

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ROSEAU

NINTH JUDICIAL DISTRICT

David Marvin,

Court File No.:

Case Type: Defamation

Plaintiff,

v.

**SUMMONS**Shana Lanctot; Matt Lanctot; Jeff Johnson; Patti  
Johnson; Coreen Lindquist, and Kristin Coquette  
Johnson

Defendants.

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THIS SUMMONS IS DIRECTED TO THE ABOVE-NAMED DEFENDANTS:

1. **You are being sued.** The Plaintiff has started a lawsuit against you. The *Complaint* is attached to this *Summons*. Do not throw these papers away. They are official papers that start a lawsuit and affect your legal rights, even if nothing has been filed with the court and even if there is no court file number on this *Summons*.

2. **You must BOTH reply, in writing, AND get a copy of your reply to the person/business who is suing you within 21 days to protect your rights.** Your reply is called an *Answer*. Getting your reply to the Plaintiff is called service. You must serve a copy of your *Answer or Answer and Counterclaim* (Answer) within 21 days from the date you received the *Summons and Complaint*.

ANSWER: You can find the *Answer* form and instructions on the MN Judicial Branch website at [www.mncourts.gov/forms](http://www.mncourts.gov/forms) under the "Civil" category. The instructions will explain in detail how to fill out the *Answer* form.

3. **You must respond to each claim.** The *Answer* is your written response to the Plaintiff's *Complaint*. In your *Answer*, you must state whether you agree or disagree with each paragraph

of the *Complaint*. If you think the Plaintiff should not be given everything asked for in the *Complaint*, you must say that in your *Answer*.

4. **SERVICE: You may lose your case if you do not send a written response to the Plaintiff.** If you do not serve a written *Answer* within 21 days, you may lose this case by default. You will not get to tell your side of the story. If you choose not to respond, the Plaintiff may be awarded everything they asked for in their *Complaint*. If you agree with the claims stated in the *Complaint*, you do not need to respond. A default judgment can then be entered against you for what the Plaintiff asked for in the *Complaint*.

To protect your rights, you must serve a copy of your *Answer* on the person who signed this *Summons* in person or by mail at this address:

LARSON • KING, LLP  
30 East Seventh Street, Ste. 2800  
Saint Paul, MN 55101

5. Carefully read the Instructions (CIV301) for the *Answer* for your next steps.

6. **Legal Assistance.** You may wish to get legal help from an attorney. If you do not have an attorney and would like legal help:

- Visit [www.mncourts.gov/selfhelp](http://www.mncourts.gov/selfhelp) and click on the “Legal Advice Clinics” tab to get more information about legal clinics in each Minnesota county.
- Court Administration may have information about places where you can get legal assistance.

**NOTE: Even if you cannot get legal help, you must still serve a written *Answer* to protect your rights or you may lose your case.**

7. **Alternative Dispute Resolution (ADR).** The parties agree to or be ordered to participate in an ADR process under Rule 114 of the Minnesota Rules of Practice. You must still serve your written *Answer*, even if you expect to use ADR.

Date: 11-13-2023

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MINNESOTA  
JUDICIAL  
BRANCH

STATE OF MINNESOTA

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David Marvin,

Court File No.:  
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v.

**COMPLAINT**Shana Lanctot; Matt Lanctot; Jeff Johnson; Patti  
Johnson; Coreen Lindquist; and Kristin Coquette  
Johnson,**JURY TRIAL DEMANDED**

Defendants.

Plaintiff David Marvin (“Marvin”), for his Complaint against Defendants Shana Lanctot; Matt Lanctot; Jeff Johnson; Patti Johnson; Coreen Lindquist; and Kristin Coquette Johnson, (collectively “Defendants”) states and alleges as follows:

**NATURE OF THE ACTION**

1. This case is about baseless allegations, wild fabrications, and false statements made by Shana Lanctot, Matt Lanctot, Jeff Johnson, Patti Johnson, and Coreen Lindquist, and Kristin Coquette Johnson, against David Marvin, designed to damage his reputation in the Warroad community.
2. Marvin, the longtime head coach of the Warroad Girls Hockey Team, recently led the team to back-to-back state championships in 2022 and 2023.
3. Despite the team’s successes, Shana Lanctot and the other Defendants have repeatedly leveled false accusations of criminal activity, sexual harassment, and abuse against Marvin and have invited and encouraged others to do the same.
4. Defendants’ false statements must stop and Marvin is entitled to relief for the damage already done to his reputation by Defendants’ untrue allegations.

