

CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION

Case No.:

█ and █ husband and wife and
as parents and natural guardians of █

Plaintiffs,

vs.

ROSARIAN ACADEMY, INC., a
Florida Not for Profit Corporation, and
ALPHA TRANSPORTATION SERVICES, INC.,
a Florida Profit Corporation,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, █ and █ as parents and natural guardians of █ (hereinafter "Plaintiffs"), hereby bring this Complaint against ROSARIAN ACADEMY, INC. (hereinafter "ROSARIAN") and ALPHA TRANSPORTATION SERVICES, INC. (hereinafter "ALPHA") (collectively sometimes herein referred to as "Defendants"), and state as follows:

UNDERLYING FACTS

1. This action concerns an educational institution, Defendant, ALPHA and its private transportation provider, Defendant, ROSARIAN, that failed to properly supervise students, including █, during school bus transportation, resulting in the repeated highly inappropriate sexual behavior and interactions of a third-party first-grade student (hereinafter "third party minor" or "TPM") with █, and subsequent deliberate indifference to █'s safety by failing to protect him from further harm and intimidation after being notified of the abuse.

2. The essential facts of this matter, upon information and belief, are as follows:

a. ■■■ was enrolled as a first-grade student at Rosarian Academy during the 2024-2025 school year;

b. During the 2024-2025 school year, while being transported on school buses owned and operated by Defendant, ALPHA and contracted by Defendant, ROSARIAN, ■■■ was repeatedly sexually victimized by TPM, a male student of approximately the same age as ■■■;

c. These highly inappropriate sexual interactions occurred over a period of months during the 2024-2025 school year without detection by any adult supervisor, driver, or monitor, due to the complete absence of adequate supervision and monitoring on the school buses, including the failure to provide a bus aide, the failure to prohibit the driver from using a personal phone while operating the bus, and the failure to monitor available surveillance camera footage;

d. Prior to the inappropriate sexual interactions discussed herein, one of Defendant, ROSARIAN's teachers, non-party Adam Stypulkoski, who was then ■■■'s kindergarten teacher, held a separate lunchtime gathering called the "Lunch Bunch". Plaintiffs were never asked permission for ■■■ to join in these separate lunches and only later found out about the "Lunch Bunch" after the sexual allegations discussed herein came to light.

e. Upon learning of these highly inappropriate sexual interactions, Plaintiffs immediately reported the abuse to the Palm Beach County Sheriff's Office, the Department of Children and Families ("DCF"), and Defendant, ROSARIAN;

f. On the evening of December 2, 2025, Plaintiffs sent a written request to Defendant, ROSARIAN demanding immediate action to keep ■■■ and TPM separated while the police

investigation was ongoing. Despite receiving this request, Defendant, ROSARIAN failed to respond, failed to implement any safety plan or protective measures, and failed to ensure that staff members were aware of the need to keep the students separated;

g. On the morning of December 3, 2025, Defendant, ROSARIAN allowed TPM to enter ■■■ classroom unsupervised and directly approach and confront ■■■ during which TPM spoke to ■■■ about the police investigation and ■■■'s disclosure to his parents, in order to intimidate ■■■;

h. Defendant, ROSARIAN's failure to respond and take any action after being notified of the subject highly inappropriate sexual behavior between TPM a ■■■ demonstrated deliberate indifference to ■■■'s safety and well-being, making it impossible for ■■■ to continue attending Defendant, ROSARIAN safely;

i. Plaintiffs were forced to immediately and permanently withdraw ■■■ from Rosarian Academy on December 3, 2025, resulting in the loss of their substantial investment in his education and the necessity of completely restructuring their lives to provide homeschooling;

i. ■■■ continues to receive trauma therapy and counseling. As is common in cases involving child sexual abuse, ■■■ has made and continues to make disclosures about the abuse sporadically over time as he processes the trauma. Plaintiffs reserve the right to amend this Complaint as additional information becomes available through ■■■'s therapy and the ongoing investigation.

FACTS COMMON TO EACH CAUSE OF ACTION

3. At all times material hereto, ■■■ was enrolled as a student at Rosarian Academy. Minor Plaintiff was born in 2018. He attended Rosarian Academy during the 2023-2024 and 2024-2025 school years, beginning when he was in kindergarten and continuing through first grade.

