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11  
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**

15 JOHN DOE 1, an individual,

16 **PLAINTIFF,**

17 v.

18 YULA HIGH SCHOOL DBA YESHIVA  
19 UNIVERSITY HIGH SCHOOL OF LOS  
20 ANGELES, a California Nonprofit  
21 Corporation; and DOES 1 through 50,  
22 inclusive,

23 **DEFENDANTS.**

Case No. **25SMCV04628**

**COMPLAINT FOR DAMAGES**

1. **SEXUAL ASSAULT**
2. **SEXUAL HARASSMENT**
3. **NEGLIGENT SUPERVISION OF A MINOR**
4. **NEGLIGENCE**
5. **NEGLIGENCE PER SE**
6. **NEGLIGENT SUPERVISION, RETENTION, AND HIRING**
7. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**DEMAND FOR JURY TRIAL**

1 PLAINTIFF, JOHN DOE 1, hereby alleges and complains as follows:

2 **PARTIES**

3 1. PLAINTIFF JOHN DOE 1 is an adult male who, at all times relevant hereto, resided  
4 in the County of Los Angeles. JOHN DOE 1 was born on November 7, 2005 and is a resident of  
5 the State of California.

6 2. PLAINTIFF was a victim of childhood sexual harassment, abuse, and assault,  
7 among other causes of action as set forth herein. As such for his privacy and security, he is entitled  
8 to protect his identity in this public court filing by not disclosing his full name.

9 3. DEFENDANT YULA HIGH SCHOOL DBA YESHIVA UNIVERSITY HIGH  
10 SCHOOL OF LOS ANGELES (hereinafter "YULA") is a California nonprofit corporation.  
11 DEFENDANT YULA is and was, at all relevant times hereto, operating and doing business as  
12 college preparatory school in Los Angeles County, California. DEFENDANT YULA is located at  
13 9760 W. Pico Blvd., Los Angeles, California 90035.

14 4. Julie Tichon (hereinafter "Tichon") is an adult female and a former counselor,  
15 coach, administrator, employee, agent, and teacher who had the job title of "Director of Academic  
16 Support" at DEFENDANT YULA.

17 5. DEFENDANTS DOES 1 through 25, inclusive, and each of them, are employees  
18 and agents of DEFENDANT YULA who had the responsibility of supervising students including,  
19 but not limited to PLAINTIFF, and/or who had a duty to supervise and/or control the conduct of  
20 the perpetrators of the abuse, including, but not limited to, Tichon.

21 6. DEFENDANTS DOES 26 through 50, inclusive, and each of them, are persons,  
22 businesses, corporations, or entities who owed a legal duty of care to PLAINTIFF or had a duty to  
23 control and/or supervise Tichon.

24 7. DEFENDANT YULA together with DEFENDANTS DOES 1 through 50 shall be  
25 referred to herein collectively as "DEFENDANTS".

26 8. PLAINTIFF is unaware of the true names and capacities of the defendants named  
27 herein as DOES 1 through 50, inclusive, whether an individual, associates, a corporation, business,  
28 public or private, or otherwise and therefore sues such defendants by such fictitious names.

1 PLAINTIFF will seek leave of the court to amend the Complaint to set forth the true names and  
2 capacities of said DEFENDANTS when the same has been ascertained. PLAINTIFF is informed  
3 and believes and thereon alleges DOES 1 through 50, inclusive, and each of them, are responsible  
4 in some manner for the wrongful acts, occurrences, and/or omissions alleged herein and for the  
5 damages caused to PLAINTIFF.

6 9. PLAINTIFF is informed and believes, and thereon alleges, that at all times herein  
7 mentioned, each of the defendants sued herein as DOES 1 through 50, inclusive, was the agent and  
8 employee of each of the remaining DEFENDANTS and was at all times acting within the course  
9 and scope of such agency and employment with the full knowledge, consent, authority, ratification,  
10 and/or permission of each of the remaining DEFENDANTS.

11 10. Wherever appearing in this Complaint, each and every reference to DEFENDANTS,  
12 or any of them, is intended to include, and shall be deemed to include, all fictitiously named  
13 defendants. Wherever reference is made in this Complaint to any act by a DEFENDANT or  
14 DEFENDANTS, such allegation and reference shall also be deemed to mean the acts and failures  
15 of each DEFENDANT, including DOES, acting individually, jointly, and severally. Wherever  
16 reference is made in this Complaint to individuals who are not named as a defendant in this  
17 Complaint, but were the agents, servants, employees, and/or supervisors of DEFENDANTS, such  
18 individuals at all relevant times acted on behalf of DEFENDANTS within the course and scope of  
19 employment.