5. Marvin seeks judicial intervention to prevent further harm to his reputation and to obtain monetary compensation for the great harm that Defendants' false statements have already caused.

### **PARTIES**

6. David Marvin is an upstanding member of the Warroad community, the current head coach of the Warroad Girls Hockey Team, and a longtime supporter of Warroad High School student-athletes.

7. Marvin has served as the head coach of the Warroad Girls Hockey team for 17 seasons. In that time, he has led the team to thirteen state tournament appearances and four state titles. The vast majority of the girls Marvin has coached have gone on to attend college or university and some continued to play hockey after high school.

8. Marvin's dedication to the Minnesota hockey community and the Warroad Girls Hockey program over almost two decades of coaching is beyond dispute. In addition to his coaching position, Marvin serves on the board of the MAX Foundation, an organization he founded to honor his son, Max Marvin, and generate support and awareness for young people experiencing mental health issues.

9. Shana Lanctot is a resident of the Red Lake Falls, Minnesota who formerly resided in Warroad, Minnesota and is a parent of former Warroad Girls Hockey players.

10. Matt Lanctot is a resident of Red Lake Falls, Minnesota who formerly resided in Warroad, Minnesota and is a parent of former Warroad Girls Hockey players.

11. Jeff Johnson is a resident of Warroad, Minnesota and a parent of a current Warroad Girls Hockey player.

12. Patti Johnson is a resident of Warroad, Minnesota and a parent of a current Warroad Girls Hockey player.

13. Coreen Lindquist is a resident of Warroad, Minnesota and a parent of a former Warroad Girls Hockey player.

14. Kristin Coauette Johnson is a former resident of Warroad currently residing in Arizona, and a parent of a former Warroad Girls Hockey player.

### **JURISDICTION AND VENUE**

15. This Court has subject matter jurisdiction over this matter pursuant to Minn. Stat. § 484.01, subd. 1.

16. This Court has personal jurisdiction over Minnesota residents Coreen Lindquist, Patti Johnson, Jeff Johnson, Shana Lanctot, and Matt Lanctot.

17. This Court has personal jurisdiction over Kristin Coauette Johnson under Minn. Stat. § 543.19. Kristin Coauette Johnson recently relocated to Arizona but continues to make frequent trips to Minnesota and the Warroad area and her actions, within the State of Minnesota and outside of Minnesota, as detailed below, have caused injury to Marvin in Minnesota.

18. Venue in this Court is proper under Minn. Stat. § 542.09 because one or more Defendants reside within Roseau County and all of the events giving rise to the Complaint took place within this judicial district.

### **FACTUAL ALLEGATIONS**

19. For months Defendants have conducted a campaign to harm Marvin's reputation and have him removed as a coach for the Warroad Girls Hockey Team. Among other things, Defendants have made reports about Marvin to the Warroad High School administration, including the athletic department. The school investigated those allegations and later renewed Marvin's coach contract. Unsatisfied, Defendants then moved their campaign to social media and continued to harm Marvin's reputation.

20. For example, Defendant Coreen Lindquist was notified on April 14, 2023, that the school had already investigated—and rejected—allegations of sexual harassment she brought forward.

21. Nevertheless, Defendants continued to press Warroad High School not to renew Marvin's contract and to instead terminate him from his coaching position. Defendants or those they are aligned with presented alleged statements to Warroad High School in an effort to force the school to terminate Marvin. On or about October 11, 2023, Warroad High School issued a statement that made clear that no action was taken against Marvin in response to the allegations. Instead, the school hired Marvin as a coach for the 2023-2024 season.

