

IN THE COMMON PLEAS COURT OF WOOD COUNTY, OHIO
CIVIL DIVISION

A.F., a minor child, by and through T.F. and C.F., as parents and natural guardians) Case No.:
c/o Charles E. Boyk)
1500 Timberwolf Drive) Judge:
Holland, Ohio 43528)
) **COMPLAINT**
)
) ***(Jury Demand Endorsed Hereon)***
)
T.F., individually) Charles E. Boyk (0000494)
c/o Charles E. Boyk) Michael A. Bruno (0033780)
1500 Timberwolf Drive) Andrea R. Young (0096334)
Holland, Ohio 43528) Emily R. Warnimont (0106207)
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and) 1500 Timberwolf Drive
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1500 Timberwolf Drive) mbruno@charlesboyk-law.com
Holland, Ohio 43528) ayoung@charlesboyk-law.com
) ewarnimont@charlesboyk-law.com
Plaintiffs,)
)
v.) ***Attorneys for Plaintiffs***
)
WOOD COUNTY AGRICULTURAL SOCIETY)
c/o Victor N. Ten Brink)
519 West Wooster Street)
Bowling Green, Ohio 43402)
)
and)
)
WOOD COUNTY FAIR FOUNDATION)
c/o Victor N. Ten Brink)
519 West Wooster Street)
Bowling Green, Ohio 43402)
)
and)

BROCK E. ABKE
2551 Genoa Road
Perrysburg, Ohio 43551

Defendants.

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Now comes Plaintiff A.F., a minor child, by and through T.F. and C.F., as parents and natural guardians, and Plaintiffs T.F. and C.F., individually, by and through the undersigned counsel, and hereby submit this Complaint against Defendants Wood County Agricultural Society, Wood County Fair Foundation, and Brock E. Abke for injuries and damages arising from the intentional infliction of emotional distress. This incident was not isolated and occurred from May 2023 to May 2025. In support of their claims, Plaintiffs state as follows:

THE PARTIES

1. Plaintiffs T.F. (Mother) and C.F. (Father), the parents and natural guardians of Plaintiff A.F., a minor child, bring this action in accordance with Ohio Civ. R. 17(B) on behalf of A.F., and also bring individual claims for loss of filial consortium.
2. A.F. is currently seventeen (17) years old and resides with his parents in Bradner, Wood County, Ohio. In furtherance of protecting his identity and given the sensitive nature of the subject matter of his Complaint, A.F. is a minor child, only his initials are being used. In a further effort to protect A.F.'s identity and given the sensitive nature of the subject matter of this Complaint, his parents are also identified by initials only. (See *Doe v. Roe*, 2024-Ohio-2716 (8th Dist.), citing *Doe v. Porter*, 370 F.3d 558 (6th Cir.2004), holding "a party may proceed under a pseudonym, where a 'plaintiff's privacy interests substantially outweigh the presumption of open

judicial proceedings.”) The identity of A.F. and his parents will be disclosed to the Defendants with service of this Complaint.

3. Defendant, Wood County Agricultural Society, is a nonprofit organization licensed to do business in the state of Ohio. Upon information and belief, Defendant Wood County Agricultural Society organizes and manages the Wood County Fair.
4. Defendant Wood County Fair Foundation is a nonprofit organization licensed to do business in the state of Ohio. Upon information and belief, Defendant Wood County Fair Foundation assists in the organization and management of the Wood County Fair.
5. Defendant Brock E. Abke is a resident of Perrysburg, Wood County, Ohio. Upon information and belief, Defendant Brock E. Abke was an agent of Defendant Wood County Agricultural Society and/or Wood County Fair Foundation at the time of the incident.
6. Brock Abke joined the senior fair board in 2015, served as first vice president, and served as president from September 2017 until he resigned in January 2018.
7. Brock Abke was secretary of the senior fair board in 2024 and 2025.
8. Brock Abke at all times as a fair board member was in direct contact with members of the junior 4H clubs in Wood County. He created the fall camping event at the fairgrounds and operated it for two years.
9. The senior fair board knew or should have known that Brock Abke lost his regular employment for inappropriate conduct with minors.
10. The senior fair board knew or should have known that allowing Brock Abke contact with junior 4H members was dangerous and outrageous.

