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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 SAM and ANDREA KASLE, as Guardians ad)
Litem for L.K., a minor; IGOR and MARINA)
15 BERSHTEYN, as Guardians ad Litem for S.B., a)
minor; MARGARETTE KESSELMAN, as)
16 Guardian ad Litem for W.K., a minor; SCOTT)
and LORI LYLE, as Guardians ad Litem for A.L.,)
17 a minor; DANIEL and JENNIFER REIF, as)
Guardians ad Litem for O.R., a minor; and LISA)
18 JOY ROSNER, as Guardian ad Litem for D.B., a)
minor,)

19 Plaintiffs,

20 v.

21 KAREN VAN PUTTEN, CHARLES)
22 VELSCHOW, WENDY PORTER, GREGORY)
S. GRUSZYNSKI, KARL LOSEKOOT,)
23 CRYSTAL LEACH, BONNIE HANSEN, TODD)
BEAL, CARRIE DU BOIS, RICHARD GINN,)
24 AMY KOO, SATHVIK NORI, and)
SHAWNEECE STEVENSON, each in their)
25 official and personal capacities,)

26 Defendants.)

Case No.

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

1 Plaintiffs SAM and ANDREA KASLE, as Guardians ad Litem for their daughter, L.K., IGOR
2 and MARINA BERSHTEYN, as Guardians ad Litem for their daughter, S.B., MARGARETTE
3 KESSELMAN, as Guardian ad Litem for her son, W.K., SCOTT and LORI LYLE, as Guardians ad
4 Litem for their son, A.L., DANIEL and JENNIFER REIF, as Guardians ad Litem for their daughter,
5 O.R., and LISA JOY ROSNER, as Guardian ad Litem for her daughter, D.B. (collectively,
6 “Plaintiffs”) bring this action against defendants KAREN VAN PUTTEN, CHARLES VELSCHOW,
7 WENDY PORTER, GREGORY S. GRUSZYNSKI, KARL LOSEKOOT, CRYSTAL LEACH,
8 BONNIE HANSEN, TODD BEAL, CARRIE DU BOIS, RICHARD GINN, AMY KOO, SATHVIK
9 NORI, and SHAWNÉE STEVENSON (collectively, “Defendants,” “SUHSD,” or the “District”),
10 each in their official and personal capacities, and allege as follows:

11 **NATURE OF THE ACTION**

12 1. This lawsuit stems from the egregious failures of Sequoia Union High School District
13 (“SUHSD”) to address an alarming surge of antisemitism within its schools, creating a hostile learning
14 environment for its Jewish students. The District’s trustees, administrators, and certain teachers have
15 repeatedly demonstrated a deliberate indifference to the problem, denying Jewish students their right
16 to participate fully in the educational process, free from discrimination and harassment, as guaranteed
17 by the U.S. Constitution, the California Constitution, and state and federal law.

18 2. SUHSD has a long history of tolerating casual antisemitism on its campuses. Students
19 and faculty have openly joked about Nazis and the Holocaust, while certain teachers have peddled
20 antisemitic falsehoods about Middle East history without facing consequences. District leadership
21 has consistently turned a blind eye to such behavior. SUHSD’s antisemitism problem worsened
22 significantly after October 7, 2023, when Hamas—a U.S.-designated terrorist organization—invaded
23 southern Israel and then mutilated, raped, and murdered more than 1,200 people. Although quick to
24 address other global injustices, SUHSD remained conspicuously silent about this historic massacre of
25 Jews, contradicting the District’s professed commitment to equity.

26 3. SUHSD’s tepid response to the October 7 attacks exacerbated the already pervasive
27 antisemitism within its schools. Jewish students faced a barrage of taunts, slurs, and hateful remarks,
28 culminating in the appearance of two giant swastikas on campus grounds. Rather than addressing the

1 escalating incidents, SUHSD officials shifted blame onto the victims, refused to engage with
2 concerned parents, and used superficial “investigations” to whitewash legitimate concerns. Jewish
3 students were even advised by teachers to conceal their religious identity to avoid becoming targets.
4 Tragically, SUHSD leadership’s primary concern seemed to be protecting its reputation, rather than
5 safeguarding the well-being of Jewish students and their families. District administrators discouraged
6 public disclosure of antisemitic incidents at their schools, citing concerns about negative publicity.

7 4. Emboldened by a lack of accountability, certain SUHSD teachers compounded the
8 District’s antisemitism crisis by infusing their lectures and course materials with antisemitic and
9 ahistorical pro-Hamas narratives. Jewish students who dared to challenge these falsehoods were often
10 targeted and harassed. To achieve academic success, Jewish students were forced to endorse skewed
11 historical narratives that undermined Jewish sovereignty and concealed atrocities committed by
12 Israel’s adversaries. Even seemingly unrelated subjects, such as ethnic studies and geometry, were
13 tainted with anti-Jewish propaganda, often echoing the dark rhetoric and imagery of Nazi Germany.

14 5. When SUHSD parents and students raised concerns—through emails, petitions, and
15 formal complaints—the District responded with bureaucratic obfuscation and outright denial,
16 demonstrating a deliberate indifference to SUHSD’s Jewish students. Emails were ignored, and
17 meetings were canceled, without explanation. The District’s administrators and trustees have
18 consistently and deliberately refused to take concrete action to stem the scourge of antisemitism on
19 their campuses, to the detriment of Jewish SUHSD students who, subjected to harassment and ridicule
20 from both peers and teachers, have been forced to endure an increasingly hostile learning environment.
21 Left with no other recourse, Plaintiffs have filed this action to protect their Constitutional and statutory
22 rights.

23 **JURISDICTION**

24 6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, in that this is
25 a civil action arising under the laws of the United States, and pursuant to 28 U.S.C. § 1343, in that the
26 claims concern deprivation of rights or privileges of United States citizens and secured by the
27 Constitution and laws of the United States providing for equal rights of citizens or of all persons. This
28

1 Court has supplemental subject matter jurisdiction over Plaintiffs' state law claims pursuant to 28
2 U.S.C. § 1367.

3 **VENUE**

4 7. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(1), in that Sequoia
5 Union High School District resides in this judicial District and all defendants reside in California, and
6 pursuant to 28 U.S.C. § 1391(b)(2), in that a substantial part of the events or omissions giving rise to
7 Plaintiffs' claims occurred in this District.

8 **DIVISIONAL ASSIGNMENT**

9 8. Assignment to the San Francisco Division is proper under Civil L.R. 3-2(c) & (d)
10 because a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred within
11 San Mateo County, and because Sequoia Union High School District is located there.

12 **THE PARTIES**

13 9. **Plaintiffs SAM KASLE** and **ANDREA KASLE** are the parents of L.K., who was at
14 all relevant times a 10th-grade student at Woodside High School, one of four comprehensive high
15 schools within the Sequoia Union High School District. **SAM KASLE**, **ANDREA KASLE**, and **L.K.**
16 reside in Redwood City, California. For **SAM KASLE** and **L.K.**, support for the right of Israel to
17 exist as a Jewish State is both a religious imperative and an integral component of their ethnic cultural
18 identity.

19 10. **Plaintiffs IGOR BERSHTEYN** and **MARINA BERSHTEYN** are the parents of
20 **S.B.**, an 11th-grade student at Woodside High School. **IGOR** and **MARINA BERSHTEYN** and **S.B.**
21 reside in Redwood City, California. For the **BERSHTEYNS** and **S.B.**, support for the right of Israel
22 to exist as a Jewish State is both a religious imperative and an integral component of their ethnic
23 cultural identity.

24 11. **Plaintiff MARGARETTE KESSELMAN** is the mother of **W.K.**, a 10th-grade
25 student at Menlo-Atherton High School. Menlo-Atherton High School is one of four comprehensive
26 high schools within the Sequoia Union High School District. **KESSELMAN** and **W.K.** reside in
27 Menlo Park, California. For **KESSELMAN** and **W.K.**, support for the right of Israel to exist as a
28

1 Jewish State is both a traditional and historical component of their ethnic cultural identity.
2 KESSELMAN is also an Israeli citizen.

3 12. **Plaintiffs SCOTT LYLE and LORI LYLE** are the parents of A.L., a 12th-grade
4 student at Woodside High School. SCOTT LYLE, LORI LYLE, and A.L. reside in Woodside,
5 California. For SCOTT LYLE and A.L., support for the right of Israel to exist as a Jewish State is
6 both a religious imperative and an integral component of their ethnic cultural identity.

7 13. **Plaintiffs DANIEL and JENNIFER REIF** are the parents of O.R., who was at all
8 relevant times an 11th-grade student at Woodside High School. DANIEL REIF, JENNIFER REIF,
9 and O.R. reside in Redwood City, California. For the REIFS and O.R., support for the right of Israel
10 to exist as a Jewish State is both a religious imperative and an integral component of their ethnic
11 cultural identity.

12 14. **Plaintiff LISA JOY ROSNER** is the parent of D.B., a 12th-grade student at Woodside
13 High School. LISA JOY ROSNER and D.B. reside in Redwood City, California. For ROSNER and
14 D.B., support for the right of Israel to exist as a Jewish State is both a religious imperative and an
15 integral component of their ethnic cultural identity.

16 15. **Defendant KAREN VAN PUTTEN** is and was at all relevant times the Principal of
17 Woodside High School. VAN PUTTEN is sued in both her individual capacity and in her official
18 capacity. Upon information and belief, VAN PUTTEN is a resident of the San Francisco Bay Area.

19 16. **Defendant CHARLES VELSCHOW** is and was at all relevant times Administrative
20 Vice Principal of Woodside High School. VELSCHOW is sued in both his individual capacity and
21 in his official capacity. Upon information and belief, VELSCHOW is a resident of the San Francisco
22 Bay Area.

23 17. **Defendant WENDY PORTER** is and was at all relevant times Administrative Vice
24 Principal of Woodside High School. PORTER is sued in both her individual capacity and in her
25 official capacity. Upon information and belief, PORTER is a resident of the San Francisco Bay Area.

26 18. **Defendant GREGORY S. GRUSZYNSKI** is and was at all relevant times a teacher
27 at Woodside High School. GRUSZYNSKI was formerly president of the Sequoia District Teachers
28 Association and is currently the Association's Bargaining Chair. GRUSZYNSKI is sued in both his

1 individual capacity and in his official capacity. Upon information and belief, GRUSZYNSKI is a
2 resident of the San Francisco Bay Area.

3 19. **Defendant KARL LOSEKOOT** is and was at all relevant times the Principal of
4 Menlo-Atherton High School. LOSEKOOT is sued in both his individual capacity and in his official
5 capacity. Upon information and belief, LOSEKOOT is a resident of the San Francisco Bay Area.

6 20. **Defendant CRYSTAL LEACH** is and was at all relevant times Superintendent of
7 SUHSD, having served in that position since March 2023. LEACH is sued in both her individual
8 capacity and in her official capacity. Upon information and belief, LEACH is a resident of the San
9 Francisco Bay Area.

10 21. **Defendant BONNIE HANSEN** is and was at all relevant times Associate
11 Superintendent of Educational Services of SUHSD, having served in that position since July 2014.
12 HANSEN is sued in both her individual capacity and in her official capacity. Upon information and
13 belief, HANSEN is a resident of the San Francisco Bay Area.

14 22. **Defendant TODD BEAL** is and was at all relevant times Assistant Superintendent,
15 Human Resources of SUHSD, having served in that position since January 2022. BEAL is sued in
16 both his individual capacity and in his official capacity. Upon information and belief, BEAL is a
17 resident of the San Francisco Bay Area.

18 23. **Defendant CARRIE DU BOIS** is and was at all relevant times a member of the
19 SUHSD Board of Trustees. DU BOIS is sued in both her individual capacity and in her official
20 capacity. Upon information and belief, DU BOIS is a resident of the San Francisco Bay Area.

21 24. **Defendant RICHARD GINN** is and was at all relevant times a member of the
22 SUHSD Board of Trustees. GINN is sued in both his individual capacity and in his official capacity.
23 Upon information and belief, GINN is a resident of the San Francisco Bay Area.

24 25. **Defendant AMY KOO** is and was at all relevant times a member of the SUHSD Board
25 of Trustees. KOO is sued in both her individual capacity and in her official capacity. Upon
26 information and belief, KOO is a resident of the San Francisco Bay Area.

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1 26. **Defendant SATHVIK NORI** is and was at all relevant times a member of the SUHSD
2 Board of Trustees. NORI is sued in both his individual capacity and in his official capacity. Upon
3 information and belief, NORI is a resident of the San Francisco Bay Area.

4 27. **Defendant SHAWNEECE STEVENSON** is and was at all relevant times a member
5 of the SUHSD Board of Trustees. STEVENSON is sued in both her individual capacity and in her
6 official capacity. Upon information and belief, STEVENSON is a resident of the San Francisco Bay
7 Area.

OTHER RELEVANT PARTIES

8
9 28. **Sequoia Union High School District (“SUHSD”)** is a public union school district
10 headquartered in Redwood City, California. SUHSD includes four comprehensive high school
11 campuses, Woodside High School, Menlo-Atherton High School, Sequoia High School, and
12 Carlmont High School. SUHSD’s website touts its “vision” to become a “national and international
13 beacon of equity and educational excellence.”¹

14 29. **Middle East Children’s Alliance (“MECA”)** is a Berkeley, California-based
15 advocacy organization whose stated goal is to “educate North Americans about children in the
16 [Middle East] region and the brutal impact of US foreign policy on their lives.” In truth, MECA is an
17 anti-Israel advocacy group with known ties to terrorist organizations² that spreads antisemitic tropes
18 alongside false and incendiary allegations against Israel. MECA regularly publishes editorials
19 accusing Israel of “genocide,” “apartheid,” and “ethnic cleansing.” Its press releases celebrate
20 antisemitic “victories,” such as a vote by UC Berkeley’s student government against the adoption of
21 International Holocaust Remembrance Alliance’s working definition of antisemitism. Through

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23 ¹ *District Profile*, Sequoia Union High School District, <https://www.seq.org/ABOUT-US/General-Information/index.html>.

24 ² MECA partners with the Union of Palestinian Women’s Committee, a group formally
25 affiliated with Fatah and designated by the United States Agency for International Development
26 (“USAID”) as the women’s wing of the Popular Front for the Liberation of Palestine (“PFLP”), a
27 notorious, U.S.-designated terrorist organization with a long history of violence targeting civilians,
28 including suicide bombings, shootings, and assassinations. The PFLP was the first Palestinian
organization to hijack airplanes in the 1960s and 1970s. *See Middle East Children’s Alliance*, NGO
Monitor (Sept. 23, 2023), https://www.ngo-monitor.org/ngos/middle_east_children_s_alliance_meca/; *Union of Health Work Committees’ Ties to the PFLP Terror Group*, NGO Monitor (Jan. 27, 2020), <https://www.ngo-monitor.org/reports/union-of-health-work-committees-ties-to-the-pflp-terror-group/>.

1 teacher trainings it calls the “Teach Palestine Project,” MECA seeks to infiltrate Bay Area K-12
 2 classrooms, and those throughout California and the rest of the United States, to indoctrinate students
 3 with its antisemitic and nakedly propagandist “lessons.” As alleged herein, SUHSD teachers use and
 4 distribute MECA instructional materials, without attribution to MECA and without state or district
 5 approval, to teach SUHSD students about the Israel-Palestine conflict.

6 30. **Samia Shoman** is MECA’s co-coordinator and a leader of the Liberated Ethnic
 7 Studies Model Curriculum Consortium. In “Teach Palestine Project” teacher training workshops,
 8 Shoman regularly excludes Israel from maps of the Middle East—instead inserting “Palestine,” which,
 9 at all times relevant to these matters, was not a country recognized by either the United States or the
 10 United Nations—and depicts alleged Palestinian suffering under purported Israeli oppression, all
 11 while concealing facts about Palestinian terrorism. In 2021, Shoman lobbied the Board of Education
 12 to exclude Jewish-American studies from the San Mateo Union High School District’s ethnic-studies
 13 curriculum, urging Board members “not to give in to the pressures and influences of . . . privileged
 14 white voices.”³

15 31. **Liberated Ethnic Studies Model Curriculum Consortium (“LESMCC”)** is the
 16 source of a great deal of virulently antisemitic instructional material that has been introduced to a
 17 growing number of school districts. These materials are in turn used to indoctrinate California school
 18 children into antisemitic beliefs about Jews and the Jewish State. This entity encourages teachers
 19 using their antisemitic materials to “fly under the radar” and emulate others who “shut their doors and
 20 teach . . . liberatory curriculum” so that the inaccurate and incendiary materials it disseminates will
 21 not be detected by parents, responsible administrators, or other members of the public.⁴

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 25 ³ Hope Solo, *California District Administrator Calls For ‘Privileged White Voices’ to be*
 26 *Banned from Influencing Ethnic Studies Curriculum and Fights Against ‘Multiple Perspectives’ in*
 27 *Email*, Daily Mail (Jan. 22, 2023), <https://www.dailymail.co.uk/news/article-11664901/California-school-administrator-urged-state-not-privileged-white-voices.html>.

28 ⁴ Complaint, Ex. A (“Preparing to Teach Palestine: A Toolkit”), *Concerned Jewish Parents &*
Teachers of L.A. v. Liberated Ethnic Stud. Model Curriculum Consortium, No. 22-cv-3243 (C.D. Cal.
 May 12, 2022), ECF No. 1-1.

1 32. **Chloe Gentile-Montgomery** was at all relevant times a teacher at Menlo-Atherton
2 High School. Upon information and belief, at this time, Gentile-Montgomery is no longer employed
3 by SUHSD.

4 33. **Abdulhadi “Hadi” Kaddoura** is and was at all relevant times a teacher at Woodside
5 High School.

6 BACKGROUND

7 A. The Recent Rising Tide of Antisemitism

8 34. Antisemitism is one of the world’s oldest and most enduring forms of hatred. It has
9 persisted through the millennia by mutating according to the majority’s prevailing ideologies, whether
10 secular or religious, and the majority’s need to scapegoat minority populations for complex and
11 intractable societal problems.⁵

12 35. In recent months, such Jew hatred has only intensified, including in the United States.
13 Ironically, this rise in antisemitism has coincided with the deadliest day for Jews since the Holocaust,
14 when 6 million Jews were systematically slaughtered as part of Hitler’s “final solution.” Eighty years
15 later, on October 7, 2023, Hamas—a U.S.-designated terrorist organization bent on the annihilation
16 of Israel and its 8 million Jewish inhabitants—invaded southern Israel and proceeded to mutilate, rape,
17 and murder more than 1,200 innocent people, many of whom had gathered to attend an outdoor music
18 festival. As documented by the terrorists’ own body cameras, Hamas slaughtered Israeli babies, raped
19 Israeli women, and burned whole Israeli families alive. Hamas terrorists also kidnapped several
20 hundred people to be used as human bargaining chips in negotiations with Israel for the release of
21 convicted terrorists held in Israeli prisons. The charred and bloodied bodies of the hostages—many
22 alive, some dead—were paraded through ecstatic Palestinian crowds who groped and spat on the
23 captives. Over a year after the Hamas massacre on October 7, dozens of men, women, and children
24 remain in Hamas captivity.⁶

25 _____
26 ⁵ Pamela Paresky, *Michal Cotler-Wunsh: “Jew Hatred Never Died, It Just Mutated”* (Apr. 5,
2024), <https://quilllette.com/blog/2024/04/05/michal-cotler-wunsh-pamela-paresky/>.

27 ⁶ See, e.g., *Only 50 Hostages Still Alive in Gaza, U.S. Officials Say*, Jerusalem Post (June 20,
2024), <https://www.jpost.com/breaking-news/article-806995>; *Israel Says It Recovered 6 Hostages’
28 Bodies in Gaza*, NPR (Aug. 20, 2024), <https://www.npr.org/2024/08/20/nx-s1-5082334/israel-hamas-war-hostages-recovered-gaza>.

1 36. Hamas moved immediately from violence to deception and obfuscation to try to turn
2 public opinion in its favor. From the first hours of its attack, Hamas and its allies—led by Iran, the
3 world’s leading state sponsor of terrorism and longtime Hamas financier—waged a sophisticated
4 misinformation campaign, inspired and supported by groups like the Islamic State, which had
5 effectively exploited the world’s major social networking platforms. Hamas’s efforts were aided by
6 Iran, Russia and, to a lesser degree, China, all of which used state and social media to support Hamas
7 and undercut Israel, while denigrating Israel’s principal ally, the United States.⁷ Social media
8 accounts were flooded with a barrage of false images, memes, videos, and posts intended to conceal
9 Hamas’s savagery, undercut Israel’s right to self-defense, and otherwise mislead the public about the
10 Palestinian cause.

11 37. Hamas’s misinformation campaign gained traction throughout the West, including in
12 the United States, where the terrorist organization found a surprisingly receptive—if gullible and
13 naive—audience among self-styled “social justice” advocates. Almost instantly after Hamas’s attack,
14 pro-Palestinian advocates downplayed the slaughter, or denied the atrocities had even happened.
15 Western political leaders—including former British Prime Minister Rishi Sunak—appropriately
16 dubbed these uncritical audiences Tehran’s “useful idiots.”⁸

17 38. The result has been a staggering surge in antisemitism in the United States and around
18 the world. In the two weeks after Hamas’s attack, the number of antisemitic incidents in America
19 quintupled compared with the same period in 2022.⁹ The Anti-Defamation League (“ADL”) reported
20 a 360% increase in antisemitic incidents in the United States after the attack, with 3,283 incidents
21 recorded from October 7, 2023, to January 7, 2024, a dramatic rise compared to the same period in
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25 ⁷ Steven Lee Myers & Sheera Frenkel, *In a Worldwide War of Words, Russia, China and Iran*
26 *Back Hamas*, N.Y. Times (Nov. 3, 2023), www.nytimes.com/2023/11/03/technology/israel-hamas-information-war.html.

27 ⁸ Dawn News English, *British PM Rishi Sunak Labels Who Chants ‘From the River to the Sea’*
28 *As ‘Idiots’*, YouTube (Jan. 26, 2024), <https://www.youtube.com/watch?v=94HMqOq02xU>.

⁹ *What Is Antisemitism—And Why Do Differences in Interpretation Matter?* The Economist
(Dec. 1, 2023), <https://www.economist.com/the-economist-explains/2023/12/01/what-is-antisemitism-and-why-do-differences-in-interpretation-matter>.

1 the previous year.¹⁰ The perpetrators deliberately targeted Jewish institutions and individuals,
2 justifying their attacks with age-old antisemitic tropes and falsehoods that parroted Hamas's
3 propagandist talking points.

4 39. The problem was made worse by social media: On X, formerly Twitter, antisemitic
5 posts soared by an astounding 919% the week after Hamas's attack, compared with a week earlier.¹¹
6 TikTok also exhibited alarming increases in antisemitism, becoming the leading platform for
7 antisemitic content in October 2023, with nearly half of all recorded incidents occurring there.¹²
8 Overall, antisemitic content across social-media platforms surged five-fold after October 7, with an
9 average of 145 new antisemitic posts per day, compared to 27 posts per day in the preceding months.¹³

10 40. Even a year later, antisemitic incidents in the United States remain pervasive and
11 violent. Such incidents have included hoax bomb threats to synagogues;¹⁴ antisemitic, pro-Hamas
12 vandalism of Jews' homes splattered with red paint and inverted red triangles, echoing Hamas's use
13 of the same symbol to identify its Israeli targets;¹⁵ a deadly attack on an elderly Jewish man counter-

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20 ¹⁰ Nicole Chavez, *ADL Records More Than 3,200 Antisemitic Incidents Since Start of Israel-*
21 *Hamas War*, CNN (Jan. 11, 2024), [https://www.cnn.com/2024/01/10/us/adl-antisemitism-reports-](https://www.cnn.com/2024/01/10/us/adl-antisemitism-reports-soar-reaaj/index.html)
[soar-reaaj/index.html](https://www.cnn.com/2024/01/10/us/adl-antisemitism-reports-soar-reaaj/index.html).

22 ¹¹ *Id.*

23 ¹² *Online Antisemitism Has Increased and Become More Violent Since October 7 – Report*,
24 Jerusalem Post (Feb. 29, 2024), <https://www.jpost.com/diaspora/antisemitism/article-789504>.

25 ¹³ *Id.*

26 ¹⁴ Marty Roney, *Six Jewish Sites Across Alabama Receive Bomb Threats Saturday*, USA Today
27 (Dec. 16, 2023), [https://www.usatoday.com/story/news/local/2023/12/16/six-jewish-sites-across-](https://www.usatoday.com/story/news/local/2023/12/16/six-jewish-sites-across-alabama-receive-bomb-threats-saturday/71946573007/)
[alabama-receive-bomb-threats-saturday/71946573007/](https://www.usatoday.com/story/news/local/2023/12/16/six-jewish-sites-across-alabama-receive-bomb-threats-saturday/71946573007/); *US Jews Suffer Nearly 200 Swatting, False*
28 *Bomb Threats Throughout Weekend*, Jerusalem Post (Dec. 17, 2023),
<https://www.jpost.com/diaspora/antisemitism/article-778427>.

¹⁵ Artemis Moshtaghian & Zenebou Sylla, *NY Governor Calls Vandalism at the Homes of Jewish*
Board Members of the Brooklyn Museum 'An Abhorrent Act of Antisemitism,' CNN (June 13, 2024),
[https://www.cnn.com/2024/06/12/us/nova-music-festival-exhibition-protest-in-new-york-called-](https://www.cnn.com/2024/06/12/us/nova-music-festival-exhibition-protest-in-new-york-called-heartbreaking/index.html)
[heartbreaking/index.html](https://www.cnn.com/2024/06/12/us/nova-music-festival-exhibition-protest-in-new-york-called-heartbreaking/index.html).

1 protesting a pro-Palestinian demonstration in California;¹⁶ and random assaults on Orthodox Jewish
2 children playing on a sidewalk.¹⁷

3 **B. Antisemitism at Educational Institutions**

4 41. Hamas's propaganda campaign found particularly fertile soil at U.S. universities and
5 schools, turning campuses into hotbeds of antisemitism. In the months following the October 7 attack,
6 Hillel International, a Jewish nonprofit organization, tallied 38 antisemitic physical assaults at
7 colleges, and 227 cases of vandalism.¹⁸ Those numbers have continued to increase. The result has
8 been a surge of congressional inquiries, over 65 Title VI complaints, and other civil rights litigation
9 leveling charges of antisemitism.¹⁹

10 42. A recent preliminary injunction issued by the United States District Court for the
11 Central District of California underscored the alarming prevalence of antisemitic harassment at
12 educational institutions, in particular at UCLA. In that ruling, U.S. District Judge Mark C. Scarsi
13 condemned UCLA for permitting the exclusion of Jewish students from campus activities for refusing
14 to renounce their faith: "In the year 2024, in the United States of America, in the State of California,
15 in the City of Los Angeles, Jewish students were excluded from portions of the UCLA campus
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17 ¹⁶ Marilyn Heck & Meredith Deliso, *Demonstrator to Stand Trial in the Death of Jewish Man at*
18 *November Israel-Hamas War-Related Protest*, ABC News (May 16, 2024),
19 [https://abcnews.go.com/US/demonstrator-stand-trial-death-jewish-man-november-](https://abcnews.go.com/US/demonstrator-stand-trial-death-jewish-man-november-israel/story?id=110286757)
20 [israel/story?id=110286757](https://abcnews.go.com/US/demonstrator-stand-trial-death-jewish-man-november-israel/story?id=110286757).

21 ¹⁷ Michael Starr, *Jewish Children Savagely Beaten by Man in New York City Attack*, Jerusalem
22 Post (May 16, 2024), https://www.jpost.com/international/article-801437#google_vignette.

23 ¹⁸ *American Universities Face a Reckoning Over Antisemitism*, Economist (Dec. 12, 2023),
24 [https://www.economist.com/united-states/2023/12/12/american-universities-face-a-reckoning-over-](https://www.economist.com/united-states/2023/12/12/american-universities-face-a-reckoning-over-antisemitism)
25 [antisemitism](https://www.economist.com/united-states/2023/12/12/american-universities-face-a-reckoning-over-antisemitism).

26 ¹⁹ See, e.g., Arno Rosenfeld, *Higher Education Investigations and Lawsuits Related to*
27 *Antisemitism*, [https://principled-haddock-800.notion.site/6db78055195b44c8b8e91ca8783534fc?v=](https://principled-haddock-800.notion.site/6db78055195b44c8b8e91ca8783534fc?v=3f1fb93547874803a9934b2e0da8da11)
28 [3f1fb93547874803a9934b2e0da8da11](https://principled-haddock-800.notion.site/6db78055195b44c8b8e91ca8783534fc?v=3f1fb93547874803a9934b2e0da8da11) (last updated Mar. 28, 2024); Press Release, N.Y.U., *Joint*
Statement on Settlement of Suit (July 9, 2024), [https://www.nyu.edu/about/news-](https://www.nyu.edu/about/news-publications/news/2024/july/a-joint-statement-on-lawsuit.html)
[publications/news/2024/july/a-joint-statement-on-lawsuit.html](https://www.nyu.edu/about/news-publications/news/2024/july/a-joint-statement-on-lawsuit.html); Kathryn Watson, *House Panel*
Opening Investigation into Harvard, MIT and UPenn After Antisemitism Hearing, CBS News (Dec.
7, 2023), [https://www.cbsnews.com/news/house-panel-antisemitism-investigation-harvard-mit-](https://www.cbsnews.com/news/house-panel-antisemitism-investigation-harvard-mit-upenn/)
[upenn/](https://www.cbsnews.com/news/house-panel-antisemitism-investigation-harvard-mit-upenn/); Complaint, *Frankel v. Regents of the Univ. of Cal.*, No. 24-cv-4702 (C.D. Cal. June 5, 2024),
ECF No. 1; First Amended Complaint, *Students Against Antisemitism, Inc. v. Trs. of Columbia Univ.*
in the City of N.Y., No. 24-cv-1306 (S.D.N.Y. June 17, 2024), ECF No. 39; *Jews at Haverford v. Corp.*
of Haverford Coll., No. 24-cv-2044 (GAM) (E.D. Pa. May 13, 2024); *Fiss v. Cal. Coll. of the Arts*,
No. 24-cv-3415 (HSG) (N.D. Cal. June 6, 2024).

