

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

ADRIENE J. KNIGHT,
Individually and as Executrix of the
Estate of William E. Knight



Plaintiff,

-vs-

MIAMI UNIVERSITY
501 East High Street
Oxford, OH 45056

and

MIAMI UNIVERSITY BOARD OF
TRUSTEES
501 East High Street
Oxford, OH 45056

and

JASON OSBORNE
501 East High Street
Oxford, OH 45056

and

LINDSAY CARPENTER
501 East High Street
Oxford, OH 45056

and

RUTH GROOM
501 East High Street
Oxford, OH 45056

Defendants.

Case No. _____

COMPLAINT
WITH
JURY DEMAND

Adriene J. Knight, individually, and as Executrix of the Estate of William E. Knight, brings these claims related to the wrongful death of William E. Knight. As Defendant Miami University is a state university, these claims have also been brought in the Ohio Court of Claims. The purpose of this suit is to preserve all claims against Defendants for all acts taken with malicious purpose, in bad faith, or in a wanton or reckless manner. Plaintiff hereby states as follows:

THE PARTIES

1. Plaintiff Adriene J. Knight (“Adriene”) is a resident of Butler County, Ohio and is the wife of William E. Knight (“William”).

2. Adriene was appointed Executrix of the Estate of William E. Knight (“the Estate”) by the Butler County Probate Court on April 6, 2022.

3. Prior to his death, William was employed by Miami University and the Board as Assistant Provost for Institutional Research and Effectiveness.

4. Plaintiff brings this action pursuant to R.C. 2125 *et seq.* as the personal representative of the Estate to recover damages on behalf of herself and any and all next of kin.

5. Miami University (“the University”) is a public university located in Oxford, Butler County, Ohio. Miami University is governed by the Miami University Board of Trustees (“the Board”).

6. At all times relevant to this Complaint, Defendant Jason Osborne (“Osborne”) was employed by Miami University and the Board as Provost and Executive Vice President for Academic Affairs. At all times relevant to this Complaint, Osborne was the direct supervisor of William Knight.

7. At all times relevant to this Complaint, Defendant Lindsay Carpenter (“Carpenter”) was employed by Miami University and the Board as Associate Vice President for Budget and Analytics. At all times relevant to this Complaint, William reported directly to Carpenter with respect to William’s primary research project.

8. At all times relevant to this Complaint, Defendant Ruth Groom (“Groom”) was employed by Miami University and the Board as Associate Vice President for Academic Personnel. At all times relevant to this Complaint, Groom was responsible for fielding and investigating any concerns or complaints made by William.

9. The principal place of business of Miami University is located in Butler County, Ohio, and Miami University transacts business in Ohio and has caused tortious injury in Ohio. The individual Defendants are residents of the State of Ohio. Therefore, this Court has jurisdiction over Defendants.

10. Venue is proper before this Court, as the activity that gave rise to the allegations of this Complaint took place in Butler County, Ohio.

FACTS

11. William was a leader and award winner in the field of Institutional Research. William’s book “Leadership and Management in Institutional Leadership” is a leading manuscript in the field of Institutional Research.

12. Prior to 2021, William was a respected and valued member of the Miami University administration. He was known for the reliability of his work, his high ethical standards, and his loyalty to his staff and to Miami University.

13. In January 2021, Osborne assigned a data project to William. The project involved an antiquated statistical method used by Provost Osborne at his previous institution, which he instructed William to follow for this project.

14. William, along with the staff working under him, worked diligently to compile the statistical data. Every record was repeatedly checked by William and his staff.

15. In February 2021, William sent Osborne a draft of the statistical report, with a request that Osborne review the report to ensure it was in a format that was usable for him. William informed Osborne that there was still significant work to do with the report, that it was not yet complete, and that it should not be shared with anyone at this point.

16. Despite William's cautions to Osborne, Osborne circulated the draft report amongst Miami University administration, including the dean of each college. Osborne received a multitude of questions and negative comments from the recipients of the report about the accuracy of the data and the accuracy of the methods.

17. Mortified by this turn of events, Osborne set out to destroy William.

18. On February 28, 2021, Osborne placed William's entire department under review. Defendant Carpenter was placed in charge of this review by Osborne. Although this was not her field, and she had no experience with the subject data, Carpenter implemented a six-point system to validate every piece of data that flowed through William's department.

19. William's workload, which was already in excess of 60 hours per week, immediately increased dramatically with the new requirements to validate and explain every step to Carpenter. William communicated with the Provost to request a reduction in his workload, which was denied.

20. Osborne and Carpenter conspired to create a paper trail of lies about William. These lies included a March 14, 2021 email from Osborne to William where Osborne berated William for his “cavalier attitude toward providing the provost and other leaders validated and accurate data.” This email included lies about William’s work, his cooperation with Carpenter, and the work of his staff.

21. In the high-pressure/high-stakes environment of higher education, this disparagement of William’s ethics and diligence was a death knell to William’s career.

