

RETURN DATE: JULY 15, 2025	:	SUPERIOR COURT
RIDGEFIELD LITTLE LEAGUE	:	J.D. OF DANBURY
PARENTS ASSOCIATION, AS CLASS	:	
REPRESENTATIVE OF THE PARENTS OF	:	AT DANBURY
RIDGEFIELD NATIONAL LITTLE LEAGUE	:	
v.	:	
RIDGEFIELD NATIONAL LITTLE LEAGUE;	:	JUNE 27, 2025
LITTLE LEAGUE BASEBALL, INCORPORATED	:	
d/b/a LITTLE LEAGUE INTERNATIONAL, INC.;	:	
KEVIN PORTANOVA, THOMAS LANSEN;	:	
JEFFREY AUDEVARD; PHILLIP BODENSTAB;	:	
ANNA COCKERILLE; DAVID DEUSER;	:	
FREDDIE ERAZO; JAY GRIFFIN; STEPHEN	:	
HANNA; ANDREW HELLER; CASEY	:	
HUTCHINGS; AARON JACOBSTEIN;	:	
JOHN JOHNSON; ALEX LERITZ; KATE	:	
LOEWENGART; FREDERICK MARSHALL;	:	
ROBERT MARTZLOFF; CHRISTOPHER	:	
MCGRATTY; AMY PFLAUM; GREGORY	:	
PFLAUM; MEGHAN RAYMOND; MICHAEL	:	
SCERRA; SCOTT SOLOFF and EMILY	:	
VANNINI	:	

COMPLAINT

Introduction

1. Plaintiff Ridgefield Little League Parents Association, as class representative of the parents of Ridgefield Little League (“RLLPA”) is an organization of concerned parents of players in the Ridgefield National Little League (“RLL”). RLLPA, on its own behalf and on behalf of similarly situated parents of RLL players brings this action seeking injunctive relief, damages, punitive damages, and attorney’s fees against RLL, RLL’s Board of Directors, and Little League Baseball, Incorporated (“Little League National”).

2. **This lawsuit is not just about RLL - it is about every Little League and youth sports organization in America.** RLLPA brings this action to deliver a clear and urgent

message: **cutting corners on child safety is unacceptable.** This case seeks to prevent future tragedies - **before a coach without proper training stands helpless on a field while a child's life hangs in the balance.** RLLPA demands accountability and meaningful reform to break the culture of complacency that has taken root across too many youth sports programs. This lawsuit is intended to be a national wake-up call.

This case arises from a disturbing pattern of **negligence, deception, and systemic failure** by the leadership of RLL, a local baseball league entrusted with the care and development of hundreds of children each year. At its core, this is a case about **a fundamental breach of trust.** Parents enrolled their children in this program believing it would be run safely, ethically, and professionally. What they encountered instead were **broken promises, unsafe practices, and a willful disregard for the well-being of children.**

Among the most serious concerns:

- **Failure to provide legally mandated training to coaches,** including training on recognizing and reporting child abuse;
- **Widespread lack of CPR and AED certification** among coaches, despite public representations suggesting otherwise;
- **Failure to conduct required first aid clinics and safety briefings,** which were promised to families and used as selling points during enrollment;
- **Routine violations of safety protocols,** including allowing minor umpires to officiate unsupervised and board members overriding rules for personal convenience.

3. Defendant RLL is a non-profit subsidiary of Little League National. RLL has an independent existence pursuant to its Constitution (attached as Exhibit A). RLL is independently governed by a board of directors.

4. Defendant Little League National is a corporation organized under the laws of the District of Columbia with its principal place of business in Williamsport, Pennsylvania.

5. Upon information and belief, Defendants Kevin Portanova, Thomas Lansen, Jeffrey Audevard, Phillip Bodenstab, Anna Cockerille, David Deuser, Freddie Erazo, Jay Griffin, Stephen Hanna, Andrew Heller, Casey Hutchings, Aaron Jacobstein, John Johnson, Alex Leritz, Kate Loewengart, Frederick Marshall, Robert Martzloff, Christopher McGratty, Amy Pflaum, Gregory Pflaum, Meghan Raymond, Michael Scerra, Scott Soloff and Emily Vannini are the directors of RLL (individually, “Board Member” and collectively, the “Defendants” or the “Board Members”).