22. Defendants then turned their attention to social media to further their false allegations against Marvin.

***The October 30 Letter***

23. On or about October 30, 2023, Defendants Jeff and Patti Johnson, Coreen Lindquist, or Matt and Shana Lanctot published an open letter regarding the “Warroad Girls Hockey Program” that falsely alleged that Marvin and other members of the Warroad coaching staff engaged in inappropriate and criminal conduct towards current and former members of the Warroad Girls Hockey team. The October 30 Letter is attached to the Complaint as Exhibit A.

24. From the nature of the allegations and the letter itself, it is clear that Marvin, as the head coach of the “Warroad Girls Hockey Program,” was the focus of the false statements.

25. The October 30 Letter falsely accused Marvin of “sexually harassing comments and public urination in front of minor players” and “Sexual Harassment – Minn. Stat. § 609.749,” as well as “Intentional infliction of emotional distress” and “Hazing under Minn. Stat. § 135A.155,” among other things.

26. The intended, actual, and reasonable interpretation of these false statements is that Marvin engaged in criminal conduct, sexually harassed and hazed members of the Warroad Girls Hockey Team, and violated Minn. Stat. § 609.749.

27. These statements and the reasonable inferences drawn from them constitute false statements of fact.

28. The October 30 Letter also called for replacement of the “existing girls hockey coaches” to “protect all players from the horrific experiences that our children have endured as well as so many before them in the girls hockey program.”

29. The October 30 Letter directed all readers to contact Defendants Jeff and Patti Johnson, Coreen Lindquist, or Matt and Shana Lanctot for “further information or statements” regarding these allegations.

30. The October 30 Letter was jointly drafted, approved, and publicized by Defendants Jeff and Patti Johnson, Coreen Lindquist, and/or Matt and Shana Lanctot.

31. Shana Lanctot shared the October 30 Letter on her Facebook page and, on information and belief, provided the letter to third parties, including but not limited to Valley News Live and makers of the podcast “Grand Forks Best Source.”

32. Media outlets, including Sports Illustrated, also publicized the false statements and baseless allegations contained in the October 30 Letter.

***Shana Lanctot and Coreen Lindquist Defame Marvin on the Grand Forks Best Source Podcast***

33. On or about October 30, 2023 Shana Lanctot participated in an interview with the host of the podcast Grand Forks Best Source. The interview was made available through the Grand Forks Best Source podcast feed and video of the interview was posted on YouTube.

34. The entire October 30 Letter was read on air. Shana Lanctot was prompted by the host to “name names” and she expressly singled out David Marvin as the subject of the letter.



35. Shana Lanctot further stated that the October 30 Letter was intended to address “mistreatment of players by David Marvin” and doubled down on the allegations of “sexual harassment” contained in the October 30 Letter.

36. Coreen Linquist called into the podcast, and joined in making additional defamatory statements regarding Marvin regarding his conduct and other members of the coaching staff.

37. The intended, actual, and reasonable interpretation of these false statements made by Shana Lanctot during the interview was that Marvin engaged in criminal conduct and sexually harassed, mistreated, and/or abused members of the Warroad Girls Hockey Team.

38. The intended, actual, and reasonable interpretation of these false statements made by Coreen Lindquist during the interview was that Marvin sexually harassed, mistreated, and/or abused members of the Warroad Girls Hockey Team.