22. When Carpenter determined that she was too busy to micromanage William’s department, Osborne and Carpenter chose another Miami University employee to oversee the review of William’s department. This employee approved of William’s data and methodology; and she was quickly removed from this oversight position by Osborne and Carpenter. An employee friendly with Osborne and Carpenter, and aware of their plan, took over the supervisory role and continued the scathing review of William’s processes.

23. From February 28, 2021 forward, Osborne, Carpenter, and Groom engaged in a malicious pattern of harassment, bullying, and gaslighting, berating William, questioning his skills and his ability to do his work, commenting on William’s lack of intelligence, and questioning his commitment and loyalty to Miami University.

24. Throughout this time period, William’s co-workers increasingly noticed his despondency and depression, a fact which was relayed to Osborne and/or Carpenter. During this time period, William also lost twenty pounds, which was readily observable to all who knew him.

25. Defendant Groom was the human resources representative at Miami University charged with addressing any complaints from William and others in his

department. William, and others in his department, had previously taken complaints regarding Osborne and/or Carpenter to Groom. Rather than addressing or investigating these past complaints, Groom immediately shared the concerns with Osborne. Groom's conduct led to reprisals to William and his department.

26. William's reports to Groom regarding his trouble with Osborne and Carpenter likewise were unfruitful.

27. In approximately early March, William applied for medical leave under the Family Medical Leave Act to address his own medical concerns. William submitted the necessary medical records to support his application. Osborne, Carpenter, and Groom knew of William's FMLA application. The processing of this application was intentionally delayed by Groom, and William was not granted FMLA leave in time for him to receive necessary medical treatment.

28. Approximately five weeks into this review and oversight process, demoralized and unable to continue in this vein, William asked Carpenter how long the review process would continue. Carpenter informed William that the review process would continue indefinitely.

29. William had no outlet at Miami University for help. All individuals to which he was permitted to report lies and harassment to which he was subjected were directly involved in these acts.

30. In the highly competitive market of higher education, William knew that if he was discharged from Miami University, he would be unlikely to find employment at another university or find any employment in the area of his training and expertise.

31. On April 5, 2021, William received word that he would be required to participate in a meeting on April 7th with Osborne, Carpenter, and other senior administration at Miami University. This meeting was scheduled for after normal business hours and its purpose was to address “personnel issues.” William was confident that he would be terminated at that meeting.

32. In the early morning hours of April 7, 2021, William overdosed on over-the-counter medication and died.

33. In his final note, William wrote “I am so sorry. I am sorry that I just wasn’t strong enough this time. My greatest hope was to make it to retirement with you and just live our life free from worry and fear, but when I was told yesterday that I have to attend a meeting about ‘personnel issues,’ presumably about firing Mollie and/or me, they finally broke me. I’m sorry I wasn’t strong enough to pull myself back up this time.”

34. In the weeks following William’s death, Osborne, Carpenter, and Groom engaged in a course of conduct to oust every staff member that was working under William at the time of his death. Osborne, Carpenter, and Groom were successful.

35. Following William’s death, Miami University’s Office of Equity and Opportunity began an investigation into the circumstances that led to William’s death. The investigation was dropped by the University and never completed. Rather than complete the investigation, the University, per Provost Osborne, provided raises to Carpenter and Groom.

36. In early 2022, Miami University began its standard three-year evaluation of Osborne as Provost. This evaluation process includes the solicitation of reviews from

university faculty and staff. A record-setting number of reviews were submitted regarding Osborne, many of them complaining of Osborne's treatment of William.

37. Miami University halted the evaluation process. Instead of proceeding with a negative evaluation process, Miami University allowed Osborne to resign as Provost. When Osborne resigned as Provost of Miami University, he was hired as Special Assistant to President Greg Crawford. Osborne remains employed by the University in the role of Special Assistant to President Greg Crawford.

38. Miami University's harassment and discrimination policy states, in part: "Harassment and discrimination are prohibited...Members of the Miami University community have the right to an environment free of conduct that unreasonably interferes, hinders, or otherwise denies another a suitable working, living, or learning environment. Therefore, members of the University community should refrain from harassing others or creating an environment that denies others a suitable working, living, or educational environment."

39. Tragically for William, the most senior administration of the University did not adhere to this policy.

COUNT ONE: WRONGFUL DEATH

40. Plaintiff incorporates the allegations of paragraphs 1-38 of the Complaint as if fully restated herein.

41. Defendants acted with malicious purpose, in bad faith, or in a wanton or reckless manner in violating Miami University's own policies and procedures prior to and subsequent to William's death.

42. Defendants each failed in their duty to facilitate an environment free of conduct that unreasonably interfered, hindered, and denied William a suitable working environment.

43. Likewise, Defendants each failed in their duty to provide William a safe working environment pursuant to R.C. 2125.01.

44. Defendants each breached their duties of care to William with respect to the investigation and reporting of harassment, bullying, and/or unsafe work environments.

