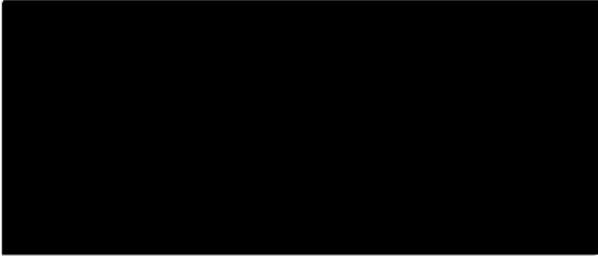


**IN THE COURT OF COMMON PLEAS
ROSS COUNTY, OHIO**



Plaintiff,

vs.

RASHAWN CANNON,
c/o Ohio State Penitentiary
878 Coitsville-Hubbard Road
Youngstown, Ohio 44505

and

JOHN DOE 1-10
(Names and Addresses Unknown),

Defendants.

Case No. _____

Judge _____

COMPLAINT

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, Chun Wong-Lansing, is the Executor of the Estate of Andrew Steven Lansing (deceased) (hereinafter "Andrew Lansing" and "Decedent"), having been duly appointed by the Ross County Court of Common Pleas, Probate Division, in Case No. 2025E0012 on January 29, 2025. A copy of the Letters of Authority issued by the Ross County Court of Common Pleas, Probate Division to Plaintiff, Chun Wong-Lansing, is attached hereto as Exhibit "A".

2. Decedent, Andrew Lansing, was, at all times relevant herein, a resident of the City of Chillicothe, County of Ross, State of Ohio.

3. Defendant, Rashawn Cannon, was, at all times relevant herein, an inmate residing at the Ross Correctional Institution (“RCI”) in the City of Chillicothe, County of Ross, State of Ohio, and is currently incarcerated at the Ohio State Penitentiary.

4. Defendants, John Doe 1-10 (Names and Addresses Unknown), are intended to be any and all individuals and/or entities who, individually, and/or by and through their agents, employees, servants, officers, and/or directors, directly and proximately caused personal injury and/or damage to Decedent, Andrew Lansing, on or about December 25, 2024, by and through their negligence, recklessness, bad faith, willful and wanton conduct, actual malice, and/or intentional acts, including both acts of omission and/or acts of commission; any persons or entities who are or may be liable for, on behalf of, or with one or more of the Defendants, for the wrongful conduct set forth herein; any persons or entities who may be contractually liable to satisfy some or all of Plaintiff’s damages herein, including insurers; and any other persons or entities who caused or contributed to the incident on December 25, 2024 involving Decedent, Andrew Lansing, and/or the injuries and/or damages sustained by Decedent, Andrew Lansing. Despite a good faith effort being made by Plaintiff and her attorneys, the names and addresses of Defendants, John Doe 1-10 (Names and Addresses Unknown), could not with reasonable diligence be ascertained prior to the preparation and filing of Plaintiff’s Complaint. Defendants, John Doe 1-10 (Names and Addresses Unknown), will not be prejudiced by Plaintiff’s failure to identify them at present and will be served with process when their respective identities become known to Plaintiff.

5. The incidents that form the basis of this litigation occurred on or about December 25, 2024 in Ross County, Ohio.

6. Jurisdiction and venue are proper as all or part of the acts or events giving rise to this cause of action occurred in Ross County, Ohio, and Defendant resided in and conducted business in Ross County, Ohio.

FACTS COMMON TO ALL CLAIMS

7. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

8. At all relevant times herein, Decedent, Andrew Lansing, was employed as a correctional officer at RCI.

9. At all relevant times herein, Defendant, Rashawn Cannon, was an incarcerated inmate at RCI.

10. On or about April 1, 2024, Defendant, Rashawn Cannon, demanded that Decedent, Andrew Lansing, provide him with early access to a phone to make a phone call.

11. Decedent, Andrew Lansing, denied Defendant, Rashawn Cannon's, demand at that time.

12. Later, on April 1, 2024, Decedent, Andrew Lansing, permitted Defendant, Rashawn Cannon, to use the phone, but Defendant, Rashawn Cannon, subsequently became loud and aggressive during his phone call.

13. Decedent, Andrew Lansing, told Defendant, Rashawn Cannon, to quiet down and de-escalate several times.

14. In response, Defendant, Rashawn Cannon, threatened Decedent, Andrew Lansing, by yelling, "FUCK YOU, I'LL KILL YOU!"

15. Upon information and belief, Decedent, Andrew Lansing, filed a conduct report against Defendant, Rashawn Cannon, relative to the April 1, 2024 incident.

16. Upon information and belief, the RCI hearing officer(s) and/or rules infractions board reviewed the April 1, 2024 incident and found Defendant, Rashawn Cannon, guilty of misconduct.

17. Decedent, Andrew Lansing, reported to work at RCI on the morning of December 25, 2024 and was assigned to the center guard shack.

18. On the morning of December 25, 2024, Defendant, Rashawn Cannon, exited his cell and residential housing unit and traveled across RCI grounds to the center guard shack where Decedent, Andrew Lansing, was working.

