

CONFIDENTIAL RECORD SHEET  
REGISTRATION SERVICE  
BOY SCOUTS OF AMERICA

DATE: Feb. 16, 1989

FULL NAME Charles W. Bristol S.S. NO. \_\_\_\_\_  
(No initials if you can possibly get full name)

ADDRESS \_\_\_\_\_

CITY Akron STATE Ohio ZIP CODE 44313

DATE OF BIRTH 8/1944 (This is important and should be exact)

APPROXIMATE AGE \_\_\_\_\_ (To be used ONLY when date of birth is not known)

RELIGION \_\_\_\_\_ NATIONALITY (Citizen of) \_\_\_\_\_

OCCUPATION UNEMPLOYED DUE TO DISABILITY

EDUCATION \_\_\_\_\_

WEIGHT 155 HEIGHT 5'6 RACE CAUCASIAN

COLOR OF HAIR DARK BROWN COLOR OF EYES \_\_\_\_\_

ANY DISTINGUISHING PHYSICAL CHARACTERISTICS "BUTCH" HAIRCUT; GLASSES

HOBBIES OR SPECIAL INTERESTS \_\_\_\_\_

MARRIED ☐ SINGLE ☒ NAME OF SPOUSE \_\_\_\_\_

CHILDREN \_\_\_\_\_  
(Name, number, ages, if possible)

SCOUTING CONNECTIONS:

| UNIT #        | CITY  | STATE | POSITION   | DATE REGISTERED | DATE RESIGNED |
|---------------|-------|-------|------------|-----------------|---------------|
| 40, 204, 3204 | AKRON | OHIO  | USUALLY MC | MANY YEARS      | JAN. 1989     |
| AND OTHERS    |       |       |            |                 | (SUSPENDED)   |

Chartered Organization #40-GOODYEAR T & R CO.: #204 & 3204 - KENMORE U.M. CHURCH  
(CO-SPONSORED WITH GOODYEAR)

SPECIAL RECOGNITION \_\_\_\_\_

INCIDENT: TYPE 1 DATE OF INCIDENT 3/19/86 RESOLUTION 3  
Type Resolution

1=Scout Related  
2=Non-scout related  
3=homosexual (not specifically with youth)

1. Internal (only Scouts Know)  
2. Criminal action  
3. Court action  
4. Probationary status  
5. Reported to state agency

Check off list of attached documentation

1. Description of incident
2. Victim(s) statement
3. media reports
4. Legal proceedings
5. Offender's statement
6. Official notification of termination
7. Found guilty/innocent by court

**NOTED**

**MAY 22 1989**

**JOSEPH L. ANGLIM**

**CONFIDENTIAL**

**FEB 27 1989**

**F. STARON**

Council GREAT TRAIL Signed D. Russell Warner  
SCOUT EXECUTIVE

3828r-eko-11/3/88

CONF017628

January 22, 1991

Mr. Stephen E. Barnes  
Scout Executive  
Great Trail Council, No. 433

PERSONAL AND CONFIDENTIAL

SUBJECT: Charles W. Bristol

Dear Steve:

A recent check of our Ineligible Volunteer File against the National Eagle Scout Association indicated that the above named individual is presently a member of NESA.

This individual is listed on our Ineligible Volunteer File and will not be permitted to register with the Boy Scouts of America. We wanted you to be aware of this, so that the individual cannot participate in any activities with the council, simply because he is a member of NESA. He should not participate in any leadership capacity or assume any responsibility in the Boy Scouts of America. He could participate as a parent if he has a son or daughter involved.

We wanted to make you aware of this; so you would not involve him. Let us know if you have any questions.

Sincerely,

Paul Ernst, Director  
Registration and Statistical Service

eko

cc: Peter M. Barbernitz, East Central Region

SEND TO FILE  
JAN 23 1991  
ERIN ORILEY

CONF017629

BOY SCOUTS OF AMERICA  
EAGLE SCOUT SYSTEM  
INELIGIBLE VOLUNTEER CHECKING MATCH REPORT - N.E.S.A. MEMBERS

PAGE: 497

| CONT | N.E.S.A. MEMBER FULL NAME | LAST NAME   | FIRST NAME   | MIDDLE NAME                     | SEX | BIRTH YEAR                             | SDC SEC NO |
|------|---------------------------|---|--|---------------------------------|-----|--|------------|
|      | VICTOR A. BRISCOE JR.     | BEERS<br>BROCK<br>BROOKS  | CHRIS<br>DONALD<br>DANNY                                 | J<br>EDWARD                     | M   | 70<br>62<br>64                         |            |
|      | PAUL B BRISKEY            | BRISCOE<br>BROOKS   | V<br>CHRIS<br>DANNY                                      | J<br>EDWARD                     | M   | 69<br>64                               |            |
|      | BRIAN BRISLIN             | BRISKEY<br>BROCK<br>BROOKS<br>BROOKS<br>BROOKS<br>BROOKS<br>BROOKS  | P<br>BRIAN<br>RONALD<br>DONALD<br>DANNY<br>DANNY<br>TROY | G<br>ALBERT<br>EDWARD<br>L      | M   | 60<br>61<br>55<br>62<br>64<br>59<br>61 |            |
|      | KERRY E BRISS             | BRISLIN<br>BARKLEY<br>BARKLIND<br>BRASWELL<br>BREGGIO<br>BURKHALTER | B<br>OWEN<br>CHARLES<br>EZRA<br>ROBERT<br>JOHN           | HERBERT<br>E<br>JOHN<br>CLINTON | M   | 00<br>23<br>44<br>66<br>46<br>32       |            |
|      | THOMAS E BRISTER          | BRISSE<br>BROCK<br>BROCK<br>BROOKS<br>BROOKS                        | K<br>CHRIS<br>BRIAN<br>DONALD<br>DANNY<br>TROY           | J<br>G<br>C<br>EDWARD<br>L      | M   | 66<br>70<br>61<br>62<br>64<br>61       |            |
|      | CHARLES W BRISTOL         | BRISTER<br>BERGSTEN<br>BROUGHTON<br>BROUGHTON                       | T<br>RAYMOND<br>CHARLES<br>PAUL                          | E<br>E<br>E                     | M   | 49<br>44<br>44<br>44                   |            |
|      | CRAIG L BRISTON           | BRISTOL<br>BERGSTEN<br>BRISTOL<br>BROUGHTON                         | C<br>RAYMOND<br>CHARLES<br>PAUL                          | E<br>E<br>E                     | M   | 44<br>44<br>44<br>44                   |            |
|      | PETER R. BRISTON          | BRISTON<br>BERGSTEN<br>BRISTOL<br>BROUGHTON                         | C<br>RAYMOND   | E                               | M   | 50<br>48                               |            |
|      | STEPHEN BRITCHKOW         | BRITCHKOW<br>BEARDSLEY  | S<br>DAVID   | J                               | M   | 47<br>42                               |            |
|      | ERIC G BRITT              | BRITT<br>BARRY<br>PARDY   | E<br>GARY<br>MICHAEL                                     | JAMES                           | M   | 59<br>54<br>60                         |            |