4. As a private, well-established school, Defendant, ROSARIAN held itself out to parents and the community as providing a safe, secure, and nurturing educational environment for young children and Plaintiffs paid substantial tuition and fees for ■■■ education at Defendant, ROSARIAN's school.

5. Defendant, ROSARIAN contracted with Defendant, ALPHA to provide private school bus transportation services for its students, including, but not limited to, ■■■ and TPM.

6. Alpha Transportation is a professional transportation company that held itself out as capable of providing safe and supervised transportation for young children to and from school.

7. Defendants owed a duty of care to ■■■ to provide adequate supervision, protection, and a safe environment during school hours and while being transported on school buses.

8. Defendant, ALPHA failed to provide adequate supervision and breached that duty in that the bus driver who transported ■■■ and other minors was driving distracted while on his personal and/or work cellular phone. That bus driver further had a clear view of ■■■, TPM and other minor students, yet failed to properly supervise due to his distractions and/or lack of effort.

9. Defendant, ROSARIAN is aware and on prior notice of the dangers of failing to adequately and properly supervise minor children who attend their school due to prior sexual misconduct occurring at the school.

10. Specifically, former Rosarian Academy teacher, non-party Stephen Budd was convicted of capital sexual battery charges for molesting two of his former fourth graders at Defendant, ROSARIAN's school during the 2006-2007 school year. Non-party Stephen Budd used

play money called “Budd Bucks” to cajole his minor victims into sexual contact because they knew they could turn it in for candy and prizes in his class. All of this occurred under the care and supervision of Defendant, ROSARIAN.

11. Also, and prior to and/or during the highly inappropriate sexual conduct discussed herein occurred, Plaintiffs advised Defendants that ■■■ was being bullied/physically assaulted on the same Defendant, ALPHA bus. Plaintiffs immediately reported the alleged bullying to Defendant. ALPHA’s driver non-party “Zack”, as well as Defendant, ROSARIAN’s guidance counselor, teacher and aide during ■■■’s first parent-teacher conference. Plaintiffs received no follow-up from Defendants and no safety changes were made.

INNAPROPRIATE SEXUAL INTERACTIONS ON DEFENDANT, ALPHA’S BUSES

12. During the 2024-2025 school year, when ■■■ was in first grade and eight (8) years old, he was transported to and from Defendant, ROSARIAN’s school on private school buses owned and operated by Defendant, ALPHA. ■■■ was regularly seated in his typical location on the bus, either in the seat directly behind the bus driver, or alternatively in the seat behind the panel/screen adjacent to the garbage bin on the opposite side of the bus.

13. TPM was also transported on the same school buses operated by Defendant, ALPHA.

14. On multiple occasions during the 2024-2025 school year, while ■■■ was being transported on a school bus owned and operated by Defendant, ALPHA, and while under the care and supervision of Defendants, TPM engaged in highly inappropriate sexual behavior with ■■■.

15. The highly inappropriate sexual behavior occurred repeatedly over a period of weeks or months during the 2024-2025 school year without detection by any adult supervisor, driver, or aide employed by Defendant, ALPHA.

16. The school buses operated by Defendant, ALPHA were equipped with surveillance cameras capable of monitoring and recording student behavior and interactions during transportation.

17. Upon information and belief, Defendants had the capability to review footage from bus surveillance cameras to monitor student conduct and ensure student safety during transportation.

18. Upon information and belief, despite having surveillance camera capabilities, neither Defendants maintained adequate monitoring or review of bus camera footage to detect and prevent inappropriate student conduct. This allegation is confirmed by surveillance footage produced by Defendant, ALPHA in connection with this matter and reveals a chaotic and unsafe environment aboard the school bus. The footage shows approximately twenty-five (25) children aboard the bus, with children getting up out of their seats on a moving bus and no child wearing a seatbelt.

19. Upon information and belief, the school buses operated by Defendant, ALPHA regularly transported students without adequate adult supervision, monitoring, or enforcement of appropriate behavior and boundaries between students..

20. Upon information and belief, Defendant, ALPHA compounded this failure by regularly operating school buses without a bus aide, leaving the bus driver as the sole adult responsible for supervising students while operating the bus.