19. Once inside the doorway of the center guard shack, Defendant, Rashawn Cannon, viciously attacked Decedent, Andrew Lansing.

20. Decedent, Andrew Lansing, was transported by ambulance to Adena Regional Medical Center and then to Ohio State University Wexner Medical Center for medical care and treatment of the injuries that he sustained from the attack by Defendant, Rashawn Cannon.

21. Decedent, Andrew Lansing, was pronounced dead at Ohio State University Wexner Medical Center on December 25, 2024, at approximately 11:38 a.m. as a result of the attack by Defendant, Rashawn Cannon.

COUNT ONE
(Personal Injury/Tort)

22. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

23. At all relevant times herein, Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), owed a duty to Decedent, Andrew Lansing, pursuant to the Ohio Revised Code and otherwise.

24. At all relevant times herein, Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), owed a duty to Decedent, Andrew Lansing, to act in a reasonable and prudent manner that would not cause injury and/or harm to Decedent, Andrew Lansing, and others.

25. At all relevant times herein, Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), owed a duty to Decedent, Andrew Lansing, to refrain from causing injury and/or harm to Decedent, Andrew Lansing, and others.

26. At all relevant times herein, Defendants, John Doe 1-10 (Names and Addresses Unknown), owed a duty to Decedent, Andrew Lansing, to prevent others, including Defendant, Rashawn Cannon, from causing injury and/or harm to Decedent, Andrew Lansing, and others.

27. At all relevant times herein, Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), breached the duties that they owed to Decedent, Andrew Lansing, by including, but not limited to: Defendant, Rashawn Cannon, performing acts and/or omissions that caused parts of his body and/or objects within his possession and control to come into contact with Decedent, Andrew Lansing's, body on one or more occasions, including, but not limited to, acts and/or omissions that occurred during the attack on December 25, 2024; failing to protect Decedent, Andrew Lansing, from unreasonable risks of harm; failing to treat Decedent, Andrew Lansing, with kindness and respect; failing to prevent Decedent, Andrew

Lansing, from suffering injuries; and other acts and/or omissions that may be disclosed during discovery.

28. The actions and/or omissions of Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), directly and proximately caused harm to Decedent, Andrew Lansing, on December 25, 2024.

29. The actions and/or omissions of Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), were unlawful, negligent, and/or reckless as to Decedent, Andrew Lansing.

30. The actions and/or omissions of Defendant, Rashawn Cannon, were done in a willful and/or wanton manner, in flagrant disregard of the rights and safety of others, including Decedent, Andrew Lansing.

31. The actions and/or omissions of Defendant, Rashawn Cannon, demonstrate a conscious disregard for the rights and safety of others, including Decedent, Andrew Lansing, that had a great probability of causing substantial harm and, in fact, caused such harm to Decedent, Andrew Lansing.

32. The actions and/or omissions of Defendant, Rashawn Cannon, constitute actual malice.

33. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), the Decedent, Andrew Lansing, sustained extensive severe and permanent injuries, including permanent and substantial physical deformity; suffered great physical pain and suffering, mental anguish, and the loss of enjoyment of life; and eventually died.

34. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), the Decedent, Andrew Lansing, and/or the Estate of Andrew Steven Lansing (deceased) incurred medical and hospital expenses for treatment of said injuries to him.

35. Each of the acts or omissions set forth above, operating singularly or in combination, was a direct and proximate cause of Decedent, Andrew Lansing's, injuries and/or damages.

36. The negligence, recklessness, willful and wanton conduct, and/or actual malice of all of the Defendants combined to cause indivisible harm to Decedent, Andrew Lansing.

COUNT TWO
(Assault/Battery)

37. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

38. On or about December 25, 2024, the actions of Defendant, Rashawn Cannon, put Decedent, Andrew Lansing, in apprehension of harmful and/or offensive conduct.

39. On or about December 25, 2024, Defendant, Rashawn Cannon, acted with intent to cause harmful or offensive contact with Decedent, Andrew Lansing, in violation of R.C. 2903.11(A).

40. On or about December 25, 2024, Defendant, Rashawn Cannon, acted with intent to cause, or attempted to cause, serious physical harm to Decedent, Andrew Lansing, in violation of R.C. 2903.11(A).

41. On or about December 25, 2024, Defendant, Rashawn Cannon, knew or believed that his actions towards Decedent, Andrew Lansing, were substantially certain to result in physical harm and/or offensive contact with Decedent, Andrew Lansing, in violation of R.C. 2903.11(A).

42. At all relevant times, Defendant, Rashawn Cannon's, actions were intentional towards Decedent, Andrew Lansing.

43. The actions of Defendant, Rashawn Cannon, directly and proximately caused physical harm and/or offensive contact to Decedent, Andrew Lansing, on or about December 25, 2024.

44. The actions of Defendant, Rashawn Cannon, constitute assault and/or battery.

45. As a direct and proximate result of Defendant, Rashawn Cannon's, assault and/or battery of Decedent, Andrew Lansing, the Plaintiff sustained the injuries and damages stated herein.