May 26, 1989

Mr. D. Russell Weaver  
Scout Executive  
Great Trail Council, No. 433

PERSONAL AND CONFIDENTIAL

SUBJECT: CHARLES W. BRISTOL

Dear Russ:

Thank you for the detailed information sent concerning the above Scouter. This case has been reviewed with our attorney and is now on our permanent Confidential File.

Sincerely,

Paul Ernst, Director  
Registration Service

je

cc: East Central Region

READY TO FILE  
MAY 24 1989  
ERIN O'KILEY

CONF017631

Great Trail Council • Boy Scouts of America  
P.O. Box 68 • Akron, Ohio 44309 • (216) 773-0415

February 15, 1989

Albert P. Sharpe, III  
President

Ronald L. Duecker  
Commissioner

D. Russell Weaver  
Scout Executive

Mr. Paul Ernst, Director  
Registration Service (S108)  
Boy Scouts of America  
1325 Walnut Hill Lane  
Irving, TX 75015-2079

Dear Paul:

Please refer the Charles Bristol file.

As of February 14, 1989, we were, in fact, served papers -  
[REDACTED] vs. Boy Scouts of America, Case #5:89CV00042.  
A copy of plaintiff's complaint is enclosed as well as an update  
on the confidential record sheet.

We will keep you advised as this case proceeds.

Sincerely,



D. Russell Weaver  
Scout Executive

DRW/ra

encl.

CONF017632

# United States District Court

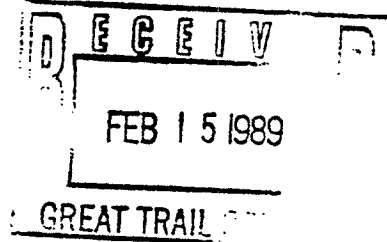
Northern DISTRICT OF Ohio

## SUMMONS IN A CIVIL ACTION

v.

CASE NUMBER: 89 CV 0042

BOY SCOUTS OF AMERICA,  
Chapter #52, et al.



TO: (Name and Address of Defendant)

Boy Scouts of America, Chapter #52  
Post Office Box 68  
Akron, Ohio 44309

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

Antonio Sweeney, Esquire

Cleveland, Ohio 44120

an answer to the complaint which is herewith served upon you, within 28 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

James S. Gallas, Clerk

CLERK

DATE

BY DEPUTY CLERK

CONF017633

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

5:89CV0042

CASE NO.

JUDGE DOWD

[REDACTED]  
Akron, Ohio 44320

and

[REDACTED]

Plaintiffs

vs.

BOY SCOUTS OF AMERICA  
Chapter #52  
Post Office Box 68  
Akron, Ohio 44309

and

CHARLES BRISTOL  
[REDACTED]

Akron, Ohio 44309

Defendants

JUDGE:

COMPLAINT WITH JURY DEMAND

CONF017634

## II. JURISDICTION AND VENUE

1. The jurisdiction of this Court is involved pursuant to 29 U.S.C. 451, 1331, 1334, 1337, 1343, 1383, 2201, and 2202. This being a suit authorized and instituted pursuant to the Civil Rights Act of 1866 and 1964, 42 U.S.C. Section 2000(e) et. seq. The jurisdiction of this Court is involved to secure the protection of and to redress deprivation of rights secured by 42 U.S.C. Section 2000(e) et. seq., providing for injunctive and other relief against discrimination.

2. The jurisdiction of this Court further arises under 28 U.S.C. Section 1331 and 42 U.S.C. Section 1981, 83 and 85, this being a civil action arising under the Fourteenth Amendment of the United States.

3. The unlawful discrimination alleged above was and is now being committed within the State of Ohio and the Northern Judicial District, Eastern Division of Ohio.

## I. PRELIMINARY STATEMENT

4. At all times relevant to this [REDACTED] was the natural parent and legal guardian of all the above named Plaintiffs; who were all under the age of 18.



