprison him as punishment.

98. Jojo's parents do not know how many times Jojo has been forced into the torture chamber or otherwise imprisoned or abused by the Defendants.

99. All named Defendants were either directly involved in, or aware of, or endorsed or supported the abuse visited upon Jojo.

100. No incidents of restraint were reported to the Massachusetts Department of Elementary and Secondary Education until Defendants were forced to disclose the incidents after Jojo's parents had learned of.

101. To this day, Defendants have failed to report to the Massachusetts Department of Elementary and Secondary Education all incidents of physical restraint forced upon Jojo.

102. Jojo's parents have still not been notified of all incidents of physical restraint inflicted upon Jojo.

103. On March 4, 2026, after the incidents came to light, Defendant Imel retroactively filled out incident reports and backdated them, trying to cover up the crimes against Jojo.

104. Despite all three reports claiming a "reverse escort" (what they call dragging him backwards by hooking their arms under his) was used to transport Jojo from the classroom, down a hall, and to a "private space," they all claim the restraint only lasted for one minute, when in reality Jojo was routinely restrained for several minutes, and in one case for nearly half an hour.

Going Forward

105. Going to school for Jojo, just like any other kindergartener, is essential to his development.

106. Jojo cannot enjoy the essential functions of the education system because he is not safe to go there.

107. Jojo wants to go back to school but cannot do that without temporary and permanent injunctive relief, ensuring he can go back to school without fear, and without the presence of those that have abused him or aided in that abuse.

108. Jojo requires permanent injunctive relief in the form of the torture chamber being barricaded shut, and an Order from this Court ensuring Defendants cannot physically barricade small children in empty closets.

CAUSES OF ACTION

Count I

42 U.S.C. § 1983 (Wrongful Imprisonment)

109. Plaintiff hereby repeats and realleges Paragraphs 1 to 108 of the Complaint as if set out in full herein.

110. False imprisonment is a “restrict[ion of] liberty without reasonable suspicion[.]” *Harrington v. City of Nashua*, 610 F.3d 24, 29 (1st Cir. 2010).

111. A “State cannot constitutionally confine without more a nondangerous individual who is capable of surviving safely in freedom by himself or with the help of willing and responsible family members or friends.” *O’Connor v. Donaldson*, 422 U.S. 563, 576 (1975).

112. Claims for false imprisonment are actionable under 42 U.S.C. § 1983 as violations of the Fourth Amendment. *Id.* at 28.

113. As set forth above, Jojo was physically confined in a small empty room on February 9, 2026, by Defendants Telena Imel, Samantha van Beever, Kali Martin, and Gagnon (“Personal Capacity Defendants”). Personal Capacity Defendants physically held the door closed to stop Jojo’s attempts to flee the cell.

114. Jojo was imprisoned in the same fashion on at least one more occasion by Defendants Bernheart, Martin, Imel, Gagnon, and van Beever.

115. At no relevant time did the Personal Capacity Defendants have reasonable suspicion that Jojo committed any crime.

116. At no relevant time did the Personal Capacity Defendants have reasonable suspicion that Jojo committed any act warranting imprisonment.

117. At all relevant times, the Personal Capacity Defendants imprisoned Jojo under color of law.

118. As a direct and proximate result of the false imprisonments, Jojo suffered actual damages, including, but not limited to, emotional distress.

119. At all relevant times, Jojo's Behavior Plan provided for addressing instances wherein Jojo might be dysregulated.

120. Jojo's Behavior Plan provides the following steps for dealing with "Physical Behaviors:"

1. Block and evade.
2. Show him 'Zones' visual ('red zone').
3. Once calm, prompt functional language such as "I need x".
4. Move his emotions chart from the 'red' zone to the 'yellow' zone.
5. Remind him of what he is earning and neutrally redirect him to the current activity.
6. Monitor for safety.