1 because they refused to denounce their faith. This fact is so unimaginable and so abhorrent to our
2 constitutional guarantee of religious freedom that it bears repeating, *Jewish students were excluded*
3 *from portions of the UCLA campus because they refused to denounce their faith.*” *Frankel v. Regents*
4 *of the Univ. of Cal.*, No. 24-cv-04702, 2024 WL 3811250, at *1 (C.D. Cal. Aug. 13, 2024). The court
5 concluded that, “under constitutional principles, UCLA may not allow services to some students when
6 UCLA knows that other students are excluded on religious grounds, regardless of who engineered the
7 exclusion.” *Id.*

8 43. A recent decision by the United States District Court for the District of Massachusetts
9 in *Kestenbaum v. President & Fellows of Harvard College* drew further attention to the troubling rise
10 of antisemitism on American university campuses. No. CV 24-10092-RGS, 2024 WL 3658793 (D.
11 Mass. Aug. 6, 2024). The lawsuit accuses Harvard of inadequately addressing a wave of antisemitic
12 incidents after October 7. The court denied Harvard’s attempt to dismiss the case, finding that the
13 complaint had documented several instances of “Harvard’s failure to address what [Harvard
14 administrators] repeatedly publicly recognized as an eruption of antisemitism on the Harvard campus.
15 Indeed, in many instances, Harvard did not respond at all.....In other words, the facts as pled show
16 that Harvard failed its Jewish students.” *Id.* at *6. The complaint echoed concerns raised by Harvard’s
17 own leadership, who previously criticized the university for failing to issue a swift and unequivocal
18 condemnation of the October 7 massacre.²⁰ As alleged herein, SUHSD’s administrators have
19 perpetrated the same horrifying double standard, in violation of SUHSD students’ civil rights. *See*
20 *infra* ¶¶ 55–58.

21 44. In July 2024, New York University settled a lawsuit alleging a pervasive climate of
22 antisemitism on campus in violation of Title VI of the Civil Rights Act of 1964. In settling, NYU
23 committed to implementing “groundbreaking measures to address antisemitism, including in the wake
24 of the October 7, 2023 terrorist attacks . . . to safeguard its community’s Jewish and Israeli
25
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27

28 ²⁰ Statement from the Harvard Corporation: Our President, Harv. Univ. (Dec. 12, 2023),
<https://www.harvard.edu/2023/12/12/statement-from-the-harvard-corporation-our-president/>.

1 students”²¹ Similar lawsuits remain pending against other schools, which have been publicly
 2 encouraged to “promptly follow [NYU’s] lead.”²²

3 45. The tacit, if not overt, complicity of educators and administrators has undoubtedly
 4 fueled antisemitism’s surge on college campuses and in other educational institutions, such as SUHSD.
 5 Leftist academics have forced the Israeli-Palestinian conflict into a simplistic Marxist “oppressor-
 6 oppressed” framework, which casts Israel as an “imperialist-colonialist” force, Israelis as “settler-
 7 colonialists,” and Palestinians as victims who may justifiably murder their “oppressors.” This
 8 ideology—a “toxic, historically nonsensical mix of Marxist theory, Soviet propaganda, and traditional
 9 antisemitism from the Middle Ages and the 19th century”²³—has gained widespread currency among
 10 a growing battalion of Hamas apologists in academia.

11 46. Especially in the United States, the ideology has been influenced by identity analysis,
 12 a framework that views history through the lens of race in the American experience.²⁴ The ideology
 13 holds that Jews and Israelis are merely “privileged whites” incapable of being victims. It falsely
 14 portrays Jews as oppressors, engaged in “exploitive capitalism” in the West and or “colonialism” in
 15 the Middle East. This noxious ideology rests on an “ahistorical delusion”²⁵ that ignores the Jewish
 16 people’s indigenous roots in Israel as well as their historical persecution, including medieval
 17 massacres by Christian and Islamic societies, the Russian pogroms, and the Holocaust. As alleged
 18 herein, despite its ahistorical foundations, certain SUHSD instructors—some of whom are open
 19 Hamas apologists—actively teach this antisemitic ideology to SUHSD students under the guise of
 20 history, ethnic studies, and even geometry. *See infra* ¶¶ 72(b), 73–83, 102–10. The result is not only
 21 a reprehensible failure of pedagogy but a hostile learning environment for Jewish students. By

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 23 ²¹ *Id.*

24 ²² *Kasowitz and NYU Announce Agreement on Settlement of Case*, Kasowitz Benson Torres (July
 25 9, 2024), <https://www.kasowitz.com/media/client-news/kasowitz-and-nyu-announce-agreement-on-settlement-of-case/>; Jonathan Stempel, *Harvard University Must Face Lawsuit Over Antisemitism On Campus, Judge Rules*, Reuters (Aug. 7, 2024), <https://www.reuters.com/legal/harvard-must-face-lawsuit-over-antisemitism-campus-us-judge-says-2024-08-06/>.

26 ²³ Simon Sebag Montefiore, *The Decolonization Narrative Is Dangerous and False*, Atlantic
 27 (Oct. 27, 2023), <https://www.theatlantic.com/ideas/archive/2023/10/decolonization-narrative-dangerous-and-false/675799/>.

28 ²⁴ *Id.*

²⁵ *Id.*

1 promoting a distorted view of history, SUHSD is perpetuating a dangerous ideology with grave
2 consequences for both Jewish students and the broader community.

3 **C. Antisemitism Defined**

4 47. In 2016, the International Holocaust Remembrance Alliance (“IHRA”) promulgated a
5 widely accepted definition of antisemitism, often regarded as the global “gold standard” in the field.²⁶
6 The IHRA Definition states that “[a]ntisemitism is a certain perception of Jews, which may be
7 expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed
8 toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions
9 and religious facilities.”

10 48. The IHRA Definition goes further by offering “contemporary examples of
11 antisemitism in public life, the media, schools, the workplace,” which include “the targeting of the
12 state of Israel, conceived as a Jewish collectivity,” and “[d]enying the Jewish people their right to
13 self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavor.”²⁷ The
14 IHRA Definition explains that “criticism of Israel similar to that leveled against any other country
15 cannot be regarded as antisemitic,” but “[a]pplying double standards by requiring of it a behavior not
16 expected or demanded of any other democratic nation” is.²⁸ The IHRA Definition acknowledges that
17 anti-Zionism—the belief that Israel should not exist as a Jewish state and that Jews lack self-
18 determination rights in their ancestral homeland—is often a manifestation of antisemitism.

19 49. In line with the IHRA Definition, anti-Zionism has been recognized as the “newest
20 strain of Jew hatred.”²⁹ Anti-Zionism rejects Israel’s legitimacy as a nation and denies the Jewish
21 people’s right to self-determination. This rejection is inherently antisemitic, often employing anti-
22 Jewish tropes, marginalizing Jews and those connected to Israel, exploiting Jewish trauma through
23 false comparisons to Nazis, and seeking to undermine Jews’ right to nationhood and self-

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25 ²⁶ *What Is Antisemitism—And Why Do Differences in Interpretation Matter?* The Economist
26 (Dec. 1, 2023), <https://www.economist.com/the-economist-explains/2023/12/01/what-is-antisemitism-and-why-do-differences-in-interpretation-matter> (noting that the IHRA Definition “has become the international gold standard.”).

27 ²⁷ Working definition of antisemitism, International Holocaust Remembrance Alliance,
28 <https://holocaustremembrance.com/resources/working-definition-antisemitism>.

²⁸ *Id.*

²⁹ Parensky, *supra* note 5.

1 determination. As the Columbia University Task Force on Antisemitism recently explained: “[T]o
 2 advocate for the active dissolution of the world’s only Jewish state is quite different from even the
 3 bitterest critique of its policies. Given the absence of such a position in relation to virtually any other
 4 political state in the world, anti-Zionism . . . hews far more closely to antisemitism than to a simple
 5 critique of Israel.”³⁰

6 50. The IHRA’s definition of antisemitism has been adopted by over 1,100 institutions and
 7 governments around the world, including the United States.³¹ The Bush administration adopted the
 8 IHRA Definition as a guide for the United States Commission on Civil Rights in 2006,³² and for the
 9 United States State Department in 2007.³³ Similarly, the Obama administration used the IHRA
 10 Definition to develop the State Department’s official working definition published in 2010,³⁴ and the
 11 State Department later adopted the current version of the IHRA Definition when it was updated in
 12 2016.³⁵ The Trump administration continued the use of the IHRA Definition by the State
 13 Department³⁶ and issued Executive Order 13899, which mandated that the relevant federal agencies
 14 consider the IHRA Definition when enforcing Title VI.³⁷ The Biden administration has followed suit,
 15 reaffirming the use of the IHRA Definition.³⁸ The IHRA framework’s utility in enforcing Title VI
 16 was recently highlighted in an October 2023 Department of Education action, in which a teaching
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 19 ³⁰ Columbia University Task Force on Antisemitism, Report #2, at 14-15 (2024),
 20 [https://president.columbia.edu/sites/default/files/content/Announcements/Report-2-Task-Force-on-](https://president.columbia.edu/sites/default/files/content/Announcements/Report-2-Task-Force-on-Antisemitism.pdf)
 21 [Antisemitism.pdf](https://president.columbia.edu/sites/default/files/content/Announcements/Report-2-Task-Force-on-Antisemitism.pdf).

22 ³¹ The White House, Exec. Order No. 13899, Combatting Antisemitism (Dec. 11, 2019),
 23 <https://www.govinfo.gov/content/pkg/DCPD-201900859/pdf/DCPD-201900859.pdf>.

24 ³² See U.S. Comm’n on C.R., Findings and Recommendations of the United States Commission
 25 on Civil Rights Regarding Campus Anti-Semitism (2006),
 26 <https://www.usccr.gov/files/pubs/docs/050306FRUSCCRRCAS.pdf>.

27 ³³ See U.S. Dep’t of State, Bureau of Democracy, H.R. & Lab., “Working Definition” of Anti-
 28 Semitism (2007), <https://2001-2009.state.gov/g/drl/rls/56589.htm>.

³⁴ U.S. Dep’t of State, Defining Antisemitism, <https://www.state.gov/defining-antisemitism/>.

³⁵ U.S. Dep’t of State, Off. Special Envoy to Monitor & Combat Antisemitism, Defining Anti-
 Semitism, <https://www.state.gov/defining-antiSemitism/> (last visited Aug. 20, 2024).

³⁶ See *id.*

³⁷ The White House, Exec. Order No. 13899, *supra* note 31.

³⁸ Am. Jewish Comm., *AJC Praises Biden Administration for Support for IHRA Working
 Definition of Anti-Semitism* (Feb. 2, 2021), [https://www.ajc.org/news/ajc-praises-biden-](https://www.ajc.org/news/ajc-praises-biden-administration-support-for-ihra-working-definition-of-anti-Semitism)
[administration-support-for-ihra-working-definition-of-anti-Semitism](https://www.ajc.org/news/ajc-praises-biden-administration-support-for-ihra-working-definition-of-anti-Semitism).

1 assistant's taunts toward Zionist students at the University of Vermont were deemed discriminatory
2 acts.³⁹

3 51. The IHRA Definition has also been adopted by 37 states across the political spectrum,
4 such as the Dakotas and Texas on the one hand to New York and Massachusetts on the other.⁴⁰
5 Multiple U.S. government departments and agencies, including the Office of Civil Rights in the
6 Department of Education, have cited the IHRA Definition with approval.⁴¹ It is also used by special
7 envoys combatting antisemitism worldwide.⁴²

8 52. Under the IHRA's definition of antisemitism, and as clarified by the examples set forth
9 therein, all of the conduct at issue in this Complaint is antisemitic, including, but not limited to:

10 (a) Presenting the war between Hamas and Israel as one-sided Israeli aggression
11 without acknowledging Hamas's attacks on Israel or Hamas's internationally recognized status as a
12 terrorist organization;

13 (b) Singling out a Jewish student for her support of the existence of the State of
14 Israel as a Jewish state, and urging her classmates to conclude that she is wrong in her beliefs;

15 (c) Attacking Israel's conduct and its policies on the enforcement of its borders by
16 invoking standards to which no other country in the world—including Israel's neighboring states—is
17 held;

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19 _____
20 ³⁹ Letter from U.S. Dep't of Education to Univ. of Vermont re Compl. No. 01-22-2002, April 3,
2023, <https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/01222002-a.pdf>.

21 ⁴⁰ See CAM Information Hub Database of IHRA Antisemitism Definition Adoptions by US
22 States, Combat Antisemitism Movement (June 23, 2023),
<https://combatantisemitism.org/government-and-policy/cam-information-hub-database-of-ihra-antisemitism-definition-adoptions-by-us-states-2/>.

23 ⁴¹ See, e.g., U.S. Dep't of State, Office of the Special Envoy To Monitor and Combat
24 Antisemitism, [https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-
25 democracy-and-human-rights/office-of-the-special-envoy-to-monitor-and-combat-antisemitism/](https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-of-the-special-envoy-to-monitor-and-combat-antisemitism/);
26 U.S. Dep't of Educ., Questions and Answers on Executive Order 13899 (Combating Anti-Semitism)
27 and OCR's Enforcement of Title VI of the Civil Rights Act of 1964 (Jan. 19, 2021),
<https://www2.ed.gov/about/offices/list/ocr/docs/qa-titleix-anti-semitism-20210119.pdf>; The White
28 House, The U.S. National Strategy To Counter Antisemitism at 13 (May 2023),
[https://www.whitehouse.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-
Antisemitism.pdf](https://www.whitehouse.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-Antisemitism.pdf).

⁴² See Global Guidelines for Countering Antisemitism, U.S. Dep't of State, July 17, 2024,
<https://www.state.gov/global-guidelines-for-countering-antisemitism/>.

1 (d) Requiring Jewish students to disregard their sincerely held religious beliefs and
2 adopt a teacher’s ahistorical, biased views on Jews and Israel in order to obtain a good grade in that
3 teacher’s class;

4 (e) Promoting and repeating tropes of Jews as “puppet masters”;

5 (f) Excusing the display of Nazi symbols—and explaining them away as Buddhist
6 Manji depictions from anime;

7 (g) Making remarks about Jewish physiognomy and jokes about the Holocaust and
8 dead Jews;

9 (h) Denying the indigeneity of the Jewish people to, and other facts of Jewish
10 history and Jews’ ancestral relationship with, the land of Israel; and

11 (i) Refusing to meet with Jewish parents to discuss the content of instructional
12 materials that bear on, and attack, the Jewish religious, ethnic, and ancestral commitment to the land
13 of Israel, when other minority groups with similar concerns would be treated differently.

14 53. As alleged herein, SUHSD trustees, administrators, and certain faculty have permitted
15 antisemitism to take root and metastasize within SUHSD’s schools, through both deliberate
16 indifference and outright animosity toward Jewish students. This has created a hostile educational
17 environment for Jewish students at SUHSD schools, causing them to fear for their safety and
18 depriving them of their right to participate fully in the educational process, free from discrimination
19 and harassment, as guaranteed by the U.S. Constitution, the California Constitution, and state and
20 federal laws.

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FACTUAL ALLEGATIONS

A. SUHSD Tolerates and Implicitly Condones Antisemitism in Its Schools

54. Even before the brutal Hamas attacks of October 7, 2023, Defendants knowingly allowed antisemitic sentiment to fester within SUHSD schools, demonstrating a widespread, de facto custom and practice of deliberate indifference to anti-Jewish harassment. For example:

(a) In or around 2022, the president of Menlo-Atherton’s Jewish Student Union (“JSU”) was called a “kike” by an older student who observed her wearing a necklace bearing the Star of David, the symbol of Judaism.⁴³ No known action was taken by Defendants.

(b) In early December 2022, Menlo-Atherton administrators found swastikas scrawled on bathroom walls. In response, administrators encouraged Jewish “students to make appointments with social-emotional counselors.”⁴⁴ Defendants failed to investigate the incident appropriately, and no student is known to have been disciplined.

(c) In or around September 2023, in the Woodside High School library, a group of students were engaged in a discussion of Anne Frank’s memoir, *The Diary of a Young Girl*. During the conversation, a student made a shockingly antisemitic remark, declaring within earshot of their Jewish classmates that all Jewish people should return to living in ghettos. The statement was heard by S.B. Despite the vile nature of the statement, no Woodside High School faculty or administrators intervened.

(d) In or around the Fall of 2023, in the Woodside High School library, a student exclaimed, also within earshot of Jewish students, “Oh my God, I thought this was a swastika symbol, I got so excited!” No SUHSD faculty or administrators intervened.

(e) In or around the Fall of 2023, a Woodside High School student created a “meme” using a picture of another student along with the caption, “He thinks the Holocaust is funny!” The picture was posted on Snapchat, a multimedia messaging application. S.B. and others saw the picture. Once again, no SUHSD faculty or administrators intervened.

⁴³ Natalie Fishman & Sonia Freedman, *More Than Graffiti: Trolling and The Rise of Antisemitism*, M-A Chronicle (May 22, 2023), <https://machronicle.com/more-than-graffiti-trolling-and-the-rise-of-antisemitism/#:~:text=After%20M%2DA%20administrators%20found%%20swastikas,appointments%20with%20social%2Demotional%20counselors.>

⁴⁴ *Id.*

1 (f) In or around September 2023, at Menlo-Atherton High School, Zoe Wilson, a
2 substitute biology teacher, asked W.K. about his family background. W.K. mentioned that his family
3 is Jewish and that his grandfather sought refuge in Bashkortostan during World War II. Wilson
4 proceeded to share jokes about the Holocaust with a group of students: “How do you fit 10,000 Jews
5 in a Volkswagen?” she asked. “In the ashtray.” Wilson continued: “What’s the difference between
6 a pizza and a Jew? The pizza doesn’t scream when you put it in the oven.” KESSELMAN and
7 another Jewish student’s mother reported Wilson’s inappropriate and insensitive “jokes” to school
8 administrators. In response, LOSEKOOT told W.K. that LOSEKOOT could either instruct Wilson
9 to apologize or transfer W.K. to another substitute, suggesting that W.K. was the only student
10 offended or harmed by Wilson’s remarks. W.K. chose to receive an apology but was disappointed
11 when Wilson’s eventual apology was insincere and did not address the offensive and insensitive
12 nature of her comments. Despite this, Wilson continues to work as a long-term substitute teacher at
13 Menlo-Atherton High School.

14 **B. SUHSD Administrators Fail to Condemn Hamas’s October 7 Massacre**

15 55. In the deadliest day for Jews since the Holocaust, on October 7, 2023, Hamas invaded
16 southern Israel and mutilated, raped, and murdered more than 1,200 innocent people, many of whom
17 had gathered to attend an outdoor music festival. Hundreds of civilians—including U.S. citizens—
18 were taken hostage, their bruised and bloodied bodies paraded through rapturous Palestinian crowds.
19 Many hostages have since died—many brutally murdered—in captivity.⁴⁵

20 56. Despite their vocal advocacy on various political and social justice matters, SUHSD
21 administrators, including Superintendent LEACH, remained conspicuously silent in the face of this
22 massacre. Their silence contrasted sharply with their swift condemnation of the deaths of people of
23 color following George Floyd’s demise. In a mass email, District administrators described those

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25 ⁴⁵ Most recently, six of the young Jewish people taken hostage—one of whom spent his early
26 childhood in the San Francisco Bay Area—were murdered in captivity. *See, e.g.*, Press Release,
27 Governor Gavin Newsom, Governor Newsom Statement on Californian Hersh Goldberg-Polin (Sept.
28 1, 2024), <https://www.gov.ca.gov/2024/09/01/governor-newsom-statement-on-californian-hersh-goldberg-polin/>; Alex Stambaugh, Nectar Gan & Jeremy Diamond, *Israel’s Military Says Six Hostages ‘Brutally Murdered’ in Gaza, Including Israeli-American Goldberg-Polin*, CNN (Sept. 1, 2024), <https://www.cnn.com/2024/08/31/middleeast/israeli-american-hostage-hersh-goldberg-polin-death-intl-hnk/index.html>.

1 events as “tragic” and expressed empathy for students, stating: “[I]t hurts us as parents because the
 2 thought of sending a young adult out into the world, not knowing if they will come back safe or alive,
 3 creates fear for our BIPOC community.” Defendant LEACH issued similar, districtwide
 4 condemnations of violent acts targeting *other* minority communities, such as the January 2023
 5 Monterey Park shooting, which devastated one of the nation’s largest Asian American, Native
 6 Hawaiian, and Pacific Islander neighborhoods.⁴⁶

7 57. Such condemnations were noticeably absent, however, when the victims of tragic
 8 events happened to be Jewish or Israeli. SUHSD’s response to the October 7 massacre was instead
 9 equivocal: On October 10, 2023, LEACH issued a tepid email offering “support and solidarity” to
 10 Jewish and Palestinian communities, along with mental health resources. While paying lip service to
 11 “shared values” of “respect” and “compassion,” LEACH conspicuously avoided condemning the
 12 abduction, murder, and mutilation of thousands of innocent Jewish civilians. LEACH’s inability to
 13 denounce such savagery undermined SUHSD’s self-proclaimed “vision” to become a “beacon of
 14 equity,” as well as LEACH’s own hollow promises to create a school environment “where every
 15 student and family feels valued and respected.”

16 58. Jewish SUHSD students and their parents were understandably distressed and
 17 disappointed by LEACH’s equivocal message. Several parents implored LEACH to issue a clear
 18 condemnation of Hamas’s horrific actions and to reassure the community of SUHSD leaders’
 19 unwavering moral compass. These pleas were ignored, and no such firm message was ever sent.

20 C. **After the October 7 Massacre, Antisemitism Surges at SUHSD Schools:**
 21 **Swastikas Are Discovered at Woodside High School, and Jewish Students Are**
 22 **Targeted with Antisemitic Slurs at Menlo-Atherton High School**

23 59. Perhaps unsurprisingly given LEACH’s failure to condemn the October 7 massacre,
 24 antisemitism—already a prevalent problem at SUHSD schools—intensified in the weeks following
 25 Hamas’s terror attacks.

26
 27 ⁴⁶ The White House, *Statement from President Joe Biden Marking One Year Since Shootings in*
 28 *Monterey Park and Half Moon Bay* (Jan 21, 2024), <https://www.whitehouse.gov/briefing-room/statements-releases/2024/01/21/statement-from-president-joe-biden-marking-one-year-since-shootings-in-monterey-park-and-half-moon-bay/>.

1 60. On or about October 26, 2023, in the hallways of Woodside High School, a group of
2 Woodside students yelled, “Go back to where you came from!” at S.B., a Jewish student. Vice
3 Principal PORTER, who witnessed the incident, did nothing. Understandably alarmed, S.B. reported
4 the incident to Principal VAN PUTTEN’s office, but no disciplinary or remedial action was taken.
5 Following the incident, Plaintiff MARINA BERSHTEYN advised her daughter, S.B., to stop wearing
6 her Star of David necklace to school. S.B. did so, fearing for her safety and recognizing SUHSD
7 leadership’s failure to protect her.

8 61. Then, on November 1, 2023, two swastikas were discovered etched on the pavement
9 at Woodside High School, as depicted below:



19 62. The next day, Plaintiff LISA JOY ROSNER’s daughter, D.B., found the swastikas and
20 reported the incident in an email to Woodside High School administrators. D.B. explained that “to
21 all the Jewish students and staff on campus[,] this is horrifying and makes us feel unsafe.”

22 63. On November 3, 2023, Principal VAN PUTTEN emailed the Woodside community
23 claiming that a purportedly “extensive investigation” by school administrators and the San Mateo
24 Sheriff’s Department had “confirm[ed]” that the swastikas were not, in fact, Nazi symbols but
25 “spiritual symbol[s] from Japanese Buddhism known as Manji popularized by anime.” (Ex. 1.)

26 64. In truth, the District’s purportedly “extensive” investigation was a sham, concluded in
27 under two days, and the “confirm[ation]” was merely a rubber-stamping of the perpetrator’s own self-
28 serving story, which SUHSD administrators quickly accepted, lest they be forced to confront the

1 growing tide of antisemitism within their schools. Even worse, VAN PUTTEN lied. Contrary to
2 VAN PUTTEN's assertion that the San Mateo County Sheriff's Department participated in the
3 "investigation," the Department has no record of receiving any reports about swastika incidents on or
4 around November 1, 2023. SUHSD administrators failed to take meaningful action to protect Jewish
5 students in the wake of this overt hostility toward Jews.

6 65. The discovery of swastikas, coupled with VAN PUTTEN's lie and her apparent
7 credulity in accepting the perpetrator's flimsy and self-serving justifications, ignited alarm among
8 Jewish SUHSD students and their families, especially given the close temporal proximity between
9 the appearance of the swastikas and the October 7 Hamas massacre, an event that continues to
10 reverberate.

11 66. In early November 2023, A.L., then an 11th-grade student at Woodside, approached
12 VAN PUTTEN about the incident and the school's lack of action. VAN PUTTEN dismissed A.L.'s
13 concerns, falsely claiming that the student-perpetrator was a recent immigrant to the United States
14 unfamiliar with the swastika's meaning. This lie contradicted both the student's five-year residency
15 in the United States and VAN PUTTEN's prior statement that the symbol was intended to represent
16 a Manji.

17 67. Rather than acknowledging A.L.'s concerns or fulfilling her duties as an educator and
18 administrator, VAN PUTTEN shifted the onus onto A.L. to educate his peers. VAN PUTTEN insisted
19 that A.L. address the entire school, explaining the effect of the swastika incident on him and other
20 Jews. Given VAN PUTTEN's conduct, A.L. understandably declined, pointing out that he was not
21 about to put "a target" on his back by publicly announcing that he is a Jew. When asked about
22 antisemitic incidents at other SUHSD campuses, including Menlo-Atherton High School, VAN
23 PUTTEN dismissively stated that she was unconcerned with events outside of Woodside High School.

24 68. Parents' inquiries into VAN PUTTEN's purportedly "extensive" investigation were
25 met with evasion. Despite growing concerns about the increasingly commonplace antisemitic
26 incidents at Woodside High School, VAN PUTTEN consistently failed to provide details or take
27 meaningful action. Jewish students and their parents found their pleas for assistance met with a
28 familiar pattern of abdicating responsibility.

1 69. For example, on November 3, 2023, Plaintiff ROSNER emailed Woodside
2 administrators and specifically asked how the school would, among other things: ensure Jewish
3 students' safety; educate students "that there is zero tolerance for hate crimes and hate speech";
4 address D.B.'s and other Jewish students' traumatic experience and help them heal from it; and punish
5 the student responsible for the swastikas.

6 70. In a clear and manifest dereliction of their duties, VAN PUTTEN and VELSCHOW
7 again shifted responsibility onto D.B., a student, to "educate" the student who drew the swastikas
8 about the symbol's malignant history. Plaintiff ROSNER pointed out that it was not D.B.'s role, nor
9 that of any student, to provide such instruction, but that of the administrators. Despite ROSNER's
10 expressed concerns for her daughter's safety and that of other Jewish students, neither VAN PUTTEN
11 nor VELSCHOW addressed the substance of her complaints.

12 71. During a meeting on or about February 15, 2024, SCOTT and LORI LYLE expressed
13 their concerns to VAN PUTTEN and PORTER about the school's handling of the swastika incident.
14 In response, PORTER admitted the truth and contradicted the District's public position by
15 acknowledging that the student responsible for drawing the swastikas was likely aware of the
16 symbol's actual meaning: a symbol of Jew hatred.

17 72. Antisemitism also surged at the Menlo-Atherton High School in the wake of the
18 October 7 attacks, prompting similarly weak and ineffectual responses from SUHSD administrators.
19 For example:

20 (a) On or about October 16, 2023, at Menlo-Atherton High School, a group of
21 Menlo-Atherton students accosted W.K., hurling antisemitic epithets and threats at him while he was
22 on his way to English class. The students called W.K. a "kike" and told W.K. they that they hope he
23 and his family "burn in hell," that "all Jews should die," and that "all Israel supporters should get
24 killed." W.K. followed the school's procedures and filed an incident report. In response, school
25 administrators blamed W.K. for his own harassment and suggested he relocate to a different class to
26 avoid "provoking" the main antisemitic perpetrator. Later, Menlo-Atherton High School's principal,
27 LOSEKOOT, cautioned an advisor of Club Z, a national Jewish youth organization to which W.K.

28

1 belongs, against publicizing W.K.'s incident report on social media, citing potential reputational
2 damage to the school.

3 (b) In or around Fall 2023, a Menlo-Atherton mathematics teacher distributed
4 materials that gratuitously invoked anti-Israel headlines under the pretext of teaching a geometry
5 exercise. (Ex. 2.) These materials included text from Naguib Mahfouz's Nobel Prize in Literature
6 acceptance speech, which states: "In the West Bank and Gaza there are people who are lost in spite
7 of the fact that they are living on their own land.....Save the Palestinians from the bullets and
8 torture! Nay, save the Israelis from profaning their great spiritual heritage." (*Id.*) Despite
9 contributing to the hostile environment for Jewish students, the teacher faced no repercussions for
10 her actions.

