



PRESS RELEASE

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CONTACT: LAWRENCE ROBERT
323-236-9992

SEXUAL ASSAULT VICTIM'S ATTORNEYS ASK COURT FOR SANCTIONS FOR HARASSMENT AND INTIMIDATION OF SPECIAL NEEDS CHILD BY HAYNES FAMILY SCHOOL

Irvine, California - Attorneys representing John RD Doe, a 14 year-old boy, who alleges sexual battery by Veronica Ramirez, a former teacher's aide at the special needs Haynes Family of Programs non-public school in LaVerne, have filed a motion in Los Angeles County Superior Court asking the court to protect their client in his case, including from harassment he suffered during an examination by a medical expert hired by Haynes.

[Click Here for Motion.](#)

According to the motion, John RD Doe who is diagnosed with emotional disturbance and Asperger's Syndrome was sexually harassed and abused by Ms. Ramirez when he was 12 years old.

Ramirez was subsequently reported to the police, arrested and pled no-contest to multiple felony charges of sexual abuse of a child. She was sentenced to five years in state prison and is registered as a sex offender for life.

"The sexual assault of any child is horrendous. When that child has special needs and is especially vulnerable, adults in authority have an even greater responsibility to protect them. In this case, Haynes did just the opposite. They added trauma to injury by allowing a doctor to question the child in excruciating detail about his sexual activity in direct violation of state laws. We are asking the court to sanction Haynes Family of Programs and its counsel for this outrageous conduct," said victim's attorney Saul Wolf.

The motion states that Haynes appointed Calvin Colarusso, M.D. to conduct an Independent Medical Examination of the child. It alleges that Dr. Colarusso violated Code of Civil Procedure Section 2017.220 by "attempting to harass, intimidate and shame" the child by asking him explicit and detailed questions about his sexual history such as "whether he masturbates and what he thinks about at the time."

According to the motion, Dr. Colarusso is the author of several books including "Why Cougars Seduce," "Understanding Masturbation," and "Size Matters."

The Motion also asks for sanctions because Haynes' attorneys asked questions of the child, in deposition, that implied that the abuse was his fault, including asking whether it was the child's idea for Ramirez to masturbate him.

[Manly, Stewart & Finaldi](#) is the nation's leading firm representing athletes in child sexual abuse cases against school districts, Universities and Olympic Governing Bodies. They recently represented 180 alleged victims of former Olympic Team doctor Larry Nassar resulting in a \$500 million-dollar settlement against Michigan State University. In 2018 the firm settled cases against the Torrance Unified School District for \$31 million on behalf of alleged victims of former wrestling coach and convicted child molester Thomas Snider, against Los Angeles Unified School district for \$8 million in cases involving former football coach and convicted child molester Jamie Jimenez and for \$14 million in cases involving former Los Angeles Unified District employee Ronnie Lee Roman. The firm has also settled \$30 million in claims against Redlands Unified School District.