121. This plan does NOT call for or allow use of imprisonment nor sensory deprivation.

122. At all relevant times, the Personal Capacity Defendants had Jojo's Individualized Education Plan and Behavior Plan available to them, but willfully, intentionally, and maliciously ignored those plans in favor of imprisoning Jojo.

123. All named Defendants were either aware of all of these incidents or physically took part in imprisoning Jojo.

124. Imprisonment of students, including but not limited to Jojo, in the torture chamber was official policy of the School Committee of Gloucester and of West Parish School.

125. Jojo reasonably fears being falsely imprisoned by Defendants in the future.

126. As a direct and proximate result of Defendants' violations of Plaintiff's right to freedom from false imprisonment, Plaintiff has suffered irreparable harm, entitling Jojo to declaratory and injunctive relief.

Count II
42 U.S.C. § 1983 (Denial of Procedural Due Process)

127. Plaintiff hereby repeats and realleges Paragraphs 1 to 108 of the Complaint as if set out in full herein.

128. The Due Process Clause of the Fourteenth Amendment prohibits a state from depriving any person of "life, liberty, or property, without due process of law." U.S. Const. amend. XIV, § 1.

129. A claim for deprivation of procedural due process requires interference with a liberty or property interest and that any such deprivation's attendant procedures are constitutionally sufficient. *See Gonzalez-Fuentes v. Molina*, 607 F.3d 864, 886 (1st Cir. 2010).

130. "Procedural due process guarantees an affected individual the right to some form of hearing, with notice and an opportunity to be heard, before he is divested of his protected interest." *Cotnoir v. Univ. of Me. Sys.*, 35 F.3d 6, 10 (1st Cir. 1994).

131. The Personal Capacity Defendants' conduct of imprisoning Jojo deprived Jojo of his liberty.

132. Prior to being deprived of his liberty, Jojo was entitled to Due Process each time he was to be imprisoned in the torture chamber.

133. At no time was there any hearing, opportunity to be heard, nor any other due process whatsoever before his imprisonments.

134. At all relevant times, the Personal Capacity Defendants deprived Jojo of due process under color of law.

135. As a direct and proximate result of the denial of due process, Jojo suffered actual damages, including, but not limited to, emotional distress.

136. At all relevant times, Jojo’s Behavior Plan provided for addressing instances wherein Jojo might be dysregulated.

137. Jojo’s Behavior Plan provides the following steps for dealing with “Physical Behaviors:”

1. Block and evade.
2. Show him ‘Zones’ visual (‘red zone’).
3. Once calm, prompt functional language such as “I need x”.
4. Move his emotions chart from the ‘red’ zone to the ‘yellow’ zone.
5. Remind him of what he is earning and neutrally redirect him to the current activity.
6. Monitor for safety.

138. This plan does NOT call for or allow use of imprisonment nor sensory deprivation.

139. At all relevant times, the Personal Capacity Defendants had Jojo’s Individualized Education Plan and Behavior Plan available to them, but willfully, intentionally, and maliciously ignored those plans in favor of denying Jojo due process.

140. All named Defendants were either aware of all of these incidents or physically took part in denying due process to Jojo.

141. Imprisonment of students without due process, including, but not limited to Jojo, in the torture chamber was official policy of the School Committee of Gloucester.

142. Jojo fears being imprisoned without due process by Defendants in the future.

143. As a direct and proximate result of Defendants' violations of Plaintiff's right to due process, Plaintiff has suffered irreparable harm, entitling Jojo to declaratory and injunctive relief.

Count III
U.S. Const. amend. VIII (Cruel and Unusual Punishment)

144. Plaintiff hereby repeats and realleges Paragraphs 1 to 108 of the Complaint as if set out in full herein.

145. Plaintiff is aware his claims under U.S. Const. amend. VIII may be prohibited by *Ingraham v. Wright*, 430 U.S. 651 (1977), although that decision left open the possibility of claims involving involuntary confinement. 430 U.S. at 669 n. 37. To the extent this claim does not fall in that carve-out, Plaintiff brings this claim with a good faith basis to modify existing law.