39. These statements and the reasonable inferences drawn from them constitute false statements of fact.

***Shana Lanctot defames Marvin on social media and invites others to do the same.***

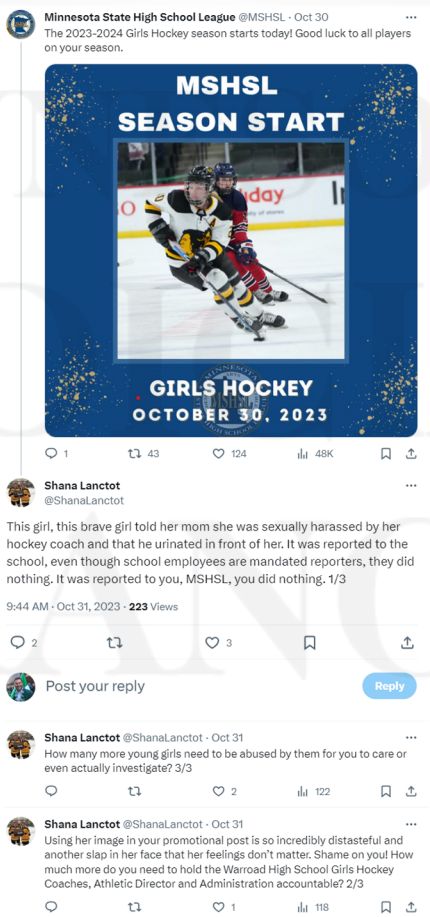
40. Shana Lanctot continued to publish defamatory statements about Marvin on social media after her podcast interview.

41. In one Facebook post, Shana Lanctot encouraged others to watch Athlete A, a documentary film about numerous sexual assaults by a physician connected to USA Gymnastics and a cover-up regarding that abuse. Shana Lanctot’s Facebook post indicates that, “[t]he amount of children that it was happening to without anyone else knowing about it reminds me of the Warroad High School Girls Hockey program. Even the cover up feels familiar.” In the context of Shana Lanctot’s other allegations of sexual harassment and abuse, this Facebook post further defamed Marvin.

42. Shana Lanctot also took to her personal page on X, the social media platform formerly known as Twitter, to publicize her podcast appearance and again falsely accuse Marvin of misconduct and abuse:



43. Additionally, she used the same account to comment on a post from the Minnesota State High School League, again falsely accusing Marvin of abuse of members of the Warroad Girls Hockey team:



44. Warroad High School officials released a statement after the October 30 Letter was publicized, expressing support for “Marvin and his staff” and discouraging “parents of past and present players” from “sharing false information about the program and staff.”

45. In response to this statement, Lanctot accused Marvin of exposing himself in front of unidentified minor players:



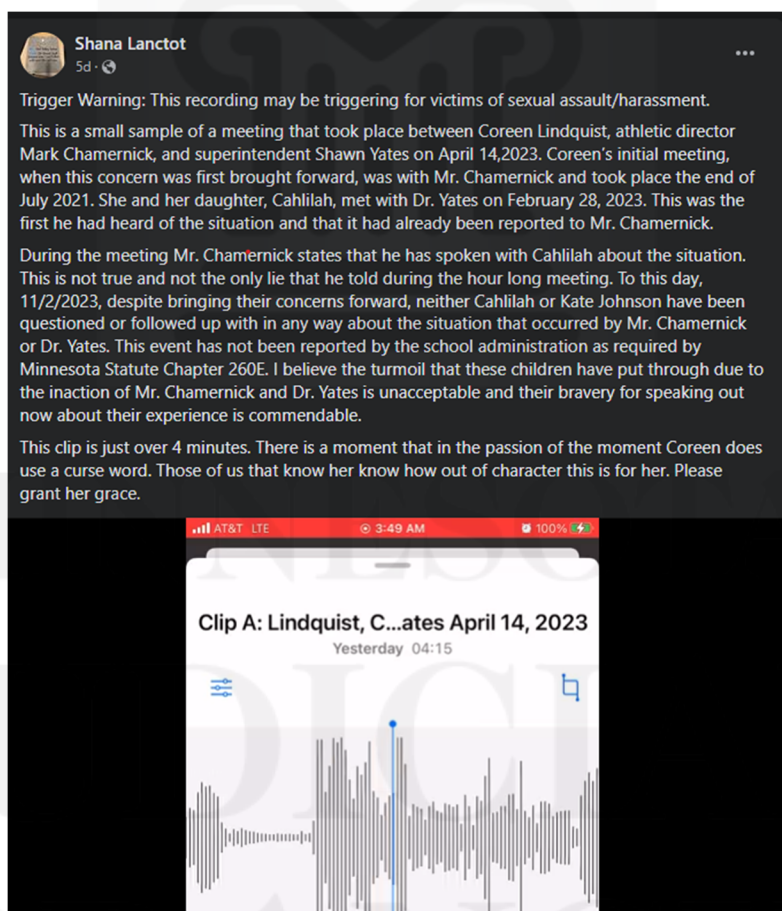
46. On or about October 31, 2023, Shana Lanctot created a Facebook group named “We Hear You 56763” and reposted the October 30 Letter and her Grand Forks Best Source interview to the group. As of November 13, 2023, the group has over 440 members.