20 11. PLAINTIFF is informed and believes, and thereon alleges, that at all times relevant  
21 herein, each of the DEFENDANTS was completely dominated and controlled by his/her/its co-  
22 DEFENDANT, and each was the alter ego of the other as to the events set forth herein.

23 **FACTS APPLICABLE TO ALL CAUSES OF ACTION**

24 12. DEFENDANT YULA is a college-preparatory Modern Orthodox Jewish high  
25 school in Los Angeles, California founded in 1979 by Rabbi Marvin Hier.

26 13. According to DEFENDANT YULA's website (yula.org), its Mission Statement is:  
27 "YULA is a Modern Orthodox Yeshiva High School, dedicated to cultivating an unwavering  
28 commitment to Halacha, Torah Values, outstanding academic achievement, and exemplary moral

1 conduct.”

2 14. PLAINTIFF enrolled in and began attending DEFENDANT YULA in ninth grade  
3 at the age of fourteen years old for the school year 2020-2021.

4 15. PLAINTIFF continued as a student at DEFENDANT YULA in tenth, eleventh, and  
5 twelfth grade through the summer of 2024 when he graduated from the school.

6 16. Julie Tichon (hereinafter “Tichon”) was an adult female employed as a counselor,  
7 coach, administrator, and teacher with the title of “Director of Academic Support” at  
8 DEFENDANT YULA during the years that PLAINTIFF was a student from the fall of 2020  
9 through the summer of 2024.

10 17. Tichon’s job duties at DEFENDANT YULA included working with students who  
11 needed short or long-term academic support and, in particular, those vulnerable students with  
12 biological conditions that can impact learning, focus, organization, and self-control such as  
13 Attention Deficit Hyperactivity Disorder (“ADHD”).

14 18. PLAINTIFF first met Tichon in her capacity as “Director of Academic Support” at  
15 DEFENDANT YULA during his first year as a student there in or around 2020.

16 19. The administrators of DEFENDANT YULA directed PLAINTIFF to meet with  
17 Tichon because PLAINTIFF had previously been diagnosed with ADHD and Tichon’s job was to  
18 assist such students by providing them academic learning support and resources.

19 20. While attending DEFENDANT YULA, PLAINTIFF met with Tichon several times  
20 a week on campus at DEFENDANT YULA’s direction.

21 21. Sometime after PLAINTIFF first met Tichon in or around 2020, Tichon began a  
22 pattern of grooming PLAINTIFF for the purpose of sexually abusing and harassing him.

23 22. Tichon’s grooming of PLAINTIFF included, but was not limited to, giving  
24 PLAINTIFF special attention, “compliments”, and spending one-on-one time alone with  
25 PLAINTIFF to try to become his “friend”.

26 23. Tichon further abused her position over PLAINTIFF, and PLAINTIFF’s trust in  
27 Tichon’s authority and position as his educator and a counselor, by manipulating PLAINTIFF to  
28 confide in her about his family and about his emotional state.

1           24.    Tichon’s sexual abuse and harassment of PLAINTIFF began in or around 2020 and  
2 continued through approximately 2024 and occurred on numerous occasions.

3           25.    Tichon’s sexual abuse and harassment of PLAINTIFF included, but was not limited  
4 to Tichon:

- 5           a.    Showing PLAINTIFF nude pictures of herself;
- 6           b.    Brushing her thigh against PLAINTIFF’s thigh;
- 7           c.    Asking PLAINTIFF about his girlfriends and his sexual history;
- 8           d.    Telling PLAINTIFF that she would give him a better “blow job” than other girls  
9           his age;
- 10          e.    Describing to PLAINTIFF her sexual encounters with men in pornographic  
11          detail including a description of her “squirting” on a man’s face;
- 12          f.    Telling PLAINTIFF the number of men she had performed sexual acts on;
- 13          g.    Sending PLAINTIFF nude and pornographic videos of herself in which she,  
14          *inter alia*, spreads her vagina with her fingers and shows her bare buttocks; and
- 15          h.    Performing fellatio on PLAINTIFF despite PLAINTIFF telling Tichon  
16          numerous times that he did not want Tichon to touch him.