FIRST CAUSE OF ACTION

5. Pursuant to 1981 and 1983 and to the Constitution of the United States.

SECOND CAUSE OF ACTION

6. Plaintiffs allege that the Defendants, Boy Scouts of America and Charles Bristol, have acted in such a way as to give rise to violations of the United States Constitution & Civil Rights Statutes § 1981, 83 and 1985, 20 U.S.C. § 621 et. seq., and the Fifth, Thirteenth, and Fourteenth Amendments. Plaintiffs seeks a judgment or decree that the practices complained of herein are in violation of the laws of the United States. On on about 3-86, Charlie Bristol of the Boy Scouts of America molested, assaulted and otherwise abused the Plaintiffs jointly and severally and as a direct and proximate cause the Plaintiffs have suffered injuries therefore, physical and mental injuries contrary to the common laws as well as §1981, 1983 and 1985 of Civil Rights Statutes and the United States Constitution, when Defendant fondled Plaintiff's genitals, and chased Plaintiffs through the woods at night yelling "kill the niggers", in a camp of minor boys, therefore plaintiffs demand an order for money damages. The Defendant also took obscence photographs of the children and as a direct and proximate result of all these acts and omissions of the Defendants, Plaintiffs has suffered injuries.

### III. PARTIES

7. Plaintiffs, [REDACTED] Natural parent and legal guardian of, [REDACTED] [REDACTED] and [REDACTED] all black were initiated as Boy Scout members.

8. Defendants, Boy Scouts of America and Charles Bristol, are employers and contractors engaged in an industry affecting the commerce of children of all ages, sex, race, religion. Defendants maintain an office in Cleveland, Ohio and Akron, Ohio.

9. The Defendant have at all times acted directly and indirectly in the interest of an employer in relation to its members of the Boy Scouts of America who performed and are performing work at the Boy Scouts of America, Chapter #52, at Post Office Box 68, Akron, Ohio 44309 and thus was an employee of the Boy Scouts of America.

10 . The Defendants have continuously and intentionally engaged in unlawful practices at the Boy Scouts of America. in violation of the Constitution of the United States. The Defendants have discriminated against Plaintiffs with respect to the terms, conditions, privileges, and benefits of The Boy Scouts of America.

#### IV. STATEMENT OF CLAIM

11. This claim arises under §1981, 1983 and 1985 and the common law.

12. Plaintiff is seeking injunctive relief, the proper compensation damages and punitive damages as well.

13. As a direct and proximate cause of the Defendants willful acts and omissions the Plaintiff has been wrongfully discriminated against in violation of the United States Constitution, which has caused economic, social and psychological damage to the Plaintiffs and their entire family.

#### SECOND CAUSE OF ACTION

14. The Plaintiff realleges paragraphs 1 through 13 as if fully rewritten herein.

15. This claim arises pursuant to §1983, which provides that all persons have the same right to make and enforce contract as is enjoyed by white citizens.

16. The Defendants have discriminated against and are continuing to discriminate against Plaintiffs with respect to the terms, conditions, privileges, advantages of the covenant that the Boy Scouts of America make with the public.

17. As a direct and proximate result thereof, Plaintiffs has been wrongfully deprived of their rights, contrary to 42 U.S.C. 1981.

THIRD CAUSE OF ACTION

18. The Plaintiff realleges paragraphs 1 through 16 as if fully rewritten herein;

19. As a direct and proximate result of the aforesaid violations, the Defendants have caused severe emotional distress to the Plaintiffs, and their family, further causing economic, social and psychological damages to the Plaintiffs and their entire family.

WHEREFORE, Plaintiffs pray for the following relief:

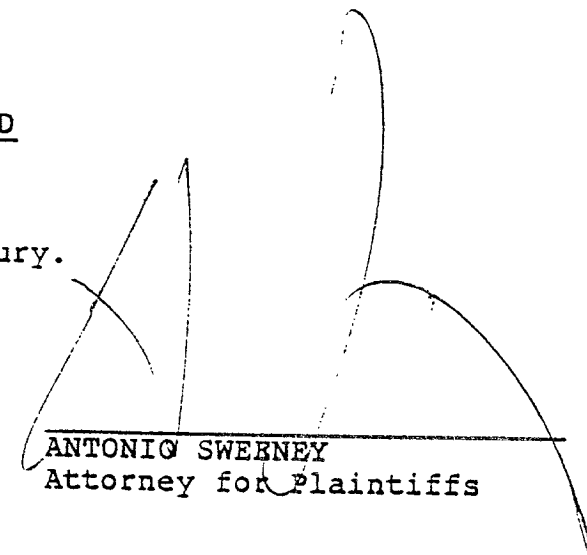
- a. That this Court declare unlawful the policies, practices, customs, and usages herein challenged as being violative of the United States Constitution and every civil statute that it offends Federal and State.
- b. That this Court issue a permanent injunction enjoining Defendant from continuing to discriminate against members of the Boy Scouts of America.
- c. Make the Plaintiffs whole by an appropriate award.
- d. Grant compensatory and exemplary damages against Defendant in the amount of Twenty Two Million Dollars (\$22,000,000.00).
- e. Allow Plaintiffs the cost of their action including interest on the sum awarded at the rate of ten percent (10%), reasonable attorney fees, and for such other relief as may appear to the Court to be equitable and just.

ANTONIO SWEENEY  
Attorney for Plaintiffs

Cleveland, Ohio 44120

JURY DEMAND

Plaintiff demands trial by jury.



ANTONIO SWEENEY  
Attorney for Plaintiffs

# ANTONIO SWEENEY & ASSOCIATES

Attorneys at Law

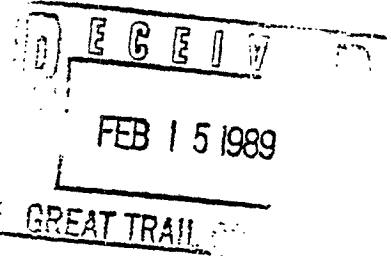
A Legal Association

121 SHAKER BUILDING

12025 SHAKER BOULEVARD • SUITE 575

CLEVELAND, OHIO 44120

216/231-7936



TO: Boy Scouts of America,  
Chapter #52, et al.  
Post Office Box 68  
Akron, Ohio 44309

RE: [REDACTED]

vs.

