

1                                   **IN THE UNITED STATES DISTRICT COURT**  
2                                   **FOR THE NORTHERN DISTRICT OF OHIO**  
3                                   **EASTERN DIVISION**

4 **AARON C. KNAPP**

Case No. \_\_\_\_\_

5  
6 Plaintiff,

Judge \_\_\_\_\_

7 v.

8 **CITY OF LORAIN**

9 200 W. Erie Avenue, Lorain, OH 44052;

10 **JAMES McCANN**, in his individual capacity

11 200 W. Erie Avenue, Lorain, OH 44052;

12 **REY CARRION**, in his individual capacity

13 200 W. Erie Avenue, Lorain, OH 44052;

14 **JACK BRADLEY**, in his individual capacity

15 200 W. Erie Avenue, Lorain, OH 44052;

16 **JOSEPH LaVECK**, in his individual capacity

17 200 W. Erie Avenue, Lorain, OH 44052;

18 **TIM WEITZEL**, in his individual capacity

Lorain County Juvenile Court, 225 Court Street, Elyria, OH 44035;

19 Defendants.

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20 **VERIFIED COMPLAINT**

21 **FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, RETALIATION,**  
22 **TORTIOUS INTERFERENCE WITH CONTRACT, INTENTIONAL INFLICTION OF**  
23 **EMOTIONAL DISTRESS, AND DESTRUCTION OF PUBLIC RECORDS UNDER R.C.**  
24 **149.351**

**(Jury Demand Endorsed Hereon)**

25 **Aaron C. Knapp (Pro Se)**

26 **4220 Talbot Lane**

27 **Lorain, Ohio 44055**

28 COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, RETALIATION, TORTIOUS  
INTERFERENCE WITH CONTRACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, AND  
DESTRUCTION OF PUBLIC RECORDS UNDER R.C. 149.351- 1

1 **Tel: (216) 659-9899**

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3 **Plaintiff, Pro Se**

4 **JURISDICTION AND VENUE**

5 1. This action arises under the Constitution and laws of the United States, including 42 U.S.C.  
6 § 1983 and related federal statutory law. Jurisdiction is proper under 28 U.S.C. §§ 1331 and  
7 1343.

8 2. The Court has supplemental jurisdiction over related state-law claims under 28 U.S.C. §  
9 1367(a).

10 3. Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or  
omissions occurred in Lorain County, Ohio.

11 **Tolling and Discovery Rule**

12 4. From March 2023 through August 2025, Plaintiff submitted repeated public-records  
13 requests under R.C. 149.43 to the City of Lorain for all emails, texts, and memoranda  
concerning Plaintiff. For more than two years, the City denied or delayed production and  
14 asserted exemptions that prevented discovery of the injury and responsible officials.

15 5. In August 2025, the City released previously withheld emails showing that Chief James  
McCann personally contacted the Ohio Counselor, Social Worker, and Marriage &  
Family Therapist Board—Plaintiff's licensing authority—made false statements about  
16 Plaintiff, and then denied doing so (Exhibit A).

17 6. The same production revealed that Mayor Jack Bradley and Law Director Joseph LaVeck  
were aware of McCann's outreach and participated in concealing or excusing it by  
rerouting requests through legal review, delaying release, and providing misleading  
18 information to Plaintiff and state officials.

19 7. Because these facts were deliberately concealed and not discoverable through reasonable  
diligence until August 2025, the limitations period for all federal and state claims did not  
begin to run until that date. See *Oliver v. Kaiser Cmty. Health Found.*, 5 Ohio St.3d 111  
20 (1983); *Sherwood v. Wayne Cnty.*, 970 F.3d 784 (6th Cir. 2020).

21 8. The August 2025 disclosure links Chief McCann's retaliatory conduct to concealment by  
Bradley and LaVeck, establishing a continuous course of retaliation and concealment  
22 through 2025.

23 9. In addition, Plaintiff filed sworn criminal affidavits with the Lorain County Court of  
Common Pleas under R.C. 2935.09–.10 regarding McCann (telecommunications  
24 harassment, retaliation, falsification, unlawful dissemination). A judge referred the matter  
to the Lorain County Prosecutor for assessment, indicating the allegations were facially  
25 sufficient for prosecutorial review.