45. Defendants breached their duties of care, and/or were negligent in their failure to supervise, failure to keep safe, failure to protect, failure to investigate, failure to report, and failure to monitor.

46. As a direct and proximate result of the conduct described above, Defendants each caused William's death and the surviving beneficiaries' resulting damages including, but not limited to, the loss of William's future earning potential, loss of consortium, significant grief and mental anguish, and funeral and burial expenses.

47. Defendants are liable for the wrongful death of William in an amount to be proven at trial, but which amount is in excess of \$25,000.

COUNT TWO: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

48. Plaintiff incorporates the allegations of paragraphs 1-46 of the Complaint as if fully restated herein.

49. By the conduct described above, Defendants intended to and did cause serious emotional distress to Plaintiff.

50. Defendants' conduct, described above, was extreme and outrageous.

51. The conduct described above was the proximate cause of Plaintiff's serious emotional distress, including William's death.

52. Defendants are liable to Plaintiff for the serious emotional distress each caused in an amount to be proven at trial, but which amount is in excess of \$25,000.

COUNT THREE: VICARIOUS LIABILITY/RESPONDEAT SUPERIOR

53. Plaintiff incorporates the allegations of paragraphs 1-51 of the Complaint as if fully restated herein.

54. At all times relevant to this Complaint, Defendants were employed by Miami University and were employed as senior administrators at Miami University.

55. At all times relevant to this Complaint, Defendants were in a supervisory capacity to William.

56. At all times relevant to this Complaint, Defendants were acting within the scope of their employment.

57. Defendants' intentional and negligent conduct directly and proximately caused William's injuries and death.

58. Defendant Miami University is liable for the tortious actions of its administration, including the malicious, wanton, and reckless acts of its administration.

59. As a direct and proximate result of the conduct described above, Defendants each caused William's death and the surviving beneficiaries' resulting damages including, but not limited to, the loss of William's future earning potential, loss of consortium, significant grief and mental anguish, and funeral and burial expenses.

60. Defendant Miami University is liable for the actions of its administration in an amount to be proven at trial, but which amount is in excess of \$25,000.

COUNT FOUR: CONSPIRACY

61. Plaintiff incorporates the allegations of paragraphs 1-59 of the Complaint as if fully restated herein.

62. Defendants Osborne, Carpenter, and Groom engaged in a malicious combination and conspiracy with each other to destroy William's reputation, position with Miami University, and ability to work and earn income.

63. Defendants Osborne, Carpenter, and Groom conspired to sabotage William's work and secure his termination.

64. Defendants Osborne, Carpenter, and Groom conspired to harass William.

65. This malicious combination resulted in actual damages to William, including William's death and the surviving beneficiaries' resulting damages including, but not limited to, the loss of William's future earning potential, loss of consortium, significant grief and mental anguish, and funeral and burial expenses.

66. As a result of Defendants' malicious combination, Plaintiff has been damaged in an amount to be proven at trial, but which is in excess of \$25,000.

COUNT FIVE: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

67. Plaintiff incorporates the allegations of paragraphs 1-65 of the Complaint as if fully restated herein.

68. Defendants breached their duties of care to William through ongoing conspiracies to destroy William's reputation, his position with Miami University, and his ability to work. Defendants further engaged in malicious and berating behavior toward William with an intent to cause him harm.

69. Defendants engaged in conduct that did directly and proximately cause William severe emotional distress, including William's death. There were no possible intervening or superseding causes that could explain William's mental breakdown and death, other than the ongoing mental and emotional distress caused by Defendants.

70. A reasonable person subjected to the same circumstances and conduct would have suffered similarly severe emotional distress.

71. Defendants are liable to Plaintiff for the serious emotional distress each caused in an amount to be proven at trial, but which amount is in excess of \$25,000.

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- A. That this Court enter a money judgment against Defendants in the amount of loss and damages that Plaintiff has suffered, which amount is in excess of \$25,000;
- B. That this Court award punitive damages against Defendants in an amount sufficient to punish them for their wrongful conduct and deter them and others from engaging in such conduct;
- C. That Plaintiff be awarded her costs of suit, including reasonable attorney fees; and
- D. That Plaintiff be awarded such other relief as may be just and proper.

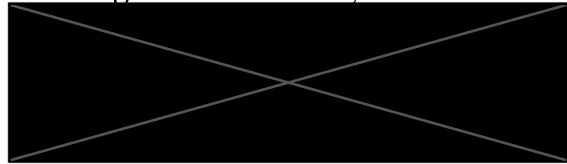
Respectfully submitted,

Angela L. Wallace

Angela L. Wallace (#0080771)

David S. Blessing (#0078509)

Blessing & Wallace Law, LLC



JURY DEMAND

Plaintiff hereby demands her right to trial by jury.

Angela L. Wallace

Angela L. Wallace (#0080771)

Attorney for Plaintiff