

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

ASHLEE TOLLETT,

Plaintiff,

v.

GARY YOUNG,

Defendant.

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Case No. CIV-19-1170-D

**JURY TRIAL DEMANDED
ATTORNEY LIEN CLAIMED**

PLAINTIFF’S ORIGINAL COMPLAINT

Plaintiff, Ashlee Tollett, by and through her attorneys of record, Cameron Spradling and Michael Blue, alleges and states as follows:

I. NATURE OF THE ACTION

1. The Plaintiff, Ashlee Tollett, (“Ashlee”) seeks redress and remedies as a result of childhood sexual abuse incidents and exploitations committed against her and directed at her by Defendant, Gary Young (“Young”), her father, that led to severe and permanent emotional and other injuries suffered by Ashlee by reason of this childhood sexual abuse and exploitation.

2. This diversity action is brought in conformity with Oklahoma’s Hidden Predator Act, as found in 12 O.S. § 95 (6). Upon information and belief the instant matter is the first civil lawsuit, either in state or federal court, brought under Oklahoma’s Hidden Predator Act.¹

¹ The Hidden Predator Act was the inspiration of survivor Virginia Lewis who worked with legislators to extend the statute of limitations so that child sexual abuse victims

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this case under 28 U.S.C. § 1332, which gives district courts jurisdiction over all civil actions arising between citizens of different States and that the amount in controversy exceeds \$75,000, exclusive of interest and costs. At the time of filing this lawsuit, Ashlee is a citizen of Florida. Young is a citizen of Oklahoma. The citizenship of the parties is completely diverse.

4. Venue is proper in this district, as the events giving rise to the claims occurred in this district, and the Defendant resides in this district.

III. THE PARTIES

5. Plaintiff, Ashlee Tollett, date of birth January of 1981, is presently 38 years old and an adult citizen of the state of Florida and the United States. Ashlee lives and resides at Inlet Beach, Walton County, Florida. Ashlee is the natural daughter of Defendant Gary Young.

6. Defendant Gary Young, date of birth August of 1954, is presently 65 years old and an adult citizen of the state of Oklahoma and the United States. Young lives and resides at Blackwell, Kay County, Oklahoma. Young is the natural father of Plaintiff, Ashlee Tollett.

IV. THEORY OF LIABILITY

7. The Hidden Predator Act became effective in Oklahoma on November 1, 2017.

could file charges against their attackers later in life. *See* Mary Hargrove & Kassie McClung, *Rape Victims at the Capitol: When pain and politics collide*, THE FRONTIER (Dec. 12, 2017).

8. The civil version of Oklahoma’s Hidden Predator Act, 12 O.S. § 95 (6), reads in pertinent part, as follows:

An action based on intentional conduct brought by any person for recovery of damages for injury suffered as a result of childhood sexual abuse incidents or exploitation as defined by Section 1-1-105 of Title 10A of the Oklahoma Statutes or incest against the actual perpetrator shall be commenced by the forty-fifth birthday of the alleged victim...

An action pursuant to this paragraph must be based upon objective verifiable evidence in order for the victim to recover damages for injuries suffered by reason of such sexual abuse, exploitation, or incest. The victim need not establish which act in a series of continuing sexual abuse incidents, exploitation incidents, or incest caused the injury complained of;²

9. According to the Hidden Predator Act “childhood sexual abuse incidents or exploitation” is “defined by” the Oklahoma Children’s Code, 10A O.S. § 1-1-105.

10. In that referenced section of the Oklahoma Children’s Code are the following relevant definitions, which state, in pertinent part, as follows:

“Abuse” means harm or threatened harm to the health, safety, or welfare of a child by a person responsible for the child's health, safety, or welfare, including but not limited to nonaccidental physical or mental injury, sexual abuse, or sexual exploitation.

10A O.S. § 1-1-105 (2).

² The criminal version of Oklahoma’s Hidden Predator Act, 22 O.S. § 152 (C)(1), also became effective on November 1, 2017 and reads in pertinent part as follows:

Prosecutions for sexual crimes against children, specifically rape or forcible sodomy, sodomy, lewd or indecent proposals or acts against children, involving minors in pornography pursuant to Section 886, 888, 1111, 1111.1, 1113, 1114, 1021.2, 1021.3, 1040.12a or 1123 of Title 21 of the Oklahoma Statutes, child abuse pursuant to Section 843.5 of Title 21 of the Oklahoma Statutes, and child trafficking pursuant to Section 866 of Title 21 of the Oklahoma Statutes shall be commenced by the forty-fifth birthday of the alleged victim.