JURISDICTION AND VENUE

11. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.
12. The Wood County Common Pleas Court has jurisdiction over this matter pursuant to R.C. 2305.01.
13. Venue is proper in this Court pursuant to Civil Rules 3(C)(1) and 3(C)(6), as Wood is the county in which the Defendants reside and in which all or part of the claims for relief arose.
14. Pursuant to Civil Rule 8(A), Plaintiffs state that they seek a judgment in excess of Twenty-Five Thousand Dollars (\$25,000.00).

STATEMENT OF THE FACTS

15. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.
16. Upon information and belief, Defendants Wood County Agricultural Society and/or Wood County Fair Foundation operated and managed the Wood County Fair.
17. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation publicly promotes the Wood County Fair as providing and hosting educational opportunities such as 4H and junior fair, where students are provided educational and learning opportunities related to agriculture.
18. Plaintiff A.F. participated in junior fair and 4H through the Wood County Fair, beginning approximately in 2018.
19. Defendant Brock E. Abke helped manage and organize junior fair and 4H at the Wood County Fair.

20. On or around May 2023, Plaintiff A.F. was introduced to Defendant Brock E. Abke through a friend.
21. Plaintiff A.F. and Defendant Brock E. Abke began engaging with each other through a group of friends.
22. Defendant Brock E. Abke added Plaintiff A.F. as a friend on Snapchat.
23. Defendant Brock E. Abke offered to get Plaintiff A.F. “anything he needs.”
24. Defendant Brock E. Abke purchased vapes for Plaintiff A.F. on numerous occasions.
25. Defendant Brock E. Abke offered alcohol to Plaintiff A.F. at a New Years Eve party.
26. Defendant Brock E. Abke began sending money to Plaintiff A.F. via PayPal.
27. Defendant Brock E. Abke began talking more sexually towards Plaintiff A.F. on Snapchat from 2023 through 2025.
28. Over the course of the next three years, Defendant Brock E. Abke sent over forty sexually explicit photos to Plaintiff A.F. via Snapchat.
29. Plaintiff T.F. discovered the explicit messages on Plaintiff A.F.’s Snapchat and reported Defendant Brock E. Abke to the Wood County Sheriff’s Office.
30. Defendant Brock E. Abke was charged with five counts of Pandering Obscenity Involving a Minor, a felony of the second degree, and thirteen criminal charges in total. At the time of filing this Complaint, Defendant Brock E. Abke’s criminal case is still ongoing.
31. Plaintiff A.F. experienced significant emotional distress, requiring him to seek psychological treatment on a regular basis.

FIRST CAUSE OF ACTION
(Intentional Infliction of Emotional Distress - Defendant Brock E. Abke)

32. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.
33. Defendant Brock E. Abke's conduct described herein is so extreme and outrageous that it goes beyond all possible bounds of decency and is utterly intolerable in a civilized community.
34. Defendant Brock E. Abke's extreme and outrageous conduct described herein was done in reckless disregard of the likelihood that Plaintiff A.F. would suffer severe emotional distress.
35. As a direct and proximate result of Defendant Brock E. Abke's outrageous conduct, Plaintiff A.F. suffered severe psychological damage.
36. As a direct and proximate result of Defendant Brock E. Abke's extreme and outrageous conduct, Plaintiff A.F. was required to undergo medical care and incurred medical care costs.
37. As a direct and proximate result of Defendant Brock E. Abke's extreme and outrageous conduct, Plaintiff A.F. has incurred great suffering, severe mental anguish, and emotional distress. Further, Plaintiff A.F. believes his injuries are permanent in nature and that he will require future psychological care and expense, and that he will continue to endure great suffering, mental anguish, and emotional distress.

SECOND CAUSE OF ACTION
(Negligent Hiring - Defendants Wood County Agricultural Society, and Wood County Fair Foundation)

38. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.

39. At all times relevant herein, Defendant Brock E. Abke was an agent of Defendant Wood County Agricultural Society and/or Wood County Fair Foundation and was acting within the scope of his authority.

40. Upon information and belief, Defendant Brock E. Abke had a history of grooming minor boys and a history of inappropriate relations with minors.

41. Defendant Wood County Agricultural Society and/or Wood County Fair Foundation had a duty to ensure that its agents are qualified and competent for their respective positions.

42. Brock Abke used the Fair Board's reputation and status to gain the confidence of minors and groom them.

43. Defendant Wood County Agricultural Society and/or Wood County Fair Foundation breached this duty owed to Plaintiffs by approving Defendant Brock E. Abke's appointment to his position, allowing him access to minors, and therefore subjecting Plaintiff to his outrageous and extreme conduct described herein.

