

IN THE CIRCUIT COURT FOR CALVERT COUNTY, MARYLAND

MARIAM CANNING

[REDACTED]
[REDACTED]

ALEXSA BILLUPS

[REDACTED]
[REDACTED]

MELISSA M. GOSHORN

[REDACTED]
[REDACTED]

ANGELICA HICKS

[REDACTED]
[REDACTED]

ROBIN COX

[REDACTED]
[REDACTED]

DIANE ANDRAKA

[REDACTED]
[REDACTED]

DIANA BALDWIN

[REDACTED]
[REDACTED], on behalf of themselves
and their minor children

Plaintiffs

v.

CALVERT COUNTY BOARD OF EDUCATION

1305 Dares Beach Road
Prince Frederick, Maryland 20678

and

DANIEL D. CURRY, Ed.D.
Calvert County Superintendent of Schools
1305 Dares Beach Road
Prince Frederick, Maryland 20678

Defendants.

Case No.:

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Mariam Canning, Alexsa Billups, Melissa M. Goshorn, Angelica Hicks, Robin Cox, Diane Andraka, and Diana Baldwin, on behalf of themselves and their minor children and grandchildren, Plaintiffs, by Hartman, Attorneys at Law and C. Edward Hartman, III, their attorneys, hereby file this Complaint for Declaratory and Injunctive Relief against the Calvert County Board of Education and Daniel D. Curry, Ed.D., Superintendent of Calvert County public schools, Defendants, and state in support thereof:

PARTIES

1. Mariam Canning is a resident of Calvert County and has children eligible to attend public school in Calvert County.
2. Alexsa Billups is a resident of Calvert County and has children eligible to attend public school in Calvert County.
3. Melissa M. Goshorn is a resident of Calvert County and has children eligible to attend public school in Calvert County.
4. Angelica Hicks is a resident of Calvert County and has children eligible to attend public school in Calvert County.
5. Robin Cox is a resident of Calvert County and has grandchildren eligible to attend public school in Calvert County.
6. Diane Andraka is a seventeen-year resident of Calvert County and her children attended CCPS.
7. Diana Baldwin is a resident of Calvert County and has grandchildren eligible to attend public school in Calvert County.
8. The Calvert County Board of Education (hereinafter referred to as the "Board") is a corporate body, which may be sued pursuant to MD. CODE ANN., Educ. Art. § 3-104. The Board is governed by five locally-elected school board members, and is responsible for

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

creating educational policies and goals for the Calvert County public schools (hereinafter referred to as “CCPS”). CCPS receives federal funding and is subject to Title VI of the Civil Rights Act of 1964.

9. Daniel D. Curry, Ed.D. is the Calvert County Superintendent of Schools (hereinafter referred to as the “Superintendent”). Dr. Curry became the superintendent in 2014. At all times relevant to the factual assertions set forth in this Complaint, Dr. Curry acted within the scope of his employment. Dr. Curry oversees the Office of Equity and School Improvement for CCPS.

JURISDICTION AND VENUE

10. The Calvert County Circuit Court has personal jurisdiction over this case as the parties involved are the Board of Education for Calvert County and the Calvert County Superintendent of Schools. MD. CODE ANN., Cts. and Jud. Proc. Art. § 6-102.
11. This Court has subject matter jurisdiction over this case as this action seeks declaratory and injunctive relief. MD. CODE ANN., Cts. and Jud. Proc. Art. § 3-403.
12. Venue is appropriate because the events giving rise to the claims occurred in Calvert County, Maryland, all plaintiffs live in and the Defendants are located in Calvert County, Maryland. MD. CODE ANN., Cts. and Jud. Proc. Art. § 6-201.

FACTS COMMON TO ALL COUNTS

13. The CCPS system includes four high schools, six middle schools, and twelve elementary schools, and serves approximately fifteen thousand children.
14. The 2021-2022 academic year commences on August 31, 2021.
15. The Board is responsible for overseeing the public school system for Calvert County, Maryland. The Superintendent is responsible for overseeing various departments of the

HARTMAN
116 Defense Highway
Suite 300
Annapolis, Maryland

CCPS, including the Office of Equity and School Improvement, Student Services, and the Assistant Superintendent of Instruction.

16. Plaintiffs are Calvert County taxpayers whose children are eligible to attend public school in CCPS for the 2021-2022 academic year and/or whose children previously attended public school in CCPS and are concerned citizens.
17. In recent months, it has become evident that the CCPS, Board, and Superintendent, through the creation of new policies, practices, and procedures, seeks to implement certain tenets of critical race theory and/or social justice reform into the CCPS curriculum.
18. Through a series of training modules, curriculum, recommended reading for students, action plans for faculty and students, and resolutions, CCPS, the Board, and the Superintendent seek to advocate a radicalized political agenda disguised as “social justice” and “equity” in an effort to create social justice activists and cause racial division among the CCPS student body. The focus of the implementation of this ideology is recognition of skin color, shaming of white people, demeaning people of color, and anti-police rhetoric.
19. Throughout the training materials, curriculum, policy statements, action plans, and resolutions of the Board, the Superintendent, and the CCPS, there is language that draws a clear distinction between white students and students of color with an emphasis on making generalizations and stereotyping by race and labeling individuals into oppressor versus oppressed groups. The materials draw superficial distinctions based on certain boxes as to whether a person is an oppressor or oppressed.
20. The rhetoric proposes to children that white people are intellectually and socially superior to students of color based purely on skin color.
21. The message to students and faculty is that if you do not agree with this ideology and fail to take action in accordance with the proposed action plan of CCPS you are racist and

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

promoting racial inequity. The message further provides that if you do not agree with this ideology you are upholding white supremacy and inequality. Students must accept the idea that due to their race, they are internally racist, whether conscious or unconscious, and to become an anti-racist, the students must zealously pursue this ideology.

