

COLLIN COUNTY, TEXAS

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from public school districts when they are “grossly negligent, reckless, or engage in intentional misconduct in hiring, supervising, or employing a professional school employee” who sexually assaults children.

3. One of the HB 4623 primary authors was state representative Mitch Little (R-Lewisville), who was interviewed by *Texas Scorecard*, and said, “We have a sexual abuse crisis in our public schools in Texas. It’s indisputable, and we can’t look away.”¹

4. This case is about an eight-year-old girl who was sexually assaulted by her second-grade public school teacher. The teacher was allowed to continue teaching despite warnings of his behavior to school administrators.

5. This is precisely the type of case that Chapter 118 was designed to address.

6. For these reasons, and with great strength and courage, the eight-year-old girl and her parents bring this civil suit under Chapter 118 and related causes of action.

II.

DISCOVERY CONTROL PLAN

7. Plaintiffs intend that discovery be conducted under Discovery Level 3 and hereby request the Court enter a Scheduling Order in accordance with the complexity of this case. Tex. R. Civ. P. 190.4.

III.

MOTION TO PROCEED UNDER PSEUDONYMS

8. Jane and John Doe are the parents of a child-victim of sexual abuse, Janie Doe. Due to extreme privacy concerns and the highly sensitive and personal nature of this matter, Plaintiffs are identified by pseudonyms to protect their identities, consistent with the intent of Texas Rule of

¹ Erin Anderson, *Texas Faces Educator Sexual Misconduct ‘Crisis’*, Texas Scorecard, May 26, 2025.

Civil Procedure 21(c). Plaintiffs' identities will be made known to Defendants through their counsel of record as counsel appears.

9. Further, Janie Doe, the minor Plaintiff is an eight-year-old child who has suffered sexual abuse. Pursuant to *Texas Civil Practice and Remedies Code* §30.013, Janie Doe and her parents may use pseudonyms in this civil proceeding.

10. Plaintiffs further request that during discovery, the parties (a) use a confidentiality designation for documents that could reveal Plaintiffs' identities; (b) redact personally identifying information from public filings; and (c) refer to the minor-Plaintiff is "Janie Doe" and her parents as specified in the case caption, to non-party witnesses by initials in depositions and public transcripts, and that at trial the Court implement measures to protect the minor-Plaintiff, any other minor-victims and their parents identities in open court, including limiting public disclosure of identifying details.

IV.

PARTIES AND SERVICE

11. Plaintiff **Jane Doe** is the mother of Janie Doe. She is an individual who resides in Collin County, Texas. Plaintiff **Jane Doe** proceeds as next friend of **Janie Doe**, her minor child.

12. Plaintiff **John Doe** is the father of Janie Doe. He is an individual who resides in Collin County, Texas. Plaintiff **John Doe** proceeds as next friend of **Janie Doe**, his minor child.

13. Defendant **Plano Independent School District ("Plano ISD" or "the District")** is an independent school district situated in Collin County, Texas. Defendant Plano ISD may be served with process by serving Dr. Theresa Williams, its Superintendent, at 2700 W. 15th Street, Plano, Texas 75075, the administrative offices of Plano ISD. *Issuance of a citation is requested at this time.*

14. Defendant, **Jennifer King** (“**King**”) was at all times relevant hereto, employed by Plano ISD as the Principal of Brinker Elementary School. She may be served with process at Brinker Elementary School, 3800 Clark Parkway Plano, Collin County, Texas 75093, or wherever she may be found. *Issuance of a citation is requested at this time.*

15. Defendant, **Paul Edward Campbell** (“**Campbell**”) was at all times relevant hereto, employed by Plano ISD at Brinker Elementary School as a second-grade teacher. He may be served with process at the Collin County jail where he is currently being held at 4300 Community Ave., McKinney, Texas 75071 or wherever he may be found. *Issuance of a citation is requested at this time.*

16. References herein to acts or omissions of Plano ISD include conduct of its governing body, directors, officers, agents, servants, employees, representatives, and/or independent contractors acting within the course and scope of employment, with authorization and/or ratification by Plano ISD.

V.

JURISDICTION AND VENUE

17. This Court has subject-matter jurisdiction because Plaintiffs seek damages in excess of the minimum jurisdictional limits of the District Courts of Collin County, Texas.

18. The Court has personal jurisdiction over Defendants because the tortious events and omissions alleged herein occurred in Collin County, Texas.