47. The purported purpose of the group was to allow “people to share their experiences and come together to promote positive change and to get justice for the girls who have been mistreated in the Warroad Girls Hockey program. One abused child is one too many. #bebetterwarroad.” But the real purpose of the Facebook group was to provide a forum for Defendants and others to defame Marvin.

48. Shana Lanctot, her daughter, and an anonymous account named “You Matter” serve as the administrators of the group. On information and belief, “You Matter” is controlled or maintained by Shana Lanctot. Shana Lanctot set up and maintains the group to allow anonymous posting. On information and belief, Shana Lanctot is the creator of all or some of the anonymous

posts. These anonymous posts include additional false allegations of “sexual harassment” and “abuse” by Marvin.

49. Shana Lanctot posted an unauthorized recording of a meeting between school administrators and Defendant Lindquist to the group’s page. Shana Lanctot characterizes the discussion as related to “sexual assault/harassment” and alleges it that it shows a lack of action on the part of the school district against Marvin and other coaches related to “unwanted sexual advances”:



50. The intended, actual, and reasonable interpretation of these false statements is that Marvin engaged in criminal conduct and sexually harassed, mistreated, and/or abused members of the Warroad Girls Hockey Team.

51. These statements and the reasonable inferences drawn from them constitute false statements of fact.

52. Shana Lanctot was also successful in inducing others to republish her defamatory statements and make defamatory statements through the group and elsewhere on social media.

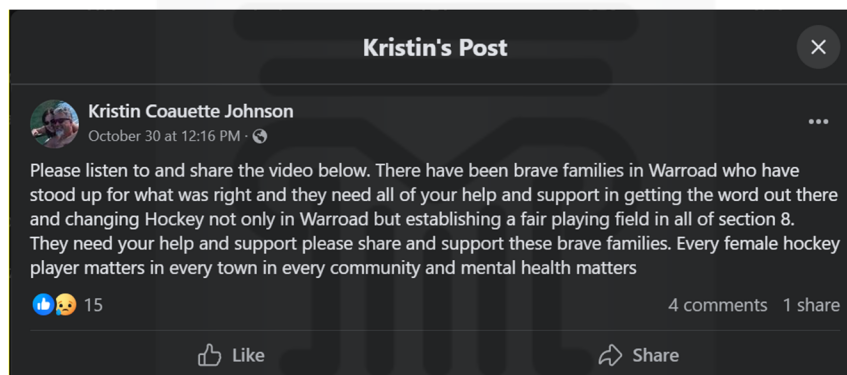
53. For example, Kristin Coquette Johnson, republished, promoted, and advanced the defamatory statements contained in the October 30 Letter.

54. On or about October 31, 2023, Kristin Coquette Johnson “shared” the October 30 Letter on her own personal Facebook feed, republishing and applauding the “brave parent group” who authored the defamatory letter:



55. The intended, actual, and reasonable interpretation of Kristin Coquette Johnson's republication of the false statements contained in the October 30 letter was that Marvin sexually harassed, mistreated, and/or abused members of the Warroad Girls Hockey Team.

56. Kristin Coauette Johnson also “shared” the video recording of the Grand Forks Best Source, republishing the defamatory statements made by Shana Lanctot and Coreen Lindquist in the recording, and encouraging others to “listen to and share” the defamatory statements contained in the video:



57. The intended, actual, and reasonable interpretation Kristin Coauette Johnson’s republication of the false statements made by Shana Lanctot and Coreen Lindquist during the interview was that Marvin engaged in criminal conduct and sexually harassed, mistreated, and/or abused members of the Warroad Girls Hockey Team.