17          26.    In addition to Tichon’s sexual abuse and harassment, Tichon exhibited additional  
18 disturbing and harassing behavior to which she subjected PLAINTIFF such as:

- 19          a.    Driving to PLAINTIFF’s house and insisting on seeing PLAINTIFF after he  
20          told her he did not want to see her;
- 21          b.    Calling PLAINTIFF’s mother to interrogate her about PLAINTIFF and feigning  
22          confusion about why PLAINTIFF did not want to see her;
- 23          c.    Telling people that she was in a relationship with PLAINTIFF;
- 24          d.    Stalking PLAINTIFF through social media apps;
- 25          e.    Attempting to communicate with PLAINTIFF through social media apps; and
- 26          f.    Threatening PLAINTIFF by telling him that if he ever reported her abuse, she  
27          would commit suicide and/or would get PLAINTIFF in trouble with YULA.

28          27.    Upon information and belief, as early as 2023, it became known by the YULA

1 community, including amongst students, that Tichon had sexual relations with a married father of a  
2 YULA student. Defendant YULA knew of this sexual relationship, but did nothing to investigate  
3 Tichon's conduct or take any action to inform the students' parents of Tichon's conduct.

4 28. Upon information and belief, Tichon sexually abused and/or sexually harassed  
5 multiple YULA students while they were minors. PLAINTIFF recalls rumors circulating amongst  
6 the YULA student body regarding Tichon's sexual abuse and misconduct with minor students as  
7 early as the 2021-2022 school year.

8 29. Upon information and belief, a minor student reported Tichon's sexual abuse of him  
9 during the spring of 2024 to his father, who then informed YULA. Upon further information and  
10 belief, it was this victim's father who reported Tichon's sexual abuse of his son to lawful  
11 authorities.

12 30. On August 29, 2024, Tichon was arrested in Los Angeles County in connection with  
13 the sexual abuse of above-referenced minor YULA student.

14 31. Tichon's criminal case is currently pending before the Superior Court of the County  
15 of Los Angeles in criminal court case no. 24ARCF01368-01. Tichon has been charged with the  
16 following: Penal Code 261.5(c)-F C261.5(c)-F Unlawful Sexual Intercourse With Minor More  
17 Than 3 Years Younger; Penal Code 261.5(c)-F Unlawful Sexual Intercourse With Minor More  
18 Than 3 Years Younger; Penal Code 261.5(c)-F Unlawful Sexual Intercourse With Minor More  
19 Than 3 Years Younger; Penal Code 287(b)(1)-F Oral Copulation With Person Under 18 Years.

20 32. At all relevant times herein, DEFENDANTS, as a school that had PLAINTIFF  
21 within its care, custody, and control, were responsible for providing school services to PLAINTIFF  
22 and its other students, with due care in a safe, legally compliant manner.

23 33. Further, by virtue of their position as school providers to minors and students,  
24 including having custody of and control over minor students, DEFENDANTS, at all relevant times  
25 herein, were standing *in loco parentis* to PLAINTIFF and therefore had a duty to treat and  
26 supervise PLAINTIFF a reasonable parent would.

27 34. Despite being mandated reporters, at no time throughout her tenure with YULA did  
28 any employee, administrator, or agent of DEFENDANT YULA report Tichon to lawful authorities.

1           35.     As a student of DEFENDANT YULA, where Tichon was also employed and  
2 worked, PLAINTIFF was under DEFENDANTS' direct supervision, care, custody, and control  
3 thus creating a special relationship with DEFENDANTS which imposed on them an affirmative  
4 duty to take all reasonable steps to protect its students including PLAINTIFF.

5           36.     DEFENDANTS YULA and DOES 1 through 50 failed to take reasonable steps and  
6 implement reasonable safeguards to avoid inappropriate or unlawful conduct by Tichon against  
7 students, including PLAINTIFF. Instead, DEFENDANTS YULA and DOES 1 through 50  
8 implemented measures designed to or which effectively made Tichon's misconduct possible  
9 including, but not limited to:

- 10           a.     Permitting Tichon to remain in a position of trust and authority after  
11                 DEFENDANTS knew or should have known that she was engaging in  
12                 inappropriate conduct with students, including PLAINTIFF;
- 13           b.     Placing Tichon in an environment which allowed her to physically interact with  
14                 children, unsupervised, including PLAINTIFF;
- 15           c.     Allowing Tichon to be in contact with minors, including PLAINTIFF, without  
16                 adequate supervision;
- 17           d.     Allowing Tichon to give students, including PLAINTIFF, rides in her vehicle;
- 18           e.     Failing to put in place any trainings of student or teachers or protocols to prevent  
19                 child sexual abuse and to prevent educator sexual misconduct; and
- 20           f.     Failing to put in place a procedure to supervise or monitor employees,  
21                 volunteers, staff, and agents to ensure that students were appropriately  
22                 supervised.