11 (c) In or around April 2024, at the Menlo-Atherton High School running track, a
12 Menlo-Atherton student further harassed and taunted W.K. by repeating, "Free Palestine. Go Hamas."

13 (d) In or around May 2024, in the Menlo-Atherton High School weight room, a
14 Menlo-Atherton student saw W.K. enter the room and exclaimed, "Oh my God, there's a Jew! Don't
15 let him in here!" W.K. again submitted an incident report, and Menlo-Atherton teachers and
16 administrators again did nothing.

17 **D. GRUSZYNSKI Uses a "World History" Class to "Teach" Antisemitic Tropes and**
18 **Hamas Propaganda**

19 73. Against this backdrop, Defendant GRUSZYNSKI, a teacher at Woodside High School,
20 exploited his position of trust to spread antisemitic and ahistorical pro-Hamas propaganda under the
21 guise of teaching 10th-grade World History. GRUSZYNSKI singled out and harassed L.K., the only
22 openly Jewish student in his class, mocked her beliefs, undermined her attempts to provide factual
23 information to classmates, and coerced her into endorsing his biased and ahistorical views to achieve
24 satisfactory grades on exams. Despite repeated complaints about GRUSZYNSKI's conduct, SUHSD
25 administrators took no action.

26 74. GRUSZYNSKI made his agenda clear from the outset. Displayed prominently on
27 GRUSZYNSKI's classroom wall was a "Free Palestine" bumper sticker that GRUSZYNSKI had
28 received from the Middle East Children's Alliance, an openly antisemitic and anti-Israel advocacy

1 group with known ties to a terrorist organization that seeks to influence K-12 school curricula through
2 its “Teach Palestine Project.” *See supra* ¶ 29. Early in the 2023-2024 school year, GRUSZYNSKI
3 was seen wearing a “Bike for Palestine” T-shirt at a school assembly.

4 75. During the 2023-2024 school year, L.K., then 15 years old, was enrolled in
5 GRUSZYNSKI’s 10th-grade World History class, a mandatory course.

6 76. Following Hamas’s October 7 massacre, GRUSZYNSKI, Woodside’s lead World
7 History teacher, seized the opportunity to present antisemitic tropes and anti-Israel myths, creating a
8 hostile educational environment for Jewish students at Woodside High School. Immediately
9 following Hamas’s terrorist attack, GRUSZYNSKI introduced the topic of the Hamas-Israel conflict
10 to his class by stating, “I want to talk about something happening now that is bad.” In an Orwellian
11 inversion, GRUSZYNSKI then wrote on the chalkboard, “Israel’s Attack on Gaza,” and proceeded to
12 criticize the Israeli Defense Force’s defensive actions. GRUSZYNSKI’s unmistakable message to
13 impressionable students was that the “bad” event was not Hamas’s murder and kidnapping of innocent
14 Israelis but the Israeli military’s response in self-defense, which he falsely misrepresented as the initial
15 act of aggression. Denying Israel’s right to self-defense, which effectively denies both Israel’s
16 statehood and the right of Israeli citizens to live free from terrorist murder and missile attacks, is
17 inherently antisemitic. *See supra* ¶¶ 48–49.

18 77. GRUSZYNSKI then went on to falsely misrepresent Israel’s response in self-defense
19 as wanton military violence, while saying nothing about the 1,200 men, women, and children whom
20 Hamas had just burned, raped, mutilated, and killed, or the hundreds of others who Hamas took
21 hostage and then paraded, beaten and bloodied, before gleeful Palestinian onlookers. Nor did
22 GRUSZYNSKI mention that Hamas had launched its attack in violation of a cease-fire agreement, or
23 that in clear violation of international law, Hamas seeks to hide and operate its military infrastructure,
24 weapons, and combatants from beneath or within civilian infrastructure, including in homes, schools,
25 mosques, and hospitals. As a result, Hamas intentionally places civilians in the line of fire.

26 78. Alarmed by GRUSZYNSKI’s openly biased and antisemitic remarks, L.K. bravely
27 raised her hand to ask rhetorically, “Who attacked first?” Only then did GRUSZYNSKI reluctantly
28 admit that Hamas had attacked Israel on October 7.

1 79. In reprisal for L.K.’s public dissent, GRUSZYNSKI redoubled his campaign of overtly
 2 biased and antisemitic lectures throughout the semester. Mirroring propaganda disseminated by
 3 Hamas, Iran, and their allies (*see supra* ¶ 36), GRUSZYNSKI propagated ahistorical anti-Israel and
 4 anti-Jewish myths as irrefutable “facts,” while ignoring—let alone condemning—Hamas’s atrocities.
 5 For example:

6 (a) Throughout the semester, GRUSZYNSKI urged students to draw a false
 7 equivalence between Hamas, a U.S.-designated terrorist organization, and the State of Israel. Though
 8 conceding that the United States and Israel had “labeled” Hamas as a terrorist organization,
 9 GRUSZYNSKI asked students rhetorically, “How different is Israel from Hamas?”
 10 GRUSZYNSKI’s obvious insinuation was that Hamas was no more a terrorist organization than
 11 Israel itself. GRUSZYNSKI insisted that Hamas was a mere “political party that fights against Israel,”
 12 when in truth and in fact, Hamas is a militant and internationally recognized terrorist organization
 13 whose own founding charter calls for the annihilation of Israel and the killing of Jews around the
 14 world.⁴⁷ As explained in a criminal complaint filed by the United States Attorney’s Office for the
 15 Southern District of New York against Hamas leaders Ismail Haniyeh, Yahya Sinwar, Mohammad
 16 al-Masri, Marwan Issa, Khaled Meshaal, and Ali Baraka, “Hamas’s stated purpose has been to create
 17 an Islamic Palestinian state throughout Israel by eliminating the State of Israel through violent holy
 18 war, or jihad..... Hamas has murdered and injured dozens of Americans as part of its campaign of
 19 violence and terror, and since 1997, Hamas has been designated as a foreign terrorist organization
 20 (“FTO”) by the United States Government.”⁴⁸

21 (b) GRUSZYNSKI repeatedly instructed students that Gaza is an “open air prison
 22 that Israel controls,” when, in truth, Israel left Gaza nearly 20 years ago—forcibly removing every
 23

24 ⁴⁷ *The Covenant of the Islamic Resistance Movement*, Yale L. Sch. (Aug. 18 1988),
 25 https://avalon.law.yale.edu/20th_century/hamas.asp; *Anti-Semitism in the Hamas Charter: Selected*
 26 *Excerpts*, ADL (Sept. 12, 2014), [https://www.adl.org/resources/news/anti-semitism-hamas-charter-](https://www.adl.org/resources/news/anti-semitism-hamas-charter-selected-excerpts)
 27 [selected-excerpts](https://www.adl.org/resources/news/anti-semitism-hamas-charter-selected-excerpts); *Hamas in Its Own Words*, ADL Blog (Jan. 10, 2024),
 28 <https://www.adl.org/resources/blog/hamas-its-own-words>.

29 ⁴⁸ Complaint ¶ 18(a), *United States v. Haniyeh*, No. 24-mj-438 (S.D.N.Y. Feb. 1, 2024), ECF
 30 No. 1; *see also* Barbara McQuade, *Why the DOJ Filed Charges Against Hamas Leaders it is Unlikely*
 31 *to Ever Arrest*, MSNBC (Sept. 8, 2024), [https://www.msnbc.com/opinion/msnbc-opinion/doj-](https://www.msnbc.com/opinion/msnbc-opinion/doj-charges-hamas-leaders-arrest-israel-rcna169910)
 32 [charges-hamas-leaders-arrest-israel-rcna169910](https://www.msnbc.com/opinion/msnbc-opinion/doj-charges-hamas-leaders-arrest-israel-rcna169910).

1 single Jew, living or dead—in 2005. In 2006, Hamas defeated Mahmoud Abbas’s Fatah party in the
2 last elections ever held in Gaza. In 2007, Hamas seized complete control of Gaza by killing or
3 expelling its Fatah rivals. Since then, Hamas has ruled Gaza without holding further elections.⁴⁹
4 Following its violent coup, Hamas misappropriated billions of dollars of international aid intended to
5 benefit Palestinian citizens by using it to build an underground tunnel network more expansive than
6 the London Underground from which to launch attacks on or abduct Israeli civilians. Israel, like
7 Egypt, has expended significant efforts to maintain a secure border with Gaza—in order to prevent
8 Palestinian terrorists from murdering its citizens and destabilizing its own government. Yet
9 GRUSZYNSKI never once blamed Egypt for contributing to Gaza being a supposed “open air prison.”

10 (c) During the semester, GRUSZYNSKI falsely described legitimate Israeli
11 border checkpoints as mere tools to humiliate Palestinians, rather than appropriate measures to
12 prevent terrorist attacks. L.K. bravely raised her hand to ask, “Isn’t it the case that the checkpoints
13 are there because of terrorism?” Once more, GRUSZYNSKI was mocking and dismissive,
14 responding, “That’s the reason they [Israelis] give.” GRUSZYNSKI did not level similar charges
15 against any other nation in the world that has border checkpoints. Indeed, as of 2022, there was no
16 country in the world that did not place at least some limitations on individuals’ abilities to enter or
17 exit its borders.⁵⁰

18 (d) During the semester, GRUSZYNSKI falsely instructed students that Palestine
19 is a state recognized by the United Nations since 1947, when in truth and in fact, the United Nations
20 has never recognized Palestine as a sovereign country, and Palestine’s bid to become a full member
21 of the United Nations has been routinely vetoed by the U.N. Security Council. Even so, to “correctly”
22 answer an “Israel Palestine Vocabulary Quiz,” L.K. and other students were forced to furnish
23 GRUSZYNSKI’s false responses if they wanted to receive credit. (See Ex. 3.) In these and other
24 ways, GRUSZYNSKI compelled L.K. to disavow not only facts and the truth, but her personally held
25 world views and the religious commitments that form her ethnic identity.

26 ⁴⁹ *Israel’s disengagement from Gaza*, Britannica (2005), <https://www.britannica.com/event/Israels-disengagement-from-Gaza>; see also Kali Robinson, *What is Hamas?* Council on Foreign
27 Relations (Aug. 19, 2024), <https://www.cfr.org/backgrounder/what-hamas>.

28 ⁵⁰ Countries with Open Borders 2024, World Population Review (2024),
<https://worldpopulationreview.com/country-rankings/countries-with-open-borders>.

1 80. When L.K. attempted to challenge GRUSZYNSKI's overt bias and factual
 2 inaccuracies in class, GRUSZYNSKI doubled down with public taunts and ridicule. For instance,
 3 when L.K. protested GRUSZYNSKI's anti-Jewish and anti-Israel sentiments, the instructor
 4 responded dismissively (and antisemitically) that he had "taught Jews in New York," as if this
 5 somehow excused his own naked antisemitism. Later, in December 2023, GRUSZYNSKI began a
 6 World History lecture by asserting, "[L.K.] is someone who doesn't think Israel is an apartheid state,"
 7 using a tone that implied L.K.'s position was preposterous. GRUSZYNSKI continued, "Maybe now
 8 others will think differently," suggesting that he intended to prove L.K.'s purported error to the rest
 9 of the class.

10 (a) Of course, the claim that Israel is an "apartheid" state is yet another antisemitic
 11 lie perpetuated by pro-Hamas advocates to undercut the Jewish State's legitimacy among the
 12 community of nations.

13 (b) In truth, "apartheid" refers to the racist system that South Africa's white
 14 minority installed in the 1990s to repress Black and other non-white racial groups comprising more
 15 than 90% of the country's population. No such system exists in Israel. To the contrary, Israeli law
 16 guarantees the equal treatment of all citizens, Jewish, Christian, Arab, and others, and its democratic
 17 institutions, including independent courts and free press, serve to uphold and enforce those rights.
 18 Israeli Arab citizens represent over 20% of Israel's population and play prominent roles in all aspects
 19 of Israeli society, including as judges, ambassadors, legislators, journalists, and professors.⁵¹
 20 GRUSZYNSKI presented none of these undisputed facts to his World History class. Indeed, Israeli
 21 Arabs were among those taken hostage by Hamas in the October 7 attacks; an Israeli-Arab man
 22 kidnapped by Hamas was recently rescued by the IDF.⁵²

23
 24
 25 ⁵¹ *Allegation: Israel is an Apartheid State*, ADL (July 8, 2021),
 26 [https://www.adl.org/resources/backgrounders/allegation-israel-apartheid-
 state?gad_source=1&gclid=EAIaIQobChMI-P-nk5fhhwMVaBAs%20StBh0rABbxEAAYASAAEgLL7fD_BwE&gclsrc=aw.ds](https://www.adl.org/resources/backgrounders/allegation-israel-apartheid-state?gad_source=1&gclid=EAIaIQobChMI-P-nk5fhhwMVaBAs%20StBh0rABbxEAAYASAAEgLL7fD_BwE&gclsrc=aw.ds).

27 ⁵² Paul Goldman, Chantal Da Silva & Daniel Arkin, *Hostage Held by Hamas in Gaza Rescued*
 28 *by Israeli Forces, IDF Says*, NBC News (Aug. 27, 2024),
[https://www.nbcnews.com/news/world/hostage-held-hamas-gaza-rescued-israeli-forces-idf-says-
 rcna168373](https://www.nbcnews.com/news/world/hostage-held-hamas-gaza-rescued-israeli-forces-idf-says-rcna168373).

1 (c) GRUSZYNSKI's derision toward L.K. had its intended effect. L.K.
2 repeatedly returned home in tears after suffering through GRUSZYNSKI's classes. The harassment
3 and humiliation that GRUSZYNSKI inflicted upon L.K. caused her to think twice before challenging
4 his misinformation and overt bias. L.K. was appalled at GRUSZYNSKI's thinly veiled suggestion
5 that her co-religionists were "monsters" deserving of mutilation, rape, and murder at the hands of
6 Hamas militants. Eventually, L.K. felt that she could not participate in classroom discussion without
7 inviting further harassment by GRUSZYNSKI, who seemed to relish taunting her and exploiting his
8 power to silence her questions.

9 81. A hostile or traumatizing educational environment is one in which students feel
10 marginalized or blamed for mistreatment targeting them based on their social identity group, or where
11 they face a double standard regarding the protection of their social identity.

12 82. For Jewish students like L.K., post-October 7 antisemitism has become a cudgel of
13 identity-based trauma wielded by certain peers, teachers, and school administrators.
14 GRUSZYNSKI's antisemitic conduct was particularly harmful because it came with the authority of
15 a teacher and the inherent power imbalance of all teacher-student relationships.

16 83. GRUSZYNSKI's unchecked antisemitic bias constitutes a traumatizing school
17 environment and culture for Jewish students like L.K., undermining their ability to feel safe and to
18 learn. These institutional conditions foster a hostile learning environment for Jewish students, who
19 are unfairly treated as "colonizers" even while being actively marginalized.

20 **E. GRUSZYNSKI and SUHSD Administrators Conceal GRUSZYNSKI's**
21 **Unauthorized Instructional Materials from SUHSD Parents**

22 84. Similar to his lectures, the instructional materials distributed by GRUSZYNSKI during
23 his World History class were filled with antisemitic misinformation and ahistorical claims. For
24 example, materials given to L.K.'s World History class repeatedly asserted that Palestinians were the
25 sole indigenous people of Israel, ignoring the undisputed archeological and historical evidence of a
26 continuous Jewish presence in the land of Israel for 3,000 years. Jewish people ruled Judean
27 kingdoms, prayed in the Jerusalem Temple for a millennium, and remained present in Israel for the
28 next 2,000 years. Jews were also indigenous to Egypt, Syria, Yemen, Turkey, Iran, and other Muslim

1 countries—before being expelled by Muslims. GRUSZYNSKI’s instructional materials failed to
2 present these and other undisputed facts objectively or fairly. Instead, the materials were purposefully
3 assembled to “prove” that Israel and its Jewish inhabitants and supporters were evil “colonialists” on
4 land rightfully belonging to others—the Palestinians.⁵³

5 85. The use of instructional materials containing such biased and ahistorical assertions
6 creates a hostile learning environment for Jewish students, making it impossible for them to fully
7 engage in or benefit from the education provided by SUHSD.

8 86. GRUSZYNSKI’s instructional materials were not properly approved or submitted for
9 approval through the appropriate process.⁵⁴ Instead, GRUSZYNSKI received tacit authorization to
10 distribute his unapproved instructional materials from SUHSD administrators, who were long aware
11 of GRUSZYNSKI’s use of biased and antisemitic course materials but refused to intervene, even after
12 receiving complaints from Woodside High School students and their parents. L.K.’s father repeatedly
13 requested that Vice Principal VELSCHOW prohibit distribution of these biased, inaccurate, and
14 unapproved materials by other teachers and warn parents of Woodside students who were taught
15 antisemitic lies by GRUSZYNSKI and other teachers. VELSCHOW refused.

16 87. Rather than fulfilling their constitutional and moral obligation to protect Jewish
17 students from rampant antisemitism, SUHSD administrators actively concealed GRUSZYNSKI’s
18 biased and antisemitic instructional materials from concerned parents. On or about December 9, 2023,
19 Plaintiff SAM KASLE (“KASLE”) requested copies of GRUSZYNSKI’s World History instructional

20
21 ⁵³ This ahistorical view is belied by the actual conduct of Arab inhabitants of the region, who
22 did not begin to refer to themselves as Palestinians until the 1960s. See Daniel Grynglas, *Debunking*
23 *the Claim That “Palestinians” are the Indigenous People of Israel*, Jerusalem Post (May 12, 2015),
24 [https://www.jpost.com/blogs/why-world-opinion-matters/are-arabs-the-indigenous-people-of-](https://www.jpost.com/blogs/why-world-opinion-matters/are-arabs-the-indigenous-people-of-palestine-402785)
25 [palestine-402785](https://www.jpost.com/blogs/why-world-opinion-matters/are-arabs-the-indigenous-people-of-palestine-402785) (“We first hear of Arabs referred to as “Palestinians” when Egypt’s President Nasser,
26 with help from the Russian KGB, established the “Palestine Liberation Organization” in 1964. It was
27 only during the 1970s that the newly minted “Palestinians” began to promote their narrative through
28 murder and assassination.”).

29 ⁵⁴ See, e.g., Cal. Educ. Code § 51501 (prohibiting “[t]he state board and any governing board shall
30 not adopt any textbooks or other instructional materials for use in the public schools that contain any
31 matter reflecting adversely upon persons on the basis of race or ethnicity, gender, religion, disability,
32 nationality, or sexual orientation, or because of a characteristic listed in Section 220.”); *id.* § 51500
33 (“A teacher shall not give instruction and a school district shall not sponsor any activity that promotes
34 a discriminatory bias on the basis of race or ethnicity, gender, religion, disability, nationality, or sexual
35 orientation, or because of a characteristic listed in Section 220.”).

1 materials and citations to the source documents from SUHSD administrators, including Vice Principal
 2 VELSCHOW. The administrators refused to provide them, however. Instead, on December 15,
 3 VELSCHOW emailed KASLE, claiming that GRUSZYNSKI had informed VELSCHOW that
 4 “approximately 75% of the curriculum for the unit was handed back to students . . . in their binders,”
 5 and that KASLE had no right to the remaining materials or the citations identifying the sources. This
 6 was false. The California Education Code requires that “[a]ll primary supplemental instructional
 7 materials and assessments, including textbooks, teacher’s manuals, films, audio and video recordings,
 8 and software shall be compiled and stored by the classroom instructor and made available promptly
 9 for inspection by a parent or guardian in a reasonable timeframe.”⁵⁵ GRUSZYNSKI and
 10 VELSCHOW undoubtedly refused to disclose the underlying sources of the instructional materials
 11 because, as both well knew, the instructional materials were incorrect and had been developed by
 12 MECA or other openly anti-Israel and antisemitic advocacy groups.

13 **F. GRUSZYNSKI Enforces His Antisemitic and Anti-Israel Teachings Through**
 14 **Tests and Quizzes**

15 88. As further evidence of his antisemitism, GRUSZYNSKI enforced his antisemitic and
 16 anti-Israel teachings using tests and quizzes designed to coerce students, including L.K., to repudiate
 17 their religious views and historical facts in favor of GRUSZYNSKI’s antisemitic and ahistorical
 18 narratives. For example, a so-called “vocabulary” quiz required students to match terms with
 19 GRUSZYNSKI’s preferred definitions. GRUSZYNSKI graded as “correct” the following pairings:
 20 “Palestine” defined as “Arab lands . . . currently occupied by Israel”; and “ Hamas” defined as a
 21 “Palestinian political party which is continuing to fight against Israel.” (Ex. 3.)

22 89. GRUSZYNSKI’s final exam in his World History class likewise included three
 23 questions designed to enforce GRUSZYNSKI’s biased and ahistorical views of the Israel-Palestine
 24 conflict and alienate Jewish students or other supporters of Israel. (Ex. 4.)

25 (a) “What were the events that led to the formation of the state of Israel, the Nakba,
 26 and the beginning of the conflict between Israel and Palestine? Explain in your opinion how much
 27

28 _____
⁵⁵ Cal. Educ. Code § 49091.10.

1 responsibility European colonial powers and specifically the United Kingdom have for causing this
2 conflict.”

3 (b) “Describe the Occupied Territories, who is occupying these territories and who
4 is living under this occupation. Describe what life is like for the people living under occupation,
5 giving at least 3 specific examples.”

6 (c) “What is the separation wall? Why did the Israeli government build the
7 separation wall? How does the separation wall affect the lives of Palestinians? What did the
8 International Court of Justice say about the separation wall? How did the Israeli government respond
9 to the International Court of Justice’s decision?”

10 90. To receive a passing grade, L.K. understood that she needed to answer
11 GRUSZYNSKI’s test questions according to GRUSZYNSKI’s skewed and antisemitic ideology.
12 GRUSZYNSKI’s test questions effectively required L.K. to describe her co-religionists as evil
13 “occupiers” oppressing the Palestinian people, and thus deserving of Hamas’s savagery. L.K.
14 understood that if she had instead responded to GRUSZYNSKI’s test questions with factually
15 accurate information, GRUSZYNSKI would have marked those answers as incorrect, resulting in a
16 low or even failing grade. In this way, GRUSZYNSKI forced L.K., a Jewish student, to condemn
17 Israel and disavow her beliefs in order to receive a passing grade. This abhorrent conduct went
18 unchecked and unremedied by SUHSD administrators.

19 **G. GRUSZYNSKI Refuses to Meet with KASLE and L.K.**

20 91. Concerned about L.K.’s treatment in GRUSZYNSKI’s class, on or about December 9,
21 2023, KASLE alerted VELSCHOW to the issue and as detailed above, in this same email, requested
22 to review GRUSZYNSKI’s course materials, which was improperly denied. *See supra* ¶ 87. KASLE
23 also agreed to a meeting with GRUSZYNSKI and VELSCHOW.

24 92. GRUSZYNSKI repeatedly evaded attempts to meet to address the concerns raised by
25 the KASLE family, however. A meeting was scheduled for January 8, 2024, but GRUSZYNSKI did
26 not show up, seemingly unwilling or unable to discuss his conduct with an adult rather than bully a
27 15-year-old high school student. VELSCHOW then rescheduled the meeting for January 16, 2024,
28 but canceled it the day before. In his email to KASLE communicating the last-minute cancelation,

1 VELSCHOW said that he was unsure whether the meeting would ever be rescheduled. No
2 explanation was provided for the cancellation, and no meeting ever occurred. No disciplinary action
3 appears to have been taken against GRUSZYNSKI for his refusal to meet or for his antisemitic
4 conduct.

5 93. On or about January 8, 2024, KASLE escalated the issue to Principal VAN PUTTEN,
6 who responded with dismissive indifference. VAN PUTTEN downplayed the severity of
7 GRUSZYNSKI's antisemitic teachings, comparing them to instruction on other "sensitive" topics,
8 such as sex education. VAN PUTTEN also justified GRUSZYNSKI's false claim that Palestine was
9 recognized as a nation in 1947, incorrectly asserting that there could be "multiple perspectives" on
10 the issue. Like VELSCHOW, VAN PUTTEN deliberately avoided taking any action to address
11 GRUSZYNSKI's antisemitic conduct. GRUSZYNSKI continues to teach World History at
12 Woodside High School.

13 **H. SUHSD Fails to Address Concerns Raised in KASLE's Formal Complaints**

14 94. From December 9, 2023, to January 19, 2024, KASLE sent Principal VAN PUTTEN
15 and Vice Principal VELSCHOW at least 17 emails expressing his concerns about GRUSZYNSKI's
16 pedagogy and antisemitism.⁵⁶ VAN PUTTEN and VELSCHOW largely ignored KASLE's emails,
17 never substantively or effectively addressing any of KASLE's concerns. Left with no other recourse,
18 and following VELSCHOW's and SUHSD policy guidance on written complaints, on or about
19 January 27, 2024, KASLE filed a formal Request for Reconsideration of Instructional Materials
20 ("RFR"), and on or about February 1, 2024, KASLE filed a Uniform Complaint Process ("UCP")
21 complaint against GRUSZYNSKI.

22 95. The UCP complaint detailed GRUSZYNSKI's biased and antisemitic teaching and its
23 harm to L.K. (*See* Ex. 5.) In the RFR, KASLE asked Woodside High School to remove the "multi-
24 media materials and oral lessons [GRUSZYNSKI] developed, curated, self-approved and presented
25 to his 10th grade World History class in the fall of 2023 relating to Judaism, Christianity, Islam, the

26 _____
27 ⁵⁶ KASLE expressed his concerns via email to Vice Principal VELSCHOW on December 9,
28 2023, December 12, 2023, December 17, 2023, December 19, 2023, December 20, 2023,
December 22, 2023, January 8, 2024, January 9, 2024, January 10, 2024, January 11, 2024,
January 15, 2024, January 16, 2024, and January 19, 2024. Likewise, KASLE emailed concerns to
Principal VAN PUTTEN on January 11, 2024, January 16, 2024, and January 19, 2024.

1 history of the Middle East and the current Hamas-Israeli war.” (*See Ex. 6.*) As examples, KASLE’s
2 RFR pointed to GRUSZYNSKI’s biased “vocabulary test.” *See supra* ¶¶ 79(d), 88. Neither the UCP
3 complaint nor the RFR resulted in any concrete or effective action by SUHSD or its administrators.

4 96. On or about March 7, 2024, VELSCHOW responded to the UCP complaint with an
5 “investigation findings” letter on behalf of Woodside High School, Principal VAN PUTTEN, trustees
6 DU BOIS, GINN, KOO, NORI, and STEVENSON, and Superintendent LEACH. (*See Ex. 7.*) In the
7 letter, VELSCHOW concluded that KASLE’s allegations had been “substantiated in part,” conceding
8 that GRUSZYNSKI had branded Israel an “apartheid” state, and that L.K. had challenged
9 GRUSZYNSKI’s anti-Israel spin on Israel’s border security checkpoints. The letter likewise admitted
10 that KASLE had requested to meet with GRUSZYNSKI, but GRUSZYNSKI refused.

11 97. The balance of the letter merely credited GRUSZYNSKI’s statements and
12 uncorroborated “sense” that L.K. was neither “uncomfortable” nor “browbeaten” by
13 GRUSZYNSKI’s antisemitic hectoring. L.K.’s own views were not considered; she was not even
14 interviewed. The letter concluded by stating that GRUSZYNSKI’s “actions were addressed with the
15 school administration in accordance with District policies and procedures,” but provided no details
16 about what specific measures were taken, if any. VELSCHOW refused to disclose any further
17 information, effectively closing the case. The letter urged KASLE to “accept the school’s decision
18 as final,” even though no clear decision had been made or action taken. It is evident that SUHSD
19 failed to take appropriate remedial action against GRUSZYNSKI to address his inaccurate and biased
20 instructional materials, or to impose any disciplinary measures.

21 98. GRUSZYNSKI’s views were accepted without scrutiny by SUHSD. The District’s
22 response to this incident was no more effective than its previous sham “investigation” into the
23 appearance of swastikas on school grounds, demonstrating a consistent pattern of deliberate
24 indifference and ineffectual responses that were clearly unreasonable in light of the known
25 circumstances.

26 99. SUHSD’s response to the RFR was more of the same. On April 24, 2024, SUHSD
27 sent a letter that misconstrued and improperly narrowed KASLE’s RFR, addressing only certain
28 allegations while leaving the vast majority unaddressed and unremedied. Associate Superintendent

1 HANSEN later admitted that SUHSD’s response to KASLE’s RFR was “incomplete.” Yet a complete
2 response was never provided. This response, too, was deficient and ineffectual.

3 100. KASLE also sent multiple emails on these issues to Defendant LEACH, who never
4 responded. The SUHSD Superintendent considered KASLE’s overwhelming evidence of
5 GRUSZYNSKI’s antisemitic teaching and mistreatment of L.K. as unworthy of a single response, let
6 alone an effort to address KASLE’s concerns in accordance with LEACH’s professional obligations
7 and state and federal law.

8 101. On or about April 19, 2024, KASLE emailed Defendants DU BOIS, GINN, KOO,
9 NORI, and STEVENSON to express his frustration that none of his complaints had been addressed
10 and to ask to meet with them. None responded. Like LEACH, the SUHSD Board of Trustees
11 considered KASLE’s evidence of GRUSZYNSKI’s antisemitic teaching and mistreatment of L.K. as
12 unworthy of a single response, let alone a concerted effort to address the concerns in accordance with
13 their professional obligations and state and federal law.

