



PRESS RELEASE

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MANLY, STEWART & FINALDI ANNOUNCE LAWSUIT AGAINST SAN BERNARDINO CITY UNIFIED SCHOOL DISTRICT ALLEGING SEXUAL ABUSE OF A CHILD BY FORMER INDIAN SPRINGS HIGH SCHOOL TEACHER NICOLE KELLY

Irvine, California, Prominent child sexual abuse survivors' law firm Manly, Stewart & Finaldi filed a lawsuit against San Bernardino City Unified School District alleging sexual battery and sexual abuse of a child by former Indian Springs High School Teacher Nicole Kelly.

[Click here for copy of complaint.](#)

According to the lawsuit, "Beginning in or around May of 2018 through January 2019, the perpetrator KELLY sexually abused, harassed and molested the Plaintiff on the school premises, including within her Indian Springs High School classroom. This sexual abuse included, but is not limited to: KELLY engaging in vaginal intercourse with the Plaintiff, KELLY performing oral sex on Plaintiff JOHN RJ DOE, requiring the Plaintiff JOHN RJ DOE to touch KELL Y's body, sexual talk and innuendo by KELLY, and sexual fondling of the Plaintiffs body by KELLY. This sexual contact occurred on numerous occasions over this time period."

John RJ Doe was 15 years old at the time of the alleged abuse. Kelly is a 38 year old married mother of three.

"San Bernardino City Unified School District has a duty to provide its student with a learning environment that is free of sexual harassment, sexual abuse and sexual assault. They had ample notice that Nicole Kelly had been engaging in inappropriate sexual activity with her male students, yet they failed to remove her from the classroom, and they failed to report her to the authorities. Ms. Kelly and the San Bernardino City Unified School District who employed and enabled her must now be held accountable," said Morgan Stewart of Manly, Stewart & Finaldi.

The lawsuit alleges that Ms. Kelly had previously engaged in dangerous and inappropriate conduct, including sexually harassing and abusing other minors at Indian Springs High School and other minors and that the school district failed to report and concealed her criminal behavior from students, parents, teachers, law enforcement authorities, civil authorities and others.

Mr. Stewart added: “Our client is believed to be one of only several of Ms. Kelly’s alleged victims. I encourage all victims to come forward and report the behavior of Ms. Kelly so that she is held accountable for her actions.”

[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.