146. A claim for cruel and unusual punishment under the Eighth Amendment requires an objectively serious condition posing a substantial risk of serious harm and a subjective indifference to health and safety. *See Giroux v. Somerset County*, 178 F.3d 28, 32 (1st Cir. 1999).

147. The conduct of Personal Capacity Defendants confining Jojo in a torture chamber placed Jojo at risk of substantial and serious harm.

148. At all relevant times, the Personal Capacity Defendants knew that imprisoning Jojo in a cell of sensory deprivation was harmful to his health and safety and they were deliberately indifferent to his health and safety.

149. At all relevant times, the Personal Capacity Defendants imprisoned Jojo in the torture chamber under color of law, and this was cruel and unusual punishment for a five-year-old autistic boy.

150. At all relevant times, Jojo's Behavior Plan provided for addressing instances wherein Jojo might be dysregulated.

151. Jojo’s Behavior Plan provides the following steps for dealing with “Physical Behaviors:”

1. Block and evade.
2. Show him ‘Zones’ visual (‘red zone’).
3. Once calm, prompt functional language such as “I need x”.
4. Move his emotions chart from the ‘red’ zone to the ‘yellow’ zone.
5. Remind him of what he is earning and neutrally redirect him to the current activity.
6. Monitor for safety.

152. This plan does NOT call for imprisonment of Jojo.

153. At all relevant times, the Personal Capacity Defendants had Jojo’s Individualized Education Plan and Behavior Plan available to them, but willfully, intentionally, and maliciously ignored those plans in favor of imprisoning Jojo.

154. All named Defendants were either aware of all of these incidents or physically took part in imprisoning Jojo.

155. Use of the torture chamber was official policy of the School Committee of Gloucester.

156. Jojo reasonably fears being imprisoned by Defendants in the future.

157. As a direct and proximate result of Defendants’ violations of Plaintiff’s right to freedom from cruel and unusual punishment, Plaintiff has suffered irreparable harm, entitling Jojo to declaratory and injunctive relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Scott Rodgers and Olivia Rodgers, as parents and next friends to J.R. a/k/a “Jojo”, a minor, ask this Court to issue and award:

- A. An injunction preventing each Defendant from further injuring Plaintiff including, but not limited to, barring the use of imprisonment and sensory deprivation, and requiring notice and an opportunity to be heard prior to any seclusion of Jojo;
- B. To award Plaintiff actual and/or nominal damages for the loss of his constitutional rights, in an amount to be determined at trial against the personal capacity defendants;
- C. To award Plaintiff punitive damages against the personal capacity defendants;
- D. An award of attorney’s fees, costs, and expenses under 42 U.S.C. § 1988 and any other applicable law; and
- E. Any further relief this Honorable Court deems appropriate.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury on each claim asserted or hereafter asserted in the Complaint, and on each defense asserted by the Defendants.

Dated: May 20, 2026.

Respectfully Submitted,

/s/ Marc J. Randazza
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Attorneys for Plaintiff, J.R.

VERIFICATION OF COMPLAINT

I, Scott Rodgers, am the parent and next friend of Plaintiff, J.R., a/k/a “Jojo” a minor, in the above-captioned matter. I have reviewed the foregoing allegations in this Verified Complaint, and I hereby declare under the penalty of perjury that the foregoing allegations are true and correct to the best of my knowledge and understanding.

Dated: 05 / 20 / 2026 

Scott Rodgers

VERIFICATION OF COMPLAINT

I, Olivia Rodgers, am the parent and next friend of Plaintiff, J.R., a/k/a “Jojo” a minor, in the above-captioned matter. I have reviewed the foregoing allegations in this Verified Complaint, and I hereby declare under the penalty of perjury that the foregoing allegations are true and correct to the best of my knowledge and understanding.

Dated: 05 / 20 / 2026 

Olivia Rodgers

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