23           37.     DEFENDANTS YULA and DOES 1 through 50 breached their duty to properly and  
24 adequately supervise, monitor, and protect PLAINTIFF by, in part:

- 25           a.     Ignoring clear and obvious signs that Tichon was engaged in an inappropriate  
26                 and harassing relationship with PLAINTIFF and other students;
- 27           b.     Allowing and facilitating PLAINITFF to spend unauthorized and unsupervised  
28                 one-on-one time with Tichon; and

1 c. By allowing Tichon to repeatedly sexually harass and assault PLAINTIFF.

2 38. As set forth herein, DEFENDANTS have failed to uphold duties imposed on them  
3 by law through written policies and procedures applicable to DEFENDANTS including, but not  
4 limited to, the following:

- 5 a. Duty to use reasonable care to supervise students;
- 6 b. Duty to properly train teachers, coaches, administrators, and staff of their  
7 responsibility for creating and maintaining a safe environment for students;
- 8 c. Duty to supervise faculty and staff and enforce rules and regulations regarding  
9 schools and school activities;
- 10 d. Duty to provide enough supervision for students;
- 11 e. Duty to act promptly and diligently to protect students;
- 12 f. Duty to refrain from violating students' rights to protection from bodily harm  
13 and from personal insult;
- 14 g. Duty to abstain from injuring the person or property of students;
- 15 h. Duty to abstain from infringing upon any of the students' rights;
- 16 i. Duty to report under Penal Code § 11166, et seq.; and
- 17 j. Duty to adequately and properly investigate, hire, train, and supervise their  
18 agents and employees who would be working with and actually did work with  
19 minors to protect the minors from harm caused by unfit individual employees.

20 39. PLAINTIFF is informed and believes, and thereon alleges, that before and/or during  
21 the time PLAINTIFF was assaulted and harassed by Tichon, DEFENDANTS YULA and DOES 1  
22 through 50 knew, or should have known, that Tichon had or was engaged in inappropriate conduct  
23 with students including PLAINTIFF.

24 40. At all relevant times herein, Tichon was an employee of, and acting as an agent of  
25 DEFENDANTS YULA and DOES 1 through 50.

26 **PLAINTIFF'S LAWSUIT IS TIMELY PURSUANT TO CODE OF CIVIL PROCEDURE**

27 **§ 340.1**

28 41. PLAINTIFF timely brings this lawsuit pursuant to the provisions of Code of Civil

1 Procedure § 340.1, which provides for victims of childhood sexual abuse to pursue civil claims for  
2 damages related to their sexual abuse.

3 **FIRST CAUSE OF ACTION**

4 **SEXUAL ASSAULT**

5 **(Against DEFENDANTS YULA and DOES 1 through 50)**

6 42. By this reference, PLAINTIFF incorporates all the allegations in all previous  
7 paragraphs as if fully set forth herein.

8 43. While PLAINTIFF was a minor student at DEFENDANT YULA, Tichon took  
9 advantage of her position of authority and trust to engage in unlawful sexual acts and other harmful  
10 misconduct with PLAINTIFF.

11 44. Tichon, in doing the things herein alleged, including intending to subject  
12 PLAINTIFF to numerous instances of sexual abuse and molestation, intended to cause harmful or  
13 offensive contact with PLAINTIFF's person, or intended to put PLAINTIFF in imminent  
14 apprehension of such contact.

15 45. In doing the things herein alleged, PLAINTIFF was put in imminent apprehension  
16 of a harmful or offensive contact by Tichon, and actually believed Tichon had the ability to make  
17 harmful or offensive contract with PLAINTIFF's person.

18 46. Tichon threatened to touch, and did touch PLAINTIFF in a harmful and offensive  
19 manner and did in fact intend to cause harmful and offensive contact to PLAINTIFF.

20 47. A reasonable person in PLAINTIFF's situation would have been offended by the  
21 conduct.

22 48. PLAINTIFF did not consent to the conduct of Tichon or to Tichon's intended  
23 harmful or offensive contact with PLAINTIFF's person, or intent to put PLAINTIFF in imminent  
24 apprehension of such contact. Additionally, because PLAINTIFF was a minor during the time  
25 herein alleged, he lacked the ability to consent to sexual contact with any person.