“Harm or threatened harm to the health or safety of a child” means any real or threatened physical, mental, or emotional injury or damage to the body or mind that is not accidental including but not limited to sexual abuse, sexual exploitation, neglect, or dependency.

10A O.S. § 1-1-105 (2)(a).

“Sexual abuse” includes but is not limited to rape, incest, and lewd or indecent acts or proposals made to a child, as defined by law, by a person responsible for the health, safety, or welfare of the child.

10A O.S. § 1-1-105 (2)(b).

“Sexual exploitation” includes ... allowing, permitting, encouraging, or engaging in the lewd, obscene, or pornographic, as defined by law, photographing, filming, or depicting of a child in those acts by a person responsible for the health, safety, and welfare of the child;

10A O.S. § 1-1-105 (2)(c).

“Harm or threatened harm to the health or safety of a child” means any real or threatened physical, mental, or emotional injury or damage to the body or mind that is not accidental including, but not limited to, sexual abuse, sexual exploitation, neglect, or dependency;

10A O.S. § 1-1-105 (33).

“Heinous and shocking abuse” includes, but is not limited to, aggravated physical abuse that results in serious bodily, mental, or emotional injury. “Serious bodily injury” means injury that involves:

- sexual abuse or sexual exploitation,
- chronic abuse including, but not limited to, physical, emotional, or sexual abuse, or sexual exploitation which is repeated or continuing,
- torture that includes, but is not limited to, inflicting, participating in or assisting in inflicting intense physical or emotional pain upon a child repeatedly over a period of time for the purpose of coercing or terrorizing a child or for the purpose of satisfying the craven, cruel, or prurient desires of the perpetrator or another person, or
- any other similar aggravated circumstance;

10A O.S. § 1-1-105 (34)(g)(h)(i) and (j).

“Heinous and shocking neglect” includes, but is not limited to:

- an act ... by a parent that results in ... serious physical or emotional harm, sexual abuse, sexual exploitation, or presents an imminent risk of serious harm to a child, or
- any other similar aggravating circumstance;

10A O.S. § 1-1-105 (35)(c) and (d).

11. Defendant, Gary Young, is liable to Plaintiff, Ashlee Tollett, for the injuries and damages caused by his violations of Oklahoma’s Hidden Predator Act as defined by the Oklahoma Children’s Code.³

V. BACKGROUND

A. The Oklahoma State Department of Education

12. On August 22, 2019, the Oklahoma State Department of Education (the “Department”) filed an administrative complaint against Gary Young with the State Board of Education (the “Board”). The pleading was entitled an Application for Emergency Order to Summarily Suspend Teaching Certification and Application to Revoke Teaching Certification (the “Application”) of Defendant Young. One day later, on August 23, 2019, the State Board issued an Emergency Order (“the Emergency Order”), finding that the public health, safety or welfare imperatively required emergency action. The Emergency Order has not been challenged and remains in effect.⁴

³ Virginia Lewis succinctly explained the reason for an extended time to file for child sexual assault victims: “It takes decades, it really does, to sort of come to grips with what’s happened, unpeel the many layers of trauma that are involved with something like sexual abuse.” See Virginia Lewis, *My Story – Stolen Childhood*, TOPREAVAIL.ORG, <https://www.topreavail.org/stolen-childhood>.

⁴ See Application filed in *State of Oklahoma, ex. rel. State Department of Education vs. Gary Young*, No. 2019-22 (Oklahoma State Board of Education), a copy of which is attached hereto as *Exhibit “I”*.

13. The Application informed of Young's teaching certifications and shared with the public that Young was "currently employed as the Superintendent and Principal of Peckham Public Schools" in Newkirk, Kay County, Oklahoma.

14. The Department explained in its Application that "[t]he Department has received multiple sexual misconduct complaints against Young. These complaints include allegations that Young has sexually assaulted adults and minors, groomed minors for sexual abuse and unfairly compensated teachers in exchange for sexual relationships."