6. Each year, hundreds of children participate in RLL.

7. The issues raised in this Complaint are common to all RLL parents and children.

8. The claims of the RLLPA are substantially identical to the claims of any other parent in RLL.

9. Plaintiff RLLPA will fairly and adequately represent the interest of similarly situated class members.

10. Defendants Little League National and RLL are amateur sports organizations as defined in 36 U.S.C. §220501(b).

11. The managers and coaches of RLL are all “covered individuals” within the definition of 34 U.S.C. §20341(c)(9).

12. Pursuant to 34 U.S.C. §20341(b), all coaches must receive periodic training in the obligation to report as well as in the identification of abused and neglected children.

13. For the period from 2019 through May 2025, RLL and the Board Members failed to ensure compliance with this statutory requirement.

14. In RLL's 2023 Safety Manual for Managers and Coaches (the "Safety Manual") which is published on RLL's website,¹ it states on page 5 that all AAA and Majors managers and coaches must become certified in CPR and AED.

15. Defendants made this representation with the intent to induce the parents of participants in RLL to rely upon these representations.

16. RLL's 2023 Safety Manual also explicitly promises the following:

"All managers and coaches in all divisions are also required to attend RLL's annual First Aid Training & Safety Clinic. Dr. Angelo Ciminiello will make a safety presentation... We will also spend time with a trainer from the Positive Coaching Alliance..."

"All managers and coaches are also required to attend the RLL Coaches' Clinics... which covers the proper instruction of players; focusing on skill development, running an effective practice, and exercises."

The Safety Manual also represents:

"RLL invested in automated external defibrillators as an added measure of safety in the event of any emergency. With this investment, RLL has required that the managers of all AAA & Majors teams must become CPR/AED certified in order to be prepared in the event of an emergency. Training, through the American Heart Association, results in a two-year certification. RLL subsidizes the cost of this training for our volunteers."

17. In actuality, most managers and coaches did not have CPR or AED certification and the Defendants took no steps to ensure that they obtained them. Indeed, Defendants failed to

¹ The Safety Manual has not been updated since 2023.

ensure that the American Heart Association training described in their own Safety Manual was ever even offered to the managers and coaches.

18. One coach, when discussing his own lack of CPR training said, “Agree, I would have gotten it done in the class if they offered it. Once they canceled, slipped my mind and never got it.”

19. In 2025, the First Aid Training & Safety Clinic and Positive Coaching Alliance sessions did not take place as promised.

20. Pursuant to Little League Rule 9.03(d) (a national rule applicable to all little league games), in any game in which the umpires are not adults, the local little league must assign an adult as Game Coordinator. If this requirement is not met, Little League Rules do not permit the game to be played. Despite this rule, RLL almost never assigned Game Coordinators.

21. Pursuant to Little League Rule 9.03(d), the Game Coordinator must be present throughout the game, must oversee the conduct of players, managers, and coaches, and have the sole authority to determine whether play should be suspended due to inclement weather or field conditions. This rule is necessary to ensure the safety of the players.

22. Indeed, RLL’s own counsel has admitted that many RLL games proceeded without Game Coordinators and youth umpires in express violation of Little League rules.

23. Pursuant to RLL’s AAA Division Rules of Play, no new inning may start more than one hour and forty-five minutes after the beginning of the game. Pursuant to these rules, the one hour and forty-five minute rule applies to playoff games as well. Nevertheless, one Board member, Mr. McGratty unilaterally decided during the season that he had the authority to change the rules.

24. Despite the one hour and forty-five minute rule, during a playoff game, Defendant McGratty changed the rule to include a full six innings.

“This is it or you can forfeit. I am making the rule change.” When asked how he could do that, he responded, “Because I make the rules and this is what it’s going to be. It’s the playoffs and we are going with six innings no matter what.” “If you do not like it, you can fucking forfeit the game.” The same Board Member, McGratty – the AAA Division Director – was recorded shouting at umpires during active gameplay in which he was coaching, in violation of both RLL and Little League International Codes of conduct.

RLL’s own rule book states:

“Managers, coaches and players will abide by all calls and decisions made by the umpire. ABSOLUTELY NO ARGUING... A manager who argues balls and strikes risks ejection and suspension. Managers or Coaches who participate in an incident... will be suspended for one game.”

RLL’s own rules requiring suspension for such conduct, but no discipline was ever imposed since McGratty was a Board Member.

25. The incident in paragraph 24 was representative of a consistent pattern of favoritism and self-dealing in which children of Board Members were favored over other players for positions on all-star teams and Board Members were favored over others to manage or coach all-star teams.

FIRST COUNT (Negligence)

1-25. Plaintiffs reallege and reincorporate the allegations in paragraphs 1-25 as if fully set forth herein.