14 **I. Menlo-Atherton Teacher Gives “Ethnic Studies” Presentation That Depicts**
15 **Antisemitic Tropes and Recites Unfiltered Pro-Hamas Propaganda**

16 102. On November 3, 2023, Chloe Gentile-Montgomery, then an ethnic studies and U.S.
17 history teacher at Menlo-Atherton High School, delivered a purported ethnic studies presentation that,
18 in reality, was Hamas propaganda, complete with ancient antisemitic tropes depicting Jews as secret
19 puppet masters who dictate so-called “dominant narratives.” (See Ex. 8.) Gentile-Montgomery’s
20 biased presentation promoted the idea that the actual truth about the Middle East lies only in so-called
21 “counter narratives” free from influence by “people in power,” by which she meant Jews. Gentile-
22 Montgomery’s presentation included the following slide:



103. The claim that Jews are secret puppet masters controlling world economies and governments is a centuries-old antisemitic trope. Such myths have been used to scapegoat Jews for wars and other global events, fueling anti-Jewish violence. Indeed, cartoon depictions of Jewish leaders pulling the strings of marionette politicians were commonplace in Nazi propaganda during the 1930s.

104. Among other historical inaccuracies in Gentile-Montgomery's presentation was the assertion, presented as fact, that "Israel is a country created on Palestinian land. The United Nations says this is illegal." As detailed above, this is unequivocally false. The United Nations voted in 1947 to establish a Jewish state in Israel.⁵⁷ Before its existence as a Jewish state, the territory comprising present-day Israel was under British mandatory rule recognized by the United Nations, and before that, for over 400 years, it was part of the Ottoman Empire.

105. As detailed above (*see* ¶ 84, *supra*), the Jewish people are indigenous to the land of Israel, and identification with the land of Israel constitutes an integral part of Plaintiffs' and their minor children's ethnic identities and shared ancestry, as well as a fundamental element of their religious consciousness.

106. The instructional materials assembled and presented by Gentile-Montgomery (and GRUSZYNSKI) completely ignored and implicitly denied these objective and undisputed facts. They

⁵⁷ G.A. Res. 181 (Nov. 29, 1947), https://avalon.law.yale.edu/20th_century/res181.asp.

1 also failed to recognize that Jews, including Plaintiffs and their minor children, hold these
2 commitments and beliefs.

3 107. Similar to GRUSZYNSKI's lectures, Gentile-Montgomery repeated the falsehood that
4 Gaza is an "open air prison" controlled by Israel. *See supra* ¶ 79(b). The presentation concluded with
5 a propaganda video, "Israeli Air Strikes Kill Palestinian Children," produced by the Turkish Radio
6 and Television Corporation, a state-run broadcaster and anti-Israel propaganda arm of the Turkish
7 government.⁵⁸ The relevance of this content to "ethnic studies"—a subject created to discuss
8 marginalized ethnic groups in the United States, specifically Black Americans, Hispanic and Chicano
9 Americans, Native Americans, and Asian Americans/Pacific Islanders—remained unexplained.

10 108. Jewish students and their parents at Menlo-Atherton High School were outraged by
11 the openly antisemitic views and factually false information presented in Gentile-Montgomery's slide
12 deck. On November 21, 2023, parents submitted a petition to Superintendent LEACH demanding
13 that the school address the biased ethnic studies materials and lessons. The petition called for SUHSD
14 to ensure that students are not subjected to discrimination and indoctrination and demanded the
15 immediate termination of Gentile-Montgomery. The petition garnered widespread support, receiving
16 hundreds of signatures.

17 109. The petition ignited a tempestuous debate at a January 17, 2024 meeting of the SUHSD
18 Board of Trustees, but the meeting ultimately yielded no concrete measures to address the increasingly
19 hostile educational environment faced by Jewish students. Even the Sequoia District Teachers
20 Association President admitted that "it is difficult to be a Jewish student and a Jewish educator in this
21 school district."⁵⁹ Rather than seize the opportunity to enact reforms to protect Jewish students,
22 however, SUHSD's trustees, administrators, and teachers circled the wagons. The District's
23 intransigence was exemplified by GRUSZYNSKI, who, just days after refusing to meet with KASLE
24

25 ⁵⁸ *See Turkish Radio & Television (TRT)*, State Media Monitor (Aug. 28, 2024),
26 <https://statemediamonitor.com/2024/08/turkish-radio-and-television-trt/> (citing member of the
27 Turkish Radio and Television Supreme Council (RTUK) that one-quarter of the daily programming
time on TRT is dedicated to disseminating government propaganda).

28 ⁵⁹ Arden Margulis & Ameya Nori, *Board Meeting Erupts Into Arguments Over Ethnic Studies
Lesson*, M-A Chronicle (Jan. 22, 2024), <https://machronicle.com/board-meeting-erupts-into-arguments-over-ethnic-studies-lesson/>.

1 to discuss these issues, spoke in defense of Gentile-Montgomery, echoing her unfounded claims that
2 the criticism of her stemmed from racism. Perhaps most alarmingly, the presence of Nazi propaganda
3 elements in Gentile-Montgomery’s instructional materials elicited little concern from SUHSD
4 trustees and administrators. The Board’s inaction was yet another stark indicator of its lack of concern
5 for Jewish students, and unwillingness to confront the District’s pervasive antisemitism.

6 110. Like other Jewish students, W.K. was disturbed by the inaccuracies in Gentile-
7 Montgomery’s presentation and sought to engage her in a discussion. Despite initially consenting,
8 Gentile-Montgomery refused to listen to W.K.’s concerns, dismissing him as a “biased Jewish
9 freshman” and walking away.

10 **J. Woodside High School Broadcasts Antisemitic “Call for Change” Video to Entire**
11 **Student Body**

12 111. The Board’s persistent inaction allowed antisemitic incidents at SUHSD schools to
13 continue unabated.

14 112. In or around January or February 2024, S.B. had resumed wearing her Star of David
15 necklace at school. A computer science teaching assistant told S.B. to conceal her Star of David to
16 avoid becoming a target of antisemitism, and that she would “get what she deserved” if she continued
17 to wear it. S.B. reported this incident to SUHSD administrators, including Vice Principal
18 VELSCHOW.

19 113. On or about March 19, 2024, a group of Woodside students called S.B. a “kike” as she
20 was walking home from school. S.B. informed SUHSD administrators, including Vice Principal
21 VELSCHOW. VELSCHOW asked S.B. if *she* wanted the school to intervene. VELSCHOW also
22 promised S.B. that the perpetrator—who had bullied S.B. previously—would not be in her classes in
23 the future. Despite VELSCHOW’s promise, this student and S.B. are currently in some of the same
24 11th-grade classes.

25 114. On March 21, 2024, Woodside High School aired a public video announcement as part
26 of its “TV Live” program. A segment titled “Call for Change” ostensibly addressed Islamophobia
27 but quickly devolved into antisemitic and anti-Israel rhetoric. Images in the video included signs
28 reading “End all US aid to Apartheid Israel,” “Stand with Palestine, End the Occupation Now,” “End

1 the Occupation,” and “There are no 2 sides to Genocide.” The video’s unmistakable message was
2 that opposing “hatred” requires opposing the State of Israel and its Jewish population.

3 115. The video featured an adult anti-Israel activist who directly addressed the camera,
4 urging Woodside High School students to become leaders of the anti-Israel movement. The activist
5 stated, “I’m going to do my part but I’m depending on the youth to be the leaders of this movement—
6 I think it’s your turn and I think you guys are killing it!” The segment thus exhorted students to join
7 the anti-Israel cause.

8 116. A Woodside High School math teacher, Abdulhadi “Hadi” Kaddoura, also appeared
9 in the anti-Israel video announcement. He claimed to have been discriminated against due to his
10 Palestinian Muslim identity and criticized diaspora Jews who claim a right to return to Israel.
11 Kaddoura was among the SUHSD teachers who signed a letter in support of Gentile-Montgomery,
12 the teacher who delivered an antisemitic and anti-Israel presentation at Menlo-Atherton High School.
13 *See supra* ¶¶ 102-10. The letter emphasized the importance of discussing Israel’s “occupation” and
14 using terms like “apartheid,” “settler colonialism,” and “ethnic cleansing” to describe Israel in ethnic
15 studies and social studies classrooms. In student newspapers, Kaddoura has expressed antisemitic
16 views, including questioning the legal rights of Jews to live in Israel.

17 117. On the same day the video aired, S.B. was waiting outside a classroom when Kaddoura
18 approached her and asked why she was there. When S.B. replied that she was “waiting for friends,”
19 Kaddoura responded with a sneer, “You have friends?” He then asked S.B. if she was Jewish,
20 claiming that he could tell by her nose. The interaction left S.B. feeling humiliated and publicly
21 shamed.

22 118. Jewish students and their parents at Woodside High School were appalled by the airing
23 of the “Call for Change” video as part of the school’s daily announcements. On March 25, 2024, a
24 group of 10 parents, including the KASLES, the LYLES, the BERSHTEYNS, and ROSNER,
25 requested more information about the video, such as whether it had been approved by teachers or
26 administrators before its broadcast.

27 119. Consistent with her previous and repeated failures to address antisemitic incidents,
28 VAN PUTTEN remained unresponsive to the concerns raised by Jewish students and their parents

1 about the “Call for Change” video. In a dismissive response on March 29, 2024, VAN PUTTEN
2 refused to act to rectify the hostile educational environment. (See Ex. 9.) VAN PUTTEN wrote that
3 the school “rel[ies] on instructors to provide guidance and oversight,” that “Woodside [High School]
4 administration is typically not directly involved in the review process for student projects,” and that
5 “Woodside TV Live daily announcements is a student-led and student-run organization.” VAN
6 PUTTEN continued: “The Woodside HS admin team and I are not school leaders who would censor
7 student produced news broadcast or publication; instead, we are committed to working on developing
8 parameters around how we can be teaching and learning partners involved in offering feedback or
9 suggestions to anticipate any potential problems or mitigate any misinformation.” What those
10 parameters were, however, remained unexplained. Ultimately, VAN PUTTEN’s word-salad response
11 demonstrated a complete lack of accountability and a continued failure to protect Jewish students
12 from antisemitic harassment.

13 120. The “Call for Change” video was the final straw for many Jewish families. On or
14 about April 22, 2024, Plaintiff LYLE filed a comprehensive UCP complaint on behalf of his minor
15 son, A.L., detailing numerous antisemitic incidents at Woodside High School and Defendants’
16 complete failure to address them. Seven other Jewish families, including Plaintiffs JENNIFER and
17 DANIEL REIF and IGOR and MARINA BERSHTEYN, signed the complaint. (Ex. 10.)

18 121. As detailed in the UCP complaint, pervasive discrimination against Jewish students at
19 SUHSD schools has created a hostile learning environment. This discrimination includes:

20 (a) Teachers’ offensive and derogatory remarks targeting Jewish students,
21 including pointing out Jewish stereotypical physical characteristics;

22 (b) The SUHSD administration’s dismissal of swastika graffiti as “Buddhist anime”
23 images and its refusal to correct its public announcement treating it as such, even when it was later
24 revealed that the administration knew that the student responsible for drawing the swastikas was likely
25 aware of the symbol’s actual meaning;

26 (c) Singling out Jewish students for debate about Israel in World History, ethnic
27 studies, and other classes;

28

1 (d) The broadcast of the “Call for Change” video segment, which featured
2 offensive imagery associated with the “Free Palestine” movement and attacked Jews and the Jewish
3 State; and

4 (e) The complete failure of Defendants VAN PUTTEN and the SUHSD Board of
5 Trustees to take any meaningful action to address these incidents.

6 122. On or about April 23, 2024, Defendant BEAL confirmed receipt of the UCP complaint.
7 Despite California law requiring SUHSD to investigate UCP complaints promptly and present written
8 findings within 60 days, *see* 5 CCR § 4631, the investigation of the complaint has dragged on for over
9 200 days. Not only have no findings been disclosed to the complainants, but no action has been taken
10 in response. SUHSD’s disregard for Jewish families and its failure to address antisemitic incidents,
11 including the broadcast of the “Call for Change” video, have created a hostile environment for Jewish
12 students. As of the date of this complaint, the offensive video remains publicly available online, and
13 SUHSD teachers, administrators, and trustees continue to evade responsibility for the rampant
14 antisemitism within the District’s schools.

15 **FIRST CLAIM FOR RELIEF**

16 **Violation of Title VI of the Civil Rights Act of 1964**

17 **42 U.S.C. § 2000d *et seq.***

18 **(Against All Defendants)**

19 123. Plaintiffs reallege and incorporate by reference paragraphs 1 through 122 above.

20 124. Title VI provides that “[n]o person in the United States shall, on the ground of race,
21 color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected
22 to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C.
23 § 2000d.

24 125. Defendants are recipients of federal financial assistance and are therefore subject to
25 the requirements of Title VI.

1 126. Plaintiffs and their children are members of a protected class based on their Jewish
2 ancestry, race, ethnic characteristics, and/or national origin. *Cf. Shaare Tefila Congregation v. Cobb*,
3 481 U.S. 615, 616 (1987).⁶⁰

4 127. As alleged herein, Defendants engaged in a pattern and practice of intentional
5 discrimination and harassment against Plaintiffs and their children based on their Jewish ancestry,
6 race, ethnic characteristics, and/or national origin. This conduct includes, but is not limited to: (i)
7 repeatedly refusing to conduct meaningful, unbiased, and effective investigations or undertake
8 discernible remedial action in response to numerous antisemitic incidents on SUHSD campuses; (ii)
9 distributing (and allowing to be distributed) instructional materials to students that gratuitously invoke
10 anti-Israel and antisemitic tropes and that baselessly cast Israel and Jews as “aggressors”; (iii)
11 repeatedly imparting (and allowing to be imparted) antisemitic, ahistorical, and pro-Hamas narratives
12 under the guise of teaching World History, ethnic studies, and geometry; (iv) taunting, ridiculing, and
13 humiliating (and allowing such taunting, ridicule, and humiliation of) Jewish students who challenged
14 their teachers’ blatantly antisemitic lectures; (v) actively concealing antisemitic teaching materials
15 from concerned SUHSD parents; (vi) enforcing (and allowing teachers to enforce) antisemitic and
16 anti-Israel teachings through tests and quizzes designed to compel Jewish students to disavow their
17 personal beliefs to receive passing grades; (vii) delivering (and allowing to be delivered) “ethnic
18 studies” lessons presenting ahistorical anti-Israel falsehoods and depicting Jews as secret “puppet
19 masters” influencing “dominant narratives,” a once-common depiction in Nazi propaganda; and (viii)
20 broadcasting (and allowing to be broadcast) schoolwide videos conveying the message that reducing
21 “hatred” means opposing the State of Israel and its “genocidal” Jewish inhabitants.

22 128. As alleged herein, Plaintiffs’ children suffered harassment so severe, pervasive, and
23 offensive that it effectively deprived them of the right of equal access to educational benefits and
24 opportunities.

25 _____
26 ⁶⁰ See also Letter from Mia Karvonides, U.S. Dep’t of Educ. to President Suresh V. Garimella,
27 Univ. of Vt., at 13 (Apr. 3, 2023), [https://www.ed.gov/sites/ed/files/about/offices/
28 list/ocr/docs/investigations/more/01222002-a.pdf](https://www.ed.gov/sites/ed/files/about/offices/list/ocr/docs/investigations/more/01222002-a.pdf) (“OCR has concerns that the University’s failure to investigate, consistent with Title VI, allegations of antisemitic harassment . . . may reflect University officials, acting within the scope of their official duties, treating individuals differently on the basis of national origin.”).

1 129. Defendants had actual notice of the discrimination and harassment, over which they
2 had substantial control and the authority to remediate. Defendants were aware that the discrimination
3 and harassment were so severe, pervasive, and objectively offensive that they created a hostile
4 environment for Plaintiffs and their children based on their Jewish ancestry, race, ethnic
5 characteristics, and/or national origin that deprived Plaintiffs' children of full access to SUHSD's
6 educational programs, activities, and opportunities.

7 130. Defendants were deliberately indifferent to the harassment such that their response (or
8 lack thereof) was clearly unreasonable in light of the known circumstances.

9 131. As a result of Defendants' actions and omissions, Plaintiffs have been injured by being
10 denied the opportunity to fully participate in, and deprived of full access to, the classroom, school-
11 sponsored activities, educational programs, and other educational opportunities.

12 132. Absent the injunctive and declaratory relief against Defendants requested herein,
13 Plaintiffs will continue to be harmed by Defendants' actions.

14 133. Plaintiffs are entitled to attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

15 **SECOND CLAIM FOR RELIEF**

16 **Violation of Fourteenth Amendment Equal Protection Clause**

17 **42 U.S.C. § 1983; U.S. Const. amend. XIV, § 1**

18 **(Against All Defendants)**

19 134. Plaintiffs reallege and incorporate by reference paragraphs 1 through 133 above.

20 135. The Fourteenth Amendment to the United States Constitution guarantees all citizens
21 equal protection of the laws.

22 136. 42 U.S.C. § 1983 provides a cause of action for individuals whose constitutional rights
23 are violated by persons acting under color of state law.

24 137. Defendants violated Plaintiffs' Fourteenth Amendment rights through a widespread or
25 longstanding practice or custom that discriminates against Plaintiffs and their children based on their
26 ethnic and religious identity as Jews, and their belief in Israel's right to exist as a Jewish nation, which
27 they consider a fundamental aspect of their shared Jewish heritage.

28

1 138. As alleged herein, Defendants intentionally failed to address antisemitic behavior by
2 students and teachers, thereby depriving Plaintiffs and their children of equal protection under the law,
3 including, without limitation, by: (i) repeatedly refusing to conduct meaningful, unbiased, and
4 effective investigations or take discernible remedial action in response to numerous antisemitic
5 incidents on SUHSD campuses; (ii) distributing (and allowing to be distributed) instructional
6 materials to students that are both false and that gratuitously invoke anti-Israel and antisemitic tropes
7 and that baselessly cast Israel and Jews as “aggressors”; (iii) repeatedly imparting (and allowing to be
8 imparted) antisemitic, ahistorical, and pro-Hamas narratives under the guise of teaching World
9 History, ethnic studies, and geometry; (iv) taunting, ridiculing, and humiliating (and allowing such
10 taunting, ridicule, and humiliation of) Jewish students who challenged their teachers’ blatantly
11 antisemitic lectures; (v) actively concealing antisemitic teaching materials from concerned SUHSD
12 parents; (vi) enforcing (and allowing teachers to enforce) antisemitic and anti-Israel teachings through
13 tests and quizzes designed to compel Jewish students to disavow their personal beliefs to receive
14 passing grades; (vii) delivering (and allowing to be delivered) “ethnic studies” lessons presenting
15 ahistorical anti-Israel falsehoods and depicting Jews as secret “puppet masters” influencing “dominant
16 narratives,” a once-common depiction in Nazi propaganda; and (viii) broadcasting (and allowing to
17 be broadcast) schoolwide videos conveying the message that reducing “hatred” means opposing the
18 State of Israel and its “genocidal” Jewish inhabitants.

19 139. Defendants had no legitimate, nondiscriminatory reasons for their decision to treat
20 Jewish students differently from similarly situated SUHSD students.

21 140. As alleged herein, (1) Defendants acted under color of state law in their individual
22 capacities as District employees, administrators, and educators; (2) Defendants’ acts, or failures to act,
23 deprived Plaintiffs of their rights under the Equal Protection Clause of the United States Constitution;
24 and (3) Defendants’ conduct was the actual cause of the injuries to Plaintiffs.

25 141. As further alleged herein, Defendants VAN PUTTEN, LOSEKOOT, VELSCHOW,
26 PORTER, LEACH, HANSEN, and BEAL (the “Administrative Defendants”), and Defendants DU
27 BOIS, GINN, KOO, NORI, and STEVENSON (the “Trustee Defendants”) (collectively, the
28 “Supervisory Defendants”) knew that their subordinates, including Defendant GRUSZYNSKI,

1 Gentile-Montgomery, and Kaddoura, were engaged in the acts alleged herein, and each knew or
2 reasonably should have known that their subordinates' conduct would deprive Plaintiffs of their rights
3 under the Equal Protection Clause of the United States Constitution, but each Supervisory Defendant
4 failed to act to prevent their subordinates from engaging in such conduct. The Supervisory Defendants'
5 conduct was so closely related to the deprivation of Plaintiffs' rights as to be the moving force that
6 caused the ultimate injury to Plaintiffs' Fourteenth Amendment rights.

7 142. As further alleged herein, all Defendants deprived Plaintiffs of their rights under the
8 Equal Protection Clause of the United States Constitution, while acting pursuant to an expressly
9 adopted official policy or a widespread or longstanding practice or custom that caused the deprivation
10 of Plaintiffs' rights; that is, the District's official policy or widespread or longstanding practice or
11 custom was so closely related to the deprivation of Plaintiffs' rights as to be the moving force that
12 caused Plaintiffs' ultimate injury.

13 143. Defendants' actions, or deliberate inaction, were intentional and discriminatory, and
14 they were not justified by any legitimate governmental interest.

15 144. As a direct and proximate result of Defendants' actions, Plaintiffs have suffered and
16 continue to suffer harm.

17 145. Absent the injunctive and declaratory relief requested herein, Plaintiffs will continue
18 to be harmed by Defendants' actions.

19 146. Plaintiffs are entitled to attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

20 **THIRD CLAIM FOR RELIEF**

21 **Violation of the First Amendment Free Exercise Clause**

22 **42 U.S.C. § 1983; U.S. Const. amend. I**

23 **(Against all Defendants)**

24 147. Plaintiffs reallege and incorporate by reference paragraphs 1 through 146 above.

25 148. The First Amendment to the United States Constitution, as applied to the states through
26 the Fourteenth Amendment, guarantees the right to free exercise of religion.

27 149. The Free Exercise Clause of the First Amendment bars state actors from intentionally
28 placing a substantial burden on any person's religious belief or practice.

1 150. Such a burden is imposed if the challenged action has “a tendency to coerce individuals
2 into acting contrary to their religious beliefs or exert[s] substantial pressure on an adherent to modify
3 his behavior and to violate his beliefs.” *Jones v. Williams*, 791 F.3d 1023, 1031-32 (9th Cir. 2015).

4 151. Plaintiffs’ Jewish identity, their sincerely held religious beliefs, and their ethnic
5 identity as an integral part of their shared ancestry are all closely tied to Israel and Zionism.

6 152. 42 U.S.C. § 1983 provides a cause of action for individuals whose constitutional rights
7 are violated by persons acting under color of state law.

8 153. As alleged herein, Defendants, acting under color of state law, violated Plaintiffs’ First
9 Amendment rights by discouraging Jewish students from displaying outward signs of their Jewish
10 identity or expressing their sincerely held beliefs during classroom discussion, thereby substantially
11 burdening Plaintiffs’ free exercise of religion. Defendants did so, without limitation, by: (i) repeatedly
12 refusing to conduct meaningful, unbiased, and effective investigations or undertake discernible
13 remedial action in response to numerous antisemitic incidents on SUHSD campuses; (ii) distributing
14 (and allowing to be distributed) instructional materials to students that gratuitously invoke anti-Israel
15 and antisemitic tropes and that baselessly cast Israel and Jews as “aggressors”; (iii) repeatedly
16 imparting (and allowing to be imparted) antisemitic, ahistorical, and pro-Hamas narratives under the
17 guise of teaching World History, ethnic studies, and geometry; (iv) taunting, ridiculing, and
18 humiliating (and allowing such taunting, ridicule, and humiliation of) Jewish students who challenged
19 their teachers’ blatantly antisemitic lectures; (v) actively concealing antisemitic teaching materials
20 from concerned SUHSD parents; (vi) enforcing (and allowing teachers to enforce) antisemitic and
21 anti-Israel teachings through tests and quizzes designed to compel Jewish students to disavow their
22 personal beliefs to receive passing grades; (vii) delivering (and allowing to be delivered) “ethnic
23 studies” lessons presenting ahistorical anti-Israel falsehoods and depicting Jews as secret “puppet
24 masters” influencing “dominant narratives,” a once-common depiction in Nazi propaganda; and (viii)
25 broadcasting (and allowing to be broadcast) schoolwide videos conveying the message reducing
26 “hatred” means opposing the State of Israel and its “genocidal” Jewish inhabitants.

27 154. As alleged herein, (1) Defendants acted under color of state law in their individual
28 capacities as District employees, administrators, and educators employed by the State of California;

1 (2) Defendants’ acts, or failures to act, deprived Plaintiffs of their rights under the Free Exercise
2 Clause of the United States Constitution; and (3) Defendants’ conduct was the actual cause of the
3 injuries to Plaintiffs.

4 155. As further alleged herein, Defendants VAN PUTTEN, LOSEKOOT, VELSCHOW,
5 PORTER, LEACH, HANSEN, and BEAL (the “Administrative Defendants”), and Defendants DU
6 BOIS, GINN, KOO, NORI, and STEVENSON (the “Trustee Defendants”) (collectively, the
7 “Supervisory Defendants”) knew that their subordinates, including Defendant GRUSZYNSKI,
8 Gentile-Montgomery, and Kaddoura, were engaged in the acts alleged herein, and each knew or
9 reasonably should have known that their subordinates’ conduct would deprive Plaintiffs of their rights
10 under the Free Exercise Clause of the United States Constitution, but each Supervisory Defendant
11 failed to act to prevent their subordinates from engaging in such conduct. The Supervisory Defendants’
12 conduct was so closely related to the deprivation of the Plaintiffs’ rights as to be the moving force
13 that caused the ultimate injury to Plaintiffs’ rights under the Free Exercise Clause of the First
14 Amendment.

15 156. As further alleged herein, all Defendants deprived Plaintiffs of their rights under the
16 Free Exercise Clause of the United States Constitution, while acting pursuant to an expressly adopted
17 official policy or a widespread or longstanding practice or custom that caused the deprivation of
18 Plaintiffs’ rights; that is, the District’s official policy or widespread or longstanding practice or custom
19 was so closely related to the deprivation of Plaintiffs’ rights as to be the moving force that caused
20 Plaintiffs’ ultimate injury.

21 157. Defendants’ actions were not justified by any compelling governmental interest and
22 were not the least restrictive means of achieving any such interest.

23 158. As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered and
24 continue to suffer harm.

25 159. Absent injunctive and declaratory relief requested herein, Plaintiffs will continue to be
26 harmed by Defendants’ actions.

27 160. Plaintiffs are entitled to attorneys’ fees and costs pursuant to 42 U.S.C. § 1988.
28

FOURTH CLAIM FOR RELIEF

Violation of the First Amendment Freedom of Speech Clause

42 U.S.C. § 1983; U.S. Const. amend. I

**(Against Defendants GRUSZYNSKI, VAN PUTTEN, VELSCHOW, PORTER, LEACH,
HANSEN, BEAL, DU BOIS, GINN, KOO, NORI, and STEVENSON)**

161. Plaintiffs reallege and incorporate by reference paragraphs 1 through 160 above.

162. “If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein.” *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943).

163. Government efforts to regulate speech based on the “specific motivating ideology or the opinion or perspective of the speaker” are a “blatant” and “egregious” form of impermissible speech restriction. *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 829 (1995). And the government cannot “coerce an individual to speak contrary to her beliefs on a significant issue of personal conviction, all in order to eliminate ideas that differ from its own.” *303 Creative LLC v. Elenis*, 600 U.S. 570, 598 (2023).

164. The First Amendment to the United States Constitution, as applied to the states through the Fourteenth Amendment, guarantees the right to freedom of speech, including the right to refrain from speaking.

165. Under the First Amendment of the United States Constitution, Plaintiffs have the right to be free from government coercion that compels Plaintiffs to speak contrary to their beliefs on an issue of significant personal conviction.

166. Plaintiffs believe that Israel has the right to exist and maintain a Jewish state in the Jewish ancestral homeland.

167. 42 U.S.C. § 1983 provides a cause of action for individuals whose constitutional rights are violated by persons acting under color of state law.

168. By coercing L.K. and others to adopt and profess a viewpoint contrary to their beliefs on an issue of significant personal conviction, Defendant GRUSZYNSKI, acting under color of state

1 law, compelled them to speak against their will in violation of the First Amendment of the United
2 States Constitution.

3 169. Defendant GRUSZYNSKI's actions against Plaintiffs would chill a person of ordinary
4 firmness from continuing to engage in the protected activity because it required L.K. and others to
5 profess or accept tenets deeply incompatible with their convictions, religious exercise, and cultural
6 identity.

7 170. Defendant GRUSZYNSKI demanded that students, including L.K., adopt his biased,
8 antisemitic views about Zionists and Israel as the only acceptable responses on assessments he
9 administered. As a result, in order to obtain a passing grade, students, including L.K., were compelled
10 to speak contrary to their beliefs pertaining to Jewish history, culture, and identity.

11 171. As alleged herein, (1) Defendants GRUSZYNSKI, VAN PUTTEN, VELSCHOW,
12 PORTER, LEACH, HANSEN, BEAL, DU BOIS, GINN, KOO, NORI, and STEVENSON acted
13 under color of state law in their individual capacities as District employees, administrators, and
14 educators employed by the State of California; (2) Defendants' acts, or failures to act, deprived
15 Plaintiffs of their rights under the Freedom of Speech Clause of the First Amendment of the United
16 States Constitution; and (3) Defendants' conduct was the actual cause of the injuries to Plaintiffs.