26  
27  
28 **COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, RETALIATION, TORTIOUS  
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DESTRUCTION OF PUBLIC RECORDS UNDER R.C. 149.351- 2**

**COUNT I — FIRST AMENDMENT RETALIATION (42 U.S.C. § 1983)**

*(Against McCann, Carrion, Bradley, LaVeck, and Weitzel — individual capacities)*

10. Plaintiff incorporates all prior paragraphs.

11. Each Defendant owed Plaintiff a legal duty, under the U.S. Constitution and federal law, not to retaliate against him for protected speech or petitioning activity.

12. Defendants breached that duty by using their public offices and authority to retaliate against Plaintiff's constitutionally protected speech and advocacy.

13. As a direct and **proximate result** of Defendants' unlawful conduct and breach of duty, Plaintiff sustained economic loss, reputational injury, and emotional distress.

14. Defendants' actions violated the First and Fourteenth Amendments and 42 U.S.C. § 1983.

**COUNT II — MUNICIPAL LIABILITY (MONELL) (42 U.S.C. § 1983)**

*(Against City of Lorain)*

15. Plaintiff incorporates all prior paragraphs.

16. The City had a duty to train, supervise, and discipline employees to prevent retaliation and concealment of records.

17. By maintaining customs and policies that tolerated or ratified unlawful retaliation and obstruction, the City breached that duty.

18. The City's breach was a **proximate cause** of Plaintiff's constitutional injuries, including emotional and economic harm.

**COUNT III — TORTIOUS INTERFERENCE WITH CONTRACT (Ohio Common Law)**

*(Against McCann and Weitzel — individual capacities)*

19. Plaintiff incorporates all prior paragraphs.

20. Defendants owed Plaintiff a duty to refrain from intentionally interfering with lawful contracts and employment relationships.

21. They breached that duty by making false, retaliatory statements and by misusing official authority to damage Plaintiff's professional relationships.

22. Defendants' wrongful conduct was the **proximate cause** of the termination of Plaintiff's employment and resulting damages, including lost wages, reputational harm, and emotional distress.

**COUNT IV — INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

*(Against McCann, Carrion, Bradley, LaVeck, and Weitzel — individual capacities)*

23. Plaintiff incorporates all prior paragraphs.

24. Each Defendant owed a duty to refrain from extreme and outrageous conduct intended to cause emotional harm.

25. Defendants breached that duty through deliberate retaliation, defamatory statements, and coordinated acts of intimidation.

26. Defendants' conduct was the **proximate cause** of severe emotional distress and mental anguish, constituting compensable injury.

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**COUNT V — DESTRUCTION OR CONCEALMENT OF PUBLIC RECORDS (R.C. 149.351)**

*(Against City of Lorain)*

27. Plaintiff incorporates all prior paragraphs.

28. The City owed a statutory duty under Ohio law to maintain, preserve, and produce all public records requested pursuant to R.C. 149.43.

29. The City breached that duty by concealing and failing to retain responsive records.

30. Such breach was the **proximate cause** of Plaintiff's injury by impairing his ability to prove his claims and vindicate his rights.

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**COUNT VI — CIVIL LIABILITY FOR INJURIES CAUSED BY CRIMINAL ACTS (R.C. 2307.60)**

*(Against McCann, LaVeck, and Bradley — individual capacities)*

31. Plaintiff incorporates all prior paragraphs.

32. Defendants owed Plaintiff a duty under Ohio law and federal civil-rights statutes to refrain from tampering with evidence, falsifying records, obstructing justice, or interfering with civil rights.

33. Defendants breached those duties through knowing and willful acts that constitute criminal violations.

34. These criminally-based torts were the **proximate cause** of Plaintiff's injuries, including financial loss, reputational damage, and severe emotional distress.