26 49. In doing the things alleged herein, Tichon violated PLAINTIFF's right, pursuant to  
27 Civil Code § 43, of protection from bodily restraint or harm, and from personal insult. In doing the  
28 things herein alleged, Tichon violated her duty, pursuant to Civil Code § 1708, to abstain from

1 injuring the person of PLAINTIFF or infringing upon PLAINTIFF's rights.

2 50. DEFENDANTS YULA and DOES 1 through 50, knew or had full opportunity to  
3 learn that Tichon had sexually assaulted PLAINTIFF and/or that Tichon had previously or  
4 subsequently sexually assaulted others. With that knowledge, DEFENDANTS ratified or approved  
5 of Tichon's sexual abuse of minors, including PLAINTIFF.

6 51. At the time Tichon and DEFENDANTS YULA and DOES 1 through 50, performed  
7 the acts alleged herein, it was or should have been reasonably foreseeable to DEFENDANTS that  
8 by continuously exposing PLAINTIFF to Tichon, and making PLAINTIFF available to Tichon,  
9 DEFENDANTS were placing PLAINTIFF in grave risk of being sexually assaulted by Tichon. By  
10 knowingly subjecting PLAINTIFF to such foreseeable danger, DEFENDANTS YULA and DOES  
11 1 through 50, were duty-bound to take reasonable steps and implement reasonable safeguards to  
12 protect PLAINTIFF from Tichon. Furthermore, as alleged herein, DEFENDANTS YULA and  
13 DOES 1 through 50, at all times exercised a sufficient degree of control over the Tichon's personal  
14 and business affairs so as to be able to prevent the acts of assault by keeping Tichon away from  
15 PLAINTIFF. However, DEFENDANTS YULA and DOES 1 through 50, failed to take any  
16 reasonable steps or implement any reasonable safeguards for PLAINTIFF'S protection whatsoever,  
17 and continued to make PLAINTIFF accessible to Tichon for the purposes of sexual assault.

18 52. As a direct, proximate, and legal cause of the acts and omission of DEFENDANTS  
19 YULA and DOES 1 through 50, and each of them, PLAINTIFF suffered injuries and damages,  
20 including, but not limited to, physical and mental pain and suffering, emotional distress, and other  
21 economic and non-economic damages, in an amount not yet ascertained but which exceed the  
22 minimum jurisdictional limits of this Court.

23 53. DEFENDANTS YULA and DOES 1 through 50, and each of them, engaged in such  
24 conduct with willfulness, malice and oppression thereby warranting an award of punitive damages  
25 pursuant to Civil Code § 3294, without limitation. More specifically, DEFENDANTS YULA and  
26 DOES 1 through 50's conduct was so vile, base, despicable, and contemptible that it would be  
27 looked down on and despised by reasonable people. Further, DEFENDANTS YULA and DOES 1  
28 through 50, and each of them, acted willfully and wantonly and with an intent to cause injury to

1 PLAINTIFF in knowing disregard of PLAINTIFF’s rights and the safety of PLAINTIFF who was  
2 subject to cruel and unjust hardship as a result of DEFENDANTS YULA and DOES 1 through  
3 50’s actions. Further, DEFENDANTS YULA and DOES 1 through 50, and each of them, were  
4 aware of the probable dangerous consequences of their conduct, and they deliberately failed to  
5 avoid those consequences. PLAINTIFF reserves the right to file a Motion to Amend the Complaint,  
6 pursuant to Code of Civil Procedure § 425.14.

7 **SECOND CAUSE OF ACTION**

8 **SEXUAL HARASSMENT (CIVIL CODE §§ 51.9 & 52)**

9 **(Against DEFENDANTS YULA and DOES 1 through 50)**

10 54. PLAINTIFF hereby incorporates by reference all previous paragraphs as if fully set  
11 forth herein.

12 55. At all relevant times herein, PLAINTIFF had a business, service, or professional  
13 relationship with DEFENDANT YULA and its employees/agents, and Tichon made sexual  
14 advances, solicitations, sexual requests, and/or demands for sexual compliance by PLAINTIFF,  
15 and engaged in other verbal, visual, and physical conduct of a sexual nature that were unwelcome  
16 and pervasive. These incidents of abuse, harassment, and assault, as discussed in this Complaint,  
17 took place while the minor PLAINTIFF was under the care of DEFENDANTS YULA and DOES  
18 1 through 50, and Tichon.