19. Venue is proper in Collin County because all or a substantial part of the events or omission giving rise to Plaintiffs’ claims occurred in Collin County, Texas. *See* TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1).

20. Because this action is *not* brought under the Texas Tort Claims Act, Chapter 101

of the Texas Civil Practice and Remedies Code, its mandatory venue provisions do not apply.

VI.

RULE 47 STATEMENT

21. Under Texas Rule of Civil Procedure 47, Plaintiffs seek monetary relief over \$1,000,000.00; the amount to be awarded will be determined by the jury.

VII.

FACTUAL BACKGROUND

22. Defendant Campbell was employed by Plano ISD and worked at Brinker Elementary School as a teacher.

23. During the 2025-2026 school year, Defendant Campbell was Plaintiff Janie Doe's second-grade teacher.

24. From September 1, 2025, through the remaining 2025-2026 school year, Defendant Campbell sexually assaulted and abused Plaintiff Janie Doe and other second grade girls on numerous occasions. The sexual abuse occurred in Campbell's classroom at Brinker Elementary and other locations. The sexual assaults constituted crimes under Texas Penal Code § 21.02 and § 21.11.

25. Upon information and belief, prior to Campbell's abuse of Janie Doe, Defendant King received at least one report of misconduct of inappropriate touching of a girl by Campbell from a Brinker Elementary School parent ("Parent A").

26. After Parent A's report of Campbell's misconduct, Defendant King did not notify law enforcement for investigation.

27. After Parent A's report of Campbell's misconduct, Defendant King did not take any action to supervise Campbell.

28. After Parent A's report of Campbell's misconduct, King and the District also failed to report Campbell to the State Board for Educator Certification for immediate investigation and potential certificate revocation.

29. Upon information and belief, in the midst of months of sexual abuse of Janie Doe, Defendant King received at least one report of a parent ("Parent B") of a second-grade girl in Campbell's class requesting to be transferred out of his class.

30. Defendant King denied the request of Parent B.

31. After Parent B's request to remove a second-grade girl from Campbell's class, Defendant King failed to investigate Campbell's behavior.

32. After Parent B's request to remove a second-grade girl from Campbell's class, Defendant King failed to adequately supervise Campbell.

33. Despite reports by Parent A and Parent B, Campbell was allowed to continue to teach at Brinker placing him in a position of authority over second-grade students as a teacher where he could have unfettered access to girls.

34. Plaintiffs rely on Defendant Campbell's s mental conditions as part of these claims. *See, Texas Rules of Evidence* 509(e)4 and 510(d)5.

35. Janie Doe was a student at Brinker Elementary during the 2025-26 school year and Campbell was assigned by Defendants King and Brinker as her teacher.

36. Jane and John Doe trusted Defendant Plano ISD and Defendant King to provide a safe, nurturing environment, *in loco parentis* and to staff teachers who were good role models and mentors not sexual predators.

37. Campbell held positions of trust, authority, and supervision over the Plaintiff Janie Doe and other girls.

38. As a teacher, Campbell had unsupervised access to girls, including Janie Doe, during school.

39. From September 1, 2025, through the remaining 2025-2026 school year, Defendant Campbell committed the criminal offense under Texas Penal Code § 21.02 and § 21.11 when he touched Janie Doe's and other girl's genitals on multiple occasions.

40. On July 4, 2026, a brave and courageous second-grade girl reported her abuse by Campbell to law enforcement and Plano Police Department began an investigation which ultimately led to Campbell's arrest on July 8, 2026.

41. As a result of the criminal investigation and arrest of Campbell, Plano ISD fired Campbell.

42. Plano ISD placed Defendant King on a leave of absence on July 14, 2026, for her role in the sexual abuse of second-grade girls at Brinker Elementary School.

43. Plaintiff Janie Doe has suffered emotional distress and psychological harm, which will continue in the future.

VIII.

CAUSES OF ACTION

A. GROSS NEGLIGENCE (Against Defendant Plano Independent School District and Defendant King)

44. Plaintiffs re-allege and incorporate the foregoing paragraphs.

45. Plaintiffs proceed against Defendants King and Plano ISD pursuant to Chapter 118 of the Texas Civil Practice and Remedies Code, which waives governmental and official immunity of public schools and professional school employees for certain conduct.