Boy Scouts of America, Chapter #52, et al.  
Case No. 5:89CV00042

DATE: February 14, 1989

## PLEASE FIND ENCLOSED:

|  |  |
|--|--|
| <input type="checkbox"/> Answer                            | <input type="checkbox"/> Judgment Entry                  |
| <input type="checkbox"/> Answers to Interrogatories        | <input type="checkbox"/> Medical Report                  |
| <input type="checkbox"/> Check in the amount of            | <input type="checkbox"/> Motion FOR STAY OF PROCEEDINGS  |
| <input type="checkbox"/> \$ _____                          | <input type="checkbox"/> Pre-Trial Statement             |
| <input type="checkbox"/> for _____                         | <input type="checkbox"/> Release                         |
| <input type="checkbox"/> Court Costs                       | <input type="checkbox"/> Request for Production          |
| <input type="checkbox"/> Court Reporter Statement          | <input type="checkbox"/> Self-addressed Stamped Envelope |
| <input type="checkbox"/> Interrogatories                   | <input type="checkbox"/> Statement from _____            |
| <input type="checkbox"/> Journal Entry                     |  |
| <input checked="" type="checkbox"/> Other: Discovery Order |  |

## INSTRUCTIONS AND COMMENTS:

☒ The enclosed is for your information and files.  
☐ Please acknowledge receipt of the enclosed.  
☐ Please sign the enclosed and return to our office.  
☐ Please examine the enclosed and telephone our office.  
☐ Please file the enclosed on our behalf  
☐ \_\_\_\_\_ and forward a time stamped copy.  
☐ \_\_\_\_\_ and forward a certified copy.  
☐ Please record the enclosed on our behalf.  
☐ Please pay the enclosed statement directly to the provider.  
☐ Please reimburse our office in the amount of \$ \_\_\_\_\_  
☐ Please telephone our office for an appointment.  
☐ We acknowledge receipt of file. Case assigned to \_\_\_\_\_  
☐ Please complete and respond per the Civil Rules.

This form is being used instead of a letter to help get you information more quickly. Should you have any further questions, please contact the undersigned.

Very truly yours,

Antonio Sweeney

CONF017641

FILED

DOWD, J.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

100 JUN 12 AM 7:39

[REDACTED]

Plaintiff

CASE NO. 5:89CV00042

vs.

BOY SCOUTS OF AMERICA, Chapter #52,  
et al

DISCOVERY ORDER

Defendant

IT IS ORDERED AS FOLLOWS:

1. This case has recently been assigned to this Court. In order to facilitate a prompt and orderly resolution of this matter, this order sets forth the procedures for discovery in this case. To help insure that discovery in this matter follows the procedure outlined in this Court's order, the Court orders plaintiff in this action to serve a copy of this discovery order upon all defendants or their counsel. Plaintiff is further ordered to file with the Clerk the attached certificate, indicating that the discovery order has been served upon all defendants, within fourteen (14) days of the filing of this order.

2. The Court expects all counsel to familiarize themselves with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the

Northern District of Ohio. Copies of the Local Rules are available in the Clerk's Office.

#### DISCOVERY

3. All discovery is to be completed on or before April 10, 1989. All discovery requests, and responses and/or objections thereto, are to be filed with the Court.

4. A stand-by trial date will be scheduled at the first pre-trial status conference. Trial may be scheduled as early as fifteen (15) days after this pre-trial status conference. Notice of the time and place for the first pre-trial status conference will be given after identification of counsel for all parties is complete. The first pre-trial status conference will be held prior to the close of the discovery indicated in paragraph 3 above, and the Court will consider requests for extension of discovery at the pre-trial status conference.

5. You are directed to proceed uninterruptedly with your discovery. No extension of the discovery date or postponement of trial will be granted for the reason that discovery was delayed pending the filing of an answer or other pleading, or pending a ruling by the Court on any motion.

6. Interrogatories to a party shall be limited to twenty (20) questions, including subparts. If a party desires to file additional interrogatories, or an additional



set of interrogatories, the party must obtain leave of Court. A motion seeking leave of Court must include a copy of the proposed interrogatories and a statement showing good cause why leave should be granted. Leave will not be granted in a piecemeal fashion as to particular individual interrogatories. Where the Court finds that the proposed interrogatories, taken as a whole, are unduly burdensome, leave will be denied as to the entire set of interrogatories. See Fed. R. Civ. P. 26(b)(1).

7. Whenever a party propounds an interrogatory requesting identification of those persons having testimonial knowledge of the facts or circumstances of the case, the Court directs the answering party to respond promptly in good faith with an accurate and complete answer. In the event the answering party entertains a good faith belief that a premature disclosure of such person's identity would work an unreasonable hardship on the answering party or the person or persons so disclosed, the answering party may apply to the Court by way of an ex parte motion seeking relief from the order.

The answering party has a continuing responsibility to supplement timely the answer to such an interrogatory. If supplementation is not accomplished until after the close of discovery, the party who has propounded the interrogatory shall have the right, without seeking leave of court, to depose the person or persons named in the supplementation.

If the supplementation is accomplished too late for the propounding party to have a reasonable opportunity to depose the new persons named, the party failing to timely supplement the answers will not be permitted to present as witnesses those persons not timely identified, absent a showing of good cause.

8. No motion regarding discovery filed under Rules 26, 35, or 37 of the Federal Rules of Civil Procedure shall be taken under consideration by the Court unless the moving party shall first advise the Court by affidavit that, after personal consultation and sincere attempts to resolve differences, the parties are unable to reach an accord. See Local Rule 3.04.