COUNT THREE
(R.C. 2307.60)

46. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

47. On December 25, 2024, Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), engaged in criminal wrongdoing against Decedent, Andrew Lansing, including, but not limited to, the following:

- a. Aggravated murder in violation of R.C. 2903.01;
- b. Murder in violation of R.C. 2903.02;
- c. Involuntary manslaughter in violation of R.C. 2903.04;

- d. Reckless homicide in violation of R.C. 2903.041;
- e. Negligent homicide in violation of R.C. 2903.05(A);
- f. Felonious assault in violation of R.C. 2903.11;
- g. Aggravated assault in violation of R.C. 2903.12;
- h. Assault in violation of R.C. 2903.13

48. As a direct and proximate result of Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown)'s, criminal wrongdoing against Decedent, Andrew Lansing, the Plaintiff sustained the injuries and damages stated herein.

COUNT FOUR
(Intentional Infliction of Emotional Distress)

49. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

50. The above-referenced conduct of Defendant, Rashawn Cannon, was unreasonable, extreme, and outrageous.

51. The above-referenced conduct of Defendant, Rashawn Cannon, subjected Decedent, Andrew Lansing, to real or impending danger.

52. The above-referenced conduct of Defendant, Rashawn Cannon, caused Decedent, Andrew Lansing, to experience severe emotional distress.

53. As a direct and proximate result of Defendant, Rashawn Cannon's, intentional infliction of emotional distress, towards Decedent, Andrew Lansing, the Plaintiff sustained the injuries and damages stated herein.

54. The injuries and damages that Plaintiff sustained as a direct and proximate result of Defendant, Rashawn Cannon's, intentional infliction of emotional distress were reasonably foreseeable.

55. The injuries and damages that Plaintiff sustained as a direct and proximate result of Defendant, Rashawn Cannon's, intentional infliction of emotional distress were severe, debilitating, and disabling.

COUNT FIVE
(Wrongful Death)

56. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

57. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and/or John Doe 1-10 (Names and Addresses Unknown), individually and/or by and through their agents, employees, servants, officers, and/or directors, Decedent, Andrew Lansing, died on or about December 25, 2024.

58. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and/or John Doe 1-10 (Names and Addresses Unknown), individually and/or by and through their agents, employees, servants, officers, and/or directors, Decedent, Andrew Lansing, the Estate of Andrew Steven Lansing (deceased), and/or Decedent, Andrew Lansing's, next-of-kin incurred large sums of money for funeral and/or burial expenses for Decedent, Andrew Lansing.

59. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and/or

John Doe 1-10 (Names and Addresses Unknown), individually and/or by and through their agents, employees, servants, officers, and/or directors, Decedent, Andrew Lansing's, next-of-kin lost the consortium, society, and services, of Decedent, Andrew Lansing, including his companionship, care, assistance, support, attention, protection, advice, guidance, counsel, instruction, training, and education.

60. As a direct and proximate result of the negligence, recklessness, willful and wanton conduct, and/or actual malice of Defendants, Rashawn Cannon and/or John Doe 1-10 (Names and Addresses Unknown), individually and/or by and through their agents, employees, servants, officers, and/or directors, Decedent, Andrew Lansing's, next-of-kin suffered extreme and severe mental anguish.

WHEREFORE, Plaintiff, Chun Wong-Lansing, as the Executor of the Estate of Andrew Steven Lansing (deceased), prays for the following relief:

As to **COUNT ONE**, Plaintiff demands judgment against Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), jointly and severally, for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive damages, for pre-judgment interest, for post-judgment interest, for Plaintiff's reasonable attorney fees, for her costs incurred herein, and for such other relief as this Court may deem just and equitable.

As to **COUNT TWO**, Plaintiff demands judgment against Defendant, Rashawn Cannon, for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive damages, for pre-judgment interest, for post-judgment interest, for Plaintiff's reasonable attorney fees, for her costs incurred herein, and for such other relief as this Court may deem just and equitable.

As to **COUNT THREE**, Plaintiff demands judgment against Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), jointly and severally, for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive damages, for pre-judgment interest, for post-judgment interest, for Plaintiff's reasonable attorney fees, for her costs incurred herein, and for such other relief as this Court may deem just and equitable.

As to **COUNT FOUR**, Plaintiff demands judgment against Defendant, Rashawn Cannon, for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive damages, for pre-judgment interest, for post-judgment interest, for Plaintiff's reasonable attorney fees, for her costs incurred herein, and for such other relief as this Court may deem just and equitable.

As to **COUNT FIVE**, Plaintiff demands judgment against Defendants, Rashawn Cannon and John Doe 1-10 (Names and Addresses Unknown), jointly and severally, for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive damages, for pre-judgment interest, for post-judgment interest, for Plaintiff's reasonable attorney fees, for her costs incurred herein, and for such other relief as this Court may deem just and equitable.

Respectfully Submitted,

/s/ Mark D. Tolles, II (#0087022)

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*Attorneys for Plaintiff, Chun Wong-Lansing, as
the Executor of the Estate of Andrew Steven
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