58. Upon information and belief, Shana Lanctot and all other Defendants have communicated similar oral statements to third parties and other written statements and/or social media posts regarding Marvin.

59. All Defendants refuse to stop making defamatory statements despite officials from Warroad High School expressly telling them that they are “sharing false information.” In early November 2023, after Defendants issued the October 30 Letter, Warroad High School issued a statement acknowledging that “for over 10 month, a few parents of past and present players have been sharing false information.” The school pointed out “two important facts”: first, all allegations that had been brought forth were reviewed as part of the school’s “due diligence”; and second, after all of that work, “the school board voted to renew coaches contracts.” Several days later, the school

issued another statement confirming that “[t]he concerns raised by some individuals . . . have already been addressed.” Nevertheless, Defendants persist in making and encouraging defamatory comments, requiring Marvin to seek the Court’s assistance to stop the harm Defendants are causing and obtain an order requiring them to compensate Marvin for the damage they have caused.

### **CLAIMS**

#### **COUNT ONE – DEFAMATION – DEFENDANTS JEFF AND PATTI JOHNSON, COREEN LINDQUIST, AND MATT AND SHANA LANCTOT**

60. Marvin realleges and incorporates the above allegations as though fully restated herein.
61. Defendants Jeff and Patti Johnson, Coreen Lindquist, or Matt and Shana Lanctot jointly drafted and published the October 30 Letter.
62. The October 30 Letter contains false statements of fact, including but not limited to, claims that Marvin engaged in sexual harassment, hazing, or committed a crime under Minn. Stat. § 609.749.
63. The statements in the October 30 Letter are directed at Marvin.
64. The statements in the October 30 Letter are reasonably interpreted to be directed at Marvin.
65. The statements in the October 30 Letter inferring or directly accusing Marvin of sexual harassment and criminal activity are defamatory per se.
66. The statements in the October 30 Letter were made without exercising reasonable care.
67. The statements in the October 30 Letter were made with reckless disregard of the truth or with knowledge that they were false.

68. The statements in the October 30 Letter published by Defendants Jeff and Patti Johnson, Coreen Lindquist, or Matt and Shana Lanctot have harmed the reputation of Marvin in the eyes of others.

69. As a direct and proximate cause of Defendants Jeff and Patti Johnson, Coreen Lindquist, or Matt and Shana Lanctot's false statements of fact in the October 30 Letter, Marvin has been damaged in excess of \$50,000.

### **COUNT TWO – DEFAMATION – SHANA LANCTOT & COREEN LINDQUIST**

70. Marvin realleges and incorporates the above allegations as though fully restated herein.

71. After publication of the October 30 Letter, Shana Lanctot and Lindquist acted on their own and/or in concert with third parties to continue publishing false statements about Marvin.

72. Shana Lanctot's oral statements in the interview she provided to Grand Forks Best Source included false statements of fact regarding Marvin, including but not limited to, allegations of abuse, mistreatment, and sexual harassment of member of the Warroad Girls Hockey team.

73. Lindquist's oral statements in the interview she provided to Grand Forks Best Source included false statements of fact regarding Marvin, including but not limited to, allegations of abuse, mistreatment, and sexual harassment of member of the Warroad Girls Hockey team.

74. The statements in the Grand Forks Best Source interview inferring or directly accusing Marvin of sexual harassment, mistreatment, and abuse are defamatory per se.

75. The statements in the Grand Forks Best Source interview were made without exercising reasonable care.

76. The statements in the Grand Forks Best Source interview were made with reckless disregard of the truth or with knowledge that they were false.

77. The statements in the Grand Forks Best Source interview by Lindquist and Shana Lanctot have harmed the reputation of Marvin in the eyes of others.