15. The Department then listed in its Application various acts of sexual predation committed by Young, as quoted herein:

- a. In 2015, a minor accused Young of sexual assault. The minor claimed that a heavily intoxicated Young approached her, started rubbing her shoulders and she became very uncomfortable. Subsequently, Young allegedly continued to rub her, kiss her and then encouraged her to go to the basement with him.
- b. Multiple former Peckham students recounting situations where Young made them feel uncomfortable at his home.
- c. One former student claims that Young called her (along with Young's daughter and the student's sister) into his bedroom where "he was laying there butt ass naked" and that "weirded us out because he deliberately called us in there."
- d. Additionally, two former students claim that Young made inappropriate comments to them while they were present with his daughter, stating, "You girls look hot. You should just get naked and go swimming."
- e. While on an out-of-state trip with one of former female students and family, Young allegedly purchased alcohol for the underage female, then while driving with her put his hand between her legs, propositioned her for sexual favors and asked if she wanted to go back to the hotel with him. When returning to the hotel, the female locked herself in a bathroom and contacted her friends for assistance and removal from the presence of Young.
- f. Former Peckham staff members have recounted incidents of sexual misconduct by Gary Young. One former staff member claims that Young "started grinding his

crotch on me and started moaning after she described to him that she was upset about missing her father”.

- g. Another former staff member writes, “Yes...he made a lot of sexual advances toward me...when I said no, he gave me poor evaluations.”
 - h. Additionally, a student claims that she witnessed Young kissing a staff member, later asking that the student “not say anything because it would ruin his life.”
 - i. The Department received a complaint that Gary Young has had inappropriate sexual conduct with young children and has groomed them for sexual abuse.
 - j. Specifically, on or near 2009, Young allegedly was seen squirting lotion on a nine-month-old, appearing to be rubbing in the lotion on the infant’s private area and labia.
 - k. Further, without explanation and after being in Young’s care, on or near 2014-15, Young’s grandchild was said to have returned from trips with Young with a “very red and raw looking penis.”
 - l. Additionally, in the winter of 2019, Young allegedly gave his eight-year-old grandson a bath, and who later advised that Young had inappropriately touched his private parts while bathing him.
 - m. The Department received a complaint that Young has had an inappropriate sexual relationship with one of his staff members for years. This staff member is a certified teacher with a Master’s degree and eighteen years of experience. In accordance with 70 O.S. § 18-114.14, which provides the statutory guidelines for the minimum salary and benefits for certified personnel, a teacher with a Master’s degree and eighteen years of experience should be provided with a minimum salary of \$47,531. Department records show that the individual is compensated \$87,849 as a Certified Employee, and paid an additional \$9,097 as a Support Employee.
16. Joy Hofmeister, Oklahoma’s State Superintendent of Public Instruction, told the media in regard to Gary Young and the allegations, “We really must listen to kids” and “[a]n opportunity that the board has is to protect student safety and any of these

suspensions come typically because of a student safety issue and that would be the case in these particular names.”⁵

17. In that same media report, Brad Clark, the State Department of Education’s General Counsel, assured the public as to Young that “effectuating the suspension” will not permit Young to be around school children or children on school property.”

B. Investigation by Law Enforcement

18. On August 22, 2019, State Department of Education’s General Counsel, Brad Clark, informed the public that the State Department of Education had been in contact with the Kay County Sheriff’s Office and that DHS had also been informed in regard to the allegations against Defendant Young.⁶

19. On September 7, 2019, it was reported that “[i]nvestigators looking into sexual misconduct allegations against a suspended superintendent seized computers, documents and cellphones from Peckham school district offices” that very week.⁷

20. On September 14, 2019, the media further reported that “[i]nvestigators looking into sexual misconduct allegations against suspended Peckham School Superintendent Gary Young served search warrant at his home” and “[i]nvestigators from the Blackwell

⁵ See Cassandra Sweetman, *Peckham superintendent suspended following numerous allegations of sexual abuse*, OKLAHOMA NEWS 4, KFOR (Aug. 22, 2019).

⁶ See *supra* note 5.

⁷ See Tim Willert, *Accuser: Peckham teachers paid ‘quite mightily’ for sex*, THE OKLAHOMAN (Sept. 7, 2019).

Police and Kay County sheriff's departments and the Kay County district attorney's office participated in the search."⁸

21. Gary Young's predatory actions, which have terrorized a multitude of victims for decades in Peckham Public Schools, Newkirk, Blackwell and Kay County, Oklahoma, are continuing to be investigated.