19 56. There was an inability by PLAINTIFF to easily terminate the relationship since  
20 Tichon was an adult counselor, coach, and mentor, and PLAINTIFF was a minor student under  
21 DEFENDANTS’ and Tichon’s care and control.

22 57. A corporation is a “person” within the meaning of Civil Code § 51.9, which subjects  
23 persons to liability for sexual harassment within a business, service or professional relationship,  
24 and such an entity defendant may be held liable under this statute for the acts of its employees.  
25 *C.R. v. Tenet Healthcare Corp.* (2009) 169 Cal.App.4th 1094. Further, principles of ratification  
26 apply when the principal ratifies the agent’s originally unauthorized harassment, as is alleged to  
27 have occurred herein.

28 58. Under Civil Code § 52(b), “[w]hoever denies the right provided by...Section 51.9,

1 or aids, incites, or conspires in that denial, is liable for each and every offense for the actual  
2 damages suffered by any person denied that right...”

3 59. DEFENDANTS aided in the denial of PLAINTIFF’s rights by allowing Tichon to  
4 harass PLAINTIFF.

5 60. Tichon’s conduct as described herein was undertaken, authorized, and/or ratified by  
6 DEFENDANTS YULA, its employees/agents, and DOES 1 through 50, who were aware of the  
7 harassment and, furthermore, ignored clear and obvious signs that Tichon was engaged in an  
8 inappropriate and harassing relationship with PLAINTIFF; allowing and facilitating PLAINTIFF to  
9 spend unsupervised one-on-one time with Tichon; Tichon inappropriately touching PLAINTIFF on  
10 campus; by allowing Tichon to establish inappropriate boundaries with PLAINTIFF; and by  
11 allowing Tichon to repeatedly sexually harass and assault PLAINTIFF. Despite this knowledge,  
12 DEFENDANTS YULA and DOES 1 through 50 continued to employ Tichon and continued to fail  
13 to supervise PLAINTIFF with the conscious disregard of the safety of PLAINTIFF. This failure to  
14 discharge Tichon constitutes DEFENDANTS YULA and DOES 1 through 50’s ratification of  
15 Tichon’s conduct.

16 61. As a direct, proximate, and legal cause of the acts and omission of DEFENDANTS  
17 YULA and DOES 1 through 50, and each of them, PLAINTIFF suffered injuries and damages,  
18 including, but not limited to, physical and mental pain and suffering, emotional distress, and other  
19 economic and non-economic damages, in an amount not yet ascertained but which exceed the  
20 minimum jurisdictional limits of this Court.

21 62. DEFENDANTS, and each of them, engaged in such conduct with malice and  
22 oppression thereby warranting an award of punitive damages pursuant to Civil Code § 3294,  
23 without limitation. More specifically, DEFENDANTS’ conduct was so vile, base, despicable, and  
24 contemptible that it would be looked down on and despised by reasonable people. Further,  
25 DEFENDANTS, and each of them, acted willfully and wantonly and with an intent to cause injury  
26 to PLAINTIFF in knowing disregard of PLAINTIFFS’ rights and the safety of PLAINTIFF who  
27 was subject to cruel and unjust hardship as a result of DEFENDANTS’ actions. Further,  
28 DEFENDANTS, and each of them, were aware of the probable dangerous consequences of their

1 conduct, and they deliberately failed to avoid those consequences. PLAINTIFF reserves the right to  
2 file a Motion to Amend the Complaint, pursuant to Code of Civil Procedure § 425.14.

3 63. PLAINTIFF seeks attorneys' fees pursuant to Civil Code § 52, with respect to  
4 PLAINTIFF'S claim being made under § 51.9, as an available remedy.

5 **THIRD CAUSE OF ACTION**

6 **NEGLIGENT SUPERVISION OF A MINOR**

7 **(Against DEFENDANTS YULA and DOES 1 through 50)**

8 64. PLAINTIFF hereby incorporates by reference all previous paragraphs as if fully set  
9 forth herein.

10 65. DEFENDANT YULA (through its employees, staff, volunteers, coaches, and agents  
11 identified in the Complaint as DOES 1 through 50), by holding themselves out as educational  
12 providers to PLAINTIFF and thereby being responsible for the control, custody, care, supervision  
13 and protection of the minor students entrusted to them, including PLAINTIFF, acted as persons  
14 standing *in loco parentis* to PLAINTIFF, and thereby created a special relationship with  
15 PLAINTIFF.

16 66. This special relationship was also based on the expectation and reliance of  
17 PLAINTIFF on DEFENDANTS for the safe, non-negligent, non-abusive supervision and care of  
18 PLAINTIFF.

