

**IN THE COMMON PLEAS COURT  
SUMMIT COUNTY, OHIO  
CIVIL DIVISION**

**ANGEL WILLIAMS, as parent/guardian of  
minor child, TAVION KOONCE-WILLIAMS**  
C/O The Okolo Law Firm  
850 ½ W. Exchange St.  
Akron, Ohio 44302

Plaintiff,

vs.

**FORMER OFFICER RYAN WESTLAKE  
(In his Official and Individual Capacities)**  
[REDACTED]  
[REDACTED]

C/O Akron Law Director  
172 S. Broadway, Suite 200  
Akron, Ohio 44308

**CASE NO.:**

**JUDGE:**

**PLAINTIFF'S CIVIL COMPLAINT**

**(Jury Demand Endorsed Hereon)**

Plaintiff Angel Williams, by and through counsel, brings this Complaint against Defendant Ryan Westlake, and makes the following allegations upon personal knowledge as to Plaintiff's own acts and upon information and belief, and states as follows:

**INTRODUCTION**

1. This cause of action arises out of Plaintiff's minor child, Tavion Koonce-William's, April 1, 2024, encounter with members of the Akron Police Department.
2. Plaintiff alleges, without limitation, that on April 1, 2024, Defendant Ryan Westlake assaulted Plaintiff while Plaintiff posed no threat to Defendant or others. Defendant's conduct was willful, wanton, and reckless.

### **PARTIES AND JURISDICTION**

3. At all times relevant to this action, Plaintiff was a resident of the City of Akron, Summit County, Ohio.
4. At all times relevant to this action, Defendant Ryan Westlake was employed as a police officer for the City of Akron, Ohio, and is a resident of Summit County, Ohio.
5. Redress is being sought from Defendant in his official and individual capacity, and Defendant was acting under color of law and within the scope of his employment with the City of Akron.
6. Venue is proper in the Summit County Court of Common Pleas pursuant to Ohio Rule of Civil Procedure 3(C)1-3.

### **FACTUAL ALLEGATIONS**

7. On April 1, 2024, Tavion Koonce-Willimas, a then 15-year-old child, was walking on the sidewalk with a toy gun in the area of Brittan Road and Ottawa Avenue.
8. An individual observing this called 911 and reported a man with black clothing walking around pointing a gun at people's houses.
9. Defendant responded to that call and saw an individual matching the description walking down the sidewalk, that being Tavion Koonce-Williams.
10. Defendant drove his vehicle behind Tavion Koonce-Williams and started to open the door and exit the vehicle while saying "where are you coming from? Can I see your hands real quick?".
11. Defendant then saw Tavion's face, knew he was a child, and saw that Tavion Koonce-Williams was not a threat to Defendant's safety.

12. When Tavion Koonce-Williams realized Defendant was stopping him, he took the toy gun, threw it to the ground, and put his hands up.
13. Before Defendant was even out of the vehicle, Defendant recklessly drew his gun, Defendant's weapon was subsequently fired, and Tavion Koonce-Williams was shot.
14. As Defendant was exiting his vehicle, he could see Tavion Koonce-Williams was not a threat as he threw the toy gun to the ground and put his hands in the air.
15. Tavion Koonce-Williams was shot after he threw the toy gun to the ground and began placing his hands in the air, further demonstrating that he was not a threat. At no point in time was Tavion Koonce-Williams a threat to Defendant.
16. Defendant has a history of violating Akron Police Department policies/procedures and using excessive/unjustified force on individuals.
17. Defendant was fired from the department in 2021, reinstated that same year, and was fired for the second time roughly a month after this shooting. The City of Akron claims Defendant was fired for misconduct they failed to timely investigate prior to this incident.
18. Tavion Koonce-Williams has suffered physical and psychological injuries as a result of Defendant's conduct.

**CLAIMS ALLEGED  
COUNT 1  
(State Law Claim for Assault and Battery)**

19. All preceding paragraphs are incorporated as if fully re-written herein.
20. The actions of Defendant towards Plaintiff created in him the apprehension of an imminent, harmful, and offensive touching, and constituted a harmful touching, made knowingly and without legal justification.

21. Defendant accomplished this harmful, non-consensual touching by aiming a firearm at Tavion Koonce Williams and ultimately discharging his firearm that resulted in Tavion Koonce-Williams being shot.
22. Defendant directly and proximately caused this touching.
23. The actions of Defendant thereby constituted assault and battery against Plaintiff.
24. Defendant acted in a willful, wanton, and reckless manner while engaged in police functions and activities that culminated in injuries to Plaintiff.
25. In the course of this conduct Defendant acted under color of law and within the scope of his employment.

## **COUNT 2**

### **(State Law Claim for Negligence – Willful, Wanton, and/or Reckless Conduct)**

26. All preceding paragraphs are incorporated as if fully re-written herein.
27. Defendant failed to exercise due care and acted in a willful, wanton, and reckless manner while engaged in police functions and activities that culminated in the above-described damages and injuries to Plaintiff.
28. Defendant police officers' reckless, wanton, and/or willful conduct in approaching Plaintiff, drawing his firearm and discharging his firearm directly and proximately caused the physical and psychological damages to Plaintiff.
29. As a direct and proximate result of the misconduct of Defendant, Plaintiff suffered and continues to suffer injuries and damages.

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand that judgement be entered in her favor on all counts and pray the Court award the following relief:

- A. Compensatory and consequential damages in an amount exceeding the jurisdictional amount in controversy requirement, to be determined at trial;
- B. Punitive damages in an amount to be determined at trial for the Defendant's willful, wanton, malicious, and reckless conduct;
- C. Attorneys' fees and the costs of this action pursuant to law; and
- D. All other relief which this Honorable Court deems equitable and just.

**JURY DEMAND**

Plaintiffs respectfully demand a trial by jury for this matter.

Dated: April 1, 2025

Respectfully submitted,

/s/ Imokhai Okolo

Imokhai Okolo

(Ohio Bar #100277)

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