EQUITY POLICY EXECUTED BY THE BOARD

22. In 2020, the Board executed the equity policy known as Policy Statement #1015. A copy of the equity policy is attached hereto and incorporated herein as **Exhibit A**.
23. The purpose of the equity policy is to “promote a culture of equity and responsibility for all students” and ensure that an “equity lens” is used to develop a “culturally, racially, and linguistically diverse workforce to reflect the student body.” See **Exhibit A**, page 1.
24. The equity plan directed the CCPS to identify alleged “institutional barriers” and “social identifiers” that prevent equity and to equip faculty and students with an “equity lens” to view unfair distributions based on “race, class, gender identity, sexual orientation, disability, language and other factors.” See **Exhibit A**, page 1.
25. The equity plan also instructed CCPS to eliminate any achievement and opportunity gaps within CCPS student subgroups utilizing the “equity lens” with an emphasis on certain classifications such as race. See **Exhibit A**, pages 1-2.
26. The equity plan further identified “implicit bias” as certain attitudes and stereotypes that may be activated involuntarily and affect an individual’s understanding as it relates to equity. See **Exhibit A**, page 2.
27. The equity plan instructs CCPS and the Superintendent to implement certain procedures across all CCPS schools, including professional development, curriculum, and educational programs, to ensure that the goals of the equity plan are achieved. See **Exhibit A**, page 2.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

ANTI-RACISM POLICY EXECUTED BY THE BOARD

28. In November 2020, while Plaintiffs, CCPS students, and the entire world, were focused on concerns surrounding COVID-19, the reopening of schools, virtual learning, and the physical and mental wellbeing of children, the Board passed the Policy Statement of the Board of Education Regarding Antiracism (hereinafter referred to as the “Anti-Racism Policy”). A copy of the Anti-Racism Policy is attached hereto and incorporated herein as **Exhibit B**.
29. The Anti-Racism Policy states that the Board, although CCPS are the recipients of federal funding, acknowledges that there is institutional racism that has existed and continues to exist in CCPS schools. *See **Exhibit B**, page 1.*
30. The Anti-Racism Policy provides that its purpose is to “eliminate all forms of systemic racism from CCPS by being proactive and responsive.” *See **Exhibit B**, page 1.*
31. The Anti-Racism Policy further provides that the value of social or cultural factors within the CCPS should be limited to race and class, as it relates to student success. *See **Exhibit B**, page 1.*
32. The Anti-Racism Policy requires the removal of “institutional barriers that create inequitable representations of students” based on race and to “eliminate the disproportionality of discipline and suspension rates between racial groups.” *See **Exhibit B**, page 1.*
33. The Anti-Racism Policy further requires CCPS, faculty and students to “acknowledge and understand the concept of white privilege and its impact in achieving equity.” *See **Exhibit B**, page 1.*
34. The Anti-Racism Policy calls for CCPS faculty training on equity and how to address the alleged “conflict.” *See **Exhibit B**, page 1.*

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

35. The Anti-Racism Policy defines certain terms with subjective understandings of these terms, including “anti-racism,” “institutional racism,” “individual racism,” “white privilege,” “structural racism,” and “white supremacy.” *See* **Exhibit B**, pages 1-2.
36. The definition for “institutional racism” is identified as our current practices and procedures have “unintentionally produce[d] inequitable outcomes for people of color and advantages for white people.” *See* **Exhibit B**, pages 1-2.
37. The definition for “white privilege” is identified as the “web of institutional and cultural treatment that affords white people greater access of power and resources than people of color in the same situation.” *See* **Exhibit B**, page 2.
38. The definition for “white supremacy” is identified as “political, economic and cultural system in which whites overwhelmingly control power and material resources; conscious and unconscious ideas of white superiority and entitlement; [and] the self-conscious racism of white supremacist hate groups.” *See* **Exhibit B**, page 2.
39. The Board further instructs CCPS faculty to take action to reduce inequity and racism as outlined and understood in the Anti-Racism Policy and that the Board will “adopt and maintain policies, practices, and procedures that produce equitable outcomes for students of color.” *See* **Exhibit B**, page 2. The Board instructs CCPS faculty to eliminate any racial inequities as understood in the Anti-Racism Policy. *See* **Exhibit B**, page 2.
40. The Board further declares that any “personal prejudice” “will not be tolerated within the CCPS school system” as understood in the Anti-Racism Policy. *See* **Exhibit B**, page 2.

**ANTI-RACIST RESOLUTION EXECUTED BY THE BOARD AND
SUPERINTENDENT**

41. The Board and the Superintendent executed the “Anti-Racist Resolution” in 2021 (hereinafter referred to as the “Resolution”). *See* the Anti-Racism Resolution of the Board

of Education of Calvert County Public Schools attached hereto and incorporated herein as **Exhibit C**.

42. The Resolution provides its issuance is in response to the death of George Floyd, Ahmaud Arbery, and Breonna Taylor, and “other African Americans who have lost their lives as a result of racism and police brutality that persist in our country.” See **Exhibit C**.
43. The Resolution declares that racism exists in the CCPS school community and identifies “white supremacy” and “racial inequity.” See **Exhibit C**.
44. The Resolution outlines certain initiatives within the CCPS system to implement certain radical ideology. See **Exhibit C**.
45. The Resolution references “systemic racism” and provides that the Board “will not tolerate the values, structures, and behaviors that perpetuate systematic racism” and will adopt “policies, practices, and procedures that produce equitable outcomes for students of color and marginalized groups...” See **Exhibit C**.
46. The Resolution requires all students and faculty to create an “anti-racist learning environment where each student and staff member is respected and valued for who they are, regardless of skin color,” but does the exact opposite by explicitly dividing students by race alone and calling for the implementation of certain policies and procedures that will benefit students of color only. See **Exhibit C**.
47. The Resolution further provides that curriculum and instructional materials for all grades should include “historically underrepresented groups of color,” that any “bias interrupters” should be removed that do not align with the tenets of critical race theory and/or social justice activism. See **Exhibit C**.
48. The Resolution requires distinct methods of discipline and suspension practices depending on race, specifically requiring the modification or elimination of certain

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

discipline and suspension practices for “students of color and marginalized groups.” *See **Exhibit C***.