17 172. As further alleged herein, Defendants VAN PUTTEN, VELSCHOW, PORTER,
18 LEACH, HANSEN, and BEAL (the "Administrative Defendants"), and Defendants DU BOIS, GINN,
19 KOO, NORI, and STEVENSON (the "Trustee Defendants") (collectively, the "Supervisory
20 Defendants") knew that their subordinate, GRUSZYNSKI, was engaged in the acts alleged herein,
21 and each knew or reasonably should have known that GRUSZYNSKI's conduct would deprive
22 Plaintiffs of their rights under the Freedom of Speech Clause of the First Amendment of the United
23 States Constitution, but each Supervisory Defendant failed to act to prevent GRUSZYNSKI from
24 engaging in such conduct.

25 173. As recipients of multiple complaints and as participants in multiple discussions where
26 Plaintiffs expressed concerns with Defendant GRUSZYNSKI's conduct, Defendants Woodside
27 Principal VAN PUTTEN; Woodside Administrative Vice Principals VELSCHOW and PORTER;
28 SUHSD Superintendent LEACH; SUHSD Associate Superintendent of Educational Services

1 HANSEN; SUHSD Assistant Superintendent, Human Resources BEAL; and SUHSD Board of
2 Trustees Members DU BOIS, GINN, KOO, NORI, and STEVENSON, in their individual capacities
3 as Supervisory Defendants, knowingly refused to terminate a series of acts by subordinate Defendant
4 GRUSZYNSKI, which the Supervisory Defendants knew or reasonably should have known would
5 cause Defendant GRUSZYNSKI to deprive the Plaintiffs of the right to be free from compelled speech.
6 The Supervisory Defendants' conduct was so closely related to the deprivation of the Plaintiffs' rights
7 as to be the moving force that caused the ultimate injury to Plaintiffs' First Amendment rights.

8 174. As further alleged herein, Defendants GRUSZYNSKI, VAN PUTTEN, VELSCHOW,
9 PORTER, LEACH, HANSEN, BEAL, DU BOIS, GINN, KOO, NORI, and STEVENSON, deprived
10 Plaintiffs of their rights under the Freedom of Speech Clause of the First Amendment of the United
11 States Constitution, while acting pursuant to an expressly adopted official policy or a widespread or
12 longstanding practice or custom that caused the deprivation of Plaintiffs' rights; that is, the District's
13 official policy or widespread or longstanding practice or custom was so closely related to the
14 deprivation of Plaintiffs' rights as to be the moving force that caused Plaintiffs' ultimate injury.

15 175. Defendants' actions were not justified by any compelling governmental interest and
16 were not the least restrictive means of achieving any such interest.

17 176. As a direct and proximate result of Defendants' actions, Plaintiffs have suffered and
18 continue to suffer harm.

19 177. Absent the injunctive and declaratory relief against Defendants requested herein,
20 Plaintiffs will continue to be harmed by Defendants' actions.

21 178. Plaintiffs are entitled to attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

22 **FIFTH CLAIM FOR RELIEF**

23 **California Constitution Art. I, § 7(a)**

24 **Violation of the Equal Protection Clause**

25 **(Against all Defendants)**

26 179. Plaintiffs reallege and incorporate by reference paragraphs 1 through 178 above.
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28

1 180. Article I, Section 7(a) of the California Constitution guarantees that “[a] person may
2 not be . . . denied equal protection of the laws.” This Clause prohibits discrimination based on race,
3 ethnicity, and religion.

4 181. Defendants, acting under color of state law, have deprived Plaintiffs of equal
5 protection of the laws, as secured by the California Constitution, through de facto policies and
6 practices that treat Plaintiffs and their children differently than similarly situated individuals because
7 Plaintiffs and their children are Jewish. Defendants have discriminated against Jewish students by,
8 without limitation, (i) repeatedly refusing to conduct meaningful, unbiased, and effective
9 investigations or undertake discernible remedial action in response to numerous antisemitic incidents
10 on SUHSD campuses; (ii) distributing (and allowing to be distributed) instructional materials to
11 students that gratuitously invoke anti-Israel and antisemitic tropes and that baselessly cast Israel and
12 Jews as “aggressors”; (iii) repeatedly imparting (and allowing to be imparted) antisemitic, ahistorical,
13 and pro-Hamas narratives under the guise of teaching World History, ethnic studies, and geometry;
14 (iv) taunting, ridiculing, and humiliating (and allowing such taunting, ridicule, and humiliation of)
15 Jewish students who challenged their teachers’ blatantly antisemitic lectures; (v) actively concealing
16 antisemitic teaching materials from concerned SUHSD parents; (vi) enforcing (and allowing teachers
17 to enforce) antisemitic and anti-Israel teachings through tests and quizzes designed to compel Jewish
18 students to disavow their personal beliefs to receive passing grades; (vii) delivering (and allowing to
19 be delivered) “ethnic studies” lessons presenting ahistorical anti-Israel falsehoods and depicting Jews
20 as secret “puppet masters” influencing “dominant narratives,” a once-common depiction in Nazi
21 propaganda; and (viii) broadcasting (and allowing to be broadcast) schoolwide videos conveying the
22 message that reducing “hatred” means opposing the State of Israel and its “genocidal” Jewish
23 inhabitants.

24 182. Defendants’ actions were intentional and discriminatory, and they were not justified
25 by any legitimate governmental interest.

26 183. As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered and
27 continue to suffer harm.

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1 184. Absent the injunctive and declaratory relief against Defendants requested herein,
2 Plaintiffs will continue to be harmed by Defendants’ actions.

3 **SIXTH CLAIM FOR RELIEF**

4 **California Constitution Art. I, § 4**

5 **Violation of the Free Exercise Clause**

6 **(Against all Defendants)**

7 185. Plaintiffs reallege and incorporate by reference paragraphs 1 through 184 above.

8 186. Article I, Section 4 of the California Constitution guarantees the “[f]ree exercise and
9 enjoyment of religion without discrimination or preference.”

10 187. Defendants, acting under color of state law, deprived Plaintiffs of the free exercise and
11 enjoyment of religion without discrimination or preference, as secured by the California Constitution,
12 through a policy and practice that substantially burdened Plaintiffs’ free exercise of religion through
13 antisemitic discrimination.

14 188. As alleged herein, Jewish students were discouraged from displaying outward signs of
15 their Jewish identity—including by wearing Star of David symbols—based on safety concerns or
16 expressing their beliefs during classroom discussion. Defendants did so by, without limitation,
17 (i) repeatedly refusing to conduct meaningful, unbiased, and effective investigations or undertake
18 discernible remedial action in response to numerous antisemitic incidents on SUHSD campuses; (ii)
19 distributing (and allowing to be distributed) instructional materials to students that gratuitously invoke
20 anti-Israel and antisemitic tropes and that baselessly cast Israel and Jews as “aggressors”; (iii)
21 repeatedly imparting (and allowing to be imparted) antisemitic, ahistorical, and pro-Hamas narratives
22 under the guise of teaching World History, ethnic studies, and geometry; (iv) taunting, ridiculing, and
23 humiliating (and allowing such taunting, ridicule, and humiliation of) Jewish students who challenged
24 their teachers’ blatantly antisemitic lectures; (v) actively concealing antisemitic teaching materials
25 from concerned SUHSD parents; (vi) enforcing (and allowing teachers to enforce) antisemitic and
26 anti-Israel teachings through tests and quizzes designed to compel Jewish students to disavow their
27 personal beliefs to receive passing grades; (vii) delivering (and allowing to be delivered) “ethnic
28 studies” lessons presenting ahistorical anti-Israel falsehoods and depicting Jews as secret “puppet

1 masters” influencing “dominant narratives,” a once-common depiction in Nazi propaganda; and (viii)
2 broadcasting (and allowing to be broadcast) schoolwide videos conveying the message reducing
3 “hatred” means opposing the State of Israel and its “genocidal” Jewish inhabitants.

4 189. Defendants’ actions were intentional and discriminatory, and they were not justified
5 by any compelling governmental interest.

6 190. As a direct and proximate result of Defendants’ actions, Plaintiff has suffered and
7 continues to suffer harm.

8 191. Absent the injunctive and declaratory relief against Defendants requested herein,
9 Plaintiffs will continue to be harmed by Defendants’ actions.

10 **SEVENTH CLAIM FOR RELIEF**

11 **California Constitution Art. I, § 2**

12 **Violation of Freedom of Speech Clause**

13 **(Against Defendants GRUSZYNSKI, VAN PUTTEN, VELSCHOW, PORTER, LEACH,**
14 **HANSEN, BEAL, DU BOIS, GINN, KOO, NORI, and STEVENSON)**

15 192. Plaintiffs reallege and incorporate by reference paragraphs 1 through 191 above.

16 193. Article I, Section 2 of the California Constitution guarantees that “[e]very person may
17 freely speak, write and publish his or her sentiments on all subjects, being responsible for the abuse
18 of this right.” This includes “the right to speak and the right to refrain from speaking” or endorsing a
19 particular message. *Beeman v. Anthem Prescription Mgmt., LLC*, 58 Cal. 4th 329, 342 (2013).

20 194. “The [California] Constitution’s free speech provision is ‘at least as broad’ as and in
21 some ways is broader than the comparable provision of the federal Constitution’s First Amendment.”
22 *Beeman*, 58 Cal. 4th at 341. “Because speech results from what a speaker chooses to say and what
23 he chooses not to say, the right in question comprises both a right to speak freely and also a right to
24 refrain from doing so at all, and is therefore put at risk both by prohibiting a speaker from saying what
25 he otherwise would say and also by compelling him to say what he otherwise would not say.”
26 *Gerawan Farming, Inc. v. Lyons*, 24 Cal. 4th 468, 491 (2000).

27 195. Plaintiffs believe that Israel has the right to exist and maintain a Jewish state in the
28 Jewish ancestral homeland.

1 196. Defendant GRUSZYNSKI, acting under color of state law, violated Plaintiffs’ rights
2 under Article I, Section 2 of the California Constitution by demanding that students, including L.K.,
3 adopt his biased, antisemitic views about Zionists and Israel as the only acceptable responses on
4 assessments he administered. As a result, students, including L.K., were forced to express views
5 contrary to their beliefs about Jewish history, culture, and identity to obtain a passing grade.

6 197. Defendants were made aware of GRUSZYNSKI’s problematic conduct through
7 numerous complaints made by Plaintiffs and others.

8 198. Defendants’ actions were not justified by any compelling governmental interest and
9 were not the least restrictive means of achieving any such interest.

10 199. As a direct and proximate result of Defendants’ actions, Plaintiffs have suffered and
11 continue to suffer harm.

12 200. Absent the injunctive and declaratory relief against Defendants requested herein,
13 Plaintiffs will continue to be harmed by Defendants’ actions.

14 **EIGHTH CLAIM FOR RELIEF**

15 **Cal. Educ. Code §§ 220, 262.4, 49091.12(a), 51500, 51501, 51513, 60044, and 60045**

16 **Harassment in Educational Institutions**

17 **(Against all Defendants)**

18 201. Plaintiffs reallege and incorporate by reference paragraphs 1 through 200 above.

19 202. Under California law, “[a]ll pupils have the right to participate fully in the educational
20 process, free from discrimination and harassment,” Cal. Ed. Code § 201(a), and “California’s public
21 schools have an affirmative obligation to combat racism, sexism, and other forms of bias, and a
22 responsibility to provide equal educational opportunity” Cal. Educ. Code § 201(b). As the California
23 Legislature has recognized, “[h]arassment on school grounds directed at an individual on the basis of
24 personal characteristics or status creates a hostile environment and jeopardizes equal educational
25 opportunity as guaranteed by the California Constitution and the United States Constitution.” Cal.
26 Educ. Code § 201(c).

27 203. Section 220 of the California Education Code provides that “[n]o person shall be
28 subjected to discrimination on the basis of disability, gender, gender identity, gender expression,

1 nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained
2 in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration
3 status, in any program or activity conducted by an educational institution that receives, or benefits
4 from, state financial assistance, or enrolls pupils who receive state student financial aid.”

5 204. “Race or ethnicity” includes “ancestry, color, ethnic group identification, and ethnic
6 background.” Cal. Educ. Code § 212.1(a).

7 205. “Religion” includes “all aspects of religious belief, observance, and practice and
8 includes agnosticism and atheism.” Cal. Ed. Code § 212.3. Section 220 prohibits discrimination
9 against Jews. *See* Cal. Educ. Code § 201(g) (“It is the intent of the Legislature that this chapter shall
10 be interpreted as consistent with . . . Title VI of the federal Civil Rights Act of 1964”); *Shaare Tefila*,
11 481 U.S. at 616 (discrimination against Jews is discrimination based on race).

12 206. Violations of Section 220 of the California Education Code may be “enforced through
13 a civil action.” Cal. Educ. Code § 262.4.

14 207. Section 49091.12(a) of the California Education Code provides that: “A pupil may not
15 be compelled to affirm or disavow any particular personally or privately held world view, religious
16 doctrine, or political opinion.”

17 208. Section 51500 of the California Education Code provides that: “A teacher shall not
18 give instruction and a school district shall not sponsor any activity that promotes a discriminatory bias
19 on the basis of race or ethnicity, gender, religion, disability, nationality, or sexual orientation, or
20 because of a characteristic listed in Section 220.”

21 209. Section 51501 of the California Education Code provides that: “The state board and
22 any governing board shall not adopt any textbooks or other instructional materials for use in the public
23 schools that contain any matter reflecting adversely upon persons on the basis of race or ethnicity,
24 gender, religion, disability, nationality, or sexual orientation, or because of a characteristic listed in
25 Section 220.” “Instructional materials” means “all materials that are designed for use by pupils and
26 their teachers as a learning resource and help pupils to acquire facts, skills, or opinions or to develop
27 cognitive processes. Instructional materials may be printed or nonprinted, and may include textbooks,
28 technology-based materials, other educational materials, and tests.” Cal. Ed. Code § 60010.

1 210. Section 51513 of the California Education Code provides that: “No test, questionnaire,
2 survey, or examination containing any questions about the pupil’s personal beliefs or practices in sex,
3 family life, morality, and religion, or any questions about the pupil’s parents’ or guardians’ beliefs
4 and practices in sex, family life, morality, and religion, shall be administered to any pupil in
5 kindergarten or grades 1 to 12, inclusive, unless the parent or guardian of the pupil is notified in
6 writing that this test, questionnaire, survey, or examination is to be administered and the parent or
7 guardian of the pupil gives written permission for the pupil to take this test, questionnaire, survey, or
8 examination.”

9 211. Section 60044 of the California Education Code provides that: “A governing board
10 shall not adopt any instructional materials for use in the schools that, in its determination, contain: (a)
11 Any matter reflecting adversely upon persons on the basis of race or ethnicity, gender, religion,
12 disability, nationality, sexual orientation, occupation, or because of a characteristic listed in Section
13 220; (b) Any sectarian or denominational doctrine or propaganda contrary to law.”

14 212. Section 60045 of the California Education Code provides that: “All instructional
15 materials adopted by any governing board for use in the schools shall be, to the satisfaction of the
16 governing board, accurate, objective, and current and suited to the needs and comprehension of pupils
17 at their respective grade levels.”

18 213. A.B 101, the legislation mandating use of an ethnic studies curriculum in California
19 public schools, contains a series of provisions to bar from the curriculum any teaching material that
20 is biased, racist, or discriminatory, including antisemitic, anti-Israel, and anti-Zionist materials.

21 214. A.B. 101 explicitly mandates that all material used to teach ethnic studies “[b]e
22 appropriate for use with pupils of all races, religions, nationalities, genders, sexual orientations, and
23 diverse ethnic and cultural backgrounds, pupils with disabilities, and English learners” and that all
24 such material “[n]ot reflect or promote, directly or indirectly, any bias, bigotry, or discrimination
25 against any person or group of persons on the basis of any category protected by Section 220.” This
26 list of protected categories includes discrimination based on nationality, religion, and ethnicity.

27 215. SUHSD receives state financial assistance and is therefore subject to suit under Section
28 220.

1 216. Plaintiffs' children were harmed by being subjected to harassment at SUHSD schools
2 based on their Jewish ethnic and religious identity, in violation of California Education Code § 220.

3 217. As alleged herein, Plaintiffs' children suffered harassment so severe, pervasive, and
4 offensive that it effectively deprived them of the right of equal access to educational benefits and
5 opportunities.

6 218. Defendants had actual knowledge of the harassment.

7 219. Defendants violated Plaintiffs' rights under California Education Code § 220 by acting
8 with deliberate indifference because their response—or lack thereof—to the harassment was clearly
9 unreasonable in light of all the known circumstances. Defendants' intentional malfeasance and
10 deliberate indifference includes, without limitation, (i) repeatedly refusing to conduct meaningful,
11 unbiased, and effective investigations or undertake discernible remedial action in response to
12 numerous antisemitic incidents on SUHSD campuses; (ii) distributing (and allowing to be distributed)
13 instructional materials to students that gratuitously invoke anti-Israel and antisemitic tropes and that
14 baselessly cast Israel and Jews as “aggressors”; (iii) repeatedly imparting (and allowing to be imparted)
15 antisemitic, ahistorical, and pro-Hamas narratives under the guise of teaching World History, ethnic
16 studies, and geometry; (iv) taunting, ridiculing, and humiliating (and allowing such taunting, ridicule,
17 and humiliation of) Jewish students who challenged their teachers' blatantly antisemitic lectures;
18 (v) actively concealing antisemitic teaching materials from concerned SUHSD parents; (vi) enforcing
19 (and allowing teachers to enforce) antisemitic and anti-Israel teachings through tests and quizzes
20 designed to compel Jewish students to disavow their personal beliefs to receive passing grades;
21 (vii) delivering (and allowing to be delivered) “ethnic studies” lessons presenting ahistorical anti-
22 Israel falsehoods and depicting Jews as secret “puppet masters” influencing “dominant narratives,” a
23 once-common depiction in Nazi propaganda; and (viii) broadcasting (and allowing to be broadcast)
24 schoolwide videos conveying the message that reducing “hatred” means opposing the State of Israel
25 and its “genocidal” Jewish inhabitants.

26 220. As a direct and proximate result of Defendants' conduct, omissions, and deliberate
27 indifference, Plaintiffs and their children suffered severe, pervasive, and objectively offensive
28 discrimination based on their Jewish ancestry, race, ethnic characteristics, and/or national origin that

1 deprived Plaintiffs' children of full access to SUHSD's educational programs, activities, and
2 opportunities.

3 221. Defendants' actions were intentional and discriminatory, and they were not justified
4 by any legitimate educational interest.

5 222. Absent the injunctive and declaratory relief against Defendants requested herein,
6 Plaintiffs will continue to be harmed by Defendants' actions.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiffs respectfully request that the Court:

- 9 A. Declare that Defendants' actions constitute unlawful discrimination under Title VI of
10 the Civil Rights Act of 1964, the First and Fourteenth Amendments of the United
11 States Constitution, the California Constitution, and the California Education Code;
- 12 B. Issue preliminary and permanent injunctive relief:
- 13 1. prohibiting Defendants' discriminatory and harassing treatment of Plaintiffs in
14 violation of Plaintiffs' constitutional and statutory rights;
 - 15 2. prohibiting the District, its employees, agents, and representatives from
16 engaging in any form of antisemitic behavior or conduct, including, but not
17 limited to, verbal, written, or physical actions that demean, harass, or
18 discriminate against individuals based on their Jewish identity or their
19 identification with and commitment to Israel;
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- 1 3. ordering the District to adopt and implement a clear and comprehensive policy
2 specifically addressing antisemitism, as defined by the International Holocaust
3 Remembrance Alliance's Working Definition of Antisemitism, that is widely
4 disseminated and communicated to all students, faculty, staff, administrators,
5 and other relevant stakeholders through various means, such as posting the
6 policy on school and District websites, distributing it during orientation
7 sessions, and incorporating it into student handbooks and code of conduct
8 documents. The policy should include an explicit statement on the centrality
9 of the Jewish State of Israel to Judaism, classify as antisemitic any statements
10 or actions that demean this identification and commitment, provide examples
11 of prohibited conduct, and outline the consequences for violations;
- 12 4. ordering the District to provide mandatory training and education programs to
13 all employees, including teachers, administrators, and staff, on the topic of
14 antisemitism that include strategies for recognizing and addressing antisemitic
15 incidents and that promote understanding, empathy, and respect for Jewish
16 individuals and communities and their connection to Israel, as antisemitism is
17 defined in § B.3, *supra*;
- 18 5. ordering the District to enhance its student curriculum to include education
19 about antisemitism, including by incorporating age-appropriate and accurate
20 information about the history, causes, and consequences of antisemitism, as
21 antisemitism is defined in § B.3, *supra*;
- 22 6. ordering the District to establish clear reporting and response protocols for
23 incidents of antisemitism, including mechanisms for students, parents, and staff
24 to report such incidents, as well as procedures for ensuring confidentiality,
25 prompt investigation, appropriate disciplinary actions, and support for affected
26 individuals;
- 27 7. ordering the District to promptly terminate any teachers or administrators who
28 have been found to have engaged in antisemitic discriminatory or harassing

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conduct, as defined in § B.3, *supra*, or to have exhibited deliberate indifference to such conduct, including, without limitation, VAN PUTTEN, GRUSZYNSKI, and Wilson;

8. ordering the District to review and revise their hiring and screening practices to ensure that individuals with a history of antisemitic behavior, as defined in § B.3, *supra*, are not employed or retained as teachers or staff members;
9. ordering the District to conduct a comprehensive review of all course materials, textbooks, and instructional resources to identify and remove materials that contain antisemitic content or that perpetuate antisemitic stereotypes or biases;
10. ordering the District to establish a process for public disclosure of course materials that ensures transparency and accountability, and which may include creating a publicly accessible online repository or database where students, parents, and the general public can review and assess the content of course materials;
11. ordering the District to take proactive measures to prevent and address religious and ethnic harassment and bullying, including, but not limited to, implementing anti-bullying policies that specifically address antisemitism, as defined in § B.3, *supra*, conducting investigations into reported incidents, and imposing appropriate disciplinary actions when necessary;
12. ordering the District to implement anti-retaliation measures to protect individuals who report antisemitic incidents, as defined in § B.3, *supra*, cooperate in investigations, come forward with information, or file complaints; and
13. ordering Defendants to establish a monitoring and reporting system to ensure compliance with non-discrimination policies and to promptly address any future complaints of antisemitic discrimination, as defined at § B.3, *supra*.

- 1 C. Appoint a qualified and impartial Special Master to oversee and monitor the District’s
2 implementation of policies against antisemitism, as defined at § B.3, *supra*, and
3 compliance with the Court’s Orders for a period of three years. The Special Master
4 should provide regular, public reports to the Court on the progress made and any
5 challenges encountered. The Special Master should be granted the necessary authority
6 and oversight to ensure Defendants’ full cooperation and compliance with the Court’s
7 orders, including the ability to request information, interview relevant individuals, and
8 take any other actions deemed necessary to fulfill the Special Master’s responsibilities.
9 The Special Master may provide recommendations for remedial measures to address
10 antisemitic discrimination and harassment, as defined at § B.3, *supra*, and to create a
11 more inclusive and respectful educational environment. These recommendations may
12 include policy revisions, training programs, and other appropriate actions to prevent
13 future instances of antisemitic discrimination or harassment, as defined at § B.3, *supra*.
- 14 D. Award Plaintiffs all costs of suit, including attorney fees and costs under 42 U.S.C.
15 § 1988 and any other applicable law; and
- 16 E. Award such other and further relief as the Court deems equitable and just.
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DATED: Nov. 15, 2024 ROPES & GRAY LLP

THE DEBORAH PROJECT

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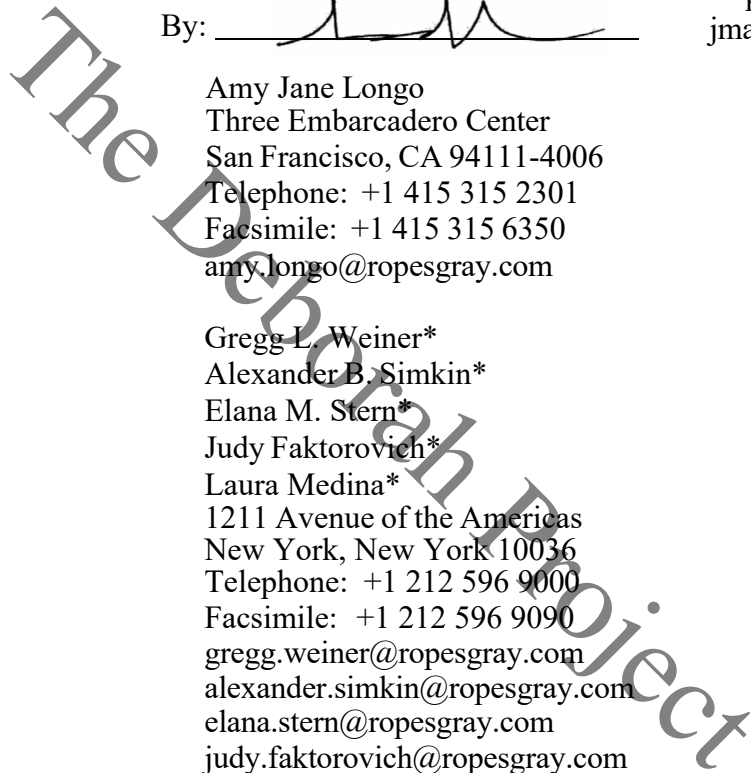
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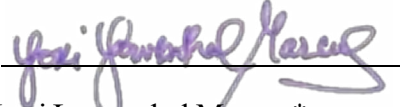
DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs respectfully demand a trial by jury on all issues triable thereby.

DATED: Nov. 15, 2024 ROPES & GRAY LLP

THE DEBORAH PROJECT

By: 

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Attorneys for Plaintiffs

* pro hac vice application pending

EXHIBIT 1

The Deborah Project

Re: Woodside High School - 11/3/2023

From: Charles Velschow [REDACTED]
To: Karen van Putten [REDACTED]
Cc: Cara Klackle [REDACTED]; Wendy Porter <[REDACTED]>

Sun, Nov 5, 2023 at 8:47 AM PST (GMT-08:00)

On Sat, Nov 4, 2023 at 11:19 PM Karen van Putten [REDACTED] <[REDACTED]> wrote:
FYI

----- Forwarded message -----

From: [REDACTED]
Date: Sat, Nov 4, 2023 at 4:47 PM
Subject: Re: Woodside High School - 11/3/2023
To: Woodside High School - Principal van Putten [REDACTED]
CC: [REDACTED]

Hello Ms. van Putten,

Thanks for alerting us about the incident. You are correct in stating that this explanation isn't enough.

We have always found Woodside High School to be a safe and supportive environment for our kids. Our eldest son, [REDACTED] graduated last year, and [REDACTED] a sophomore. I have to say that I don't feel the same way anymore.

The drawing was obviously a Swastika like you suspected in the beginning. You know that people don't tend to draw Manjis at schools, they draw Swastikas, a Nazi symbol. Why would they draw a Manji? What is the goal?

This was a pure hate crime against the Jewish community. Since October 7th, after the horrific terrorist attack on Israel, we have only seen an increase in antisemitism, including the drawing of Swastikas.

We are very disappointed with how the school and the school district have handled the situation this month. I haven't seen even one condemnation of the massacre in Israel after October 7th. The email from the superintendent was very disappointing. My husband and I emailed the superintendent, and she didn't even respond to us.

And now, I see that you treat Swastikas like they were Manjis? Yes, I know that the symbols look similar, but you know that no one has a reason to draw the Buddhist symbol at school. However, a lot of people these days draw Swastikas, unfortunately.

The image below was taken today in Lyons, France. A Jewish woman was stabbed, and this symbol was drawn. It looks exactly like a Manji. But you know very well that it's not a Manji. It's a Swastika that was drawn as part of a hate crime.

Please note that the Jewish community feels a lot of hate right now and doesn't feel supported by the community. We feel unsafe, and afraid to show Jewish symbols because of fear of hate crimes. Giving an excuse for drawing Swastikas makes me feel that my son and other Jewish students are not safe at Woodside High School. I reported the incident to the Anti-Defamation League (ADL).