46. Plano ISD was grossly negligent, reckless, or engaged in intentional misconduct in hiring, supervising, or employing professional school employee Paul Edward Campbell, rendering it liable for an act or omission committed by the employee against enrolled students

that is sexual misconduct. Tex. Civ. Prac. & Rem. Code § 118.002(a).

47. Based upon information and belief, Plano ISD was grossly negligent in (a) continuing to employ Campbell after a report from at least one parent of an improper touching of a student; (b) failing to report and/or act on Campbell's misconduct; (c) failing to supervise interactions with young girls and (d) failing to train on child protection policies and continuing education.

48. Viewed objectively, Campbell's continued employment around minor children, especially young girls involved an extreme degree of risk; and Plano ISD, with actual awareness of that risk from prior misconduct, acted with conscious indifference to the minors' rights and safety.

49. These acts and omissions, singly or collectively, constituted gross negligence proximately causing the sexual misconduct and Plaintiffs' injuries; had Plano ISD and Defendant King taken preventative measures, including criminal complaint or termination, the minor-Plaintiff and other girls would not have been subjected to sexual assault and sexual abuse.

50. Plaintiffs have named the professional school employee who committed the acts or omissions—Paul Edward Campbell—as a Defendant, in compliance with Tex. Civ. Prac. & Rem. Code § 118.002(b).

51. Plano ISD is a “public school” within Chapter 118 and Defendant King was the Principal of Brinker Elementary School at the time of the events made the basis of this lawsuit.

52. Paul Edward Campbell was a “professional school employee” as a teacher employed by Plano ISD.

53. The acts or omissions were committed by Campbell against enrolled students and constituted “sexual conduct” as defined in Tex. Civ. Prac. & Rem. Code § 118.001(4), including violations of Texas Penal Code § 21.02 and § 21.11.

B. FAILURE TO REPORT SUSPECTED CHILD ABUSE UNDER SECTION 261.101 OF THE TEXAS FAMILY CODE (Against Defendant King)

54. Plaintiffs re-allege and incorporate the foregoing paragraphs as if set forth fully herein.

55. At all relevant times, Defendant Jennifer King was employed by Plano ISD acting as the Principal of Brinker Elementary School, with supervisory authority and responsibilities over campus operations, staff conduct, and student safety, including duties to respond to and address reports or indications of staff misconduct involving students.

56. Based on information and belief, prior to Campbell's abuse of Janie Doe during the 2025–2026 school year, King received at least one report from a Brinker parent of inappropriate touching by Campbell involving an enrolled student, giving King actual notice and, at minimum, cause to believe that abuse had occurred under Section 261.101 of the Family Code.

57. Despite receiving at least one prior report and having cause to believe abuse had occurred, King failed to make a required report to law enforcement and failed to initiate or ensure a prompt and adequate investigation consistent with her duties to protect students and address suspected abuse. Further, Defendants King and the District did not report Campbell's misconduct to law enforcement for investigation or terminate his employment.

58. Defendant King also failed to report Campbell to the State Board for Educator Certification for immediate investigation and potential certificate action as part of her obligations arising from notice of suspected misconduct involving a student.

59. As a direct and proximate result of King's failures to report and/or investigate, Campbell remained in his teaching position at Brinker with unfettered access to second-grade girls, enabling the continued sexual abuse of Janie Doe and other girls during the 2025–2026 school year and increasing the duration and extent of harm to victims.

60. Pursuant to Tex. Civ. Prac. & Rem. Code § 118.002(a)(2), King's failures described

above render her liable for sexual misconduct committed against an enrolled student when, after receiving a report or having cause to believe abuse occurred under Section 261.101 of the Family Code, she failed to make a required report and/or failed to investigate consistent with her duties, and such failures were a proximate cause of the continued abuse and resulting damages to Plaintiffs.

C. CONTINUOUS SEXUAL ABUSE OF A YOUNG CHILD-TEXAS PENAL CODE § 21.02(b). (Against Defendant Campbell)

61. Plaintiffs assert a civil claim against Defendant Paul Edward Campbell for violations of *Texas Penal Code* § 21.02(b), premised on Campbell's continuous sexual abuse of Janie Doe and seek relief consistent with the remedies requested elsewhere in this Petition.

62. At all times material, Defendant Paul Edward Campbell was employed by Plano ISD as a second-grade teacher at Brinker Elementary School during the 2025–2026 school year, and he held a position of trust, authority, and supervision over the minor-Plaintiff, Janie Doe.