49. Although the Resolution claims that each student is to be treated with respect and dignity regardless of skin color, the Resolution calls for the implementation of policies and procedures that will be different depending on the skin color of a student.

CCPS FIVE-YEAR ACTION PLAN ADDRESSING “CULTURAL PROFICIENCY” AND CLASSROOM RESOURCES

50. In conjunction with the Resolution, the Board and Superintendent implemented “The CCPS 5-Year Action Plan: Addressing Cultural Proficiency, 2018-2023” (hereinafter referred to as the “Action Plan”). A copy of the 5-Year Action Plan is attached hereto and incorporated herein as **Exhibit D**.
51. The Action Plan states that the vision is to make all students “culturally proficient” through equity plans. To move towards “cultural proficiency”, CCPS utilizes certain tools. *See **Exhibit D***, pages 1-3.
52. The Action Plan states that CCPS intend to train staff in “advocating for equity,” specifically the outcome is that the “staff will have the knowledge and will to take responsibility for advocating.” *See **Exhibit D***, page 7.
53. The Action Plan provides for the implementation of “culturally responsive curriculum and instruction,” as developed by the organization “Teaching Tolerance” now known as “Learning for Justice.” *See **Exhibit D***, page 10.
54. The steps of the Action Plan include implementation of culturally responsive teaching practices, review of policy and procedures for implementing new curriculum and revisions as necessary, promote diverse students who have been marginalized, and implementation of the social justice standards. *See **Exhibit D***, page 11.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

55. The first tool identified in the Action Plan is the implementation of “social justice standards” as developed by “Learning for Justice.” The Action Plan provides: “The Social Justice Standards are a road map for anti-bias education at every stage of K-12 instruction.” See **Exhibit D**, page 3, referencing and relying upon the social justice standards located at www.tolerance.org/frameworks/social-justice-standards, attached hereto and incorporated herein as **Exhibit E**.

56. CCPS rely upon the resources, guidelines, and recommended readings of “Learning for Justice” to implement the social justice standards in the CCPS curriculum. See **Exhibit D**, page 3.

57. The tools utilized to implement the social justice standards identified by CCPS in its Action Plan promote racial discrimination and religious discrimination. For example, the third domain of the social justice standards implemented by CCPS is justice. One of the curriculum tools for the justice domain entitled “Understanding Justice” requires students to complete a chart with various identities including white, black, democrat, Christian, atheist, straight, overweight, skinny, and republican, and to provide a reaction to each term. A copy of the “Teaching Tolerance, Anti-Bias Framework, Understanding Justice” resource utilized by Learning for Justice attached hereto and incorporated herein as **Exhibit E**.

58. The “Understanding Justice” exercise requires students to divide themselves based on race, religion, sexual orientation, and several other factors, and react to each classification. This exercise does not further academic progress, emphasizes division, and is an inappropriate exercise for students. See **Exhibit E**.

59. In addition to discriminatory exercises, the featured school resources for utilization in the CCPS curriculum focus on the identify of students based on race. The school resources include reflections on “racism and police violence,” “Why Teaching Black Lives Matter Matters,” and “Discussing Whiteness.” A copy of the school resources utilized by the Learning for Justice, which has been implemented into the CCPS Action Plan, curriculum, and faculty training, is attached hereto and incorporated herein as **Exhibit F**.
60. In the “Discussing Whiteness” school resource to be used in the classroom, the focus is on “white privilege” and “whiteness as a racial identity with the understanding that acknowledging whiteness and the privilege and power attached to it is a necessary step in working toward racial justice.” *See* **Exhibit F**.
61. The materials promote the idea that only white people are in positions of power based on their skin color and people of color have not been successful in society because of their skin color. These materials are not only false but damaging to the minds of innocent children and will increase racial division in the CCPS student body. *See* **Exhibit F**.
62. The classroom resources to be used by CCPS in accordance with its Action Plan further provide for a discussion of the history and culture of “whiteness” and the “normalization of whiteness...as a social default.” The resource includes a discussion of the struggle of white people with “internalized dominance and the search for cultural belonging.” The discussion criticizes white people for “cling[ing] violently to their white cultural identity.” *See* **Exhibit F**.
63. The resources further provide for a discussion on the “inherited privilege” of white people to trace their genealogy that is not enjoyed by most African Americans who are descendants of enslaved people thereby blaming the white population for obstacles to tracing African-American genealogy. *See* **Exhibit F**.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

64. The resources further provide that “whiteness...[is] linked to power and privilege for the purpose of maintaining an unjust social hierarchy.” See **Exhibit F**.
65. The classroom resources highlight recommended authors to assist with the discussion of social justice standards. One of the recommended authors in the “Discussing Whiteness” module asserts the position that white people did not even exist until the end of the seventeenth century “when the elite class enacted anti-miscegenation laws and other laws designed to keep black and white workers separate...” See **Exhibit F**. The resource continues to note that it is important for students to understand the history of “whiteness” and the subjective understanding of racial history. See **Exhibit F**.
66. The classroom resources contained within the social justice modules created by “Learning for Justice” and utilized by the CCPS discourage any discussion of self-made Americans and the “myth of the individual American who makes their own way....” The discussion highlights the founding of the United States based on “racist white supremacist principles.” See **Exhibit F**. These tenets are not supported by fact but rather are the subjective opinions of a radicalized movement that are being implemented by CCPS as fact.
67. The social justice standards implemented by CCPS specifically instruct white students that they must take action to address alleged racial inequities within society and that recognition of “white privilege” alone is not sufficient to attain “cultural proficiency.” See **Exhibit E** and **Exhibit F**.
68. White students are encouraged to engage in discussions with other white students to discuss their “white privilege” and take action to dismantle the current “racist institution [to] work towards equity.” See **Exhibit F**.
69. Students are instructed to “avoid white noise” and “listen to people of color talk about their experiences with oppression.” White students alone are instructed to take

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

responsibility for educating themselves about racism, noting "... [W]hen white educators expect students or colleagues of color to teach them about racism, it raises a number of problems, not least of which is people of color doing white people's work for them." *See* **Exhibit F**.