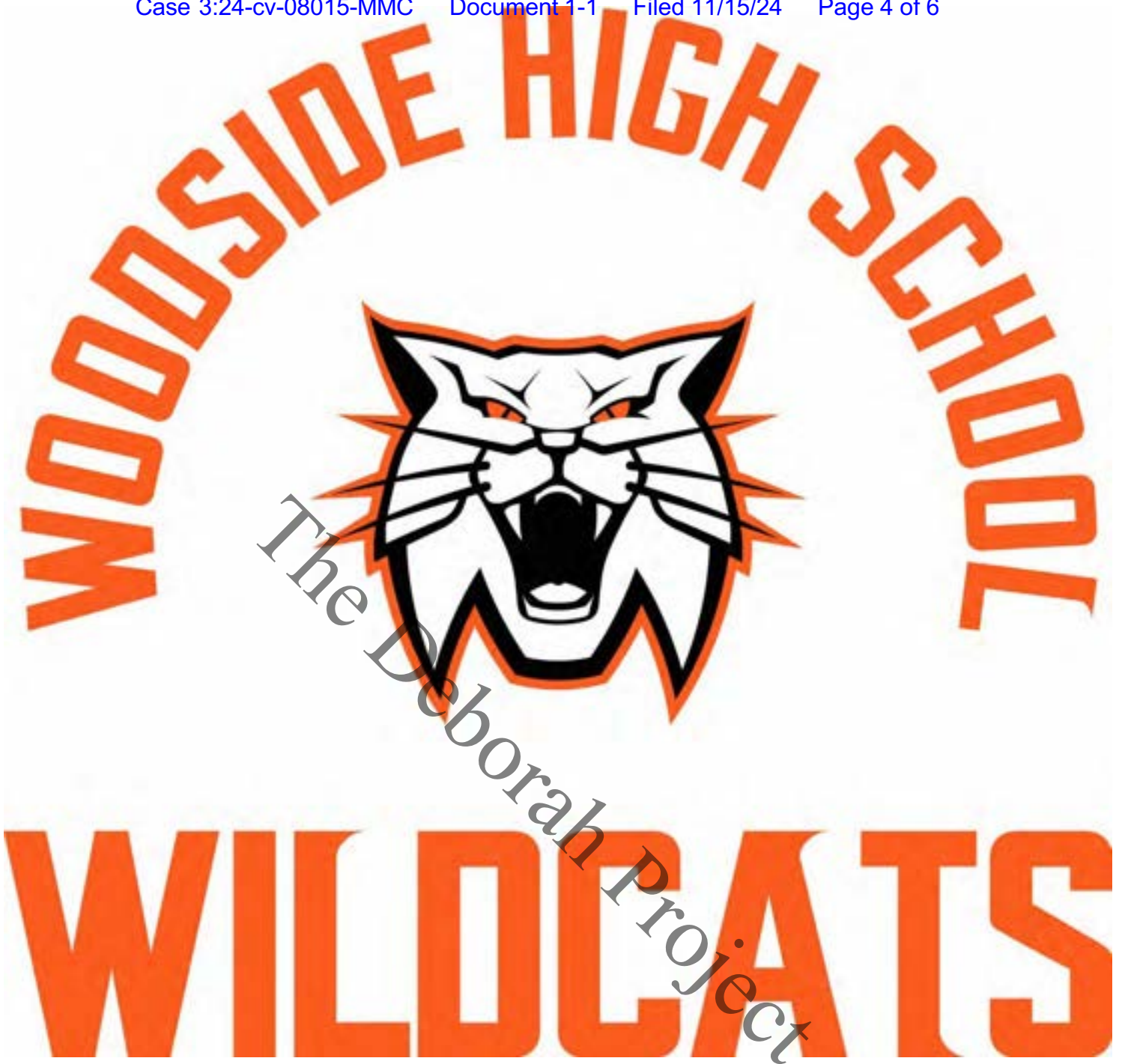
We will not donate to any of the school's organizations this year until we feel that our son is safe.

I hope that the people who drew the swastikas are found and punished and that the school explains to the students why hate crimes against any group, including Jews, are wrong.

The Deborah Project

Thanks,
[REDACTED]

On Fri, Nov 3, 2023 at 7:28 PM Woodside High School - Principal van Putten [REDACTED] wrote:



November 3, 2023

Dear Woodside Community,

On Wednesday, November 1st, we were informed of two drawings on our campus grounds that appeared to resemble a symbol of hate.

We contacted the San Mateo County Sheriff's Department in order to investigate the matter and determine if our school was at risk of a potential threat.

After an extensive investigation from both our school administration and the San Mateo County Sheriff's Department, we have both determined that Woodside High School is not under any threat.

Additionally, we have also confirmed that the drawings in question were not intended to be hate speech targeted at anyone or any group, as our mutual investigation was able to confirm that it was a spiritual symbol from Japanese

Buddhism known as Manji popularized by anime. To make that determination, beyond interviews, we were able to view the anime/manga images used as the genesis of the drawings and were able to verify the testimony we received.

I know that the idea of hate speech on our campus is heartbreaking for all of us. I, too, was saddened by the idea that hate speech may have occurred on our campus, as we do not tolerate any hateful speech or actions on our campus. We take great pride in working with our students to create a school environment where we celebrate our diversity and strive to create safe spaces for all.

I recognize that this explanation may not feel like enough for some in our community. This is an isolated incident that we have investigated with sensitivity and seriousness, and we are committed to educating all our students. When you have a concern, our staff and I will listen and problem-solve with you because your safety, well-being, and feeling of being a part of our community are top priorities at Woodside High School.

Sincerely,

H. Karen van Putten, *Principal*

Querida comunidad de Woodside,

El miércoles 1 de noviembre, nos informaron de dos dibujos en los terrenos de nuestro campus que parecían un símbolo de odio.

Nos comunicamos con el Departamento del Sheriff del condado de San Mateo para investigar el asunto y determinar si nuestra escuela estaba en riesgo de sufrir una amenaza potencial.

Después de una extensa investigación tanto de la administración de nuestra escuela como del Departamento del Sheriff del Condado de San Mateo, ambos hemos determinado que la Escuela Secundaria Woodside no está bajo ninguna amenaza.

Además, también hemos confirmado que los dibujos en cuestión no pretendían ser un discurso de odio dirigido a nadie ni a ningún grupo, ya que nuestra investigación mutua pudo confirmar que se trataba de un símbolo espiritual del budismo japonés conocido como Manji, popularizado por el anime. Para tomar esa determinación, más allá de las entrevistas, pudimos ver las imágenes de anime/manga utilizadas como génesis de los dibujos y pudimos verificar el testimonio que recibimos.

Sé que la idea del discurso de odio en nuestro campus es desgarradora para todos nosotros. A mí también me entristeció la idea de que el discurso de odio pudiera haber ocurrido en nuestro campus, ya que no toleramos ningún discurso o acción de odio en nuestro campus. Estamos muy orgullosos de trabajar con nuestros estudiantes para crear un ambiente escolar donde celebramos nuestra diversidad y nos esforzamos por crear espacios seguros para todos.

Reconozco que esta explicación puede no parecer suficiente para algunos en nuestra comunidad. Este es un incidente aislado que hemos investigado con sensibilidad y seriedad, y estamos comprometidos a educar a todos nuestros estudiantes. Cuando tenga una inquietud, nuestro personal y yo lo escucharemos y resolveremos su problema porque su seguridad, bienestar y sentimiento de ser parte de nuestra comunidad son las principales prioridades en Woodside High School.

Atentamente,

H. Karen van Putten, *Directora*

Sequoia Union High School District would like to continue connecting with you via email. If you prefer to be removed from our list, please contact Sequoia Union High School District directly. To stop receiving all email messages distributed through our SchoolMessenger service, follow this link and confirm: [Unsubscribe](#)

SchoolMessenger is a notification service used by the nation's leading school systems to connect with parents, students and staff through voice, SMS text, email, and social media.



Chuck Velschow (him/he/el)
Administrative Vice Principal
(Last names 'A-L')
(650) 367-9750 x40030

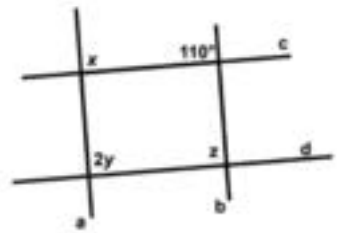
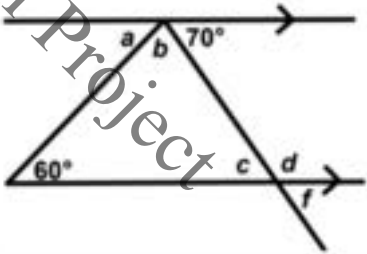
The Deborah Project

EXHIBIT 2

The Deborah Project

To retake this part of the test:

- Make an appointment for Thursday's Flex time.
- You are responsible for the coming.
- I will not be making appointments for you

NAME(s):	Period:
<p>If $a \parallel b$ and $c \parallel d$, find the value of x, y, and z.</p> 	<p>Find the measure of the lettered angles.</p> 
<p>x=_____ y=_____ z=_____</p> <p>_____ partner initials</p>	<p>a=_____ b=_____ c=_____</p> <p>d=_____ d=_____</p> <p>_____ partner initials</p>



Monday October 16, 2023

JOB

The Deborah Project

What saying does this puzzle mean?

Agenda

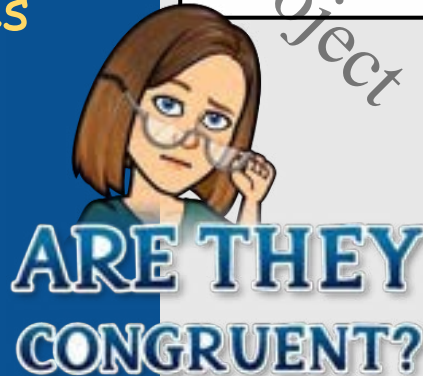
1. Angle Chase - Practice
2. Identifying marked parts of congruent triangles.
3. Congruent triangles
 - a. Determining if triangles are congruent
 - b. Proofs

Learning objectives:

- I can identify if triangles are congruent by SSS, SAS, AAS, or ASA.

Vocabulary

- SSS
- SAS
- ASA
- AAS



Read quietly to yourself the directions

CW Unit 2: Identifying Triangle Parts Your Name & Partner: Per:

Partner 1 - Directions:
 Complete with your partner:
 1) Identify the how the triangles are marked (SSS, SAS, ASA, AAS/SAA, AAA or ASS/SSA)
 2) Circle your answer.
 3) Cut out each figure and tape to the poster for each way triangles can be marked.

Partner 2 - Directions:
 Complete with your partner:
 1) Identify the how the triangles are marked (SSS, SAS, ASA, AAS/SAA, AAA or ASS/SSA)
 2) Circle your answer.
 3) Cut out each figure and tape to the poster for each way triangles can be marked.



Example:

1

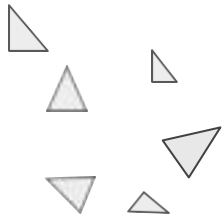


Circle the way the parts are marked in the Δ .

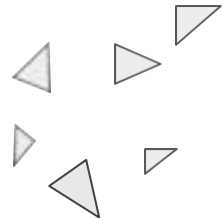
SAS	SSS	Can be used to prove $\Delta \cong$
ASA	AAS/SAA	
AAA	ASS/SSA	Cannot be used to prove $\Delta \cong$

Tape your triangle to the poster board it corresponds to

SSS



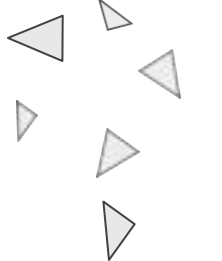
SAS





ASA



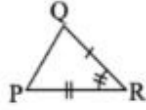
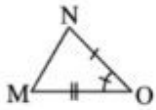
AAS/SAA



AAA

SSA/ASS


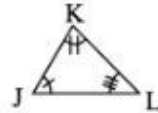
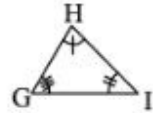
Reflection - Yellow Classwork Page 8

Determine which parts are marked for each triangle then state if the triangles are congruent by shortcut.



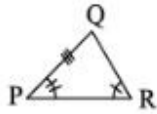
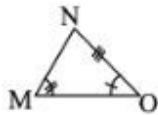
Marked parts: _____

Are the triangles congruent? Yes No



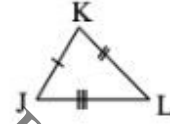
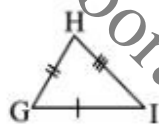
Marked parts: _____

Are the triangles congruent? Yes No



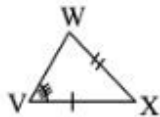
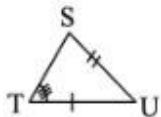
Marked parts: _____

Are the triangles congruent? Yes No



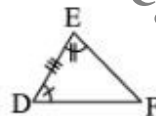
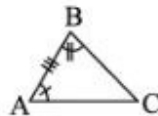
Marked parts: _____

Are the triangles congruent? Yes No



Marked parts: _____

Are the triangles congruent? Yes No

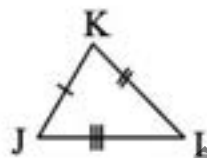
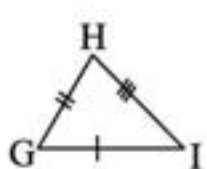


Marked parts: _____

Are the triangles congruent? Yes No

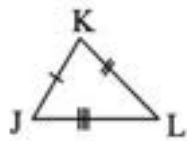
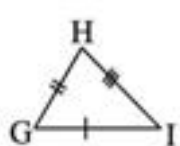


Introducing Proofs



Marked parts: _____

Are the triangles congruent? Yes No



Given:

$$\overline{GH} \cong \overline{JK}$$

$$\overline{GI} \cong \overline{JL}$$

$$\overline{HI} \cong \overline{KL}$$

Statement/Reason

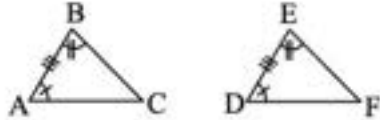
IF

THEN

Conclusion

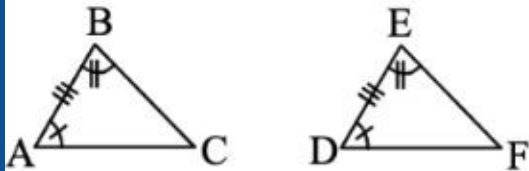
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Introducing Proofs



Marked parts: _____

Are the triangles congruent? Yes No



Given:

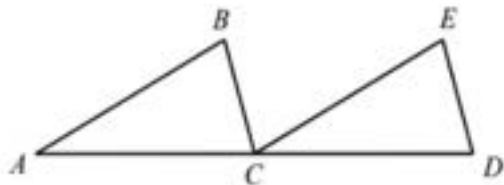
$$\overline{AB} \cong \overline{DE}$$

$$\angle A \cong \angle D$$

$$\angle B \cong \angle E$$

Statement/Reason		THEN →	Conclusion		
IF				→	

Introducing Proofs



Given:

$$\overline{AC} \cong \overline{DC}$$

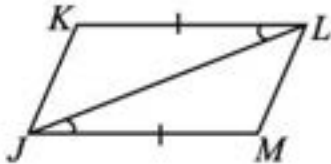
$$\angle ACB \cong \angle CDE$$

$$\angle B \cong \angle E$$

Statement/Reason		THEN	Conclusion
IF			

Identifying the third part of the congruent triangles

Reflexive Property



How many parts are marked?

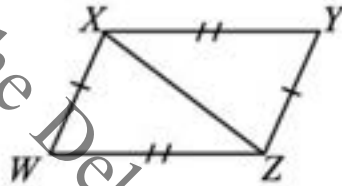
___ angles ___ sides

What is the third part?

Δ ___ \cong Δ ___ by

SSS SAS

AAS ASA



How many parts are marked?

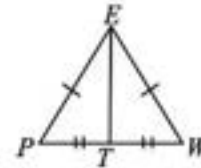
___ angles ___ sides

What is the third part?

Δ ___ \cong Δ ___ by

SSS SAS

AAS ASA



How many parts are marked?

___ angles ___ sides

What is the third part?

Δ ___ \cong Δ ___ by

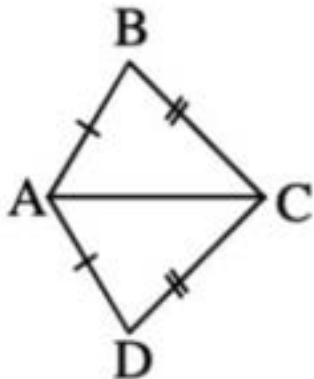
SSS SAS

AAS ASA

Identifying the third part of the congruent triangles

Given: $\overline{AB} \cong \overline{AD}$, $\overline{BC} \cong \overline{DC}$

Prove: $\triangle ABC \cong \triangle ADC$



Statement/Reason	
IF	

THEN →

Conclusion

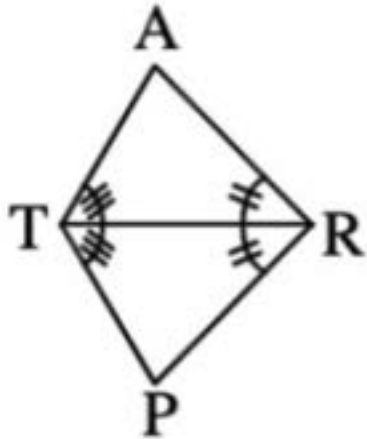
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Identifying the third part of the congruent triangles

Given: $\angle ATR \cong \angle PTR$,

$\angle ART \cong \angle PRT$

Prove: $\triangle ART \cong \triangle PRT$



Statement	Reason

The Deborah Project

The Deborah Project

Complete the Practice quiz

Unit 2 Practice Quiz 2

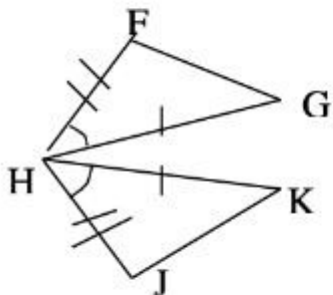
/6pts

Name: _____

State whether the two triangles could be proven congruent or NOT. If the triangles are congruent, stated by SSS, SAS, AAS, ASA then write a congruence statement if congruent (like above).

MARK YOUR FIGURES

1.



SSS, SAS, AAS, ASA (circle)

$\triangle HFG \cong$ _____

No, triangles NOT congruent

3.



SSS, SAS, AAS, ASA (circle)

$\triangle MNO \cong$ _____

No, triangles NOT congruent

We will be self-grading these afterwards!



Tuesday October 17, 2023

*I'M 1, 2, 3
U*

The Deborah Project

What saying does this puzzle mean?

Agenda

1. Unit 2 practice Quiz
2. Congruent triangles
 - a. Determining if triangles are congruent
 - b. Proofs
3. Notes

Learning objectives:

- I can identify if triangles are congruent by SSS, SAS, AAS, or ASA.

Vocabulary

- SSS
- SAS
- ASA
- AAS

The Deborah Project

SAME



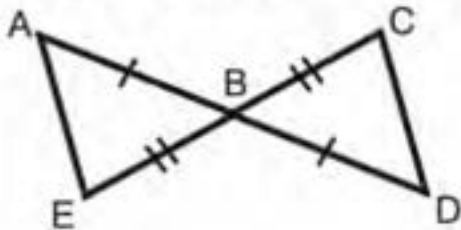
ARE THEY CONGRUENT?

Quiz on BLOCK 10/19
or 10/20 on Unit 2

Identifying the third part of the congruent triangles

Identifying congruent angles which are not marked

VERTICAL ANGLES



Given: $\overline{AB} \cong \overline{BC}$, $\overline{EB} \cong \overline{BD}$

Prove: $\triangle ABE \cong \triangle CBD$

Identify the transformation which maps the triangles together.

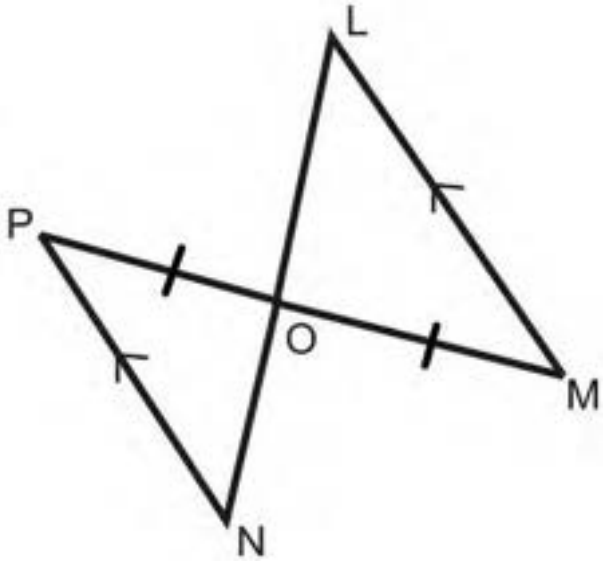
Statement/Reason

	THEN →	
IF		

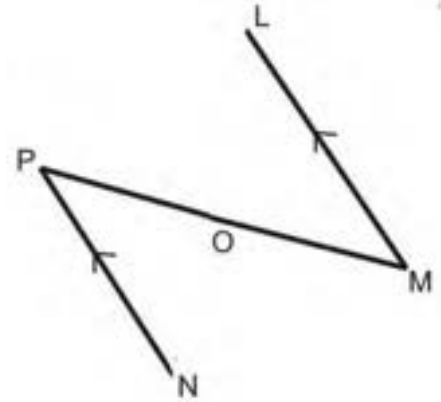
Conclusion

Third congruent part is:

Identifying the third part of the congruent triangles

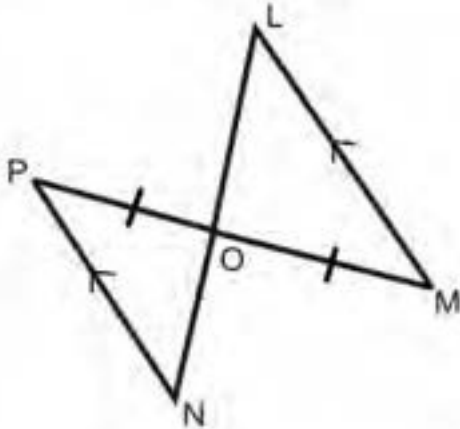


The Deborah Project



Identifying the third part of the congruent triangles

PARALLEL LINES



Identify the transformation which maps the triangles together.

Given: $\overline{AB} \parallel \overline{CD}$, $\overline{PO} \cong \overline{OM}$

Prove: $\triangle PON \cong \triangle MOL$

Statement	Reason

To retake this part of the test:

- Make an appointment for Friday's Flex time.
- You are responsible for the coming.
- I will not be making appointments for you

<p>a=_____ b=_____ c=_____</p> <p>_____ partner initials</p>	<p>a=_____ b=_____ c=_____</p> <p>d=_____ d=_____</p> <p>_____ partner initials</p>



The Deborah Project

Block Oct 19 or 20, 2023

EYE
EYE

The Deborah Project

What saying does this puzzle mean?

Agenda

1. Angle Chase
 2. CW - Proofs (pg. 4)
 3. Notes - pg.27 & 28
 4. Unit 2 Quiz
- Break-
5. Slope Practice

Learning objectives:

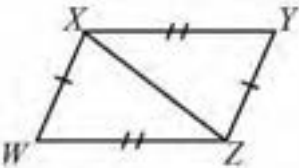
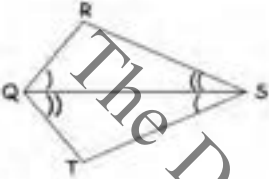

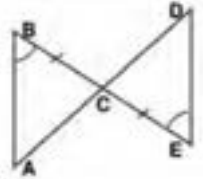
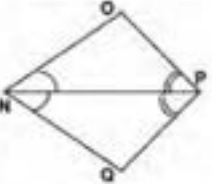
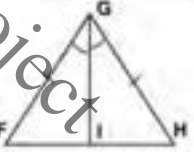
- I can identify if triangles are congruent by SSS, SAS, AAS, or ASA.

Vocabulary

- SSS
- SAS
- ASA
- AAS

Complete page 4 of the Intro go proof classwork

Each pair of triangles are congruent -Write a congruence statement AND determine why they are congruent.

 <p>Δ _____ \cong Δ _____ by</p> <p> <input type="checkbox"/> SSS <input type="checkbox"/> SAS <input type="checkbox"/> AAS <input type="checkbox"/> ASA </p>	 <p>Δ _____ \cong Δ _____ by</p> <p> <input type="checkbox"/> SSS <input type="checkbox"/> SAS <input type="checkbox"/> AAS <input type="checkbox"/> ASA </p>	 <p>Δ _____ \cong Δ _____ by</p> <p> <input type="checkbox"/> SSS <input type="checkbox"/> SAS <input type="checkbox"/> AAS <input type="checkbox"/> ASA </p>
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Logic - and evidence/reasoning for making conclusions.

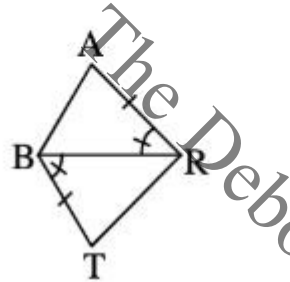


Why logic matters and using reasons to be the basis for conclusions?

Teacher comments to class: Look at the change in the headlines over the period of 24 hours. While you may not need to prove triangles in life, we study it to understand how we need to make statements and reasons to lead to conclusions.



Notes - pg. 27 & 28

Things to look for to prove triangles are congruent												
<p>Shared sides</p> <p>(or angles, which are rare)</p>	 <p>Prove $\triangle BAR \cong \triangle RTB$</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th style="padding: 5px;">Statement</th> <th style="padding: 5px;">Reason</th> </tr> </thead> <tbody> <tr><td style="height: 25px;"> </td><td> </td></tr> <tr><td style="height: 25px;"> </td><td> </td></tr> <tr><td style="height: 25px;"> </td><td> </td></tr> <tr><td style="height: 25px;"> </td><td> </td></tr> </tbody> </table>	Statement	Reason								
Statement	Reason											
For Practice, complete proofs on Page 1 of Proof Packet												

What do you do when DONE with Quiz?

- 1.) Turn in Quiz into the Basket
- 2.) Pick up **BLUE** slope practice and work on
- 3.) Then you can work on **HW Review Quiz-4**

<<time>>

5 minute break

If you were **LATE** to class - no break

If you are **LONGER** than 5 minutes, no bathroom privileges for a week.

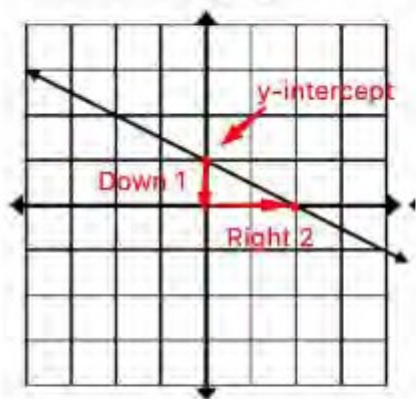


Determine SLOPE

Finding Slope

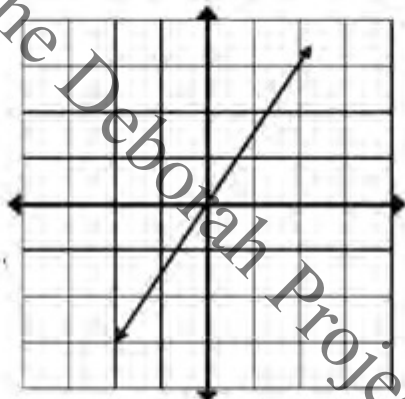
Name _____

Determine the slope and y-intercept for each graph



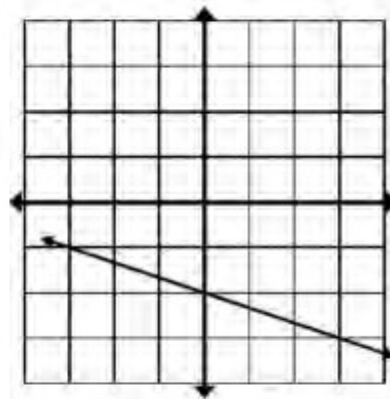
y-intercept = 1

$$\text{Slope} = \frac{\text{down } 1}{\text{right } 2} = \frac{1}{2}$$



y-intercept = _____

Slope = _____



y-intercept = _____

Slope = _____

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Determining if triangles are congruent

CW Unit 2: Color Congruent Triangles

Name(s):

Per:

Directions: Color the triangle pairs or trios that are congruent THEN complete the congruence statement and by what reason (shortcut) they are congruent. You will need 4 colors

→ FIGURES ARE NOT DRAWN TO SCALE

→ There are 5 triangles that are NOT congruent

				$\Delta A \cong \underline{\hspace{1cm}}$ by $\underline{\hspace{1cm}}$
				$\Delta B \cong \underline{\hspace{1cm}} \cong \underline{\hspace{1cm}}$ by $\underline{\hspace{1cm}}$
				$\Delta C \cong \underline{\hspace{1cm}}$ by $\underline{\hspace{1cm}}$
				$\Delta D \cong \underline{\hspace{1cm}} \cong \underline{\hspace{1cm}}$ by $\underline{\hspace{1cm}}$

5 triangles which are not congruent to the others. LIST the triangles.

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Apply the importance of a congruence statement letter order

Given $\triangle ABC \cong \triangle DEF$, which statement is NOT true?

- AB = DE
- perimeter of $\triangle ABC$ = perimeter of $\triangle DEF$
- BC = DF
- $m\angle C = m\angle F$
- area of $\triangle ABC$ = area of $\triangle DEF$

Given three measurements (length), which set would make a triangle with the largest **PERIMETER**?

Triangle 1:

15 cm, 7.7 cm & 5.8 cm

Triangle 2:

13 cm, 5.8 cm & 5.8 cm

Triangle 3:

10.8 cm, 9.4 cm, & 5.8 cm

Put you and your partners answer on a post note and stick it to the front board (Geometry side)

Hypothesize your answer to each and we will come back to these and see if we are correct.

Using the given measurements for the length of the different triangles - build your triangles.

Triangle 1:

15 cm, 7.7 cm & 5.8 cm

Blue 13 centimeters

Yellow 10.8 cm

Purple 7.7

Red 15 cm

Green 9.4

Orange 5.8

Triangle 2:

13 cm, 5.8 cm & 5.8 cm

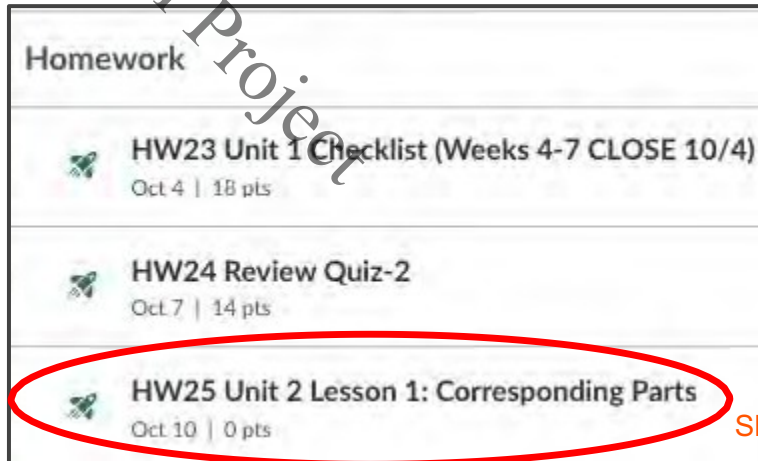
Triangle 3:

10.8 cm, 9.4 cm, & 5.8 cm




Did you post the correct answer?