#### MOTIONS

9. The Court specifically orders all parties to comply with the time limits for serving answers and replies set forth in Fed. R. Civ. P. 12(a), regardless of whether any motions are pending in this case, unless otherwise ordered by the Court.

10. All motions must be made in writing. The Court will not consider oral motions. All motions must be signed by an attorney of record. The Court does not consider a motion or pleading to have been signed by an attorney of record where the lawyer's signature was signed on his or her behalf by a person identified only by initials placed in parentheses immediately following the signature; this

practice does not comply with the provisions of Rule 11 of the Federal Rules of Civil Procedure. The Court strictly enforces the provisions of Rule 11.

11. Motions to add parties shall not be made more than sixty (60) days after the filing of the complaint unless written leave of the Court is first obtained.

12. All other motions must be submitted to the Court no later than seven (7) days after the completion date for discovery unless written leave of the Court is first obtained.

13. Summary judgment motions and briefs in opposition shall include a separate list of the pleadings, depositions, answers to interrogatories, admissions on file, and affidavits submitted in support of or in opposition to the motion, along with a statement showing how this submission is properly before the Court pursuant to the provisions of Fed. R. Civ. P. 56(e). If a party intends to rely upon deposition testimony in support of, or in opposition to, a motion for summary judgment, that party must file the entire original deposition with the Court.

14. A party seeking an extension of time within which to file a responsive pleading or brief, or within which to complete discovery, must file a written motion or stipulation. All motions must be supported by a brief and affidavit(s) which assert with particularity the good cause that justifies the granting of an extension. Approval of a

stipulation normally will not be granted in the absence of a showing of good cause. An extension of time shall become effective only after the Court has affirmatively acted to grant it. Informal agreements between counsel may or may not be ratified by the Court.

15. The Court considers motions to be at issue as soon as the nonmoving party or parties have filed responsive briefs. Moving parties may file reply briefs only with leave of Court upon a showing of the necessity therefor. See Local Rule 3.02.

16. Counsel are requested to provide the Court with copies of cited authorities that are not easily accessible to the Court. The following are examples of authorities not easily accessible to the Court:

A. United States Supreme Court cases cited in the Supreme Court Reporter, and Lawyer's Edition;

B. Federal cases cited in specialized reporter systems, such as F.E.P. Cases, U.S.P.Q., or L.R.R.M.;

C. State cases from jurisdictions other than Ohio;

D. Statutes other than federal or Ohio statutes;

E. Code of Federal Regulations (C.F.R.);

F. Secondary sources, such as treatises and law review articles.

The Court appreciates your cooperation with this request if at all possible.

#### FILINGS

17. The within action having been assigned to this

Court, it is requested that all motions, responses, stipulations, and any other matters presented to the Court be filed with the Clerk in Akron, and not with the Clerk in either Youngstown or Cleveland. Please do not send materials for filing directly to the Judge's chambers. The Akron Clerk's Office address is:

568 Federal Building - U. S. Courthouse  
2 South Main Street  
Akron, Ohio 44308

18. All counsel are required to notify the Clerk's Office immediately in writing of any address and/or telephone number changes.

SCHEDULING/MISCELLANEOUS

19. Debbie Leaver, Judge Dowd's courtroom deputy, is in charge of scheduling. If counsel have any questions about scheduling matters, counsel should contact Debbie at

Questions about docketing matters should be directed to Jackie Porter, Judge Dowd's docket clerk, at

COUNSEL ARE SPECIFICALLY REQUESTED NOT TO TELEPHONE THE JUDGE'S CHAMBERS TO INQUIRE ABOUT SCHEDULING OR DOCKETING MATTERS.



David D. Dowd, Jr.  
U. S. District Judge

ANTONIO SWEENEY & ASSOCIATES

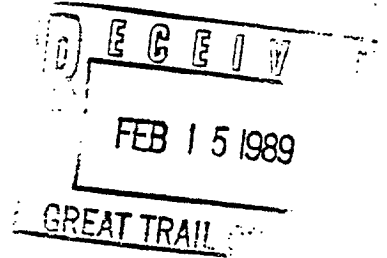
Attorneys at Law

A Legal Association

121 SHAKER BUILDING

12025 SHAKER BOULEVARD • SUITE 575

CLEVELAND, OHIO 44120



TO: Boy Scouts of America,  
Chapter #52, et al.  
Post Office Box 68  
Akron, Ohio 44309

RE: [REDACTED]

vs.

Boy Scouts of America, Chapter #52, et  
Case No. 5:89CV00042

DATE: February 14, 1989

PLEASE FIND ENCLOSED:

☐ Answer  
☐ Answers to Interrogatories  
☐ Check in the amount of  
\$ \_\_\_\_\_  
for \_\_\_\_\_  
☐ Court Costs  
☐ Court Reporter Statement  
☐ Interrogatories  
☐ Journal Entry  
☒ Other: Discovery Order


☐ Judgment Entry  
☐ Medical Report  
☐ Motion FOR STAY OF PROCEEDINGS  
☐ Pre-Trial Statement  
☐ Release  
☐ Request for Production  
☐ Self-addressed Stamped Envelope  
☐ Statement from \_\_\_\_\_

INSTRUCTIONS AND COMMENTS:

☒ The enclosed is for your information and files.  
☐ Please acknowledge receipt of the enclosed.  
☐ Please sign the enclosed and return to our office.  
☐ Please examine the enclosed and telephone our office.  
☐ Please file the enclosed on our behalf  
\_\_\_\_\_ and forward a time stamped copy.  
\_\_\_\_\_ and forward a certified copy.  
☐ Please record the enclosed on our behalf.  
☐ Please pay the enclosed statement directly to the provider.  
☐ Please reimburse our office in the amount of \$ \_\_\_\_\_  
☐ Please telephone our office for an appointment.  
☐ We acknowledge receipt of file. Case assigned to \_\_\_\_\_  
☐ Please complete and respond per the Civil Rules.