70. White students are further instructed to "be down, but stay white," and it is taught that appreciating a diverse group of friends does not result in confronting "white privilege."

See **Exhibit F**.

71. Students of color are taught that they and their predecessors cannot succeed in the American society based on their own hard work and merit because of their skin color.

72. The third tool for implementing social justice standards as set forth in the Action Plan focuses on the barriers to "cultural proficiency" including an alleged worldview of the "dominant culture (white culture)" that allegedly "blames and finds fault with marginalized individuals..." *See* **Exhibit D**, **Exhibit E**, and **Exhibit F**.

73. The third tool emphasizes privilege and entitlement and criticizes any belief system that recognizes personal achievements based on merit and the quality of one's character. *See*

Exhibit D, **Exhibit E**, and **Exhibit F**.

74. The third social justice tool further criticizes a student who fails to make personal changes in response to social awareness as presented by this ideology. *See* **Exhibit D**, **Exhibit E**,

and **Exhibit F**.

75. The third tool within the Action Plan also highlights any individual who is resistant to the principles of "cultural proficiency" and states that these individuals are resistant to this way of thinking because they do not want to examine their own bias and discriminatory practices, fear loss of power, or feel overwhelmed by the need to act differently. *See*

Exhibit D, page 5.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

76. The Action Plan states that these social justice tools are necessary to create and maintain a socially just democracy and prepare children to be productive citizens in society. *See **Exhibit D***, page 6.

77. The Action Plan further criticizes any belief system that rewards achievements based on merit and the quality of one's character and labels such belief systems as "privilege and entitlement,...[that] often makes people blind to the barriers experienced by marginalized individuals." *See **Exhibit D***, page 5.

78. In accordance with the Action Plan, any student who fails to agree with the ideology promoted by the Action Plan is considered an individual resistance to change and "cultural proficiency" because they are "fearful of loss of power or unwilling to acknowledge their own bias and discriminatory practices." In effect, any student who objects to the radical ideology promoted by Learning for Justice, including the shaming of white people and demeaning students of color, is considered to be racist. *See **Exhibit D***, page 5.

79. The Action Plan clearly states that the goal is to incorporate this ideology into the curriculum. *See **Exhibit D***, page 10.

MODULE 2, PART I: 2020-2021, IMPACT OF RACE AND CULTURE
BOOKLET-CURRICULUM MATERIAL

80. In 2020-2021, CCPS, the Board, and the Superintendent incorporated curriculum materials entitled Module 2, Part 1: 2020-2021, "Impact of Race and Culture Participant Booklet" (hereinafter referred to as "Module 2"). A copy of the Module 2 material is attached hereto and incorporated herein as **Exhibit G**.

81. Module 2 separates individuals into historically advantaged and disadvantaged through the use of a chart. *See **Exhibit G***, pages 1-2.

82. The chart reflected on page 2 of Module 2 requires faculty and students to determine if they are considered “one-up” meaning that “the particular group has been identified by our American society in a way that gives the people in that group a leg up from the beginning whether they want it or not.” See **Exhibit G**, page 2.
83. The chart identified several “types of oppression” known as “isms.” The chart identifies racism, sexism, homophobia, religious oppression, classism, elitism, xenophobia, linguistic oppression, ableism, and ageism. See **Exhibit G**, page 2.
84. The chart is simplistic, using binary categories to describe an individual as the oppressed or the oppressor based on a check mark box alone, and the individual’s background, environment, opportunities, and/or other factors that shape individuals play no role.
85. The chart provides that if you are white you have an automatic advantage over people of color to include African, Asian, Native, and Latinx. See **Exhibit G**, page 2.
86. The chart promotes several other classifications beyond the classification of race.
87. The chart further provides that men have an automatic advantage over women and transgender individuals. See **Exhibit G**, page 2.
88. The chart further provides that Protestants have an advantage over Catholics, Jews, Muslims, and Sikhs. See **Exhibit G**, page 2.
89. The chart provides that individuals who are college-educated in a top 20-40 school have an historical advantage over non-college educated and students who attended less prestigious schools requiring some sort of reparation without factoring in students who excelled in school and were rewarded for their hard work. See **Exhibit G**, page 2.
90. Module 2 instructs students that the societal understanding as it relates to race and the other “isms” is that “one-up groups are intellectually, culturally, and morally superior to all other one-down groups.” See **Exhibit G**, page 2.

91. Module 2 implies that students who were raised by great parents and taught to treat everyone with respect and fairness is not enough and these students are still racist. *See **Exhibit G**, page 2.*
92. Module 2 further teaches students that to move toward diversity and cultural proficiency, students must understand two fundamental principles: even good people are racist and that systemic oppression will continue until good people take action and become “culturally effective” in accordance with the tenets described herein. *See **Exhibit G**, pages 1-2.*
93. Module 2 provides that students who do not become activists are part of the problem with systemic oppression. *See **Exhibit G**, pages 1-3.* Module 2 provides: “A culturally effective person accounts for the existence of not only personal bias (conscious and unconscious) but also institutional barriers. In fact, to be culturally effective in supporting one-down groups, being a ‘good person’ is not enough. You have to do something about the system.... being passive can yield the same results as being bigoted.” *See **Exhibit G**, page 3.*
94. Pre-recorded slides for Module 2 note that attendees and/or participants may feel “guilt,” “shame,” and “anger” as part of the training. *See **Exhibit G**, page 5.*

RECOMMENDED READINGS FOR TEACHERS

95. In an “Equity Resources” document provided to CCPS faculty following a required teaching training entitled “Module I, Cultural Identity,” CCPS faculty are recommended to reflect and listen to certain resources created by individuals who promote the ideology described herein. The recommended material includes a podcast entitled “Nice White Parents,” “White Rage,” “White Fragility,” and the works of Ibram X. Kendi. A copy of the equity resources is attached hereto and incorporated herein as **Exhibit H**.