21. Upon information and belief, Defendant, ALPHA further failed to prohibit its drivers from using personal cellular phones while operating its school buses. The bus driver regularly spoke on his personal phone during bus rides, diverting his attention entirely away from the students in his care.

27. Venue is proper in this Court because the acts and omissions giving rise to this action occurred in Palm Beach County, Florida, and Defendants conduct business in Palm Beach County, Florida.

COUNT I
NEGLIGENT SUPERVISION AGAINST ALPHA TRANSPORTATION SERVICES, INC.

28. Plaintiffs repeat and re-allege paragraphs 1 through 27 above as if set forth fully herein.

29. At all material times, Defendant, ALPHA owed to [REDACTED] a duty to use reasonable care to ensure his safety during transportation to and from school, including protecting him from foreseeable harm, including highly inappropriate sexual misconduct by other students, including TPM.

30. At all material times, Defendant, ALPHA knew, or in the exercise of reasonable care should have known that young minor children transported on school buses require adequate adult supervision to prevent inappropriate physical contact and sexual misconduct between the minor students it was transporting on behalf of Defendant, ROSARIAN.

31. At all material times, Defendant, ALPHA knew, or in the exercise of reasonable care should have known that a failure to properly supervise minor students during bus transportation could lead to dangerous and harmful conduct, including sexual misconduct.

32. Alpha Transportation negligently failed to provide adequate supervision of students on its school buses, including:

- a. Failing to ensure that bus drivers and bus aides actively observed and monitored student behavior during transportation;
- b. Failing to implement seating arrangements designed to protect vulnerable students;
- c. Failing to employ sufficient bus aides to supervise students;
- d. Failing to train drivers and bus aides to recognize, prevent, and respond to inappropriate physical contact between students;
- e. Failing to implement and enforce rules prohibiting inappropriate physical contact between students;

- f. Failing to maintain visual and auditory supervision of all students at all times during transportation;
- g. Failing to implement any system for monitoring or documenting student behavior and interactions on the bus;
- h. Failing to properly monitor or review surveillance camera footage despite having cameras installed on buses;
- i. Failing to implement adequate protocols for regular review of camera surveillance footage to detect and prevent inappropriate student conduct.
- j. Permitting and/or failing to prohibit its bus driver from using a personal cellular telephone while operating the school bus and transporting students, thereby diverting the driver's attention from the monitoring and supervision of student passengers; and
- k. Failing to provide an aide on a bus transporting approximately twenty-five (25) young children, thereby leaving the sole bus driver without adequate assistance to both operate the vehicle and maintain proper supervision of all student passengers.

33. Defendant, ALPHA failed to conduct adequate background checks, screening, training, and supervision of its drivers and monitors to ensure they were qualified and capable of protecting students from harm.

34. As a direct and proximate result of Defendant, ALPHA's breach of its duty to reasonably and adequately supervise students during transportation [REDACTED] was repeatedly sexually victimized by TPM on Defendant, ALPHA's school bus.

35. The sexual victimization of [REDACTED] has caused him to suffer, and to continue to suffer, severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, loss of enjoyment of life, and disruption of his education. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demand judgment against Defendant, ALPHA for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper.

COUNT II
NEGLIGENT HIRING, TRAINING, AND RETENTION AGAINST ALPHA
TRANSPORTATION SERVICES, INC.

36. Plaintiffs repeat and re-allege paragraphs 1 through 27 and the preceding paragraphs above as if set forth fully herein.

37. At all material times, Defendant, ALPHA had a duty to exercise reasonable care in the hiring, training, and retention of drivers and bus aides who would be responsible for the safety and supervision of young minor children during school bus transportation.

38. Upon information and belief, Defendant, ALPHA negligently failed to provide adequate training to its drivers and bus aides regarding:

- a. The supervision and monitoring of student behavior on school buses;
- b. Recognition of signs of inappropriate physical contact or sexual behavior between students;
- c. Prevention of inappropriate physical contact between students;
- d. Appropriate seating arrangements and student management techniques;
- e. Monitoring and review of surveillance camera footage;
- f. Mandatory reporting requirements for suspected child abuse; and
- g. Emergency response protocols for incidents of abuse or inappropriate conduct.
- h. Inappropriate and unlawful use of cellular telephones by its bus drivers during the transportation of its minor children.