C. State of Oklahoma v. Gary Young

22. On December 18, 2019, an Affidavit for Arrest Warrant⁹ was presented to and signed by the Honorable Jennifer Brock, Associate District Judge for the District Court of Kay County, Oklahoma, and a Criminal Information¹⁰ was filed, which alleges multiple felony counts of: [1] lewd and indecent acts by Gary Young towards three minors (Victims 1, 2 and 3) in violation of 21 O.S. § 1123, pertaining to "Lewd or Indecent Acts to Child Under 16"; [2] causing, procuring and/or permitting injury to two minors (Victims 1 and 2) in violation of 21 O.S. § 834.5, pertaining to "Cause/Procure/Permit Injury to a Child"; and [3] acts of blackmail by Gary Young to obtain sexual favors from a former adult employee through the wrongful use of fear/force and threat effecting the employee's employment (Victim 4) in violation of 21 O.S. § 1482.

⁸ See Tim Willert, *Search warrant served at superintendent's home*, THE OKLAHOMAN (Sept. 14, 2019).

⁹ See Affidavit filed in *State of Oklahoma v. Gary Young*, No. CF-2019-624 (District Court of Kay County, Oklahoma), a copy of which is attached hereto as *Exhibit "2"*.

¹⁰ See Criminal Information filed in *State of Oklahoma v. Gary Young*, No. CF-2019-624 (District Court of Kay County, Oklahoma), a copy of which is attached hereto as *Exhibit "3"*.

23. Plaintiff, Ashlee Tollett, is the first (Victim 1) of the four victims, which upon information and belief, makes the instant matter not only the first civil case brought under Oklahoma's Hidden Predator Act but also the first criminal case brought under Oklahoma's Hidden Predator Act.

VI. FACTUAL RECITATIONS OF ASHLEE TOLLETT

24. Defendant, Gary Young, would brag that when Ashlee was around the age of three (3), approximately 1984, a babysitter went to Young and his wife, the natural father and mother of Ashlee, and told them that she was fearful that Ashlee had been sexually abused because she regularly masturbated. Young would boast that he then fired this babysitter over her interference because she was crazy.¹¹

25. Unfettered by the expressed concerns of the babysitter Young continued to "groom" little Ashlee.¹²

¹¹ In regard to another victim some thirty-five (35) years later, the Oklahoma State Department of Education in its Application stated, "...on or near 2009, Young allegedly was seen squirting lotion on a nine-month-old, appearing to be rubbing lotion on the infant's private area and labia." See Application for Emergency Order to Summarily Suspend Teaching Certification and Application to Revoke Teaching Certification, Page 3, ¶8, *State of Oklahoma, ex. rel. State Department of Education vs. Gary Young*, No. 2019-22 (Oklahoma State Board of Education), *Exhibit "I"*. The peculiar details of this event was that Young was caught in a bedroom alone with the baby and having removed her diaper he had squirted a large pile of lotion on the baby girl's labia and private area and was rubbing the lotion with his right hand. When confronted Young said that he thought it was baby powder instead of lotion that he had squirted and was rubbing.

¹² Grooming is defined as: "A process by which a person prepares a child, significant others, and the environment for the abuse of this child. Specific goals include gaining access to the child, gaining the child's compliance, and maintaining the child's secrecy to avoid disclosure. This process serves to strengthen the offender's abusive pattern, as it may be used as a means of justifying or denying their actions." See Craven, Samantha, Sarah Brown, and Elizabeth Gilchrist. 2006. "Sexual Grooming of

26. From the age of four (4) to the age of ten (10), Gary Young insisted that he was the only one to bath Ashlee. Young would masturbate Ashlee in the water with a washcloth. Young would also masturbate Ashlee in the water with his bare hand on her clitoris and private area. Finally, Young would have Ashlee stand before him in the tub while he would masturbate his own daughter. These episodes of Young masturbating Ashlee also took place outside of the bathroom.

27. Up to the age of ten (10), Gary Young would have Ashlee stand naked in front of her parent's large mirror in the master bedroom while he brushed and blow dried her hair.

28. As a young girl (6th grade), and continuing into adulthood, Gary Young would ambush Ashlee from behind with open mouth wet kisses to the back of her neck, the sides of her neck and pressing forward to her cheeks. These events would be so forceful and aggressive that the attack would give Ashlee no time for escape. Young was so lustful in his ambush that he would leave his wet saliva on her body.

29. Another Gary Young attack method was to ambush Ashlee from the side and place his arms around her hips and pull her into him so that he could place his open mouth on her neck and cheek. Again, Young was so lustful in his ambush that Ashlee would have to wipe away his wet saliva.

30. These attacks would be followed by Gary Young raucously laughing and he would then guilt Ashlee with comments such as, "you never show your father any physical affection", "you never liked it when I touched you", and "you won't let me touch you."

Children: Review of Literature and Theoretical Considerations." *Journal of Sexual Aggression* 12(3):287–299.