RECOMMENDED READINGS FOR STUDENTS

96. The political nature of the ideology promoted by CCPS, the Board, and Superintendent is evident in a letter to the CCPS community dated June 3, 2020 from the Superintendent. A copy of the June 3, 2020 letter is attached hereto and incorporated herein as **Exhibit I**.
97. The letter includes recommended reading for CCPS students to address issues of police brutality. The recommended reading list includes the works of Ibram X. Kendi. Ibram X. Kendi condemns former President Trump, is very vocal about his criticism of former President Trump, and more importantly states that former President Trump is the classic racist. In one of the recommended readings by Mr. Kendi, *How to Be An Antiracist*, the author states: “The only remedy to racist discrimination is anti-racist discrimination. The only remedy to past discrimination is present discrimination. The only remedy to present discrimination is future discrimination.” A copy of the article reflecting on Mr. Kendi’s book *How to Be an Antiracist*, entitled “Trump ‘Embodies Nearly Every Aspect of a Racist’” by Rachel Martin, dated August 13, 2019, is attached hereto and incorporated herein as **Exhibit J**.
98. The letter also includes a brochure from the CCPS Office of Equity and School Improvement that calls for the integration of the social justice standards outlined by Learning for Justice into the CCPS elementary school curriculum. See **Exhibit I**.
99. The letter and brochure recommend the promotion of an organization entitled “Read Woke” that includes resources that vehemently oppose former President Trump and label him as a racist and blame President Trump for crimes against Asian Americans in the United States. See **Exhibit I**. A copy of the article entitled “Read Woke: From Picture Books to Fantasy, Children’s Literature Can Open Minds and Hearts,” by Cicely Lewis, dated May 12, 2021, is attached hereto and incorporated herein as **Exhibit K**.

100. The letter provides that “Read Woke” is promoted in the CCPS school libraries. See **Exhibit I**. This organization is led by Cicely Lewis.

101. The “Read Woke” movement includes discussions on voting with a focus on individuals from certain political parties, specifically the Democratic party only, and promotes the implementation of “The 1619 Project,” which has been rejected in academic circles as historically inaccurate and an attempt to engage in revisionist history to support a particular agenda. Additional resources provided by the “Read Woke” organization identify all white people as “privileged” regardless of socioeconomic status or background. A copy of the article entitled “Stay Woke from Home with these Books, Resources and Articles,” by Cicely Lewis, dated May 5, 2020, is attached hereto and incorporated herein as **Exhibit L**.

102. Ms. Lewis admits that she will challenge students to become “social justice warriors.” A copy of the article entitled “Making Good Trouble,” by Cicely Lewis, dated November 8, 2018 is attached hereto and incorporated herein as **Exhibit M**.

**CCPS MANUAL GOVERNING THE CONDUCT OF CCPS STUDENTS FOR
THE 2021-2022 ACADEMIC YEAR**

103. In addition to the Action Plan, the Board and Superintendent adopted the revised manual governing the conduct of CCPS students for the 2021-2022 academic year. The manual is entitled “Students’ Rights, Responsibilities and Code of Conduct” (hereinafter referred to as the “Student Manual”). A copy of the Student Manual is attached hereto and incorporated herein as **Exhibit N**.

104. The Student Manual states that “CCPS strives to create a positive school climate where staff, students, and parents work together to maintain safe and orderly learning

environments. Working together, we will provide inclusive environments where all students come to school free from judgment.” See **Exhibit N**, page 1.

105. Although the Manual requires an inclusive judgment-free environment, the revised curriculum invites judgment of students based on race and encourages students to judge other students based on their skin color.

106. The Manual notes that the disciplinary process for students should be consistent and fair; however, the Resolution calls for special treatment for students of color as it relates to disciplinary and suspension procedures. See **Exhibit N**, page 1.

107. The Manual further calls for the discipline of any student who demonstrates “bias behavior,” which may include any student who does not agree with the radical ideology promoting certain tenets of critical race theory. The Manual identifies “bias behavior” generally and provides that such actions “may involve the use of images, language, or behaviors that directly or indirectly demonstrate racism, hostility or contempt toward a person or group on the basis of actual or perceived identity.” See **Exhibit N**, page 35.

108. The Manual encourages students to report other students who demonstrate bias based on color and may result in removal of a student from the classroom or school. See **Exhibit N**, page 1, 35. If the student opposes the ideology described herein, he or she may be reported for bias behavior and experience discipline, including school suspension.

IMPACT OF TEACHINGS ON CCPS STUDENTS

109. The implementation of this curriculum to include certain tenets of critical race theory and divide the students based on race will result in psychological harm to the children as it creates apprehension and fear among the children. The implementation of this curriculum will discourage students from fostering relationships with other students due to fear of judgment.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

110. There is no evidence reflecting the benefit of the implementation of this curriculum as it relates to the education of children and the development of children. The implementation of this curriculum is not in the best interest of children as it promotes racial division, suppression of thought and freedom of speech, and harms the innocence of children.

111. If a student does not agree and/or align with this ideology, the Resolution, Action Plan, and policies set forth herein call for the alienation and reprimand of the student by faculty, staff, and peers. CCPS, the Board, and Superintendent promote the idea that to avoid being racist, a student must affirmatively participate in the social action plans described herein.

112. Students who support neutral legal principles set forth in the United States Constitution and Maryland Constitution or who oppose the ideas that white people are inherently evil and that our institutions are infiltrated with white supremacy are considered racist within the ideology described herein and promoted by CCPS, the Board, and the Superintendent.

113. Concepts related to neutral application of law, equality based in the Declaration of Independence, patriotism, respect for others, merit-based rewards, and other self-evident virtues are not pillars of a white culture but are characteristics of a productive society that spans all races.

114. As CCPS students recover from the effects of the COVID-19 pandemic, lockdowns, and school closures, they will continue to experience heightened anxiety and depression as they return to in-person learning. To create an environment whereby students are labeled as oppressors versus oppressed based on skin color alone will result in significant psychological harm to the students, including increased apprehension, anxiety, and depression.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

115. There is no place for the implementation of tenets of political movements within the public school system.

116. Plaintiffs, as parents of CCPS students, do not object to lesson plans presenting multiple perspectives of history and celebrating diversity of students. Plaintiffs disagree with the implementation of policies and practices that focus on the skin color of the students and the notion that all white students have advantages over students of color and are responsible for creating and maintaining a systemic of systemic racism. There should be no division of students based on race and/or use of curriculum or classroom resources that promote division of students based on race.