What to do when done

- 1) Turn in “CW Unit 2: Sorting Congruent Triangles” to basket
 - a) Make sure YOUR NAME and your PARTNER’s NAME is on it
- 2) Work on your HW for tonight (on paper and upload to canvas when done:



The image shows a screenshot of a Canvas LMS interface displaying a list of homework assignments. The list is titled "Homework" and contains three entries. The third entry, "HW25 Unit 2 Lesson 1: Corresponding Parts", is circled in red. A large, semi-transparent watermark "The Deborah Project" is overlaid diagonally across the entire page.

Homework	
 HW23 Unit 1 Checklist (Weeks 4-7 CLOSE 10/4)	Oct 4 18 pts
 HW24 Review Quiz-2	Oct 7 14 pts
 HW25 Unit 2 Lesson 1: Corresponding Parts	Oct 10 0 pts

Naguib Mahfouz Nobel Prize Acceptance Speech (1988)

Ladies and Gentlemen,

To begin with I would like to thank the Swedish Academy and its Nobel committee for taking notice of my long and perseverant endeavours, and I would like you to accept my talk with tolerance. For it comes in a language unknown to many of you. But it is the real winner of the prize. It is, therefore, meant that its melodies should float for the first time into your oasis of culture and civilization. I have great hopes that this will not be the last time either, and that literary writers of my nation will have the pleasure to sit with full merit amongst your international writers who have spread the fragrance of joy and wisdom in this grief-ridden world of ours. [...]

I am the son of two civilizations that at a certain age in history have formed a happy marriage. The first of these, seven thousand years old, is the Pharaonic civilization; the second, one thousand four hundred years old, is the Islamic one. [...]

You may be wondering: This man coming from the third world, how did he find the peace of mind to write stories? You are perfectly right. I come from a world labouring under the burden of debts whose paying back exposes it to starvation or very close to it. Some of its people perish in Asia from floods, others do so in Africa from famine. In South Africa millions have been undone with rejection and with deprivation of all human rights in the age of human rights, as though they were not counted among humans. In the West Bank and Gaza there are people who are lost in spite of the fact that they are living on their own land; land of their fathers, grandfathers and great grandfathers. [...] Surrounding them are 150 million Arabs following what is happening in anger and grief. This threatens the area with a disaster if it is not saved by the wisdom of those desirous of a just and comprehensive peace.

Yes, how did the man coming from the Third World find the peace of mind to write stories? Fortunately, art is generous and sympathetic. In the same way that it dwells with the happy ones it does not desert the wretched. It offers both alike the convenient means for expressing what swells up in their bosom.

In this decisive moment in the history of civilization it is inconceivable and unacceptable that the moans of Mankind should die out in the void. There is no doubt that Mankind has at last come of age, and our era carries the expectations of *entente*¹ between the Super Powers. The human mind now assumes the task of eliminating all causes of destruction and annihilation. And just as scientists exert themselves to cleanse the environment of industrial pollution, intellectuals ought to exert themselves to cleanse humanity of moral pollution. It is both our right and duty to demand of the big leaders in the countries of civilization as well as their economists to affect a real leap that would place them into the focus of the age.

¹ **Entente**: a friendly understanding or informal alliance between states or factions

In the olden times every leader worked for the good of his own nation alone. The others were considered adversaries, or subjects of exploitation. There was no regard to any value but that of superiority and personal glory. For the sake of this, many morals, ideals and values were wasted; many unethical means were justified; many uncounted souls were made to perish. Lies, deceit, treachery, cruelty reigned as the signs of sagacity² and the proof of greatness. Today, this view needs to be changed from its very source. Today, the greatness of a civilized leader ought to be measured by the universality of his vision and his sense of responsibility towards all humankind. The developed world and the Third World are but one family. Each human being bears responsibility towards it by the degree of what he has obtained of knowledge, wisdom, and civilization. I would not be exceeding the limits of my duty if I told them in the name of the Third World: Be not spectators to our miseries. You have to play therein a noble role befitting your status. From your position of superiority you are responsible for any misdirection of animal, or plant, to say nothing of Man, in any of the four corners of the world. We have had enough of words. Now is the time for action. [...] We are in the age of leaders responsible for the whole globe. Save the enslaved in the African south! Save the famished in Africa! Save the Palestinians from the bullets and the torture! Nay, save the Israelis from profaning their great spiritual heritage! Save the ones in debt from the rigid laws of economy! Draw their attention to the fact that their responsibility to Mankind should precede their commitment to the laws of a science that Time has perhaps overtaken.

In spite of all what goes on around us I am committed to optimism until the end. [...] Good is achieving victory every day. It may even be that Evil is weaker than we imagine. In front of us is an indelible³ proof: were it not for the fact that victory is always on the side of Good, hordes of wandering humans would not have been able in the face of beasts and insects, natural disasters, fear and egotism, to grow and multiply. They would not have been able to form nations, to excel in creativeness and invention, to conquer outer space, and to declare Human Rights. The truth of the matter is that Evil is a loud and boisterous debaucherer⁴, and that Man remembers what hurts more than what pleases. Our great poet Abul-'Alaa' Al-Ma'ari was right when he said:

"A grief at the hour of death
Is more than a hundred-fold
Joy at the hour of birth."

I finally reiterate my thanks and ask your forgiveness.

What does Mahfouz seem to value? How does he communicate these values?

What is his message to his Western audience?

² Sagacity: the quality of being wise or intelligent

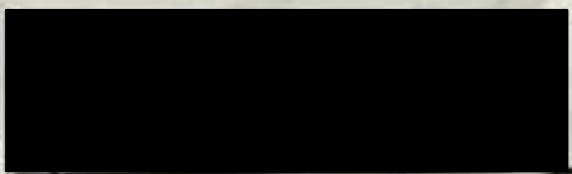
³ Indelible: not able to be forgotten or removed

⁴ Debaucherer: someone who overly indulges in sensual pleasures

EXHIBIT 3

The Deborah Project

Name



Period

2nd 18/20



Israel – Palestine Conflict Vocabulary Quiz

Write the letter of the matching definition in the blank.

1. <u>P</u> Palestine	A. The Arabic word for catastrophe. For Palestinians, this word describes when more than 700,000 Palestinians fled or were expelled from their homes in the 1948 war that followed the formation of the state of Israel.
2. <u>H</u> Zionism	B. This structure, built by the Israeli government, divides Palestinian land in the West Bank and Jerusalem from Israeli land and is illegal according to international law
3. <u>D</u> anti-semitism	C. The areas of Palestine that have been taken over and controlled by Israel since the 1967 War
4. <u>I</u> checkpoint	D. Anti- Jewish racism
5. <u>Q</u> the Holocaust	E. This is the Arabic word for uprising.
6. <u>A</u> the Nakba	F. The language spoken by the majority of Israelis
7. <u>N</u> refugee camp	G. The takeover of land by force by Jewish Israeli citizens in the Occupied Territories with Israeli government support. This takeover of Palestinian land is not legal, according to the United Nations.
8. <u>E</u> intifada	H. The political movement of the Jewish diaspora to create a new Jewish state in the holy land
9. <u>G</u> the Occupied Territories	I. The crossings where the Israeli Defense Forces regulate who goes in and out of the Occupied Territories. Israeli citizens can generally cross freely, while Palestinians must show IDs and submit to searches
10. <u>O</u> the Gaza Strip	

11. L diaspora

12. C settlement

13. K the West Bank

14. F Hebrew

15. T apartheid

16. M Israel

17. R islamophobia

18. B separation wall

19. J Fatah

20. S Hamas

J. This is one Palestinian political party which is more willing to compromise with Israel.

K. This is one part of Palestinian land that is now known as one part of the Occupied Territories. It lies on Western shore of the Jordan River.

L. This is the word given to a people that have been scattered from their homeland, usually by force.

M. The name for the Jewish country that includes the holy land. The United Nations established this country in 1947.

N. The areas where Palestinians fleeing from the 1948 war were obligated to live on an emergency basis – these areas ended up becoming permanent with very high poverty rates

O. This is one part of Palestinian land that is now known as one part of the Occupied Territories. It is a narrow bit of land that lies on the coast of the Mediterranean Sea.

P. The name given to the Arab lands that include the holy land. The United Nations established this land as a country in 1947. All of these lands are currently occupied by Israel.

Q. The genocide that occurred in Europe during World War II that resulted in the murder of over 6 million Jews by the Nazis

R. Anti-Muslim discrimination and racism

S. This is one Palestinian political party which is continuing to fight against Israel.

T. This word comes from the Dutch colonizers in South Africa and means “separateness” in Dutch. The word was used to describe the system of racism and racial separation between White South Africans and Black South Africans.

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EXHIBIT 4
The Deborah Project

Name _____

Period 2nd

78/100

World History Final Exam Semester 1 2023

Answer each question with a minimum of 3 sentences and a maximum of 5 sentences. Make sure you answer all of the different parts of each question.

- Using the Global Data Statistics (Life Expectancy, Adult Literacy, Population Growth Rate, GDP per capita), give a definition for developed countries. Give an example of a developed country. Again using the Global Data Statistics, give a definition for developing countries. Give an example of a developing country. What are the historical reasons why we have rich countries and poor countries in the world today?

A developed country is a country that has a high life expectancy rate, high adult literacy rate, low population growth rate, and a high GDP. An example of a developed country is America. An example of a developing country is Afghanistan, meaning a country that has a low life expectancy, adult literacy, high population growth rate, and a low GDP. The reasons why some countries are richer are due to geography, which impacts amount of food and crops.

- How did the Spanish conquer the Aztec Empire? Give as much detail as possible.

no this history is the conquest of the Aztec Empire

Spanish surprise attacked them. They gave the Aztec leader one chance to convert to Catholicism, and when the Aztec leader refused, they went on horses and killed the majority of the Aztecs. Then, they captured the Aztec leader and told him that if he orders the rest of his people to melt all of their gold and give it to the Spanish, he will be freed. After the gold was melted, the Spanish killed the leader.

the Aztecs were enslaved.

- What is colonialism? Who was colonized? Who did the colonizing? How did colonialism change the world?

Colonialism is a system where one country maintains military control over overseas lands. An example of a colonized country is America, which was colonized by European explorers who colonized the Native Americans (Arawaks). Colonialism changed the world by resulting in many countries coming to existence through colonizing others.

61

4. What does Eduardo Galeano mean when he says, "Latin America is the region of open veins"? Explain how Galeano describes the position of Latin America in the development of worldwide industrialization and capitalism. What is neo-colonialism? Which country today directs the neo-colonial control over Latin America, according to Galeano?

10 Galeano means that Latin America is still healing from being colonized. He states that Latin America is existing at the service of others' needs, meaning that Latin America is not profiting much from how much is being extracted from their lands. Neo-colonialism means "New Colonialism", the colonialism that is extracting wealth in recent years. According to Galeano, the country that is directing most of the control over Latin America is the United States.

5. Use your *Guns, Germs and Steel Part 1 The Haves and Have Nots* Cornell Notes to help you answer this question. Many historians (including many European colonizers themselves) have maintained a racist understanding of the reasons for colonization. These racist accounts of the colonization of Latin America, Africa, Asia and Polynesia by Europeans usually include the racist ideas that Europeans are superior to non-Europeans and that non-Europeans are inferior to Europeans. These racist ideas frequently lead to the false idea that European colonization was a "natural" or inevitable outcome and that European colonization of the world was conducted to "help" the non-Europeans. Explain Jared Diamond's hypothesis in *Guns, Germs and Steel Part 1* about why some societies developed so much material wealth and other societies didn't. Does Jared Diamond's hypothesis support the racist accounts of colonization or does it provide a counternarrative in opposition to the racist accounts of colonization? Give evidence to support your claim.

Jared Diamond's hypothesis provides a counternarrative to the racist stereotypes against non-Europeans.

7 Diamond does this by stating that the reason why some non-European countries aren't as advanced is due to geography and the non-European countries "Not having the luck to certain crops that grow in your area."

44

= 5x

6. What are the beliefs and practices of Islam? How is Islam similar to Judaism and Christianity? Give at least 3 detailed and non-superficial ways that Islam is similar to Judaism and Christianity.

Muslims believe in God named "Allah", whom they pray to multiple times a day. They also believe that if you don't follow God's words, you will go to hell, but if you do, you will be rewarded with paradise. The Muslims follow a holy book called the Koran, as well as the Five Pillars of Islam. Islam, Judaism, and Christianity all follow a sacred book written thousands of years ago, as well as believing in only one God and believing in an afterlife.

7. Where is Malala Yousafzai from? What happened to her? What did she say about Islam in her Nobel Peace Prize acceptance speech? About which issue does she speak out publicly and how is this issue connected to her understanding of Islam?

10 Malala is from Pakistan. She was targeted for speaking out against the Taliban and how there is not enough education for girls, and as a result, was shot by the Taliban. Malala said that terrorists were misusing the name of Islam. She spoke out about how children are being forced into labor & denied an education. This connects to her understanding of Islam by valuing the

8. What were the events that led to the formation of the state of Israel, the Nakba, and the beginning of the conflict between Israel and Palestine? Explain in your opinion how much responsibility European colonial powers and specifically the United Kingdom have for causing this conflict.

8 The holocaust was a major event that led to the formation of the state Israel. The Nakba occurred after Jews came to Israel & war started between the two.

first word of the Quran, "Bismillah"

I believe that United Kingdom has a good amount of responsibility. I feel like the UK could have done more to ensure that there would not be a war.

9. Describe the Occupied Territories, who is occupying these territories and who is living under this occupation. Describe what life is like for the people living under occupation, giving at least 3 specific examples.

The occupied Territories are the areas of Palestine that have been taken over by Israel in which Palestinians live in. For the people living under occupation, they live in poverty (Sonabel from Promises), live 'around' walls, & do not have much freedom to go in and out of the checkpoints.

10. What is the separation wall? Why did the Israeli government build the separation wall? How does the separation wall affect the lives of Palestinians? What did the International Court of Justice say about the separation wall? How did the Israeli government respond to the International Court of Justice's decision?

10 The separation wall is a 450 mile long wall that separates Israel & Palestine. The wall was built to ensure safety for the Israelis against terrorist attacks. The separation wall makes it hard for Palestinians to go places like work & the hospital. The International Court of Justice did not agree with the separation wall, but Israel did not comply with their rulings.

EXHIBIT 5

The Deborah Project



**Sequoia Union High School District
Uniform Complaint Procedures
COMPLAINT FORM**

I. Your Contact Information

Last Name: Kasle First Name: Sam

Address: [REDACTED] Apt. #:

City: [REDACTED] State: [REDACTED] Zip: [REDACTED]

Home Phone: [REDACTED] Work or Cell Phone: [REDACTED]

Email: [REDACTED]

II. Complainant

You are filing this complaint on behalf of: [REDACTED] Kasle and Family

Parent/Guardian Pupil Witness to the Incident Other:

III. School Information

School Name: Woodside High School

Grade: 10 Principal: Karen Van Putten

IV. Basis of the Complaint

A. District violation of state or federal law or regulations/policies governing:

- | | |
|---|---|
| <input type="checkbox"/> Accommodations for Pregnant and Parenting Pupils | <input type="checkbox"/> Every Student Succeeds Act / No Child Left Behind (Titles I–VII) |
| <input type="checkbox"/> Adult Education | <input type="checkbox"/> Local Control and Accountability Plans (LCAP) |
| <input type="checkbox"/> After School Education and Safety | <input type="checkbox"/> Migrant Education |
| <input type="checkbox"/> Agricultural Career Technical Education | <input type="checkbox"/> Physical Education Instructional Minutes |
| <input type="checkbox"/> Career Technical and Technical Education; Career Technical; Technical Training (State) | <input type="checkbox"/> Pupil Fees |
| <input type="checkbox"/> Career Technical Education (Federal) | <input type="checkbox"/> Reasonable Accommodations to a Lactating Pupil |
| <input type="checkbox"/> Child Care and Development | <input type="checkbox"/> Regional Occupational Centers and Programs |
| <input type="checkbox"/> Compensatory Education | <input type="checkbox"/> School Plans For Student Achievement |
| <input type="checkbox"/> Course Periods without Educational Content | <input type="checkbox"/> School Safety Plans |
| <input type="checkbox"/> Education Of Pupils In Foster Care, Pupils Who Are Homeless, Former Juvenile Court Pupils Now Enrolled In A School District, and Pupils Of Military Families | <input type="checkbox"/> School Site Councils |
| | <input type="checkbox"/> State Preschool |
| | <input type="checkbox"/> State Preschool Health And Safety Issues In LEAs Exempt From Licensing |

List the **individuals** involved in the incident(s) complained of:

Please see attached documents.

List any **witnesses** to the incident(s):

Please see attached documents.

What steps, if any, have you taken to resolve this issue before filing a complaint?

Please see attached documents.

I understand that the District will maintain the confidentiality of this information, to the extent provided by law or the applicable collective bargaining agreement; that I will be protected from retaliation for filing this complaint; that the District may request further information about this matter; and if such information is available, I agree to present it upon request.

I understand that with the exception of pupil fee complaints, which may be filed within one (1) year of the alleged violation, all other complaints must be filed within six (6) months of the alleged occurrence. Pupil fees and LCAP complaints may be filed anonymously.

I believe that the forgoing is true and correct.

Note: I understand that if I file a complaint right before Thanksgiving Recess, Winter Recess, Spring Recess or Summer Recess, that school staff will be on vacation and it will take longer to investigate; and I agree to extend the timeline for responding to my complaint by the number of days schools are closed. Initials SK

Signature of Person Filing Complaint

2/1/2024

Date

Please submit this complaint to:

Assistant Superintendent of Human Resources
Human Resources Department
480 James Avenue
Redwood City, CA 94062

Faculty Complaint

█████ Kastle was a tenth grade student at Woodside High School in the beginning of the 2023-2024 academic year. █████'s World History teacher, Greg Gruszynski, wore a "Bike for Palestine" t-shirt on one of the first days of school, hung a "Free Palestine" poster on the wall, and introduced the topic of the Hamas-Israel conflict the week of October 7, 2023, by stating, "I want to talk about something happening now that is bad. He then wrote on the board, "Israel's Attack on Gaza," and began describing Israel's Defense Forces' military attack against Hamas in Gaza. █████ knew what was happening in the Middle East as she is Jewish—in fact, she was the only engaged Jewish student in that 10th grade World History class—and she and her family had been paying close attention to what was happening in the Middle East since early Saturday morning, October 7. █████ was frustrated because she knew the teacher was inaccurately presenting the conflict, in fact, he didn't even mention the October 7 Hamas massacre of approximately 1200 Israelis. She finally raised her hand and asked, "Who attacked first?" And though Mr. Gruszynski admitted that it was Hamas, throughout the time that he taught this topic he constantly downplayed any culpability by Hamas and either ignored or downplayed any efforts on the part of Israel to solely focus on eradicating the terrorist organization, Hamas, as well as the return of the hostages taken on Oct 7th and instead presented Israel's self-defensive actions as wanton violence and the intentional targeting of Palestinian civilians.

Mr. Gruszynski repeated, as if fact, claims that Israel caused the Gaza Strip to exist as an "open air prison that Israel controls," and showed multiple videos, all from NPR's "Democracy Now" show which is notoriously anti-Israel. Once, in early December, Mr. Gruszynski began his discussion of "Israel-Palestine" with the comment, "█████ is someone who doesn't think Israel is an Apartheid state," with an intonation that made it clear such a position is ridiculous, and continued with, "maybe now others will think differently," meaning it was his intention to show the rest of the students in the class that █████ is wrong. █████ was humiliated by Mr. Gruszynski's ridiculing of her position, and she was also mortified that the teacher was describing her people as monsters. But even the most violent acts of Hamas were never criticized by this teacher. In fact, Mr. Gruszynski told the class that the U.S. and Israel labeled Hamas as a terrorist

organization, but, he asked out loud, “how different is Israel from Hamas?” Mr. Gruszynski described Hamas, rather, as a “political party that fights against Israel.” He also taught this 10th grade World History class that Palestine is a state founded and recognized by the United Nations in 1947, which is patently false.

The Israeli checkpoints set up at border crossings were described by Mr. Gruszynski to his 10th grade class as tools solely to humiliate the Palestinians. When [REDACTED] raised her hand and asked isn't it the case that the checkpoints are there because of terrorism? Mr. Gruszynski's response was “that's the reason they [Israelis] give.” [REDACTED] continued trying occasionally to point out when Mr. Gruszynski stated inaccuracies, but she eventually gave up as she had the feeling that the teacher was enjoying the game of his words taunting her and her efforts to help fairly educate the other students; with such a power differential, however, [REDACTED] found nothing funny or engaging about it.

The instructional materials gathered and distributed to [REDACTED]'s 10th grade World History class repeatedly asserted that the Palestinians—not the Jews—are indigenous to the land of Israel, despite historical, archeological and genetic proof to the contrary.

When [REDACTED] would complain about Mr. Gruszynski's bias against the Jewish State, he often responded that “he used to teach Jews in New York,” as if that made it okay for him to be antisemitic.

The only videos Mr. Gruszynski used in the class (aside from the antiquated “Promises” movie that was released 23 years ago in 2001 - three years before Israel left Gaza and four years before Hamas was voted in by the Palestinian people to lead their government) on the “Israel-Palestine” unit were four or more videos from Democracy Now. There was never any effort to do anything but prove, through the materials Mr. Gruszynski handed out in class or through his oral presentations, that Israel was always in the wrong. [REDACTED] is convinced that anyone who didn't know much about what is actually happening in the Middle East and only

learned about it from Mr. Gruszynski's class would come away from the class not with a balanced or nuanced perspective, but with absolute certainty that Israel is evil and while unstated that Jews themselves are evil.

Due to the environment at Woodside during this time and from past anti-semitic experiences at Woodside, both [REDACTED] and her older sister [REDACTED] (a Woodside senior) stopped wearing their always-present Star of David necklaces for fear of being singled out, harassed and even attacked.

There were three questions that dealt with the Israel-Palestine unit on the final exam for the semester. [REDACTED] knew that she had to write her answers to those questions the way Mr. Gruszynski wanted, which was to cast Israel as the wrongdoer. She said that if she were to write what she genuinely knew to be true Mr. Gruszynski would have failed her. In other words, that teacher forced a Jewish student to write bad things about Israel, and by extension her own people, in order to get a good grade.

Mr. Gruszynski's biased and discriminatory teaching violates numerous California Education Code policies including §§60045, 49091.12, 51500, 60045(a), 220.

The Deborah Project

EXHIBIT 6
The Deborah Project

REQUEST FOR RECONSIDERATION OF INSTRUCTIONAL MATERIALS

This form is for use only by district employees, district residents, or parents/guardians of children enrolled in a district school to challenge the content or use of an instructional material. For complaints regarding sufficiency of instructional materials, please use the Williams Uniform Complaint Procedure complaint form.

Date: Today's date is 1/27/2024, but the first time I formally requested the materials was on 12/9/2023. I have made subsequent written requests since then.

Name of person filing complaint: Sam Kasle

Anonymous complaints will not be accepted (this is anything but anonymous).

Group represented (if any): Kasle Family and to some extent Jews and anyone who believes that the truth, as best we can manage, should be taught in schools in an unbiased manner; supporters of our civil rights. My daughter, [REDACTED], was in the class when the false and objectionable material was presented.

Phone: [REDACTED] texts preferred, but you can also call of course.

E-mail address, if any: [REDACTED]

Address: [REDACTED]

Material Being Challenged: The entirety of the multi-media materials and oral lessons Greg Gruszynski developed, curated, self-approved and presented to his 10th grade World History class in the fall of 2023 relating to Judaism, Christianity, Islam, the history of the Middle East and the current Hamas-Israeli war.

Title: Multiple and unknown

Author: Mostly unknown despite my repeated requests of and refusals by the teacher, Greg Gruszynski, who gathered and provided the objectionable material to his students, including my daughter. Both Mr. Gruszynski and the Woodside administration refused to provide the multimedia classroom materials and the **sources for that material, including** the oral teaching and discussion led by this teacher.

Publisher: Greg W, et al.

Date of Edition: Greg claims to have been doing this for 20 years (quote from recent school board meeting)... that's a lot of misinformation - assuming just one class a year, with 30 students, likely 600-1000 students have been exposed to this type of miseducation. The number is likely much higher as Greg teaches multiple classes and shares the material with other teachers. The true number could be easily and well north of 5,000 students and faculty.

Name of school/classroom material was used: another question that has been left unanswered by Mr. Gruszynski and the Woodside High School administration - I only have direct knowledge of the materials my daughter brought home and her recollections and descriptions of what was presented in school - but based on email exchanges this curriculum is being used by other teachers. Greg's class was World History 10th grade.

1. Please specifically state the nature of your concern or objection and identify your objection by page, tape sequence, video frame, or words, as appropriate. You may use additional pages if necessary.

Providing a detailed list of the inaccuracies is an abusive request and misunderstands or misrepresents the severity of the situation. For one, there are errors of OMISSION. Secondly, the materials contain AHISTORICAL, factually inaccurate material. There are errors of SCOPE as the lessons relate to the relevant state guidelines, there are errors of BIAS as revealed in the materials which I have from my daughter and which she directly experienced, as well as did the entire class of students. There were errors in APPROVAL & OVERSIGHT, and then of course there are the errors that this question specifically points to, but these are mere signposts of the outrageously flawed and biased material presented, not in and of themselves the core issue. In essence, if these factual inaccuracies were remedied, the material would still be defunct, the process uncorrected, and the behavior or the teacher and the administration unresolved:

Examples One through Five:

Vocab matching test.

Term: "Palestine"

Greg's answer: "The name given to the Arab lands that include the holy land. The United Nations established this land as a country in 1947. All of these lands are currently occupied by Israel."

#1 'Arab Lands' - historically loose at best and negates Jews as an indigenous people to Israel whose presence in the region is 3300 years old. Use of this term appears to be a way of associating the Palestinians to the land, despite the appearance of a people who began to be known as Palestinians did not appear for several thousand years after Jews inhabited the land, as revealed through archeology, history and literature. The effort to create the impression, that the Jews are usurpers and the Palestinians are the indigenous people in the

region was one of the underlying themes throughout the time Mr. Gruszynski taught this lesson, which is an affront both to me, my family and my people, but to history.

#2 UN est. as a country - Palestine is a UN recognized Observer, but so are NGOs; Palestine is not now and has never been a country or a separate sovereign entity. It was the term used to refer to the region in the Middle East following the collapse of the Ottoman Empire. In November, 2012 the UN granted Palestine non-member observer status.

#4 currently occupied by Israel - Article 42 of the Hague Regulations of 1907, states “Territory is considered occupied when it is actually placed under the authority of a hostile army.” Whoa... this negates Israel as a sovereign country; its rewrites the history (including the Six-Day War) from a defensive action to an offensive action; continues the libel of “IOF”, where anti-Israeli propagandists call the Israeli Defense Force, the Israeli Occupation Force. Please google “denialism” as a common tactic of anti-semites - from Holocaust denial to Oct 7th denial, to the denial that Jesus was a Jew. And I want to say clearly, the denialism throughout the material and how it was taught is/was problematic.

#5 These “facts” were tested. A teacher tests material that is core to the section that needs to be remembered - “if you remember just one thing from my class...” This demonstrated FOCUSED INTENT as Greg curated or created these materials without reference to recognized historical documents or sources and then used the material he selected—with great bias aforethought—which was then the basis upon which he graded his exams and quizzes.

Throughout my repeated requests for the material used in this class I have repeatedly been told that we have received “75%” of the material in Greg’s possession for my daughter’s 10th Grade World History class. But the material we do have is replete with omissions, inaccuracies and bias.

Example 6 & 7:

“Introduction About Christianity” handout

First page, second paragraph, third sentence.

“During his life he [Jesus] traveled around northern Palestine...”

#6 The land at the time was known as Judea - OMISSION & INACCURACY

#7 Palestine was not a written word, a historical word until at least 70 AD. After Jesus’ death. Just as the Native Americans didn’t walk around what they called New York or California in the 1300’s. Dangerous reimagining of our collective past.

2. Did you read/view the entire selection? I have, and my friends & family have, and a scholar on the subject has multiple times.

3. For what age group would you recommend this material? None. I would not recommend ingesting arsenic to any age group.
4. If not, what percentage did you read/view, or what parts? 100% of the material provided; not all materials have been provided even after many many written and direct requests to Woodside administration and Greg.
5. What do you feel might be the result if a student reads/views this material? Basic misunderstanding of recorded history and most insidiously anti-semitic beliefs and views.
6. What would you like the school to do about this material?

