

August 20, 2025

TORT CLAIMS NOTICE

Mooresville Consolidated School Corporation
Attn: Dr. Jake Allen, Superintendent
11 W. Carlisle Street
Mooresville, IN 46158

Indiana Political Subdivision
Risk Management Commission
311 W. Washington Street, Suite 300
Indianapolis, IN 46204

North Madison Elementary School
Attn: Lisa Guthrie, Principal
7456 E. Hadley Road
Camby, IN 46113

Via Certified Mail Return Receipt Requested

Re: Notice of Claim on Behalf of [REDACTED]

STATEMENT OF CLAIM

This is a notice pursuant to Indiana code section 34-13-3.5-1, *et seq.* on behalf of [REDACTED] a Minor at the time of injury, by her parents, [REDACTED] for injuries [REDACTED] suffered as a result of intentional, willful, malicious, and/or negligent acts or omissions of Mooresville Consolidated School Corporation, North Madison Elementary School, and their administration

These events are believed to have taken place at North Madison Elementary School on or about April 14, 2025. Specifically, [REDACTED] was harassed, inappropriately touched, and intimidated, by her art teacher, Mr. James Buchler. Art is a required class at NMES and the inappropriate touching occurred during art class. A few days later, the parents of [REDACTED] were made aware of the incident in which Mr. James Buchler touched their daughter inappropriately. At the time of the incident, the school had already received several reports and/or notices that Mr. Buchler had inappropriately touched other kids. Notwithstanding their prior knowledge, the school did nothing to remove Mr. Buchler from his position, resulting in [REDACTED] being assaulted by Mr. Buchler. As a result of the foregoing conduct, [REDACTED] and her parents had to make the decision to enroll [REDACTED] in another school. [REDACTED] has experienced pain and suffering, physical, mental and emotional trauma, loss of enjoyment of life, medical expenses, counseling expenses, and other damages.



ALLEGED NEGLIGENCE

Based upon facts presently known and upon information and belief, the following parties were negligent as set forth below. The claimant and his counsel reserve the right to supplement or amend these allegations of negligence as additional facts and evidence become known or available:

1. Mooresville Consolidated School Corporation – Failure to exercise reasonable care for the supervision and protection of its students such as [REDACTED] failure to adequately prevent abuse; failure to properly train and supervise school employees.
2. North Madison Elementary School – Failure to exercise reasonable care for the supervision and protection of its students such as [REDACTED] failure to adequately prevent abuse; failure to properly train and supervise school employees.

NAMES OF PERSONS OR ENTITIES KNOWN TO BE INVOLVED

1. [REDACTED] (Victim)
2. James Buchler
3. [REDACTED] (Mother to [REDACTED])
4. [REDACTED] (Father to [REDACTED])
5. Mooresville Consolidated School Corporation, 11 W. Carlisle St., Mooresville, IN 46158
6. Dr. Jake Allen, Superintendent, 11 W. Carlisle St., Mooresville, IN 46158
7. Holly Frye, Assistant Superintendent, 11 W. Carlisle St., Mooresville, IN 46158
8. North Madison Elementary School, 7456 E. Hadley Road, Camby, IN 46113
9. Lisa Guthrie, Principal – North Madison Elementary School, 7456 E. Hadley Road, Camby, IN 46113
10. [REDACTED]
11. [REDACTED]

DAMAGES SOUGHT

[REDACTED]'s injuries include, but are not limited to, depression, anxiety, post-traumatic stress disorder, physical, mental, and emotional trauma, loss of enjoyment of life, medical expenses, counseling expenses, and other damages.

[REDACTED] seeks damages for the injuries she suffered as a result of the above-described negligence, to pay the expenses of medical bills necessitated by the negligence, and for all other damages and expenses provided for and allowed under Indiana law. [REDACTED] also seeks all other damages and expenses permissible under the circumstances and pursuant to any other legal theory or statute as may be applicable in this case. Plaintiffs seek the maximum amount of damages recoverable under Indiana law.



PROPOSED REMEDY

Pursuant to Indiana Code section 34-13-3-5.5, [REDACTED] offer the proposed remedy of appropriate monetary relief as set forth by Indiana law and reflective of the above-stated damages.

RESIDENCE OF CLAIMANT

Names: [REDACTED] on behalf of [REDACTED] minor
Address: [REDACTED]

ATTORNEYS FOR CLAIMANT

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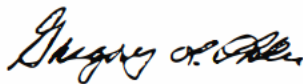
ADDITIONAL DOCUMENTATION

The following documents are attached to this Notice:

1. Additional records related to the injuries sustained by [REDACTED] are being collected and will be made available to the appropriate governmental entity upon request.

If I can be of further assistance in evaluating this claim, please contact me.

Sincerely,


Gregory L. Laker