COUNT I

Violation of the United States Constitution, Amendment XIV, Equal Protection Clause

117. Plaintiffs incorporate by reference and reallege the averments of paragraphs 1 through 116.

118. The Fourteenth Amendment to the United States Constitution, known as the Equal Protection Clause, provides that “[n]o State shall...deny to any person within its jurisdiction the equal protection of the laws.” U.S. CONST. amend. XIV, § 1.

119. The purpose of the Equal Protection Clause “is to prevent the States from purposefully discriminating between individuals on the basis of race.” *Shaw v. Reno*, 509 U.S. 630, 642 (1993). The United States Supreme Court recognized that “[c]lassifications of citizens solely on the basis of race ‘are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.’” *Shaw*, 509 U.S. at 643 (quoting *Hirabayashi v. United States*, 320 U.S. 81, 100 (1943)); *See also Richmond v. J.A. Croson Co.*, 488 U.S. 469, 518 (1989) (Kennedy, J., concurring) (“The moral imperative of racial neutrality is the driving force of the Equal Protection Clause.”).

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

120. The “rights created by the first section of the Fourteenth Amendment are, by its terms, guaranteed to the individual. The rights established are personal rights.” *J.A. Croson Co.*, 488 U.S. at 493 (quoting *Shelley v. Kraemer*, 334 U.S. 1, 22 (1948)).

121. “Classifications based on race carry a danger of stigmatic harm. Unless they are strictly reserved for remedial settings, they may in fact promote notions of racial inferiority and lead to a politics of racial history.” *Id.* Any classification based on race is presumptively invalid. *See Shaw*, 509 U.S. at 643-44 (quoting *Pers. Adm’r of Massachusetts v. Feeney*, 442 U.S. 256, 272 (1979)).

122. “When the government distributes burdens or benefits on the basis of individual racial classifications, that action is reviewed under strict scrutiny.” *Parents Involved in Cty. Schs. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 719 (2007); *See also Adarand Constructors v. Pena*, 515 U.S. 200, 224 (1995) (“[A]ny person, of whatever race, has the right to demand that any governmental actor subject to the Constitution justify any racial classification subjecting that person to unequal treatment under the strictest judicial scrutiny”).

123. The alleged attempts by the Board and Superintendent to remedy previous racism is not a justification for new racism against white students and students of color. The United States Supreme Court clearly stated that “[t]he way to stop discrimination on the basis of race is to stop discriminating on the basis of race.” *Parents Involved in Cty. Schs.*, 551 U.S. at 748.

124. The CCPS, the Board, and Superintendent denies certain students, specifically white students, certain educational opportunities, consistency with the disciplinary and suspension practices, and a quality education based solely upon their race.

125. The Board and Superintendent, through the implementation of certain practices and policies distinguishing students based on race alone, treat Plaintiffs’ minor children

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

differently from students of color based on race alone and promote perceived notions about students of color based on race alone. The Board and Superintendent unlawfully discriminate against Plaintiffs based on their race.

126. The Board and Superintendent further discriminate against students of color by promoting the idea that students of color have not and cannot succeed on the basis of their skin color. The Board and Superintendent further promote the idea that students of color are somehow inferior to white students based on skin color alone.

127. The discriminatory actions of Defendants will cause significant psychological harm to Plaintiffs and other members of the CCPS student body.

128. Defendants' discriminatory actions towards Plaintiff do not serve a compelling interest nor are they narrowly tailored to achieve a compelling government interest. *Parents Involved in Community Schools v. Seattle School District No. 1, et al.*, 551 U.S. 701, 720 (2007).

129. Defendants are acting under the color of state law.

130. Defendants' discriminatory actions violate the Equal Protection Clause of the Fourteenth Amendment.

131. Pursuant to MD. CODE ANN., Cts. and Jud. Proc. § 3-401, *et seq.*, this Court may “declare rights, status, and other legal relations whether or not further relief is or could be claimed.” Further, “any person...whose rights, status, or other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation...may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation...”. *Id.*

132. As such, Plaintiffs are entitled to declaratory and injunctive relief pursuant to 42 U.S.C. § 1983.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

- A. Enter a declaratory judgment order against Defendants declaring that the actions, practices, policies, procedures, and curriculum described herein violate the constitutional rights of the Plaintiffs as set forth in the Equal Protection Clause of the Fourteenth Amendment;
- B. Order Defendants to remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment;
- C. Order Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein;
- D. Enter a monetary award in favor of Plaintiffs and against Defendants in excess of \$75,000.00;
- E. Award attorney's fees and costs to be paid by Defendants to Plaintiffs pursuant to 42 U.S.C. § 1988 and any other applicable legal authority; and
- F. Grant such other and further relief as the nature of this cause may require.

COUNT II
Violation of Title VI of the Civil Rights Act

133. Plaintiffs incorporate by reference and reallege the averments of paragraphs 1 through 132.
134. Title VI of the 1964 Civil Rights Act protects all students who attend institutions receiving federal funding from being treated differently based on their race, color, or national origin. 42 U.S.C. § 2000d (“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”).
135. Defendants are recipients of federal financial assistance for educational purposes. Recipients of federal financial assistance must provide, as a condition to approval and extension of any federal financial assistance, an assurance that the educational program will comply with all requirements set forth in Title VI. *See* 34 C.F.R. § 100.4(a).

136. Discrimination that violates the Equal Protection Clause also violates Title VI of the Civil Rights Act. The actions of Defendants violate the Equal Protection Clause and therefore, also violate Title VI of the Civil Rights Act. *See Alexander v. Sandoval*, 532 U.S. 275, 281 (2001).