26. Defendants RLL and Little League National owe a duty of care to the players and parents participating in RLL.

27. By failing to ensure that all managers and coaches complied with federal law concerning abuse training, Defendants breached that duty of care.

28. RLL's own Safety Manual requires that all managers and coaches attend a First Aid Training and Safety Clinic. In 2025, the clinic did not occur.

29. By failing to conduct this clinic and ensure that all managers and coaches attend this clinic, RLL and Little League National have breached their duty of care to the players and parents in the league.

30. RLL's own Safety Manual requires that all AAA and Majors managers and coaches be certified in CPR and AED. By failing to ensure that all such managers and coaches have these certifications, RLL and Little League National have breached their duty of care to the children and parents of the league.

31. Little League Rule 9.03(d) required the appointment of adult Game Coordinators for each game officiated by youth umpires. As set for the in paragraph 21 above, this rule is in part necessary to ensure that a responsible adult makes the decision as to when weather conditions and field conditions are safe for the players to play.

32. By failing to enforce Little League National's rule requiring Game Coordinators, Defendants RLL and Little League National have breached their duty of care to the Plaintiffs.

33. AAA League Rules do not permit the start of an inning more than one hour and forty-five minutes after the start of the game. This rule is intended to protect the health and safety of the players.

34. By refusing to enforce RLL's own rules and by arbitrarily changing the rule mid-season, RLL and Little League National have breached their duty to the players and coaches.

35. By unnecessarily exposing RLL players to these risks, RLL and Little League National are exposing RLL players to potentially irreparable harm. Accordingly, Plaintiff RLLPA and the class it represents are entitled to a permanent injunction requiring RLL and Little League National to enforce federal law and their own rules and regulations.

**SECOND COUNT
(Fraud)**

1-35. Plaintiffs reallege and reincorporate the allegations in paragraphs 1-35 as if fully set forth herein.

36. In its Safety Manual which is published on its website, RLL has expressly represented that its coaches and managers all have received safety and first aid training, CPR and AED training.

37. These statements were false.

38. Each of the Board Member Defendants were aware of the false nature of the statements in the Safety Manual.

39. The false statements were intended to induce parents to enroll their children in RLL.

40. These false statements induced RLL parents to enroll their children in RLL.

41. As a result of these false statements, RLL parents, including the members of RLLPA were induced to enroll their children in the RLL and pay its entry fees.

**THIRD COUNT
(CUTPA)**

1-41. Plaintiffs reallege and reincorporate the allegations in paragraphs 1-41 as if fully set forth herein.

42. At all relevant times, RLL has been engaged in trade or commerce as defined in Conn. Gen. Stat. §42-110a(4).

43. By falsely representing to parents that managers and coaches had received first aid training, safety training, CPR training and AED training, RLL engaged in deceptive trade practices in violation of Conn. Gen. Stat. §42-110b(a).

44. Plaintiff RLLPA and the other parents similarly situated have suffered an ascertainable economic loss.

45. Pursuant to Conn. Gen. Stat. §42-110g(a), Plaintiff RLLPA and the other parents may recover actual and punitive damages.

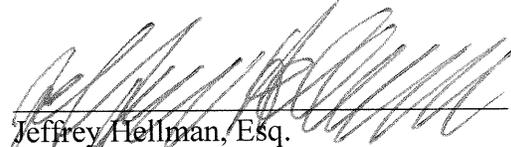
46. Pursuant to Conn. Gen. Stat. §42-110g(d), Plaintiff RLLPA and the other RLL parents may recover their reasonable attorney's fees.

WHEREFORE, Plaintiffs claim:

- a. a permanent injunction requiring RLL and Little League National to enforce federal law and their own rules and regulations;
- b. damages;
- c. punitive damages pursuant to Conn. Gen. Stat. §42-110g(a);
- d. attorney's fees pursuant to Conn. Gen. Stat. §42-110g(d); and
- e. such other legal or equitable relief as the Court may deem appropriate.

**PLAINTIFFS
RIDGEFIELD LITTLE LEAGUE
PARENTS ASSOCIATION, AS
CLASS REPRESENTATIVE OF
THE PARENTS OF RIDGEFIELD
NATIONAL LITTLE LEAGUE**

By:



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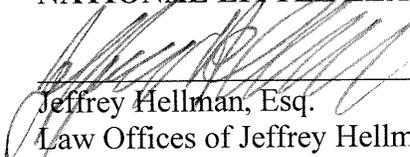
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STATEMENT OF AMOUNT IN DEMAND

The amount in demand is greater than \$15,000.00, exclusive of interest and costs.

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