63. During the 2025–2026 school year, Janie Doe was an enrolled second-grade student at Brinker Elementary School and was assigned to Campbell's class. She was eight years old at the time of the sexual abuse complained of herein.

64. Defendant Paul Edward Campbell was a man in his sixties at the time of the sexual abuse and exploitation complained of herein.

65. From September 1, 2025, through the remaining 2025-2026 school year, Campbell sexually assaulted and abused Janie Doe by touching her genitals and bottom with his hand on numerous occasions in the classroom at Campbell's desk or the "teacher's table." Janie Doe also observed him abusing other girls in the class in a similar manner.

66. The sexual acts and abuse described herein occurred during a period of time that was 30 or more days in duration satisfying the elements of continuous sexual abuse of a young child

under the age of fourteen as prescribed by Texas Penal Code § 21.02(b).

67. As a direct and proximate result of Campbell's conduct, the minor-Plaintiff has suffered emotional distress and psychological harm and will continue to suffer in the future.

D. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (Against Defendant Campbell)

68. Campbell intentionally touched Janie Doe on her genitals.

69. Campbell's repeated conduct constituted continuous sexual abuse of a child under Texas Penal Code §21.02(b)(6).

70. Campbell's conduct was extreme and outrageous, beyond all bounds of decency as recognized by the Texas Penal Code.

71. Campbell's conduct proximately caused severe emotional distress to the minor-Plaintiffs.

IX.

ATTORNEY'S FEES & COSTS

72. Plaintiffs are entitled to court costs and reasonable and necessary attorney's fees under Tex. Civ. Prac. & Rem. Code § 118.004.

X.

CONDITIONS PRECEDENT

73. All conditions precedent to Plaintiffs' claims for relief have been performed or have occurred.

XI.

DAMAGES

74. As a direct and proximate cause of Defendants' negligent acts and/or omissions, the minor-plaintiff, **Janie Doe** suffered damages and injuries that include, but are not limited to:

- a. Physical pain and suffering in the past;
- b. Physical pain and suffering, in reasonable probability, sustained in the future;
- c. Mental anguish in the past;
- d. Mental anguish, in reasonable probability, sustained in the future;
- e. Physical impairment;
- f. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the past; and
- g. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the future; and
- h. Loss of earning capacity in the future.

75. As a direct and proximate cause of Defendants' negligent acts and/or omissions, **Jane Doe and John Doe, the parents of Janie Doe** have suffered damages and injuries that include, but are not limited to:

- a. Reasonable and necessary medical expenses paid on behalf of their minor child in the past; and
- b. Reasonable and necessary medical expenses paid on behalf of their minor child, in reasonable probability, sustained in the future;
- c. Loss of wages in the past;
- d. Costs of suit; and
- e. All other relief, in law and equity, to which Plaintiffs may be justly entitled.

76. Plaintiffs' damages clearly exceed the minimum jurisdictional requirements for this Court. Therefore, Plaintiffs seek compensation by the Court and jury for their damages actual and punitive damages, in an amount to be determined by the jury.

XII.

PRE-JUDGEMENT AND POST JUDGMENT INTEREST

77. Plaintiffs seek interest in accordance with Texas Finance Code § 304.104 et seq., and

other applicable law.

XIII.

RULE 193.7 NOTICE

78. Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiffs hereby give actual notice to Defendants that any and all documents produced may be used against the Defendant producing the documents at any pretrial proceedings and/or trial of this matter without the necessity of authenticating documents.

XIV.

JURY DEMAND

79. Plaintiffs demand a trial by a jury. The jury fee will be submitted with this case filing.

XV.

PRAYER

FOR THE REASONS STATED ABOVE, Plaintiffs, Jane Doe and John Doe individually and as next friends of Janie Doe, a minor child respectfully pray that the Defendants named herein be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for Plaintiff against Defendants jointly and severally for damages in an amount within the jurisdictional limits of the Court for:

- a. Actual damages;
- b. Exemplary damages;
- c. Court costs and legal expenses;
- d. Pre- and post-judgment interest;
- e. Attorney's fees; and
- f. All other relief, legal or equitable, general or special, to which Plaintiffs may be justly entitled.

**RESPECTFULLY SUBMITTED,
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Filing Description: Plaintiffs' Original Petition and Jury Demand

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