31. As Ashlee went through puberty (7th and 8th grade), her disgust and embarrassment towards her father grew. Gary Young would attempt to touch Ashlee in inappropriate sexually charged ways. Young would attempt to kiss Ashlee on her neck, face and mouth. Young would make inappropriate comments about Ashlee's physical appearance and sexual development, *e.g.*, the shape of her legs, her breast size, her physique, and her physical appearance. Young would tell Ashlee that she was attractive and flirt with her like a high school boy. Young would pinch his daughter's bottom, slap her rear-end and try to pop off her bras and swimsuit tops.

32. Undaunted by her rejections, Young schemed, contrived, and tricked Ashlee into another method that allowed him to touch Ashlee. In her middle school and high school years Ashlee had developed into an athlete, engaging in basketball, softball and track. Young would offer to give Ashlee full body massages. Young manipulated Ashlee into these massages by saying that he observed that she was "sore" and needed his help to "loosen up". He manipulated her into believing that these were "sports massages" but in truth the massages were for the sole purpose of gratifying Young's deviant desires to access and touch her body.

33. Defendant, Gary Young, would have his daughter lay on the floor in her parent's living room. She would normally be wearing a T-shirt and gym shorts. Young would rub up and down her legs very methodically. Later in her life, after marriage, Ashley would recognize these massages as sensual foreplay and intimacy. The massages were not only rubbing of the muscles, but also a "rubbing" of her body. Young would rub Ashlee from her ankles to her quadriceps, close to her groin area, and the backsides of her

hamstrings close to her bottom and down to her calf muscles. Young rubbed her upper body and back. Young then would have Ashlee lean back onto him as he rubbed her neck. He then would close the session by sitting in front of Ashlee and propping her leg on his shoulder and sometimes over his head. He would then comment on the physicality of her legs. All the time that Young engaged in these “procedures” he would be staring at her crotch area that he had manipulated her body into being exposed to him.

34. Defendant Young frequently videotaped Ashlee, even as a young child, and would direct her to pose and turn around and then he would pan or focus in on her body.

35. After the bathing rituals had stopped, Young would routinely burst in on Ashlee in the bathroom while she was changing clothes or naked in the shower. These events would happen at night or on weekends and she remembers specific events that occurred to her as a freshman and sophomore in high school. Young would pretend that he did not know she was getting dressed or naked. Ashlee would respond by yelling at her Young that he was a “pervert”.

36. As a child and especially as Ashlee entered adolescence in middle school and continuing through high school, Young would walk through the house in nothing but underwear or just a towel. Many times his underwear had gaping holes and the sides of his underwear did not fit; thus, revealing his pubic hair and the sides of his genitals. This behavior happened even when Ashlee would have friends over to the house. Young knew it was humiliating and embarrassing to Ashlee, yet he gained a perverse enjoyment from these expositions.

37. Gary Young exposed his penis to his daughter Ashlee on multiple occasions. When she was between ten (10) and twelve (12) years of age Young called Ashlee into his bedroom where she found him naked on top of the sheets. One of these occasions he had a video camera set up toward him as he lay on the bed.

38. In high school, Ashlee recalls a time when she had invited a few friends over to the house. Hearing the girls in the house Young called them into the bedroom. Young was completely naked on top of the bed and exposing his penis to them.

39. Another female friend from Ashlee's middle school and high school years recalls Young walking down the hallway of the house completely naked in front of her and Ashlee.

40. Young's voyeurism was so commonplace that Ashlee became desensitized to Young's sinister lurking presence. By way of example, below are screenshots from a videotape taken by Young as Ashlee attempted to dress herself in private in preparation for her junior prom at the age of seventeen (17):





41. Upon graduation from high school in 1999, the Plaintiff, Ashlee Tollett, moved away from Blackwell to go to college, then moved out of state, and then married and had four (4) children.

42. Ashlee kept this horrific family secret and additional family secrets to herself.

43. The triggering event that forced all to be exposed and come cascading down occurred on Monday, June 10, 2019.

44. On that date, the Tollett family unit was in Blackwell, Oklahoma at the Young house as a stopover during their move from Overland Park, Kansas to Inlet Beach, Florida. The purpose for the visit was to give Ashlee's mother the opportunity to have some time with her grandchildren. Ashlee's husband was out of town on business and the three older grandchildren had gone to a movie in Ponca City with their maternal grandmother. That afternoon Ashlee put her baby to sleep in the house.