137. Plaintiffs have been intentionally discriminated against on the grounds of race because CCPS, the Board, and Superintendent denies certain students, specifically white students, the certain educational opportunities, consistency with the disciplinary and suspension practices, and a quality education based solely upon their race. Plaintiffs are prohibited from certain discussions in relation to their race because the curriculum identifies viewpoints of white students as founded in “white supremacy” and “racism.”

138. The Board and Superintendent further discriminate against students of color by promoting the idea that students of color have not and cannot succeed on the basis of their skin color. The Board and Superintendent further promote the idea that students of color are somehow inferior to white students based on skin color alone.

139. The discriminatory actions of Defendants will cause significant psychological harm to Plaintiffs and other members of the CCPS student body.

140. Defendants’ discriminatory treatment of Plaintiffs violates Title VI of the Civil Rights Act.

141. Pursuant to MD. CODE ANN., Cts. and Jud. Proc. § 3-401, *et seq.*, this Court may “declare rights, status, and other legal relations whether or not further relief is or could be claimed.” Further, “any person...whose rights, status, or other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation...may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation...”. *Id.*

142. As such, Plaintiffs are entitled to declaratory and injunctive relief.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Enter a declaratory judgment order against Defendants declaring that the actions, practices, policies, procedures, and curriculum described herein violate the rights of the Plaintiffs as set forth in Title VI of the Civil Rights Act;
- B. Order Defendants to remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment;
- C. Order Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein;
- D. Enter a monetary award in favor of Plaintiffs and against Defendants in excess of \$75,000.00;
- E. Award attorney's fees and costs to be paid by Defendants to Plaintiffs pursuant to 42 U.S.C. § 1988 and any other applicable legal authority; and
- F. Grant such other and further relief as the nature of this cause may require.

COUNT III
Violation of First Amendment-Freedom of Speech

143. Plaintiffs incorporate by reference and reallege the averments of paragraphs 1 through 142.

144. The First Amendment of the United States Constitution protects the freedom of speech, and specifically viewpoints of individuals, compelled speech, and chilled speech.

145. A government entity violates the First Amendment's freedom of speech protection when it discriminates on the basis of viewpoint, forces certain speech and/or chills certain speech. "It is axiomatic that the government may not regulate speech based on its substantive content or the message it conveys...., [and] [i]n the realm of private speech or expression, government regulation may not favor one speaker over another. Discrimination against speech because of its message is presumed to be unconstitutional. *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 828 (1995).

HARTMAN
116 Defense Highway
Suite 300
Annapolis, Maryland

146. “When the government targets not subject matter, but particular views taken by speakers on a subject, the violation of the First Amendment is all the more blatant. Viewpoint discrimination is thus an egregious form of content discrimination. The government must abstain from regulating speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.” *Id.* at 829.

147. CCPS, the Board, and Superintendent are acting under the color of state law.

148. CCPS, the Board, and Superintendent engaged in viewpoint discrimination, compelled speech, and chilled speech, and continue to engage in viewpoint discrimination, compelled speech, and chilled speech, by silencing the viewpoints of white students, imposing a radical ideology based on race alone, and implementing policies to silence “bias interrupters” or any student who disagrees with the tenets of critical race theory.

149. The policies and practices of the Board and Superintendent require disciplinary actions for any white students that do not agree with the ideology promoted by CCPS.

150. Bias reporting systems implemented by the Board and Superintendent chill speech in violation of the First Amendment. *See Speech First, Inc. v. Schlissel*, 939 F.3d 756, 765 (6th Cir. 2019). The bias reporting systems created by the Board and Superintendent call for the reporting of any student who disagrees with the ideology described herein to be identified as a “bias interrupter.” CCPS, the Board, and Superintendent, by creating a bias reporting system has created content-based regulations of speech based on viewpoint because only certain speech, in objection to the promoted ideology described herein, is reportable and considered bias.

151. CCPS, the Board, and Superintendent do not have a compelling government interest in discriminating against Plaintiffs on account of their viewpoint, compelling

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

speech, and chilling the speech of Plaintiffs and the discriminatory actions of the Defendants are not narrowly tailored to serve any government interest.

152. The discriminatory actions of Defendants will cause significant psychological harm to Plaintiffs.

153. Defendants' discriminatory treatment of Plaintiffs violates the First Amendment of the United States Constitution.

154. Pursuant to MD. CODE ANN., Cts. and Jud. Proc. § 3-401, *et seq.*, this Court may "declare rights, status, and other legal relations whether or not further relief is or could be claimed." Further, "any person...whose rights, status, or other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation...may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation...". *Id.*

155. As such, Plaintiffs are entitled to declaratory and injunctive relief.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Enter a declaratory judgment order against Defendants declaring that the actions, practices, policies, procedures, and curriculum described herein and the silencing of the viewpoints, compelling speech, and chilling the speech of Plaintiffs violates the rights of the Plaintiffs as set forth in the First Amendment of the United States Constitution;
- B. Order Defendants to remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment;
- C. Order Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein;
- D. Enter a monetary award in favor of Plaintiffs and against Defendants in excess of \$75,000.00;
- E. Award attorney's fees and costs to be paid by Defendants to Plaintiffs pursuant to 42 U.S.C. § 1988 and any other applicable legal authority; and
- F. Grant such other and further relief as the nature of this cause may require.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