44. Upon information and belief, Defendants Wood County Agricultural Society and/or Wood County Fair Foundation knew or should have known of Defendant Brock E. Abke's history of inappropriate relations and grooming of minor boys.

45. Furthermore, prior to the conduct described herein, Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation knew or

reasonably should have known that Defendant Brock E. Abke had a history of inappropriate relations with minors and was not suitable for positions that put him in contact with minors.

46. Alternatively, upon information and belief, Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation failed to make an appropriate inquiry into whether Defendant Brock E. Abke was not suitable for his position.

47. As a direct and proximate result of the Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent support and vouching for the character of Brock E. Abke, Plaintiff A.F. suffered severe psychological damage.

48. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent support and vouching for the character of Brock E. Abke, Plaintiff A.F. was required to undergo psychological care and incurred psychological care costs.

49. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent support and vouching for the character of Brock E. Abke, Plaintiff A.F. has incurred great suffering, severe mental anguish, and emotional distress. Further, Plaintiff A.F. believes his injuries are permanent in nature and that he will require future psychological care and psychological care costs, and that he will continue to endure great suffering, mental anguish, and emotional distress.

THIRD CAUSE OF ACTION
(Negligent Training - Defendants Wood County Agricultural Society, and Wood County Fair Foundation)

50. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.

51. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation owed Plaintiffs the duty to ensure that its agents were properly trained and knew how to properly interact with minors.

52. Upon information and belief, Defendant Brock E. Abke engaged in extreme and outrageous conduct while acting as an agent of Defendant Wood County Agricultural Society and/or Wood County Fair Foundation.

53. Upon information and belief, Defendant Wood County Agricultural Society and/or Wood County Fair Foundation either failed to develop adequate policies, procedures, and practices, or failed to train Defendant Brock E. Abke on proper policies, procedures, and practices.

54. Due to Defendant Wood County Agricultural Society's and/or Wood County Fair Foundation's failure to implement proper policies and/or failure to adequately train its agents, Defendant Brock E. Abke engaged in extreme and outrageous conduct that Defendants should have instructed their employees/agents to avoid.

55. As a direct and proximate result of the Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent training of Brock E. Abke, Plaintiff A.F. suffered severe psychological damage.

56. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent training of Brock E.

Abke, Plaintiff A.F. was required to undergo psychological care and incurred psychological care costs.

57. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent training of Brock E. Abke, Plaintiff A.F. has incurred great suffering, severe mental anguish, and emotional distress. Further, Plaintiff A.F. believes his injuries are permanent in nature and that he will require future psychological care and psychological care costs, and that he will continue to endure great suffering, mental anguish, and emotional distress.

FOURTH CAUSE OF ACTION
(Negligent Supervision - Defendants Wood County Agricultural Society, and Wood County Fair Foundation)

58. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.

59. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation knew or should have reasonably known, that an individual with a history of inappropriate relations with minors may be unfit for a position that requires the individual to interact with minors.

60. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation had a duty to safeguard minors, including Plaintiff A.F., from employees/agents who are unfit and/or who may present a certain risk of harm to them.

61. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation knew or reasonably should have known of Defendant Brock E. Abke's history of inappropriate relations with minors.
62. Yet, Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation appointed Defendant Brock E. Abke, and failed to properly supervise him, breaching their duty to protect minors, including Plaintiff A.F., from his extreme and outrageous conduct.
63. As a result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's failure to properly supervise Defendant Brock E. Abke, he—in the course and scope of his agency—intentionally caused harm to Plaintiff A.F.
64. As a direct and proximate result of the Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent supervision of Brock E. Abke, Plaintiff A.F. suffered severe psychological damage.
65. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent supervision of Brock E. Abke, Plaintiff A.F. was required to undergo psychological care and costs.
66. As a direct and proximate result of Defendant Wood County Agricultural Society's and/or Defendant Wood County Fair Foundation's negligent supervision of Brock E. Abke, Plaintiff A.F. has incurred great suffering, severe mental anguish, and emotional distress. Further, Plaintiff A.F. believes his injuries are permanent in nature and that he will require future psychological care and psychological care

costs, and that he will continue to endure great suffering, mental anguish, and emotional distress.

FIFTH CAUSE OF ACTION

(Vicarious Liability - Defendants Wood County Agricultural Society and Wood County Fair Foundation)

67. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.