39. Upon information and belief, Defendant, ALPHA negligently failed to implement any system for monitoring, evaluating, or supervising the performance of its drivers and aides to ensure they were adequately monitoring and protecting students.

40. Upon information and belief, Defendant, ALPHA negligently failed to implement policies and procedures requiring drivers and aides to maintain continuous visual supervision of all students during transportation and to regularly review surveillance camera footage.

41. Upon information and belief, Defendant, ALPHA negligently failed to staff its buses with sufficient aides to adequately supervise the number of students being transported.

42. If Alpha Transportation had exercised reasonable care in hiring, training, and supervising its employees, and if it had implemented adequate policies and procedures for student supervision and camera monitoring, the repeated sexual victimization of [REDACTED] would not have occurred.

43. As a direct and proximate result of Defendant, ALPHA's negligent hiring, training, and retention practices, [REDACTED] was repeatedly sexually victimized on Defendant, ALPHA's school bus.

44. The sexual victimization of [REDACTED] has caused him to suffer, and to continue to suffer, severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, and loss of enjoyment of life. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demands judgment against Defendant, ALPHA for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper

COUNT III
NEGLIGENT UNDERTAKING AND BREACH OF CONTRACT (THIRD-PARTY BENEFICIARY) AGAINST ALPHA TRANSPORTATION SERVICES, INC.

45. Plaintiffs repeat and re-allege paragraphs 1 through 27 and the preceding paragraphs above as if set forth fully herein.

46. Alpha Transportation entered into a contract with Rosarian Academy to provide school bus transportation services for students of the Academy, including [REDACTED]

47. The Plaintiffs and [REDACTED] are intended third-party beneficiaries of the contract

between Defendant, ALPHA and Defendant, ROSARIAN, as the purpose of the contract was to provide safe transportation for students, including [REDACTED]

48. The contract required, and/or industry standards required, Defendant, ALPHA to provide adequate supervision of students, including [REDACTED] during transportation and to implement reasonable safety measures to protect students from harm.

49. Defendant, ALPHA undertook the duty to transport its minor children student, including [REDACTED] safely to and from school and to supervise him during transportation.

50. Having undertaken this duty, Defendant, ALPHA was required to exercise reasonable care in performing its undertaking.

51. Defendant, ALPHA negligently and carelessly performed its undertaking by failing to provide adequate supervision and by allowing repeated incidents of sexual victimization to occur without detection or intervention.

52. As a direct and proximate result of Defendant, ALPHA's negligent performance of its undertaking, [REDACTED] was sexually victimized.

53. The sexual victimization of [REDACTED] has caused him to suffer, and to continue to suffer, severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, and loss of enjoyment of life. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demand judgment against Defendant, ALPHA for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper.

COUNT IV
NEGLIGENT SUPERVISION AND FAILURE
TO PROTECT AGAINST ROSARIAN ACADEMY

54. Plaintiffs repeat and re-allege paragraphs 1 through 27 above as if set forth fully herein.

55. At all material times, Defendant, ROSARIAN owed to [REDACTED] a duty to use reasonable care to ensure his safety and to care for his health and well-being, including protecting him from sexual victimization and, after learning of sexual victimization, protecting him from further harm, intimidation, and retaliation.

56. This duty encompassed using reasonable care in the supervision and protection of [REDACTED] and his fellow students, both on school premises and during school-sponsored transportation, specifically with Defendant, ALPHA. Defendant, ROSARIAN further owed [REDACTED] a duty to prevent foreseeable harm from occurring to him while he was under the Academy's care and supervision.

57. Defendant, ROSARIAN was acting in loco parentis while entrusted with the custody and control of [REDACTED] and received substantial financial remuneration for educational services from Plaintiffs.

58. At all relevant times, Defendant, ROSARIAN knew, or in the exercise of reasonable care should have known that young minor children require continuous adult supervision to prevent sexual abuse and inappropriate conduct.

59. Defendant, ROSARIAN negligently failed to adequately supervise its transportation contractor, Defendant, ALPHA, to ensure that students, including [REDACTED] were properly supervised during bus transportation.