19 67. This special relationship imposed on DEFENDANTS a duty of care to PLAINTIFF  
20 who could suffer foreseeable harm as a result of any breach of DEFENDANTS' duty to  
21 PLAINTIFF.

22 68. DEFENDANTS, and each of them, had a duty at all times to supervise PLAINTIFF  
23 on the grounds of school and to enforce those rules and regulations necessary for the protection of  
24 PLAINTIFF.

25 69. DEFENDANTS, and each of them, were negligent and careless in that they failed to  
26 exercise ordinary care in supervising PLAINTIFF on the grounds of the school. While enrolled/in  
27 attendance at YULA, PLAINTIFF was repeatedly assaulted, battered, harassed, and neglected by  
28 Tichon.





1 staff, volunteers, coaches, and agents (identified in the Complaint as DOES 1 through 25) allowed  
2 Tichon to continue, unhindered, in her abuse of minors, including PLAINTIFF, thereby breaching  
3 their duty of care.

4 85. The violation of California Penal Code § 11166 actually and proximately caused the  
5 harm to PLAINTIFF as alleged above.

6 86. DEFENDANTS' abuse of the PLAINTIFF was the type of occurrence that  
7 California Penal Code § 11166 was designed to prevent.

8 87. PLAINTIFF at all times alleged herein was within the class of persons for whose  
9 protection California Penal Code § 11166 was adopted.

10 88. As a direct and proximate result of the negligence of DEFENDANTS, PLAINTIFF  
11 has suffered injuries as alleged above.

12 89. As a direct, proximate, and legal cause of the acts and omission of DEFENDANTS  
13 YULA and DOES 1 through 50, and each of them, PLAINTIFF suffered injuries and damages,  
14 including, but not limited to, physical and mental pain and suffering, emotional distress, and other  
15 economic and non-economic damages, in an amount not yet ascertained but which exceed the  
16 minimum jurisdictional limits of this Court.

17 **SIXTH CAUSE OF ACTION**

18 **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**

19 **(Against DEFENDANTS YULA and DOES 1 through 50)**

20 90. By this reference, PLAINTIFF hereby incorporates all of the previous allegations in  
21 this Complaint into this cause of action.

22 91. DEFENDANTS, by acting as a school to PLAINTIFF, and by exercising exclusive  
23 control over PLAINTIFF, were standing *in loco parentis* to PLAINTIFF, and therefore created a  
24 special relationship with PLAINTIFF.

25 92. This special relationship was also based on the expectation and reliance of  
26 PLAINTIFF upon DEFENDANTS for the safe, non-negligent, non-abusive supervision and care of  
27 PLAINTIFF.

28 93. This special relationship imposed on DEFENDANTS a duty of care to PLAINTIFF

1 who could suffer foreseeable harm.

2 94. DEFENDANTS had a duty to exercise reasonable care in the supervision of  
3 PLAINTIFF and to prevent harm to PLAINTIFF while he was under their care.

4 95. DEFENDANTS had a duty to adequately and properly investigate, hire, train, and  
5 supervise its agents and employees who would be working with minors to protect the minors from  
6 harm caused by unfit individuals hired as employees.

7 96. DEFENDANTS hired Tichon to work at DEFENDANT YULA.

8 97. Tichon was, and/or had become, unfit and incompetent to perform the work for  
9 which she was hired.

10 98. DEFENDANTS knew, and should have known, that Tichon was unfit and  
11 incompetent to care for and supervise minors in her care, including PLAINTIFF, and actually knew  
12 or should have known that Tichon was abusing, and harming minors in her care, including  
13 PLAINTIFF and that their actions actually harmed PLAINTIFF and created a high degree of risk  
14 that Tichon would further harm PLAINTIFF.

15 99. Tichon's unfitness and incompetency to care for and supervise the PLAINTIFF did  
16 actually harm PLAINTIFF.

17 100. DEFENDANTS' negligence in hiring Tichon and failing to supervise her was a  
18 substantial factor in causing PLAINTIFF's harm.

19 101. As a direct, proximate, and legal cause of the acts and omission of DEFENDANTS  
20 YULA and DOES 1 through 50, and each of them, PLAINTIFF suffered injuries and damages,  
21 including, but not limited to, physical and mental pain and suffering, emotional distress, and other  
22 economic and non-economic damages, in an amount not yet ascertained but which exceed the  
23 minimum jurisdictional limits of this Court.