**COUNT VII — FEDERAL STATUTORY VIOLATIONS**

COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, RETALIATION, TORTIOUS INTERFERENCE WITH CONTRACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, AND DESTRUCTION OF PUBLIC RECORDS UNDER R.C. 149.351- 4

(Against McCann, Bradley, LaVeck, Carrion, and Weitzel — individual capacities)

35. Plaintiff incorporates all prior paragraphs.

36. Defendants owed Plaintiff a duty under federal law to comply with and refrain from violating the civil-rights and obstruction statutes of the United States, including 18 U.S.C. § 241 (Conspiracy Against Rights), 18 U.S.C. § 242 (Deprivation of Rights Under Color of Law), and 18 U.S.C. § 1519 (Obstruction or Falsification of Records).

37. Defendants breached those duties by conspiring and acting together to retaliate against Plaintiff for exercising his First Amendment rights, depriving him of liberty and property without due process, and concealing, falsifying, or destroying public records to obstruct investigation and accountability.

38. Such conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's federally protected rights, constituting violations of both federal statutory and constitutional law.

39. Defendants' coordinated actions were the direct and proximate cause of Plaintiff's injuries, including loss of employment, reputational harm, emotional distress, and deprivation of civil rights.

40. Plaintiff seeks declaratory and injunctive relief, compensatory and punitive damages, attorney fees as permitted by law, and all other relief deemed just and proper.

## PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court:

A. Declare that Defendants violated Plaintiff's rights under the **First, Fourth, and Fourteenth Amendments to the U.S. Constitution, 42 U.S.C. §§ 1983 and 1988**, and other applicable **federal statutory law**, including **18 U.S.C. §§ 241, 242, and 1519**;

A-1. Declare that Defendants' coordinated conduct constitutes a conspiracy and obstruction under those federal statutes, and that Plaintiff is entitled to full civil and equitable relief arising therefrom;

B. Declare that Defendants' conduct also violated **Ohio common law** and statutory provisions including **R.C. 149.351** and **R.C. 2307.60**;

C. Enter judgment for Plaintiff on all counts;

D. Award compensatory damages including lost wages of \$12,800, emotional distress, reputational injury, and diminished earning capacity;

E. Award punitive damages against the individual defendants;

F. Award prejudgment and post-judgment interest at the highest lawful rate;

G. Award costs under 28 U.S.C. § 1920 and, if counsel later appears, attorney's fees under 42 U.S.C. § 1988;

H. Issue injunctive relief prohibiting Defendants from contacting Plaintiff's employers or licensing agencies absent court approval, compelling the City to preserve and produce all responsive records, and enjoining future retaliation; and

I. Grant all other and further relief in law or equity as this Court deems just and proper.

COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, RETALIATION, TORTIOUS INTERFERENCE WITH CONTRACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, AND DESTRUCTION OF PUBLIC RECORDS UNDER R.C. 149.351- 5

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2 **JURY DEMAND**

3 Plaintiff demands trial by jury on all issues so triable.

4

5 **Respectfully submitted,**

6 /s/ Aaron C. Knapp  
7 **Aaron C. Knapp (Pro Se)**  
8 4220 Talbot Lane  
9 Lorain, Ohio 44055  
10 Tel: (216) 659-9899  
11 Email: [a4xbeaverman@yahoo.com](mailto:a4xbeaverman@yahoo.com)

12 **Verification**

13 I, Aaron C. Knapp, being first duly sworn, state that I am the Plaintiff in this action; that I have  
14 read the foregoing Verified Complaint and know the contents thereof; and that the facts stated  
15 herein are true and correct to the best of my knowledge, information, and belief.

16 \_\_\_\_\_  
17 **Aaron C. Knapp**

18 Sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2025.

19 \_\_\_\_\_

20 Notary Public  
21 My Commission Expires: \_\_\_\_\_

22 **Certificate of Service**

23 **CERTIFICATE OF SERVICE**

24 I certify that this Verified Complaint will be served by the United States Marshal upon the  
25 Defendants if my Application to Proceed In Forma Pauperis is granted, in accordance with  
26 Federal Rule of Civil Procedure 4(c)(3) and 28 U.S.C. § 1915(d).

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Jack Bradley (individual capacity), 200 W. Erie Ave., Lorain, OH 44052;  
Joseph LaVeck (individual capacity), 200 W. Erie Ave., Lorain, OH 44052;  
Tim Weitzel (individual capacity), Lorain County Juvenile Court, 225 Court St., Elyria, OH 44035.