This form is being used instead of a letter to help get you information more quickly. Should you have any further questions, please contact the undersigned.

Very truly yours,

  
Antonio Sweeney

CONF017649

February 7, 1989

Mr. D. Russell Weaver  
Scout Executive  
Great Trail Council, No. 433

PERSONAL AND CONFIDENTIAL

SUBJECT: CHARLES BRISTOL

Dear Russ:

This is a follow up to our previous communication. Has any further legal action taken place related to Charles Bristol?

Please send us any material which would substantiate our refusal of registration. We want to build a file which is complete enough to protect youth anywhere across the country.

I am enclosing a confidential record sheet which I would like to have completed so that we have the information necessary for identifying Mr. Bristol. Please complete this with as much information as you have available.

Sincerely,

Paul Ernst, Director  
Registration Service

eko

Enclosure

cc: East Central Region

READY TO FILE

FEB 07 1989

ERIN ORILEY

CONF017650

C3204 - ID # 001946 3/4  
S0040 - 009104 8/44  
S0204 - 010536

December 22, 1988

Mr. D. Russell Weaver  
Scout Executive  
Great Trail Council, No. 433

*Deleted from  
reg. file 12/22/88  
Added to CF file*

PERSONAL AND CONFIDENTIAL

SUBJECT: CHARLES BRISTOL

Dear Russ:

Some information has just come into my hands related to the above named individual. I understand that we now have a law suit against Mr. Bristol and the Boys Scouts of America, alleging abuse of various kinds.

I do note that you gave Mr. Bristol a letter in September, suspending him from active participation with the Boy Scouts of America. I wondered if anything further has developed since that time and whether you could update me related to placing Mr. Bristol on the confidential file.

We will need the outcome of any legal action related to this matter, so that a proper decision can be made related to his reinstatement or continued suspension from the Boy Scouts of America.

I am enclosing a Confidential Record Sheet which I would like to have completed, so that we have this information available as we proceed. This file, of course, could be put in an inactive status, if the charges against Mr. Bristol are considered to be incorrect.

Thanks for your help in building a file for our use.

Sincerely,

Paul Ernst, Director  
Registration Service

je

Enclosure

cc: East Central Region

READY TO FILE  
DEC 22 1988  
ERIN O'RILEY

CONF017651





BOY SCOUTS OF AMERICA

National Office  
1325 Walnut Hill Lane  
P.O. Box 152079, Irving, Texas 75015-2079  
214-580-2000

12-20-88  
CLARE-  
DVT 1/5/89  
NO

December 19, 1988

SUBJECT: GREAT TRAIL COUNCIL  
ADULT LEADER CHARLES BRISTOL  
ALLEGATIONS OF SEXUAL, PHYSICAL AND EMOTIONAL ABUSE

From: Debra C. Duhs *DC*

To: Paul Ernst

Paul, attached is the information I received concerning adult Scout leader Charles Bristol. If Mr. Bristol has not already been placed on the confidential file, I suggest that you follow up with the Scout Executive and determine whether or not there is any truth to the allegations against Mr. Bristol. Since a claim has been made, this matter is also being assigned to Employers Self Insurance Services for a liability investigation.

sd

enclosures

CONF017652

MEMO TO: Russ Weaver  
Wes Bergdorf

DATE: August 1, 1986

FROM: Dick Heilman

Late evening July 31, 1986, about 11:30 p.m., upon reporting into the camp ad building, I received the following verbal reports from staff and campers.

A half-dozen or more young black Scouts in Troop 53 had a campfire going while their Scoutmaster, Steve Goodwin, was attending the OA ceremonies.

Charles Bristol told the boys not to fan or build up the fire any more as he felt sparks could enter a near-by tent.

Apparently the boys disagreed with Charles and continued to increase the fire's intensity.

Charles told the boy fanning the fire to do pushups, whereupon he refused.

Words were exchanged and fire buckets were thrown by the boy and Charles Bristol. The boy claims to have been hit on the head with a fire bucket.

One of the boys was to have chased Charles around the site with a broom.

One of the boys had the buttons popped from his shirt in the pushing and shoving that took place that evening.

The boys are accusing Charles and the senior patrol leader of taking nude pictures of them.

Several boys compained to Wes Bergorf that Charles had played with one boy's legs and another boy's bottom.

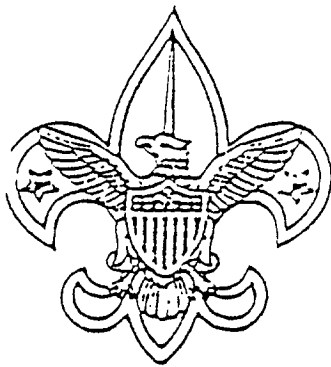
Apparently, the Scouts were mooning other Scouts at the pool and were told by Charles and the senior patrol leader that they would take a picture of them and show it to their mother. We were told by the senior patrol leader that a picture was taken of one boy in his underwear.

Mr. Bristol denies touching any of the boys.

Mr. Bristol did admit to calling the boys "nigger" several mornings back in the site before breakfast.

8/4/86

CONF017653



Great Trail Council • Boy Scouts of America  
P.O. Box 68 • Akron, Ohio 44309 • (216) 773-0415

September 10, 1986

Mr. Charles W. Bristol  
[REDACTED]

Akron, Ohio 44313

Dear Charlie:

As I parted from our meeting last week, there was no doubt in my mind that we had communicated and that you fully understood that a sabbatical from Scouting was clearly in order as a result of the July 31st incident at Camp Manatoc.

