

IN THE FRANKLIN COUNTY COURT OF COMMON PLEAS
CIVIL DIVISION

JADA BELL
c/o COX LAW OFFICE, LLC
4930 REED ROAD, SUITE 200
COLUMBUS, OHIO 43220

PLAINTIFF,

Vs.

LE'VEON BELL, SR.
12311 PARLIAMENT DRIVE NW
BALTIMORE, OHIO 43105

AND

LA'VONTE BELL
608 HERROGATE SQUARE
PICKERINGTON, OHIO 43147

DEFENDANT.

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CASE NO.

JUDGE

JURY DEMAND ENDORSED HEREON

COMPLAINT

Now comes the Plaintiff Jada Bell, by and through the undersigned counsel, and for her complaint states as follows:

Facts Common to All Counts:

1. At present, and at all times relevant hereto, Plaintiff was a citizen of Franklin County, Ohio.
2. At present Le'Veon Bell is a resident of Franklin County, Ohio.
3. At present, and at all times relevant hereto, La'Vonte Bell was a resident of Franklin County, Ohio.
4. Le'Veon and La'Vonte Bell are biological brothers.
5. Plaintiff is the biological cousin of both Le'Veon and La'Vonte Bell.

6. In Ohio marriage between cousins is considered incestual.
7. Le'Veon reached the age of majority on February 18, 2010, *dob* February 18, 1992.
8. La'Vonte reached the age of majority on January 20, 2013, *dob* January 20, 1995.
9. Plaintiff did not reach the age of majority until January 26, 2018, *dob* January 22, 2000.
10. Plaintiff did not reach the age of consent (16) until January 22, 2016.
11. Plaintiff did not reach the age of thirteen (13) until January 22, 2013.
12. It is unlawful in Ohio to have sexual contact with another, not the spouse of the offender when the other person is less than thirteen years of age.
13. Sexual intercourse between persons of close biological relation is commonly termed "incest."
14. Sexual intercourse between an adult and person under the age of thirteen is commonly termed "statutory rape."
15. Both Defendants engaged in ongoing incestual relations with the Plaintiff beginning when Plaintiff was just six to seven years old.
16. These incestual relations continued through at least 2017.
17. Le'Veon continuously engaged in these encounters throughout Plaintiff's minority, including during his frequent returns to central Ohio during his college years and beyond.
18. La'Vonte continuously engaged in these encounters throughout Plaintiff's minority.
19. Le'Veon often used slang terms to instruct the minor child as to which incestual acts he wished for her to perform upon him. For instance, he termed oral sex "fire."
20. La'Vonte would request that the minor child assume various "P's" or positions during which he would "grind" against her.

21. These encounters were frequent and ongoing from the time Plaintiff was just six (6) or (7) through the time she reached the age of consent.
22. None of these encounters were consensual and they happened with such frequency as to habitualize Plaintiff to the abuse.
23. Defendants' age disparity, disparity of physical size, familial relations, access to Plaintiff's home, and grooming of the Plaintiff were used to force the Plaintiff to engage in these incestual acts without her consent.
24. Plaintiff has suffered extreme and ongoing mental anguish and distress as a result of the incestual sexual relations forced upon her by the Defendants.
25. The mental injuries inflicted upon her as a result of Defendants actions have had immense negative effect on her interpersonal relationships and day-to-day life.
26. All of the incestual relations between La'Vonte and Jada occurred in Franklin County, Ohio.
27. The vast majority of incestual relations between Le'Veon and Plaintiff occurred in Franklin County, Ohio.

Count I: Assault and Battery Childhood Sexual Abuse

28. Plaintiff incorporates all other paragraphs as if fully restated herein.
29. Defendants' incestual acts against Plaintiff, after Defendants had reached the age of majority and Plaintiff was not yet thirteen (13) constitute criminal offenses of RC 2907.02(A)(1)(b)..
30. Defendants' actions toward the Plaintiff as set forth herein constitute assault and battery as contemplated in RC 2305.111.

31. Defendants' actions toward Plaintiff as set forth herein constitute childhood sexual abuse as contemplated in RC 2305.111.

32. Defendants' actions toward the Plaintiff as set forth herein constitute common law assault and battery.

33. Plaintiff has been damaged as a result of Defendants' actions.

COUNT II: DECLARATORY JUDGMENT

34. Plaintiff incorporates all other paragraphs as if fully restated herein.

35. Plaintiff seeks that the Court enter a declaratory judgment that all sexual acts perpetrated by the Defendants after the date on which each reached the age of eighteen (18) respectively and the Plaintiff had not yet reached the age of thirteen (13) would constitute a criminal violation of RC 2907.02(A)(1)(b).

Prayer for Relief:

Wherefore, the Plaintiff seeks an award of monetary damages in an amount in excess of \$25,000.00, or such other amount as is determined appropriate by a jury, together with punitive damages, attorneys' fees, costs, pre and post judgment interest, and such further legal and equitable relief to which the Plaintiff may be entitled. Plaintiff further demands a declaratory judgment as set forth herein.

Jury Demand

Plaintiff demands a jury consisting of the maximum number of jurors to which she is entitled on all issues so triable.

/s/ Michael T. Cox

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