78. As a direct and proximate cause of Defendants' false statements of fact in the Grand Forks Best Source interview, Marvin has been damaged in excess of \$50,000.

**COUNT THREE – DEFAMATION – SHANA LANCTOT**

79. Marvin realleges and incorporates the above allegations as though fully restated herein.

80. Shana Lanctot expanded the scope of the defamatory statements contained in the October 30 Letter and the Grand Forks Best Source interview to include false allegations of sexual harassment, abuse, and sexual abuse against Marvin.

81. Shana Lanctot's social media posts, as detailed above, included false statements of fact regarding Marvin, including but not limited to, allegations of abuse, mistreatment, and sexual harassment of member of the Warroad Girls Hockey team.

82. The statements in the social media posts inferring or directly accusing Marvin of sexual harassment, mistreatment, and abuse are defamatory per se.

83. The statements in the social media posts were made without exercising reasonable care.

84. The statements in the social media posts were made with reckless disregard of the truth or with knowledge that they were false.

85. The statements in the social media posts Shana Lanctot have harmed the reputation of Marvin in the eyes of others.

86. As a direct and proximate cause of the false statements made by Shana Lanctot in her social media posts, Marvin has been damaged in excess of \$50,000.

**COUNT FOUR – DEFAMATION – KRISTIN COAUETTE JOHNSON**

87. Marvin realleges and incorporates the above allegations as though fully restated herein.

88. Kristin Coquette Johnson republished the defamatory statements contained in the October 30 Letter and the Grand Forks Best Source interview, false allegations of sexual harassment, abuse, and sexual abuse against Marvin via social media.

89. Kristin Coquette Johnson made direct statements, including but not limited to the social media posts detailed above, inferring or directly accusing Marvin of sexual harassment, mistreatment, and abuse.

90. Kristin Coquette Johnson's social media posts, as detailed above, included false statements of fact regarding Marvin, including but not limited to, allegations of abuse, mistreatment, and sexual harassment of member of the Warroad Girls Hockey team.

91. Kristin Coquette Johnson republished these statements despite the fact that she knew, or had reason to know, that the material was false and defamatory.

92. Kristin Coquette Johnson's statements and her republication of the October 30 Letter and Grand Forks Best Source interview that inferred or directly accused Marvin of sexual harassment, mistreatment, and abuse are defamatory per se.

93. Kristin Coquette Johnson's statements in the social media posts were made without exercising reasonable care.

94. Kristin Coquette Johnson's republication of the October 30 Letter and Grand Forks Best Source interview was made without exercising reasonable care.

95. Kristin Coquette Johnson's statements and her republication of the October 30 Letter and Grand Forks Best Source interview were made with reckless disregard of the truth or with knowledge that they were false.

96. Kristin Coquette Johnson's statements and her republication of the October 30 Letter and Grand Forks Best Source interview have harmed the reputation of Marvin in the eyes of others.

97. As a direct and proximate cause of the false statements made by Shana Lanctot in her social media posts, Marvin has been damaged in excess of \$50,000.

#### **COUNT FIVE – INJUNCTIVE RELIEF – ALL DEFENDANTS**

98. Marvin realleges and incorporates the above allegations as though fully restated herein.

99. Defendants' defamatory statements have caused Marvin irreparable harm for which there is no adequate remedy at law.

100. Defendants' conduct and continued defamatory activity demonstrate that Marvin will continue to suffer irreparable harm during the pendency of this lawsuit.

101. An injunction is necessary to prevent further irreparable harm to Marvin pending a final determination by the Court on the merits of these claims.

102. Absent relief, Defendants will continue engaging in defamatory conduct towards Marvin, impairing Marvin's ability to obtain, and the Court's ability to order, effective relief.

103. Marvin seeks an injunction pursuant to Minn. R. Civ. P. 65, enjoining Defendants from making further defamatory statements involving sexual harassment, mistreatment, or abuse of Warroad Girls Hockey players.