It has now come to my attention that you did not clearly understand and, in fact, attended a Scout meeting this week.

Charlie, the matter is of grave importance, and you need to understand that very serious charges are being brought against you, and until those charges and the air have been cleared, you are to avoid any association with Scouting in the Great Trail Council.

It is my fervent hope and desire that this issue will be cleared as quickly as possible and that this action may be lifted.

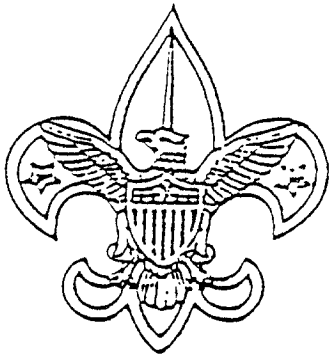
Sincerely,

D. Russell Weaver  
Scout Executive

DRW/ra

cc: Howard L. Flood  
Albert P. Sharpe III  
Edward Gilbert  
bcc: Wesley V. Bergdorf  
William H. Fish

CONF017654



Great Trail Council • Boy Scouts of America  
P.O. Box 68 • Akron, Ohio 44309 • (216) 773-0415

October 24, 1986

Mr. Edward Gilbert,  
Chairman, Urban Scouting Committee

[REDACTED]  
Akron, Oh 44308

Re: Summer Camp Incident  
Mr. Charles Bristol

Dear Ed:

I have just concluded a lengthy meeting with Mr. Charles W. Bristol, [REDACTED]  
[REDACTED] Akron, Ohio 44307, regarding the charges brought against him this  
past July 31, 1986.

Mr. Bristol advises me that the charges are unfounded, in fact, without a  
shred of truth. He has, therefore, asked for a hearing before the Urban  
Committee to clear his name and reputation. I advised Mr. Bristol that I  
would request that hearing on his behalf and am so doing by this letter.  
By copy of this letter I will so advise Mr. Bristol that I have followed  
through with his request.

In addition, attached to this letter is a copy of the camp incident memorandum  
from Camp Director Dick Heilman, for your information and Mr. Bristol's.

I also met this morning with Mr. Roger McKeown, Scoutmaster of Troop 95.  
Mr. McKeown also advises that the charges are not true and that he will  
write a letter to substantiate his statement. I will provide the committee  
that correspondence upon receipt.

In conclusion, I share with you that I again reminded Mr. Bristol that the  
charges in question are most serious; that if, in fact, they are true, they  
violate the basic fundamentals of the Boy Scouts of America, and that  
neither the Boy Scouts of America nor the Great Trail Council will allow  
such behavior in a volunteer leader.

Will await your response.

Cordially,

D. Russell Weaver  
Scout Executive

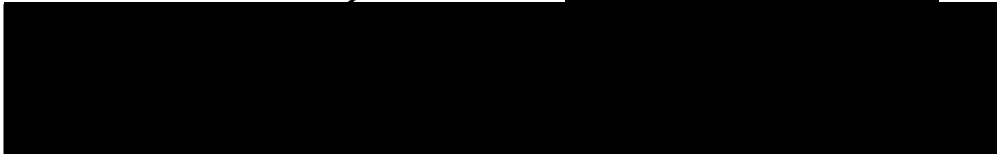

DRW/ra

cc: Charles W. Bristol  
Howard L. Flood  
Albert P. Sharpe III  
[REDACTED]

CONF017655

Mr. Wes Berstorf.

Thank you for letting us go to camp.  
We really liked



We also enjoyed  
company our leaders in camp.

From all of us at Troop 95,



LAW OFFICES

Parns, Pumell & Gilbert

THE EQUITY BUILDING  
[REDACTED]  
AKRON, OHIO 44308  
[REDACTED]

EDWIN L. PARN'S  
NORMAN PUMELL  
EDWARD L. GILBERT CO., LPA  
JAMES E. PAYNE  
LOUIS SMITH

CANTON OFFICE  
[REDACTED]  
CANTON, OHIO 44714  
[REDACTED]

September 18, 1986

PLEASE REPLY TO \_\_\_\_\_ OFFICE

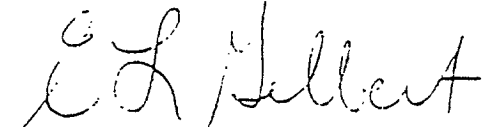
TO: Attorney Howard Fort  
Ms. Ann Gates  
Mr. Carter Womack  
Deputy Mayor Dorothy Jackson

Dear Committee Members:

Please find enclosed a copy of the report I received from Attorney Mark H. Ludwig, who is the Prosecutor for the Village of Peninsula.

I am in the process of contacting the parents to get an approval to secure the factual statements of the children. Upon receipt of the same, I will forward it to you.

Very truly,

  
EDWARD L. GILBERT CO., LPA  
Attorney at Law

ELG:sc

Enclosure

cc: Mr. D. Russell Weaver

CONF017657

Area Code 216

September 17, 1986

Attorney at Law

Akron, OH 44308

In re: Village of Peninsula  
Incident of 7/28/86  
Camp Manatoc

Dear Mr. Gilbert:

Our office prosecutes for the Village of Peninsula.

Enclosed are copies of the Incident Reports you requested. The statements taken are, of course, "confidentials". Ohio Rev. Code §149.43.

Absent further clarification of the grounds for your request, we cannot produce the same.

If you've any questions, please call me at your convenience.

Very truly yours,

COLE CO. L.P.A.

