

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

AARON C. KNAPP

Plaintiff,

Judge _____

V.

CITY OF LORAIN

200 W. Erie Avenue, Lorain, OH 44052;

JAMES McCANN, in his individual capacity
200 W. Erie Avenue, Lorain, OH 44052;

REY CARRION, in his individual capacity
200 W. Erie Avenue, Lorain, OH 44052;

JACK BRADLEY, in his individual capacity
200 W. Erie Avenue, Lorain, OH 44052;

JOSEPH LaVECK, in his individual capacity
200 W. Erie Avenue, Lorain, OH 44052;

TIM WEITZEL, in his individual capacity
Lorain County Juvenile Court, 225 Court Street, Elyria, OH 44035;

Defendants.

VERIFIED COMPLAINT

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

**PLAINTIFF
(Jury Demand Endorsed Hereon)**

**Aaron C. Knapp (Pro Se)
4220 Talbot Lane
Lorain, Ohio 44055**

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

1 Tel: (216) 659-9899
2 Email: a4xbeaverman@yahoo.com

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).
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.

10 **Tolling and Discovery Rule**

11 4. From March 2023 through August 2025, Plaintiff submitted repeated public-records
12 requests under R.C. 149.43 to the City of Lorain for all emails, texts, and memoranda
13 concerning Plaintiff. For more than two years, the City denied or delayed production and
asserted exemptions that prevented discovery of the injury and responsible officials.
14 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
Plaintiff, and then denied doing so (Exhibit A).
15 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
information to Plaintiff and state officials.
16 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 Cnty. Health Found.*, 5 Ohio St.3d 111
(1983); *Sherwood v. Wayne Cnty.*, 970 F.3d 784 (6th Cir. 2020).
17 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
through 2025.
18 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
harassment, retaliation, falsification, unlawful dissemination). A judge referred the matter
to the Lorain County Prosecutor for assessment, indicating the allegations were facially
sufficient for prosecutorial review.

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

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

3

4 10. Plaintiff incorporates all prior paragraphs.

5 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.

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

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

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

9

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

11 *(Against City of Lorain)*

12

13 15. Plaintiff incorporates all prior paragraphs.

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

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

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

17

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

19 *(Against McCann and Weitzel — individual capacities)*

20

21 19. Plaintiff incorporates all prior paragraphs.

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

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

24 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.

25

1 **COUNT IV — INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

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

3 23. Plaintiff incorporates all prior paragraphs.

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

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

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

7

8 **COUNT V — DESTRUCTION OR CONCEALMENT OF PUBLIC RECORDS (R.C.
9 149.351)**

10 (*Against City of Lorain*)

11 27. Plaintiff incorporates all prior paragraphs.

12 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.

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

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

15

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

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

19 31. Plaintiff incorporates all prior paragraphs.

20 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.

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

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

23

24 **COUNT VII — FEDERAL STATUTORY VIOLATIONS**

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

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

2 35. Plaintiff incorporates all prior paragraphs.

3 36. Defendants owed Plaintiff a duty under federal law to comply with and refrain from
4 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).

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

8 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.

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

11 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.

13 PRAYER FOR RELIEF

14 Plaintiff respectfully requests that the Court:

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

18 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
19 therefrom;

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

21 C. Enter judgment for Plaintiff on all counts;

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

23 E. Award punitive damages against the individual defendants;

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

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

26 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

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

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

1

2 **JURY DEMAND**

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

4

5 **Respectfully submitted,**

6

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

10

11 **Verification**

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

14

15 **Aaron C. Knapp**

16 Sworn to and subscribed before me this ____ day of _____, 2025.

17

18 Notary Public
19 My Commission Expires: _____

20 **Certificate of Service**

21 **CERTIFICATE OF SERVICE**

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

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Tim Weitzel (individual capacity), Lorain County Juvenile Court, 225 Court St., Elyria, OH
44035.