#### **PRAYER FOR RELIEF**

WHEREFORE, Marvin requests the following relief:

1. Judgment in its favor in an amount in excess of \$50,000, plus applicable interests and costs.
2. An injunction, enjoining Defendants from making further defamatory statements involving sexual harassment, mistreatment, or abuse of Warroad Girls Hockey players.
3. For such other and further relief as the Court deems just, equitable, or proper.

#### **JURY DEMAND**

Plaintiff demands a trial by jury on all claims and defenses so triable.

Date: 11-13-2023

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**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that sanctions may be imposed under Minnesota Statute Section 549.211.

David M. Wilk

David M. Wilk

4882-6228-3408



***EXHIBIT A***

***COMPLAINT  
JURY TRIAL DEMANDED***

MINNESOTA  
JUDICIAL  
BRANCH

To whom it may concern,

We, a group of Warroad Girls hockey team players and parents and community members, have approached the Warroad girls hockey coaches, high school administration, as well as members of the school board to inform them of the alleged abusive and alleged inappropriate behavior and actions we believe have clearly violated school policy and MSHSL guidelines. Our intent of this release is to promote safety within the program and ensure a positive environment exists for all youth athletes involved in the Warroad Girls Hockey Program. A summary of this behavior includes,

- Sexually harassing comments and public unnaion in front of minor players;
- Drinking alcohol while supervising players at overnight trips and at the state tournament;
- A member of the coaching staff consuming so much alcohol that they passed out in a player's room and in bed with members of the team;
- Allowing players to leave the hotel and be unattended in the downtown St. Paul and unsupervised in the hotel past 3:00 AM;
- Ignoring concussion protocol and allowing players to play without medical clearance;
- Berating and bullying players, causing some of them to suffer serious emotional distress;
- Violations of MSHSL rules;
- Improper conduct regarding utilizing players of their team to advertise without their consent and giving an unfair advertising advantage to a select organization; and
- Violating a team member's First Amendment rights by disciplining her because of her protected free speech.

We are dissatisfied with the levels of any meaningful action or response from District 690. We have continued concerns of the seriousness of these alleged events and we do not feel that the school administration and school board are taking adequate action in response to these allegations. We obtained legal counsel to try and open a dialogue to rectify these problems and concerns. Due to the above listed concerns counsel has informed us we have numerous potential civil claims for monetary compensatory damages and injunctive relief against the coaches and the District. They include, but are not limited to the following:

- Sexual harassment – Minn. Stat. § 609.749;
- Intentional infliction of emotional distress;
- Negligent infliction of emotional distress;
- Defamation;
- Negligent hiring and supervision of Hockey team Coaches;
- Other Negligence;
- Hazing under Minn. Stat. § 135A.155;
- Breach of fiduciary duty;
- Breach of contract for violations of District, School, Conference, and/or Minnesota State High School League policies;
- Vicarious liability for the District.

In lieu of pursuing our complaints we have asked for the following measures intended to rectify the conduct and prevent or minimize the likelihood of its reoccurrence:

- Immediately respond to and stop all harassment of girls hockey team members;
- Retain a mental health consultant to work with girls team members suffering from mental/emotional health issues;
- Create an anti-bullying taskforce;
- No organization be allowed to advertise with the girls hockey program or other programs, or require its logo on the uniforms of players and/or any team gear;
- Prepare and implement an effective Girls Hockey Team Handbook;
- Track reports of alleged harassment;
- Train staff, and retain a third-party consultant to determine what additional measures are needed and to monitor compliance with these measures;
- Reimbursement of legal expenses of the parties; and
- Replace the existing girls hockey coaches.

We have been open to addressing these matters through some type of mediated discussions but there has been no attempts at these discussions made from the High School Administration, School Board, or their counsel. We do not want to cause financial hardship for District 690 and only want to protect all players from the horrific experiences that our children have endured as well as so many before them in the girls hockey program.

If you would like any further information or statements from our parent/player group our contact information is as follows:

- Jeff and Pat Johnson - (218)689-1499 or (218)689-6972
- Coreen Lindquist - (218)779-7837
- Matt and Shana Landot - (218)289-2171 or (218)289-2169