Mark H. Ludwig

MHL/mja  
Encl.

cc: Mrs. Jean Wurzbacher, Clerk  
Peninsula Mayor's Court

CONF017658





## SUPPLEMENT REPORT

Date of This Report  
07-31-86

Case Number

Complainant Name

Offense as Reported and Date

Follow Up ☐ Continuation ☒2 Page 2  
of

## SHORT FORM SUPPLEMENT INFORMATION:

☒ Contacted Complainant

Date and Time

No Additional Information

☐ Contacted Witness/s  
Listed

Date and Time

No Additional Information

☐ Unable to Contact Complainant  
and/or Witness/s Listed

Date and Time

On the week in question, 07-28-86 through 07-31-86 this officer spoke with [redacted] in reference to complaints she had recieved from her children [redacted] age 12 and [redacted] age 11. The children stated that there scout leader, Mr. Charles Bristol had called them names, threatened physical harm and did cause physical harm by striking a [redacted] with a bucket. The children also complained that Mr. Bristol and another subject, a [redacted] (age 17) did take pictures of the children when changing clothes and using rest room facilities.

This officer also spoke with two other children who said they witnessed the threat and physical abuse. They are: [redacted] age 12 of [redacted] and [redacted] age 11. [redacted] there statements agreed with the other children. [redacted] confidential report\*

Reporting Officer's Name and Status Recommendation  
☐ Open ☐ Suspended ☐ Closed

Supervisor Approving

Status  
☐ Open ☐ Suspended ☐ Closed

CONF017660

PENINSULA POLICE DEPARTMENT

OFFENSE - INCIDENT REPORT

Case Number  
7687-012B

OFFENSE ☐ Homicide ☐ Rape ☐ Robbery ☐ Assault ☐ Burglary ☒ Menacing ☐ Domestic  
☐ Carjacking ☐ Death ☐ Forgery ☐ Assault Sexual ☐ Worthless Document ☐ Armed Robbery

The Above Classification is Preliminary And May Be Changed After Investigation

DATE REPORTED 07-31-86 TIME 2343 DAY Fri LOCATION Camp Manatoc  
 OCCURRED (FROM) 07-28-86 MON  
 OCCURRED (TO) 07-31-86 Fri TYPE OF LOCATION Boy Scout Camp

Business of Firm Address City State Zip Phone

Reporting By Last Name First Middle Home Address City State Zip  
 [Redacted] Ohio 44320

Employer/School Occupation Hours Worked  
 [Redacted] 0900-1300

NAME Home Address Home Phone  
 (J) W [Redacted] Mother [Redacted]  
 (J) W [Redacted] Mother [Redacted]

NAME Address - DOB - Clothing - Scars - Etc. Comp Speech Beard Must  
 (J) O Charles Bristol [Redacted]  
 NAME Address - DOB - Clothing - Scars - Etc. Comp Speech Beard Must  
 (J) O [Redacted]  
 NAME Address - DOB - Clothing - Scars - Etc. Comp Speech Beard Must  
 (J) O [Redacted]  
 NAME Address - DOB - Clothing - Scars - Etc. Comp Speech Beard Must  
 (J) O [Redacted]

Number of Offenders Direction of Flight Can Victim Identify Offender ☐ Yes ☐ No Victim Injured - Describe injuries ☐ Minor ☐ Serious ☐ Fatal

INJURED PERSON Subj. of Victim Victim Taken to Transported By Coroner Notified ☐ Yes ☐ No Photo Taken ☐ Yes ☐ No By Whom

M/O How Force Used - At What Point With What Tool or Weapon - Other Acts or Trademarks  
 Verbal Threats and Physical Harm (Hands)

WORTHLESS DOCUMENT Type of Document Color of Document Method of Preparing Identification Used Date of Doc  
 Document No Name of Bank Address Signature on Face Other Name on Doc Made Payable To  
 Amount of Loss Names Endorsed on Back of Doc Amt. of Check Reason not Honored Stolen ☐ Y ☐ N  
 Type of Property or Service Obtained: Serial No. No. of Items Color of Items Cash

VEHICLE USED BY SUSPECTS Year Make Model Veh. Color Lic. Year State No. Style Veh. Condition Characteristics

STOLEN PROPERTY Quant Description of Stolen Property Serial No Where Located Value New Age Value Now

NARRATIVE See Supplemental on back

Officer on Scene Reporting Officer Other Officer(s) Supervisor Approving Page 1 of 2

Arrest Made ☐ Yes ☐ No CID Notified ☐ Yes ☐ No Investigator Assigned

## SUPPLEMENT REPORT

Date of This Report  
07-31-86

Case Number

Complainant - Name

Offense as Reported and Date

Follow Up ☐ Continuation ☒Page  
2 of 2

## SHORT FORM SUPPLEMENT INFORMATION:

☒ Contacted Complainant

Date and Time

No Additional Information

☐ Contacted Witnesses  
Listed

Date and Time

No Additional Information

☐ Unable to Contact Complainant  
and/or Witnesses Listed

Date and Time

On the week in question, 07-28-86 through 07-31-86, this officer spoke with

in reference to complaints they had received from their children:

13, age 12, and age 11. The children stated that their scout

leader, Mr. Charles Bristol had called them names, threatened them with bodily harm and did cause physical harm by striking one child with a bucket. The children also complained that Mr. Bristol and another subject, a juvenile George Richardson, did take pictures of the boys when changing clothes and using rest room facilities.

This officer also spoke with two other children who said that they did witness the threats and the physical harm inflicted by Mr. Bristol. They are: age 12 of (mother's name). And age 11 of (mother's name). They agreed with the statements made by the others.

\*see confidential report\*

Reporting Officer's Name and Status Recommendation: Supervisor Approving

☐ Open ☐ Suspended ☐ Closed

Status

☐ Open ☐ Suspended ☐ Closed

CONF017662