24 **SEVENTH CAUSE OF ACTION**

25 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

26 **(Against DEFENDANTS YULA and DOES 1 through 50)**

27 102. PLAINTIFF hereby incorporates by reference all previous paragraphs as if fully set  
28 forth herein.

1           103. DEFENDANTS' conduct towards PLAINTIFF, as described herein, was so  
2 outrageous and extreme that it exceeded all bounds of that usually tolerated in a civilized  
3 community.

4           104. A reasonable person would not expect or tolerate DEFENDANTS YULA and  
5 DOES 1 through 50 putting Tichon in a position of authority at DEFENDANT YULA, which  
6 enabled the Tichon to have access to minor children, including PLAINTIFF, so that Tichon could  
7 commit wrongful sexual acts with him, including the conduct described herein above. PLAINTIFF  
8 held great trust, faith, and confidence in DEFENDANT YULA, which, by virtue of DEFENDANT  
9 YULA's wrongful conduct, turned to fear.

10           105. A reasonable person would not expect or tolerate DEFENDANT YULA to be  
11 incapable of supervising and preventing employees, including Tichon, from committing wrongful  
12 sexual acts with minor children in their charge, including PLAINTIFF, or to be incapable of  
13 properly supervising the Tichon to prevent such assault from occurring.

14           106. DEFENDANTS' conduct described herein was intentional and malicious and done  
15 for the purpose of causing, or with reckless disregard to the rights of PLAINTIFF, with the  
16 substantial certainty that it would cause PLAINTIFF and the other minor students in  
17 DEFENDANTS' care to suffer humiliation, anguish, and emotional and physical distress.

18           107. PLAINTIFF suffered severe emotional distress as a result.

19           108. DEFENDANTS' conduct was a substantial factor in causing PLAINTIFF's harm.

20           109. As a direct, proximate, and legal cause of the acts and omission of DEFENDANTS  
21 YULA and DOES 1 through 50, and each of them, PLAINTIFF suffered injuries and damages,  
22 including, but not limited to, physical and mental pain and suffering, emotional distress, and other  
23 economic and non-economic damages, in an amount not yet ascertained but which exceed the  
24 minimum jurisdictional limits of this Court.

25           110. DEFENDANTS, and each of them, engaged in such conduct with malice and  
26 oppression thereby warranting an award of punitive damages pursuant to Civil Code § 3294,  
27 without limitation. More specifically, DEFENDANTS' conduct was so vile, base, despicable, and  
28 contemptible that it would be looked down on and despised by reasonable people. Further,

1 DEFENDANTS, and each of them, acted willfully and wantonly and with an intent to cause injury  
2 to PLAINTIFF in knowing disregard of PLAINTIFF's rights and the safety of PLAINTIFF who  
3 was subject to cruel and unjust hardship as a result of DEFENDANTS' actions. Further,  
4 DEFENDANTS, and each of them, were aware of the probable dangerous consequences of their  
5 conduct, and they deliberately failed to avoid those consequences. PLAINTIFF reserves the right to  
6 file a Motion to Amend the Complaint, pursuant to Code of Civil Procedure § 425.14.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, PLAINTIFF prays for judgment against all DEFENDANTS YULA, and  
9 DOES 1 through 50, each of them, as follows:

- 10 1. For general damages and special damages according to proof at trial;
- 11 2. For reasonable attorneys' fees pursuant to California Civil Code § 52;
- 12 3. For costs of the suit herein in an amount according to proof; and
- 13 4. For such other and further relief as this Court may deem just and proper.

14  
15 DATED: September 5, 2025

NOVIAN & NOVIAN, LLP

16 By: /s/ Lauren Woodland  
17 FARHAD NOVIAN, ESQ.  
18 LAUREN WOODLAND, ESQ.  
*Attorneys for Plaintiff*

19  
20 DATED: September 5, 2025

PAUL MONES, P.C.

21 By: /s/ Paul Mones  
22 PAUL MONES, ESQ.  
23 COURTNEY KIEHL, ESQ.  
*Attorneys for Plaintiff*

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**DEMAND FOR JURY TRIAL**

PLAINTIFF requests that this action be determined by trial by jury.

DATED: September 5, 2025

NOVIAN & NOVIAN, LLP

By:           /s/ Lauren Woodland            
FARHAD NOVIAN, ESQ.  
LAUREN WOODLAND, ESQ.  
*Attorneys for Plaintiff*

DATED: September 5, 2025

PAUL MONES, P.C.

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