60. Defendant, ROSARIAN negligently failed to require, monitor, or enforce adequate supervision and safety protocols on school buses transporting its minor students, including [REDACTED]

61. Defendant, ROSARIAN negligently failed to require Defendant, ALPHA to implement proper monitoring and review of surveillance camera footage, despite having knowledge that cameras were installed on the buses.

62. Defendant, ROSARIAN negligently failed to implement its own oversight protocols to ensure that available surveillance camera footage was being monitored to protect student safety.

63. After being notified on or about December 2, 2025 of the sexual victimization of [REDACTED] by TPM, Defendant, ROSARIAN had a duty to protect [REDACTED] from further harm, including protecting him from intimidation, harassment, or retaliation by TPM.

64. Despite receiving a specific written request from Plaintiffs on the evening of December 2, 2025 that TPM have no interaction with [REDACTED] pending the police investigation, Rosarian Academy:

- a. Failed to respond to the above request;
- b. Failed to implement any safety plan or protective measures;
- c. Failed to ensure that staff members were aware of the need to keep the students separated;
- d. Failed to provide any supervision or monitoring to prevent TPM from Approaching and confronting [REDACTED] and
- e. Allowed TPM to enter [REDACTED]'s classroom unsupervised on December 3, 2025, and directly approach, confront and speak with [REDACTED] about the police investigation and [REDACTED]'s disclosure.

65. Defendant, ROSARIAN's complete failure to respond to a specific written safety request, combined with its allowance of direct contact and witness intimidation, demonstrates deliberate indifference to [REDACTED]'s safety and well-being.

66. Upon information and belief, local law enforcement officials specifically encouraged Defendant, ROSARIAN to coordinate with Plaintiffs to develop a safety plan, yet Defendant, ROSARIAN failed to engage in any such coordination or planning.

67. As a direct and proximate result of Defendant, ROSARIAN's breach of its duty to reasonably and adequately supervise ██████ to oversee its transportation contractor, to ensure proper monitoring of surveillance capabilities, and to protect ██████ after being notified of TPM's sexual victimization of ██████, ██████ was sexually victimized and subsequently subjected to TPM's intimidation and harassment.

68. The sexual victimization and subsequent intimidation of ██████ has caused him to suffer, and to continue to suffer severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, loss of enjoyment of life, and complete disruption of his education, necessitating his permanent removal from Defendant, ROSARIAN's school and transition to homeschooling. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demands judgment against Defendant, ROSARIAN for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper.

COUNT V
NEGLIGENT RETENTION AND FAILURE TO SUPERVISE CONTRACTOR
AGAINST ROSARIAN ACADEMY

69. Plaintiffs repeat and re-allege paragraphs 1 through 27 above and the preceding paragraphs above as if set forth fully herein.

70. Defendant, ROSARIAN had a duty to exercise reasonable care in selecting, retaining, and supervising contractors who would provide services involving the safety and welfare of its students.

71. Defendant, ROSARIAN selected and retained Defendant, ROSARIAN to provide school bus transportation services for its students.

72. Upon information and belief, Defendant, ROSARIAN knew, or in the exercise of reasonable care should have known that Defendant, ALPHA was not adequately supervising students during bus transportation of Defendant, ROSARIAN's students, including [REDACTED]

73. Upon information and belief, Defendant, ROSARIAN received prior complaints or had prior knowledge of inadequate supervision on buses owned and operated by Defendant, ALPHA, yet failed to take corrective action or terminate the relationship.

74. Rosarian Academy negligently failed to:

- a. Conduct adequate due diligence before selecting Defendant, ALPHA as its transportation contractor;
- b. Monitor and supervise the performance of Defendant, ALPHA to ensure adequate student supervision;
- c. Require Defendant, ALPHA to implement and maintain adequate supervision and safety protocols;
- d. Require Defendant, ALPHA to implement proper monitoring and review of surveillance camera footage;
- e. Investigate complaints or concerns about inadequate supervision on school buses;
- f. Terminate its relationship with Defendant, ALPHA when it knew or should have known that students were not being adequately supervised; and
- g. Implement its own oversight and monitoring systems to ensure student safety during transportation, including oversight of camera monitoring protocols.