COUNT IV
Violation of Maryland Constitution, Article 24, Equal Protection Clause

156. Plaintiffs incorporate by reference and reallege the averments of paragraphs 1 through 155.
157. The Maryland Constitution, Declaration of Rights, Article 24 provides: “That no man ought to be taken or imprisoned or disseized of his freehold, liberties or privileges, or outlawed, or exiled, or, in any manner, destroyed, or deprived of his life, liberty or property, but by the judgment of his peers, or by the Law of the land.”
158. Article 24 of the Maryland Declaration of Rights is the Maryland state counterpart to the Fourteenth Amendment of the United States Constitution, and is interpreted equivalently. Accordingly, Supreme Court interpretations of the Fourteenth Amendment function as authority for interpretation of Article 24. *Pitsenberger v. Pitsenberger*, 287 Md. 20, 410 A.2d 1052, 1056 (1980).
159. The analysis under the Fourteenth Amendment is duplicative of the analysis under Article 24. *Rosa v. Bd. Of Educ. Of Charles Cnty.*, Md., Civil Action No. 8:11-cv-02873-AW, 2012 WL 3715331, at *6-7 (D. Md. Aug. 27, 2012).
160. “Classifications based on race carry a danger of stigmatic harm. Unless they are strictly reserved for remedial settings, they may in fact promote notions of racial inferiority and lead to a politics of racial history.” *Id.* Any classification based on race is presumptively invalid. *See Shaw v. Reno*, 509 U.S. 630, 643-44 (1993) (quoting *Pers. Adm’r of Massachusetts v. Feeney*, 442 U.S. 256, 272 (1979)).
161. “When the government distributes burdens or benefits on the basis of individual racial classifications, that action is reviewed under strict scrutiny.” *Parents Involved in Cty. Schs. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 719 (2007); *See also Adarand Constructors v. Pena*, 515 U.S. 200, 224 (1995) (“[A]ny person, of whatever race, has

the right to demand that any governmental actor subject to the Constitution justify any racial classification subjecting that person to unequal treatment under the strictest judicial scrutiny”).

162. The alleged attempts by the Board and Superintendent to remedy previous racism is not a justification for new racism against white students. The United States Supreme Court clearly stated that “[t]he way to stop discrimination on the basis of race is to stop discriminating on the basis of race.” *Parents Involved in Cty. Schs*, 551 U.S. at 748.

163. The CCPS, the Board, and Superintendent denies certain students, specifically white students, the certain educational opportunities, consistency with the disciplinary and suspension practices, and a quality education based solely upon their race.

164. The Board and Superintendent, through the implementation of certain practices and policies distinguishing students based on race alone, treat Plaintiffs differently from students of color based on race alone. The Board and Superintendent unlawfully discriminate against Plaintiffs based on their race.

165. The Board and Superintendent further discriminate against students of color by promoting the idea that students of color have not and cannot succeed on the basis of their skin color. The Board and Superintendent further promote the idea that students of color are somehow inferior to white students based on skin color alone.

166. CCPS unjustifiably discriminates against the Plaintiffs on the basis of race in violation of the equal protection provisions of Article 24 of the Maryland Declaration of Rights, Maryland Constitution.

167. The discriminatory actions of Defendants will cause significant psychological harm to Plaintiffs and other members of the CCPS student body.

168. Defendants’ discriminatory actions towards Plaintiff do not serve a compelling interest nor are they narrowly tailored to achieve a compelling government interest.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

Parents Involved in Community Schools v. Seattle School District No. 1, et al., 551 U.S. 701, 720 (2007).

169. Defendants' discriminatory actions violate the Equal Protection Clause of the Maryland Declaration of Rights.

170. Pursuant to MD. CODE ANN., Cts. and Jud. Proc. § 3-401, *et seq.*, this Court may "declare rights, status, and other legal relations whether or not further relief is or could be claimed." Further, "any person...whose rights, status, or other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation...may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation...". *Id.*

171. As such, Plaintiffs are entitled to declaratory and injunctive relief.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Enter a declaratory judgment order against Defendants declaring that the actions, practices, policies, procedures, and curriculum described herein violate the constitutional rights of the Plaintiffs as set forth in the Equal Protection Clause of the Maryland Declaration of Rights;
- B. Order Defendants to remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment;
- C. Order Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein;
- D. Enter a monetary award in favor of Plaintiffs and against Defendants in excess of \$75,000.00;
- E. Award attorney's fees and costs to be paid by Defendants to Plaintiffs; and
- F. Grant such other and further relief as the nature of this cause may require.

COUNT V

Violation of Md. Educ. §4-205- Quality Education Requirement

172. Plaintiffs incorporate by reference and reallege the averments of paragraphs 1 through 171.

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

173. Pursuant to MD. CODE ANN., Cts. and Jud. Proc. § 3-401, *et seq.*, this Court may “declare rights, status, and other legal relations whether or not further relief is or could be claimed.” Further, “any person...whose rights, status, or other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation...may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation...”. *Id.*

174. Plaintiffs request that this Court declare the rights and status of the Plaintiffs regarding the quality of education to which their children are entitled pursuant to MD. CODE ANN. Educ. § 4-205. Specifically, Plaintiffs request that this Court find that the discriminatory policies, practices, procedures, and curriculum described herein do not provide a “quality education” as required pursuant to MD. CODE ANN. Educ. § 4-205.

175. Further, Plaintiffs request that this Court enter a preliminary and permanent injunction requiring CCPS, the Board, and Superintendent to immediately remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment, and enter an order enjoining Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein by August 30, 2021.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Declare the rights of Plaintiffs as it relates to a quality education pursuant to MD. CODE ANN. Educ. § 4-205;
- B. Enter a declaratory judgment order against Defendants declaring that the actions, practices, policies, procedures, and curriculum described herein violates MD. CODE ANN. Educ. § 4-205;
- C. Order Defendants to remove all policies, practices, procedures, and materials described herein from the CCPS curriculum, faculty and staff training, CCPS codes of conduct, and any other aspects of the CCPS environment;

HARTMAN

116 Defense Highway

Suite 300

Annapolis, Maryland

- D. Order Defendants to take all necessary steps to remedy the effects of the unconstitutional and discriminatory conduct described herein;
- E. Enter a monetary award in favor of Plaintiffs and against Defendants in excess of \$75,000.00;
- F. Award attorney's fees and costs to be paid by Defendants to Plaintiffs; and
- G. Grant such other and further relief as the nature of this cause may require.

Respectfully submitted,

HARTMAN, Attorneys at Law

By: /s/ C. Edward Hartman, III
C. Edward Hartman, III
CPF#8501010262
116 Defense Highway, Suite 300
Annapolis, Maryland 21401
Telephone: (410) 266-3232
Facsimile: (410) 266-5561
Email: Ed@Hartman.law
Attorneys for Plaintiffs

HARTMAN
116 Defense Highway
Suite 300
Annapolis, Maryland