68. Based on information and belief, Defendant Brock E. Abke was at all relevant times an agent for Defendant Wood County Agricultural Society and/or Wood County Fair Foundation.

69. Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation is liable for the extreme and outrageous conduct of its agents under the doctrine of respondent superior or vicarious liability.

70. Because Defendant Brock E. Abke's conduct was extreme and outrageous as set forth above, and because at all relevant times, he was in the scope and course of his agency and being a representative for Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation, Defendant Wood County Agricultural Society and/or Defendant Wood County Fair Foundation is liable for the extreme and outrageous conduct of its agent Defendant Brock E. Abke.

SIXTH CAUSE OF ACTION

(Loss of Filial Consortium - Plaintiffs T.F. and C.F.)

71. Plaintiffs T.F. and C.F. incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

72. Plaintiffs T.F. and C.F. are the legal and natural parents of Plaintiff A.F. and have been his legal parents at all times relevant to this Complaint.

73. Plaintiff T.F. states that as a result of all Defendants' conduct, she has been deprived of the love, affection, services, consortium, and society of her son, Plaintiff A.F. Plaintiff T.F. further states that as a result of all Defendants' conduct, the enjoyment and quality of her life and her ability to carry on the normal activities of her daily life with her son have been impaired.

74. Plaintiff C.F. states that as a result of all Defendants' conduct, he has been deprived of the love, affection, services, consortium, and society of his son, Plaintiff A.F. Plaintiff C.F. further states that as a result of all Defendants' conduct, the enjoyment and quality of his life and his ability to carry on the normal activities of his daily life with his son have been impaired.

SEVENTH CAUSE OF ACTION
(Loss of Parental Consortium - Plaintiff A.F.)

75. Plaintiff A.F. incorporates by reference each preceding and succeeding paragraph as though fully rewritten herein.

76. Plaintiff A.F. is the legal and natural son of Plaintiffs T.F. and C.F. and has been their legal son at all times relevant to this Complaint.

77. Plaintiff A.F. states that as a result of all Defendants' conduct, he has been deprived of the love, affection, services, consortium, and society of his mother, Plaintiff T.F. Plaintiff A.F. further states that as a result of all Defendants' conduct, the enjoyment and quality of his life and his ability to carry on the normal activities of his daily life with his mother have been impaired.

78. Plaintiff A.F. states that as a result of all Defendants' conduct, he has been deprived of the love, affection, services, consortium, and society of his father, Plaintiff C.F. Plaintiff A.F. further states that as a result of all Defendants' conduct, the enjoyment

and quality of his life and his ability to carry on the normal activities of his daily life with his father have been impaired.

EIGHTH CAUSE OF ACTION
(Punitive Damages – All Defendants)

79. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

80. The acts of Defendants described herein constitute conscious disregard for the rights and safety of Plaintiff A.F. and the rest of the public, acting with reckless indifference to the consequences to others despite being aware of or should have been aware of the great possibility of causing substantial harm. Accordingly, Plaintiffs demand punitive damages against Defendants Wood County Agricultural Society, Wood County Fair Foundation, and Brock E. Abke.

WHEREFORE, Plaintiff A.F. prays for:

(A) Judgment against all Defendants, jointly and severally, for his injuries arising from Causes of Action One, Two, Three, Four, Five, and Seven, in an amount exceeding Twenty-Five Thousand Dollars (\$25,000.00), together with interest, costs, and such other and further relief as the Court may deem just;

Plaintiffs T.F. and C.F., individually pray for:

(B) Judgment against all Defendants, jointly and severally, for their loss of filial consortium arising from Cause of Action Six, in an amount exceeding Twenty-Five Thousand Dollars (\$25,000.00), together with interest, costs, and such other and further relief as the Court may deem just;

and

All Plaintiffs pray for:

(C) Punitive damages against Defendants in an amount to be determined by the trier of fact;

(D) Reasonable attorney fees associated herewith; and

(E) Such other and further relief as the Court may deem just.

Respectfully submitted,

/s/ Charles E. Boyk

Charles E. Boyk (0000494)

Attorney for Plaintiffs

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues triable by right.

/s/ Charles E. Boyk _____

Charles E. Boyk (0000494)

Attorney for Plaintiffs

PRAECIPE

TO THE CLERK: SERVICE ON DEFENDANTS

Please serve summons and Complaint upon Defendants at their respective addresses listed on the caption.

/s/ Charles E. Boyk
Charles E. Boyk (0000494)
Attorney for Plaintiffs