45. Believing she was alone Ashlee undressed and put on her bikini to read and lay out by the family pool. Defendant, Gary Young, suddenly came into the back yard through the side gate on the north side of the house. Young made Ashlee uncomfortable

and appeared “high” as he stared and leered at her as he pretended to be doing a chore. Ashlee questioned Young as to what he was doing but then he just stood and stared at her.

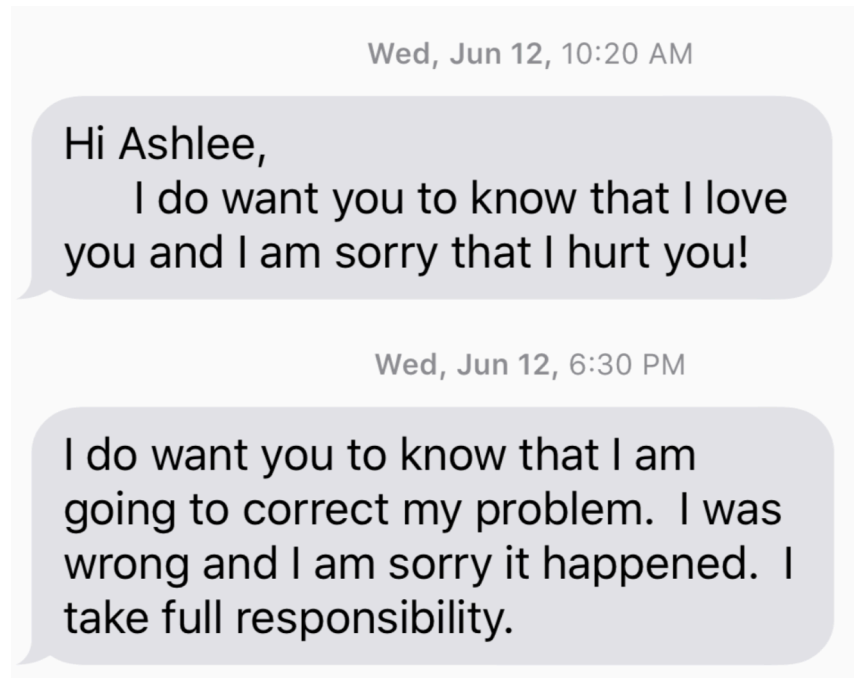
46. The entire interaction and exchange harkened her back to the past. Ashlee was uncomfortable and she left Young in the backyard as she went inside to cover herself into clothes. Ashlee then busied herself by taking laundry out of the dryer and folding clothes.

47. Defendant, Gary Young, then entered her space wearing nothing but underwear with the same type of gaping holes where his pubic hair and genitals were exposed. Ashlee objected and Young taunted and laughed at her. Young then went to the basement for the next 5 to 6 hours.

48. The Tollett family left Blackwell the next day.

49. Plaintiff, Ashlee Tollett, for the first time, began to share with her husband her life of sexual abuse. Ashlee began to investigate if there were other victims and discovered that she was not alone.

50. Ashlee confronted her father, Gary Young, in text message exchanges between June 12, 2019 at 2:33 a.m. and 6:30 p.m. that culminated in his admission as follows:



VII. DAMAGES

51. As a direct, legal and proximate result of each and all of the foregoing acts and omissions of Defendant, Gary Young, the Plaintiff, Ashlee Tollett, has been damaged as herein below set forth.

52. Plaintiff has suffered psychological and emotional injury and harm, including not only the immediate distress caused by Defendant and his conduct, but also long-term psychological injuries which were to a large extent only latent at the time of the wrongful conduct, and which have developed and occurred, and will in the future continue to develop and occur in Plaintiff, all to Plaintiffs general damages in an amount in excess of \$75,000.

53. All of the acts committed by Defendant, Gary Young, above amounted to a reckless disregard for the rights of others, were committed intentionally and with malice

toward others and were life threatening to others and therefore the Plaintiff seeks punitive or exemplary damages an amount in excess of \$75,000.

WHEREFORE, Plaintiff, Ashlee Tollett, respectfully request judgment in her favor and against Defendant, Gary Young, as follows:

- a. Compensatory damages, including Plaintiff's physical damages, as well as physical, mental pain and suffering, psychological and emotional distress;
- b. Punitive damages;
- c. Costs;
- d. Prejudgment and post-judgment interest; and
- e. All other damages or relief deemed appropriate by the Court or jury.

ATTORNEYS' LIEN CLAIMED

JURY TRIAL DEMANDED

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