



STAPP LAW, LLC

Gregory A. Stapp, Esquire
153 West 4th Street, Suite 6
Williamsport, PA 17701

Phone 570-326-1077, Fax 570-651-9420
gstapp@stapplaw.net
www.StappLaw.net

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VIA FEDERAL EXPRESS

Josh Shapiro, Attorney General
Pennsylvania Office of the Attorney General
Strawberry Square
Harrisburg, PA 17120

RE: [redacted] parent and natural guardian of [redacted]

Dear Sir/Madam:

The purpose of this letter is to provide you with notice pursuant to 42 Pa.C.S.A. §5522. tha [redacted] parent and natural guardian, and [redacted] located [redacted] Williamsport, PA 17701 intends to make a claim against multiple Commonwealth agencies for failure to report and properly handle the indecent assault, harassment and intimidation of [redacted] that took place in Myrtle Beach, South Carolina while on the Williamsport High School baseball trip in March of 2018. This cause of action will be against the Commonwealth of Pennsylvania, Williamsport Area School District, Lycoming County, Williamsport City Police (City of Williamsport) and other defendants, including, but not limited to, employees and agents of each of these various governmental agencies.

[redacted] was assaulted by [redacted] at the Atlantica Resort while other members of the baseball team were present, one of which videotaped the assault and posted the video on social media. There were five coaches with the baseball team on this trip. Brandon Pardoe, Williamsport High School Principal, and Sean McCann, the Athletic Director, were also on the trip. One of the five coaches, Nick Caringi, a volunteer coach, was an employee of Little League Baseball Incorporated at the time of the assault. All the above individuals were mandated reporters under the Child Protective Services Law, 23 Pa.C.S.A. §6311. Despite this fact, none of these individuals reported the assault on [redacted] either while in Myrtle Beach, South Carolina or when they returned to Williamsport.

Over the course of the months following this incident, each of the agencies involved participated in an effort to cover up the assault on [redacted]. The assault was

initially reported by an individual who was not on the trip to Myrtle Beach with the team or affiliated with Williamsport Area School District. When the referral of this matter was finally made to Childline, the matter was referred to the Lycoming County District Attorney's Office. Acting District Attorney, Ken Osokow, referred this matter to Chief County Detective William Weber. Despite the fact that a meeting was held with [REDACTED] at Brandon Pardoe's office in May 2018, the Resource Officers at Williamsport Area School District, such as Officer Stoltzfus, told officers in Myrtle Beach that they had no knowledge of the incident in October 2018. Officer Stoltzfus is an employee of the Williamsport City Police Department.

As a direct and proximate result of the assault, harassment and intimidation of [REDACTED] and the subsequent attempts to cover up the assault, [REDACTED] has suffered numerous damages.

Should you have any questions regarding this claim, please direct them to my attention. This letter will serve as notice that a copy has been served upon Lycoming County, Williamsport Area School District, and the City of Williamsport.

Thank you for your attention to this matter.

Very truly yours,
STAPP LAW, LLC



Gregory A. Stapp, Esquire

cc: Lycoming County Commissioner's Office
Fred Holland, Esquire (WASD Solicitor)
City of Williamsport