75. As a direct and proximate result of Defendant, ROSARIAN's negligent retention and supervision of Defendant, ALPHA, [REDACTED] was sexually victimized on Defendant, ALPHA's school bus.

76. The sexual victimization of [REDACTED] has caused him to suffer, and to continue to suffer, severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, and loss of enjoyment of life. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demand judgment against Defendant, ROSARIAN for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper.

COUNT VI
BREACH OF FIDUCIARY DUTY AND VIOLATION OF IN LOCO PARENTIS
AGAINST ROSARIAN ACADEMY

77. Plaintiffs repeat and re-allege paragraphs 1 through 27 and the preceding paragraphs above as if set forth fully herein.

78. At all material times, Defendant, ROSARIAN stood in loco parentis to [REDACTED], having accepted responsibility for his care, education, safety, and welfare during school hours and school-sponsored activities, including transportation.

79. By virtue of this in loco parentis relationship, Rosarian Academy owed Plaintiffs and [REDACTED] a fiduciary duty of care, protection, and good faith.

80. This fiduciary duty was heightened by the tender age of Minor Plaintiff and the trust placed in Defendant, ROSARIAN by Plaintiffs.

81. Rosarian Academy breached its fiduciary duty by:

- a. Failing to provide adequate supervision during school-sponsored transportation;
- b. Failing to ensure proper monitoring and review of available surveillance camera

footage;

c. Failing to respond to Plaintiffs' written request for safety measures after being notified of sexual abuse;

d. Failing to implement any safety plan or protective measures after being notified of sexual abuse;

e. Allowing TPM to approach and intimidate Minor Plaintiff after being specifically asked to keep them separated;

f. Demonstrating deliberate indifference to Minor Plaintiff's safety and well-being.

82. As a direct and proximate result of Defendant, ROSARIAN's breach of its fiduciary duty, ■■■ suffered sexual abuse and was subsequently subjected to intimidation, and Plaintiffs were forced to remove ■■■ from Defendant, ROSARIAN's school permanently, losing their substantial investment in his education.

83. ■■■ has suffered, and continues to suffer, severe and permanent psychological and emotional injuries, trauma, mental anguish, pain and suffering, and loss of educational opportunity. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demand judgment against Defendant, ROSARIAN for compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00), costs, and such other and further relief as this Court deems just and proper.

COUNT VII
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

84. Plaintiffs repeat and re-allege paragraphs 1 through 27 and the preceding paragraphs above as if set forth fully herein.

85. Plaintiffs are the parents of ■■■ and have suffered severe emotional distress as a direct result of Defendants' negligence in failing prevent the sexual victimization of ■■■

86. The emotional distress Plaintiffs suffered by was foreseeable to Defendants, as any reasonable person would know that parents would suffer severe emotional trauma upon learning

that their young child was repeatedly sexually victimized while under the care and supervision of a school and its transportation contractor.

87. Plaintiffs have suffered and continue to suffer severe emotional distress, including but not limited to anxiety, fear for their child's safety and well-being, guilt, anger, depression, and trauma related to the sexual victimization of their son and Defendants' failures to protect him. The abuse has robbed [REDACTED] of his innocence and fundamentally altered his development, causing him to exhibit behaviors that are precocious and inconsistent with those of a typical child of his age, which Plaintiffs must navigate daily.

88. The impact of Defendants' failures has extended beyond [REDACTED] and has caused significant and ongoing harm to the marital relationship and Plaintiffs' family unit. The stress, grief, and trauma arising from the abuse and its aftermath have created severe tension and strain within the marriage, affecting every aspect of family life.

89. Plaintiffs' emotional distress suffered by the [REDACTED] sexual victimization is severe and debilitating and has manifested in physical symptoms and psychological harm affecting both Plaintiffs individually and their relationship as a couple. Plaintiffs further suffered a substantial financial loss due to tuition money paid to Defendant, ROSARIAN.

WHEREFORE, Plaintiffs demand judgment against Defendants for compensatory damages for their emotional distress, loss of consortium, loss of investment in education, and economic damages, costs, and such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

PLAINTIFFS DEMAND TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Dated: March 27, 2026

Respectfully submitted,

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NOT A CERTIFIED