Do not assign it to my child

YES **Withdraw it from all students and faculty immediately until resolved - this request was made nearly two months ago. Alert the parents and students and faculty impacted by this material. Then let's find a path forward to remediate the damage done, to improve the approval and oversight process, and to limit Greg's ability to inflict harm in the future (intent is sometimes not relevant). I must make clear that not only was my daughter—the only Jewish student in the class—harmed by the teacher's insistence on teaching high school students false and dangerously biased material, but every other student was also harmed by the infliction of antisemitic material presented as truth and so contributing to their development of an antipathy towards Jews and the Jewish state.**

Reconsider it

There is nothing inherently wrong with teaching Middle-Eastern history or bringing in current events to show how history is being made today and how the past impacts our present. I'm taking a hard line when students are taught in the biased manner Greg has demonstrated (hanging a "Free Palestine" poster in his classroom, wearing Pro-Palestinian t-shirt while teaching... how do you spell "blatant"?), how the material was created and self approved, the lack of oversight by administration, the lack of response by administration, the scope of the material (6-7 sessions were focused on this section which means the students had reduced access to state mandated material), and the repeated refusal by both the teacher and the teacher's supervisors to provide me with the material I did not yet have or any of the sources for the material that was used in class despite my repeated requests.

Signature of complainant

For District Use:

Request received by:

Date: Title:

Action taken: Date:

The Deborah Project

EXHIBIT 7
The Deborah Project



Sam Kasle [Redacted]

Re: Findings Letter

1 message

Sam Kasle [Redacted]
To: Charles Velschow [Redacted]
Cc: andrea kasle [Redacted]

Thu, Mar 7, 2024 at 2:08 PM

Thanks Chuck. This appears to deal with the second complaint, what's the timing on the first?

Sam

On Mar 7, 2024, at 1:00 PM, Charles Velschow [Redacted] wrote:

Sam and Andrea -

Attached is the findings letter regarding your complaint against Greg Gruszynski, along with the BP/ARs 1312.1. A hard copy will be mailed to your home address today.

This concludes the school's role in this complaint - any appeal process will go through the superintendent's office.

--



Chuck Velschow (him/he/el)
Administrative Vice Principal
(Last names 'A-L')
(650) 367-9750 x40030

<Regulation 1312.1 Complaints Concerning District Employees.pdf>
<Findings Letter Kasle Complaint 3-7-24.pdf>

The Deborah Project

<h1>Woodside High School</h1>		BOARD OF TRUSTEES Carrie Du Bois Richard Ginn Amy Koo Sathvik Nori Shawneece Stevenson
199 CHURCHILL AVENUE WOODSIDE, CA 94062-1152 <i>Karen van Putten, Principal</i>	(650) 367-9750	SUPERINTENDENT Crystal Leach

March 5, 2024

Delivered via Email ([REDACTED])
 Sam and Andrea Kasle
 [REDACTED]

Re: Investigation Findings

Dear Mr. and Mrs. Kasle:

Woodside High School ("School") has completed its investigation into the Uniform Complaint Process written complaint that your family, ("Complainant") filed with Woodside High School on February 15, 2024 ("Complaint against faculty"). The Complaint brought concerns that a teacher, Greg Gruszynski ("Respondent"), was biased and discriminatory in his teachings on the Middle East, specifically related to Israel and the current conflict between Israel and Hamas. Ultimately the lessons and instructional materials had a detrimental impact on your daughter, [REDACTED] Kasle, in the classroom. Prior to the complaint filed on February 15th, Sam Kasle completed a 'Request for Reconsideration of Instructional Materials' pertaining to the lessons and materials being used in Greg Gruszynski's class. The 'Findings' will address some of the concerns brought in the reconsideration of materials request, but not all of them. The entire Sequoia Union High School District has received a request for public records through a separate complaint. Teachers must provide all teaching materials to District counsel containing the terms "Zionism, Zionists, Israel, Israelis, Palestine, and/or Palestinians" that have been used in their classroom from September 1, 2023, to the present. That issue will be handled through the Superintendent's Office.

The Complaint was investigated by Chuck Velschow, Administrative Vice-Principal, under District Board Policy ("BP") and Administrative Regulation ("AR") 1312.1 (Complaint of School Employee). Copies of BP/AR 1312.1 are enclosed for your reference.

As part of the investigation, Mr. Velschow interviewed six student witnesses and one staff member. Further, corroborating evidence and, where necessary, witness credibility was also considered. Relevant evidence was evaluated under a preponderance of the evidence standard in order to determine whether, based on the totality of the evidence, there was sufficient evidence to sustain the allegations. "Preponderance of the evidence" means that the evidence on one side

outweighs, or is more than, the evidence on the other side. Following a thorough analysis of the evidence, findings of fact and conclusions of law were made, as are set forth below.

Findings of Fact

At the conclusion of the investigation, the following factual findings were made:

Substantiated in Part

After the Israeli invasion of the Gaza Strip, Mr. Gruszynski's World History class discussed the invasion as part of its current events component of the class (on or around October 31, 2023). This discussion was largely dominated by a conversation between Mr. Gruszynski ("Respondent") and [REDACTED] ("Complainant"). The conversation between Mr. Gruszynski and [REDACTED] was very civil, but student witnesses reported that Mr. Gruszynski was "pro-Palestinian" and the student "pro-Israel", and Mr. Gruszynski's position was further buttressed by a 'Free-Palestine' bumper sticker on his wall, which student witnesses noticed or was possibly referenced by Mr. Gruszynski. The full context of the bumper sticker was not explained by Mr. Gruszynski, it was distributed at a fundraiser he had participated in for the organization called the Middle East Children's Alliance (MECA). This discussion between teacher and student went on for approximately 10 minutes, during the discussion [REDACTED] challenged Mr. Gruszynski on many of his assertions, for example (possibly in response to the number of Palestinian deaths being reported), [REDACTED] stated, "who attacked first?" Mr. Gruszynski reported that he allowed the discussion to go on longer than normal because he wanted [REDACTED] to provide her perspective. Mr. Gruszynski was very impressed with [REDACTED] and complimented her individually (not in front of the class) for both her knowledge of the topic and her strong articulation.

After this initial current events conversation, the class continued with its unit on Latin America and began a unit on the Middle East in mid-November. During the unit on the Middle East, Mr. Gruszynski brought forth classroom materials that provided a historical perspective on the Palestine-Israel Conflict, current topics related to the conflict in Gaza and its repercussions in the US (ex: resignations of college presidents), and readings on violence against Jews and Palestinians in the US, along with videos. Much of this material comes from the organization 'Democracy Now'; the "Complainant" alleges this material and the organization are "anti-Israel", Mr. Gruszynski stated they are a legitimate source because they do not allow any corporate funding. Mr. Gruszynski stated that it is not the teacher's role to support a country's foreign policy in any case. He further defined a teacher's obligation to present factual material, even if that includes counter-narrative material.

During Mr. Gruszynski's unit on the Middle East student witnesses reported that [REDACTED] was never discriminated against or called out in front of the class as being wrong. However, [REDACTED] told a classmate that she did not want to attend class or deal with Mr. Gruszynski because the classroom materials and topics related to Israel and Gaza were making her feel uncomfortable.

Mr. Gruszynski did not get this sense from [REDACTED]. In a few instances during the unit on the Middle East [REDACTED] positively participated and always seemed comfortable to raise her hand and express an opinion. She brought up the issue that Israel was "not an apartheid state", and challenged the definition of 'checkpoints' being presented in class. Mr. Gruszynski stated that he felt the relationship between him and [REDACTED] was a positive one. Near the end of the semester [REDACTED] asked Mr. Gruszynski if he was going to miss having her in class (she had found out her transfer to Sequoia had been approved), and he responded in the affirmative that he was disappointed she would no longer be a 'Wildcat'. He did not get any sense that the [REDACTED] had felt "browbeaten". The initial concern by the "Complainant" (specifically the father - Sam Kasle) was brought in an email the weekend of December 9th, 2023 to AVP Velschow. At that time the "Complainant" did not want Mr. Gruszynski to know his identity. Almost two weeks later the "Complainant" expressed a willingness to meet with Mr. Gruszynski, but the semester was nearly over, attempts for the two sides to meet in January disintegrated during email exchanges in which Mr. Gruszynski described the "Complainant" as becoming increasingly hostile.

Conclusion

The Respondent's actions were addressed with the school administration in accordance with District policies and procedures. Due to the laws pertaining to personnel files, additional information cannot be shared.

Parties should consider and accept the School's decision as final. However, you have the right to address the Superintendent or designee regarding the complaint. See the enclosed BP/AR for more information about this process.

Sincerely,

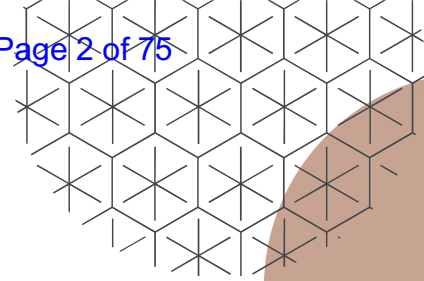


Chuck Velschow
Administrative Vice-Principal ('A-L')
Woodside High School

[REDACTED]
650-367-9750, ext: 40030

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EXHIBIT 8
The Deborah Project



1.8 Dominant and Counter Narrative

Unit 1 - Ethnic Studies and Narrative

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1.8 Warm Up

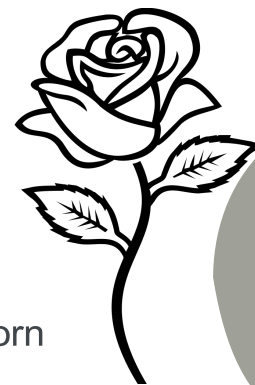
Turn and talk with your table group about the following questions. Be prepared to share with the whole class

What is one thing you heard in the news this week?

One thing I heard in the news this week was ...

What was a rose (highlight), bud (something you are looking forward to), and thorn (challenge) of this week?

This week my rose was when _____, something I'm looking forward to is _____, and a thorn would be _____.



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1.8 Agenda

- Warm up / welcome / agenda / announcements
- Narrative definition
- Connect dominant and counter narratives to current events in Israel and Palestine
- Exit Ticket

Objective: Define narrative, dominant narrative, and counter narrative to help us describe the ongoing conflict in Israel and Palestine.

What do you know
about narratives and
counter-narratives?

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Narrative

Definition: A story



Dominant Narrative

Definition: an explanation or story that is told to benefit the dominant social group's interests and ideologies

Example: Pocahontas was a young woman who fell in love with an English explorer, John Smith.



Counter Narrative

Definition: an explanation or story that is often untold or misrepresented

Example: Pocahontas (Matoaka) was an 11 year-old girl who was forced into a relationship with 28 year-old John Rolfe.



Name: _____
Period: _____

U.S. History

2.8: Israel and Palestine

Lesson Question:

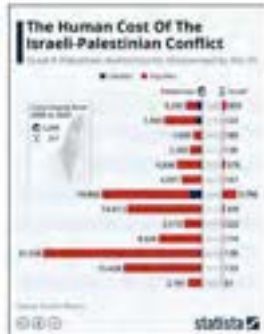


Warmup: What do you know about Israel and Palestine?



Notes:

1. On October 7, 2023, people from a group from _____ named _____ attacked _____.
2. They killed _____ people and injured _____ in Israel.
3. Hamas attacked _____ and also _____.
4. Civilians are _____.
5. Israel declared a _____, on Oct. 7th, 2023.
6. Israel and Palestine have been in conflict since _____.
7. Israel is a country _____.
8. The United Nations says _____.
9. _____ of the population in Palestine are children.
9. People of _____ have experienced more death and injury than people in _____.



Lesson question:

What is happening in Israel and Palestine and what are the dominant and counter narratives?



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Content Warning:

Today we will talk about war and violence. Some people have experience war and violence so maybe this lesson will be hard for you. If you need a break let us know. If you want to talk to a counselor let us know. Take care of yourself.



Name: _____
Period: _____

U.S. History

2.8: Israel and Palestine

Lesson Question:



Warmup: What do you know about Israel and Palestine?



Notes:

1. On October 7, 2023, people from a group from _____ named _____

attacked _____

2. They killed _____

3. Hamas is a _____

4. Civilians _____

5. Israel does _____

6. Israel and _____

7. Israel is _____

The United Nations says _____

8. _____ of the population in Palestine are children.

9. People of _____ have experienced more death and injury than people in _____

2:00



Warmup:



What do you know about Israel and Palestine?



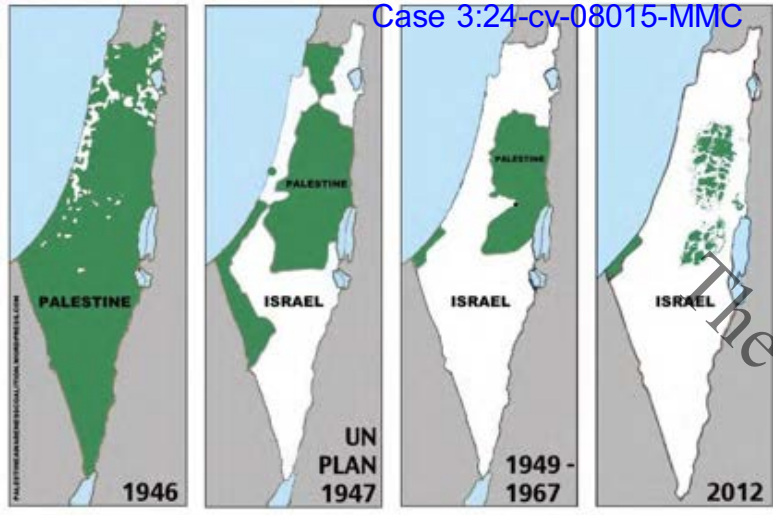
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Notes:



1. On October 7, 2023, people from a group from **Gaza, Palestine** named **Hamas** attacked **Israel**. They killed **1,300** people and injured **3,227** in Israel.
2. **Hamas** attacked **soldiers** and also **civilians**.
3. Civilians **are normal people (not soliders or police)**
4. Israel declared a **war** on Oct. 7th, 2023.



Notes:

6. Israel and Palestine have been in conflict since **1947**.

7. Israel is a country **created on Palestinian land**. The United Nations says **this is illegal**.

8. **52%** of the population in Palestine are children.

The Human Cost Of The Israeli-Palestinian Conflict

Israeli & Palestinian deaths/injuries documented by the UN

■ Deaths ■ Injuries



Source: United Nations



statista

Which side has experienced more death and injury?

9. People of Palestine have experienced more death and injury than people in Israel.



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**Shrinking Palestine
expanding Israel**

Before 1947:



Christian,
Muslim, and
Jewish people
lived in
Palestine.

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1939-1945



During World War 2, Nazis killed Jewish people in Germany because of their religion. This is called the Holocaust.

1947 - Creation of Israel

Europe felt bad that Jewish people suffered so much and wanted to give them a safe home. They took land from Palestine to create the country of Israel for Jewish people.



1947 - Nakba

“Nakba” is the name for the day that Muslim and Christian people of Palestine were forced to leave their home so Jewish people could move to Israel.





Over time, there were many wars and Israel took more land. Today, many countries do not recognize Palestine as a country.

Life in Palestine Today

There are walls around the city of Gaza. The Human Rights Watch says it is “an open air prison”. Israel controls the water and electricity of Gaza.



Different Opinions



Some people support Israel because it is a safe home for Jewish people after they were oppressed for many years.



Some people support Palestine because the land was originally their land, and now they are being oppressed by the Israeli government.

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Summarize!

Notes: Israel & Palestine

Before 1947: Christian, Muslim, and Jewish people lived in Palestine.

1939-1945: During World War 2, Nazis killed Jewish people in Germany because of their religion. This is called the Holocaust.

1947 - Creation of Israel: Europe felt bad that Jewish people suffered so much and wanted to give them a safe home. They took land from Palestine to create the country of Israel for Jewish people.

1947: Jewish people from across the world moved to Israel.

1947 - Nakba: "Nakba" is the name for the day that Muslim and Christian people of Palestine were forced to leave their home so Jewish people could move to Israel.

Life in Palestine Today: There are walls around the city of Gaza. The Human Rights Watch says it is "an open air prison". Israel controls the water and electricity of Gaza.

Different Opinions:

- Some people support Israel because it is a safe home for Jewish people after they were oppressed for many years.
- Some people support Palestine because the land was originally their land, and now they are being oppressed by the Israel government.

Write a summary in your own words about what has been happening in Israel and Palestine.



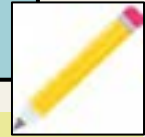
In your own words, write a summary of what happened.

Review:

**Dominant
and
Counter
Narratives**

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Dominant Narrative



Definition: The story that is told by people in power (such as men, white people, rich people)

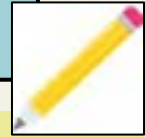
Definición: La historia que cuentan las personas en el poder (como hombres, blancos, ricos).

Tanım: İktidardaki kişilerin (erkekler, beyazlar, zenginler gibi) anlattığı hikaye.

定义：由有权势的人（例如男人、白人、富人）讲述的故事

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Counter Narrative



Definition: The story that is told by people with **less power (such as women, people of color, poor people)**

Definición: La historia contada por personas con menos poder (como mujeres, personas de color, personas pobres).

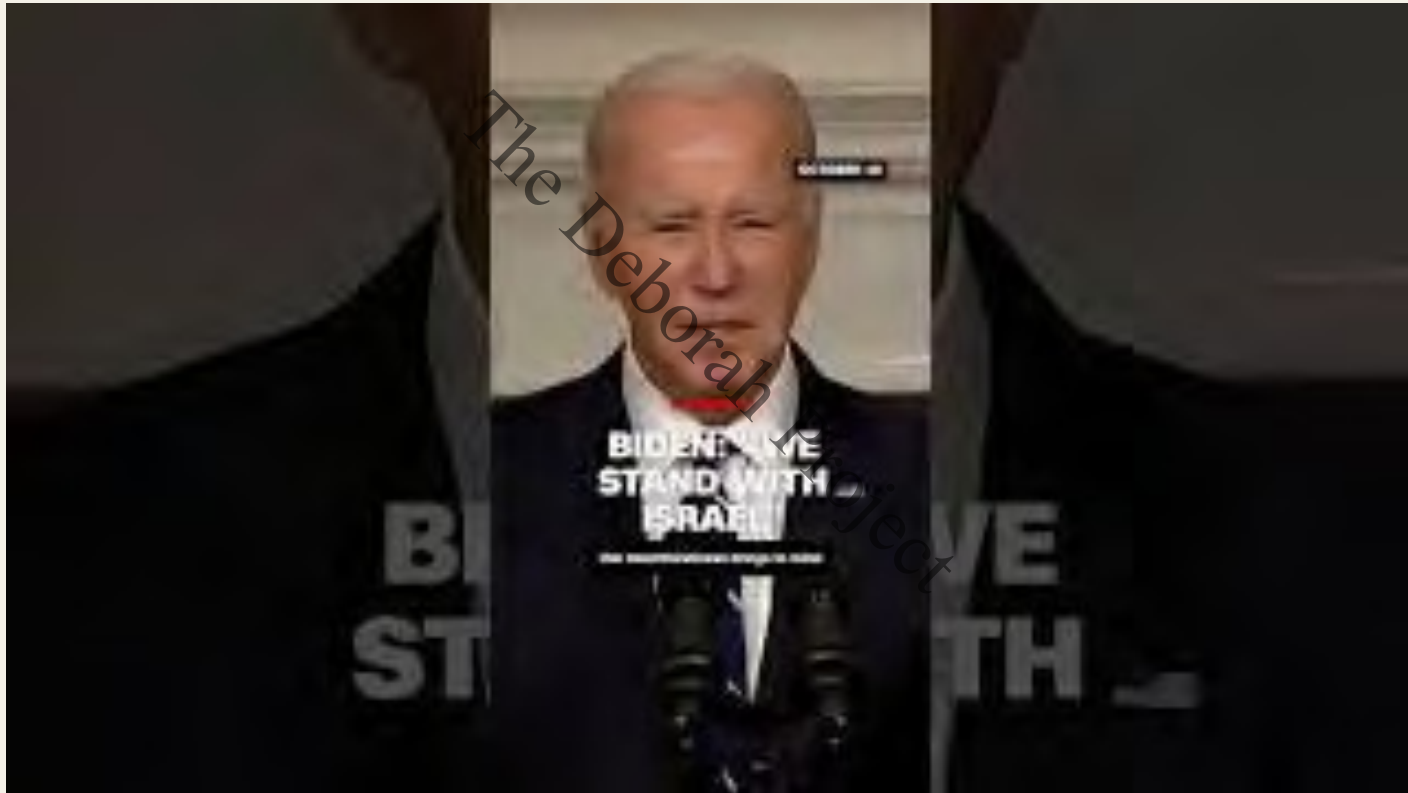
Tanım: Daha az güce sahip insanlar (kadınlar, farklı ırklardan insanlar, fakir insanlar gibi) tarafından anlatılan hikaye.

定义：由权力较小的人（例如女性、有色人种、穷人）讲述的故事

Dominant or Counter Narrative?

The Deborah Project

Statement from Joe Biden, U.S. President




La brutalidad de Hamas, la sed de sangre, recuerdan lo peor, los peores ataques de ISIS. Esto es terrorismo. Pero, lamentablemente, para el pueblo judío esto no es nuevo. Este ataque saca a la superficie los dolorosos recuerdos de las cicatrices dejadas por milenios de antisemitismo y genocidio para el pueblo judío. Estamos con Israel. Estamos con Israel. Nos aseguraremos de que Israel tenga lo que necesita para cuidar de sus ciudadanos, defenderse y responder a este ataque.

Hamas'in vahşeti, kana susamışlığı IŞİD'in en kötü saldırılarını akla getiriyor. Bu terörizmdir. Ama ne yazık ki Yahudi halkı için bu yeni değil. Bu saldırı, Yahudi halkı üzerinde bin yıllık antisemitizmin ve soykırımın bıraktığı yara izlerini, acı dolu anıları gün yüzüne çıkarıyor. İsrail'in yanındayız. İsrail'in yanındayız. İsrail'in vatandaşlarının kendisini savunması ve bu saldırıya yanıt vermesi için ihtiyaç duyduğu her şeye sahip olmasını sağlayacağız.

哈马斯的残暴和嗜血让人想起伊斯兰国最严重的暴行。这是恐怖主义。但可悲的是，对于犹太人来说，这并不新鲜。这次袭击使人们痛苦的记忆浮出水面，即数千年来反犹太主义和种族灭绝给犹太人留下的伤疤。我们与以色列站在一起。我们与以色列站在一起。我们将确保以色列拥有照顾其公民、保卫自己和应对此次袭击所需的一切。

Narrative #1



a. Who created this narrative? / ¿Quién creó esta narrativa? / 谁创造了这个叙述?

President Joe Biden

b. Is the person who created this narrative a person with power and/or privilege? Yes or no? (ex: white people, men, rich people) / ¿La persona que creó esta narrativa es una persona con poder y/o privilegio? Sí o no? (ej: gente blanca, hombres, gente rica) / Bu anlatıyı yaratan kişi güce veya ayrıcalığa sahip bir kişi midir? Evet veya hayır? (örnek: beyaz insanlar, erkekler, zengin insanlar) / 创造这个叙述的人是一个拥有权力和/或特权的人吗？是/不是？（例如：白人、男性、富人）

Circle: Yes / No

c. Is this a dominant narrative or a counter-narrative?

Dominant

d. What is the message of this narrative? Summarize with 1-2 sentences. (The person who created this narrative is trying to say that _____) / ¿Cuál es el mensaje de esta narración? Resume con 1-2 oraciones. (La persona que creó esta narrativa está tratando de decir que _____) / Bu anlatının mesaj nedir? 1-2 cümleyle özetleyin. (Bu anlatıyı yaratan kişi şu söylemeye çalışıyor _____) / 这个叙述的信息是什么？用1-2句话概括。（请描述这个叙述的大概情况）

e. If people only heard this narrative and no other narrative, which side would they support? / Si la gente sólo escuchara esta narrativa y ninguna otra, ¿a qué lado apoyarían? / Eğer insanlar sadece bu anlatıyı duysaydı, en başta bu anlatıyı duyarsaydıkları hangi tarafa desteklerdiler? / 如果人们只听到这个叙述而没有其他叙述，他们最支持哪一边？

If people only heard this narrative, they would support Israel.

Israeli Prime Minister Benjamin Netanyahu




Hemos comenzado y subrayo que apenas hemos comenzado a atacar a Hamás. Las imágenes de la devastación y destrucción de los bastiones de Hamás en Gaza son sólo el comienzo. Hemos eliminado a muchos cientos de terroristas y no nos detendremos ahí.

Hamas'a saldırmaya başladık ve vurguluyorum ki, Hamas'a saldırmaya daha yeni başladık. Gazze'deki Hamas kalelerinden gelen yıkım ve yıkım görüntüleri sadece başlangıç. Yüzlerce teröristi ortadan kaldırdık, bununla da kalmayacağız.

我们已经开始了，我强调我们才刚刚开始对哈马斯进行打击。加沙哈马斯据点的破坏和破坏的景象仅仅是一个开始。我们已经消灭了数百名恐怖分子，但我们不会就此止步。

Narrative #2



a. Who created this narrative? / ¿Quién creó esta narrativa? / 谁创造了这个叙述?

b. Is person with power and/or privilege? Yes or no? (ex: white people, men, rich people) / ¿La persona que creó este narrativa es una persona con poder y/o privilegio? Sí o no? (ej: gente blanca, hombres, gente rica) / Bu anlatıyı yaratan kişi güce ve/veya ayrıcalığa sahip bir kişi midir? Evet veya hayır? (örnek: beyaz insanlar, erkekler, zengin insanlar) / 创造这个叙述的人是一个拥有权力和特权的人吗？是还是不是？（例如：白人、男性、富人）

Circle:

Yes / No

c. Is this a dominant narrative or a counter narrative?

Dominant

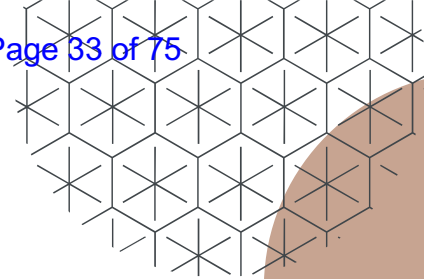
d. What is the message of this narrative? Summarize with 1-3 sentences. (The person who created this narrative is trying to say the _____) / ¿Cuál es el mensaje de esta narración? Resuma con 1-2 oraciones. (La persona que creó esta narrativa está tratando de decir que _____) / Bu anlatının mesaj nedir? 1-2 cümleyle özetleyin. (Bu anlatıyı yaratan kişi şunu söylemeye çalışıyor _____) / 这个叙述的信息是什么？用1-2句话概括。（回答这个叙述的人试图说_____）

e. If people only heard this narrative and no other narrative, which side would they support? / Si la gente sólo escuchara esta narrativa y ninguna otra, ¿a qué lado apoyarían? Eğer insanlar sadece bu anlatıyı duyarsaydı, ve başka bir anlatıyı duymasaydı hangi tarafa desteklerlerdi? / 如果人们只听到这个叙述而没有其他叙述，他们会支持哪一边?

If people only heard this narrative, they would support Israel.

Israeli Prime Minister Benjamin Netanyahu

Think:
According to him, what kind of people are they killing?



1.9 Dominant and Counter Narrative

Unit 1 - Ethnic Studies and Narrative

The Deborah Project

Period 3

1

Alicia	

4

Stella	Emma
Kira	Addy

Cozy corner

2

Patrick	Claire
Henry	Peter

5

Beau	Joey
Marlo	Nirma

8

Paul	Armando
Amaya	

3

Ella	Elise
William	Lev

6

Cleo	Cole
Miya	Kevin

7

Navid	Milan
Mariela	Elena

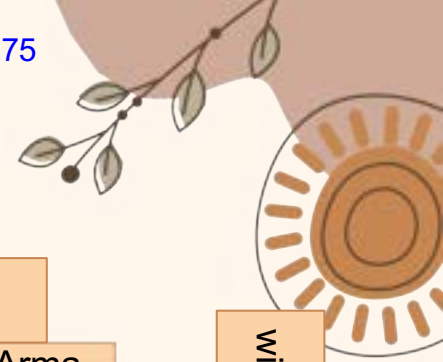
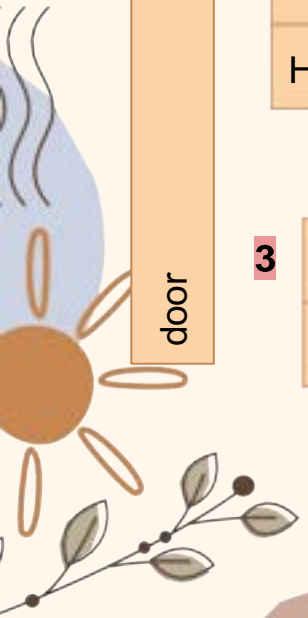
door

windows

front

Montgomery's Desk

The Brain Project



1

4

door

2

Jazmin	Ashley
Yaneisis	Jocelyn

5

Cole	Aiden
Marco	Alejandro

Cozy corner

Emily

8

Josie	Ruby
Lucca	Armando

windows

3

Cam	Sofia
Sebastian	Juliana

6

Alex	Sasha
Alexa	Aarushi

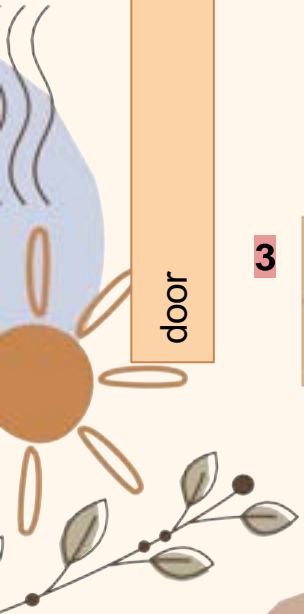
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Cynthia	Valentin
Daniella	Andrew

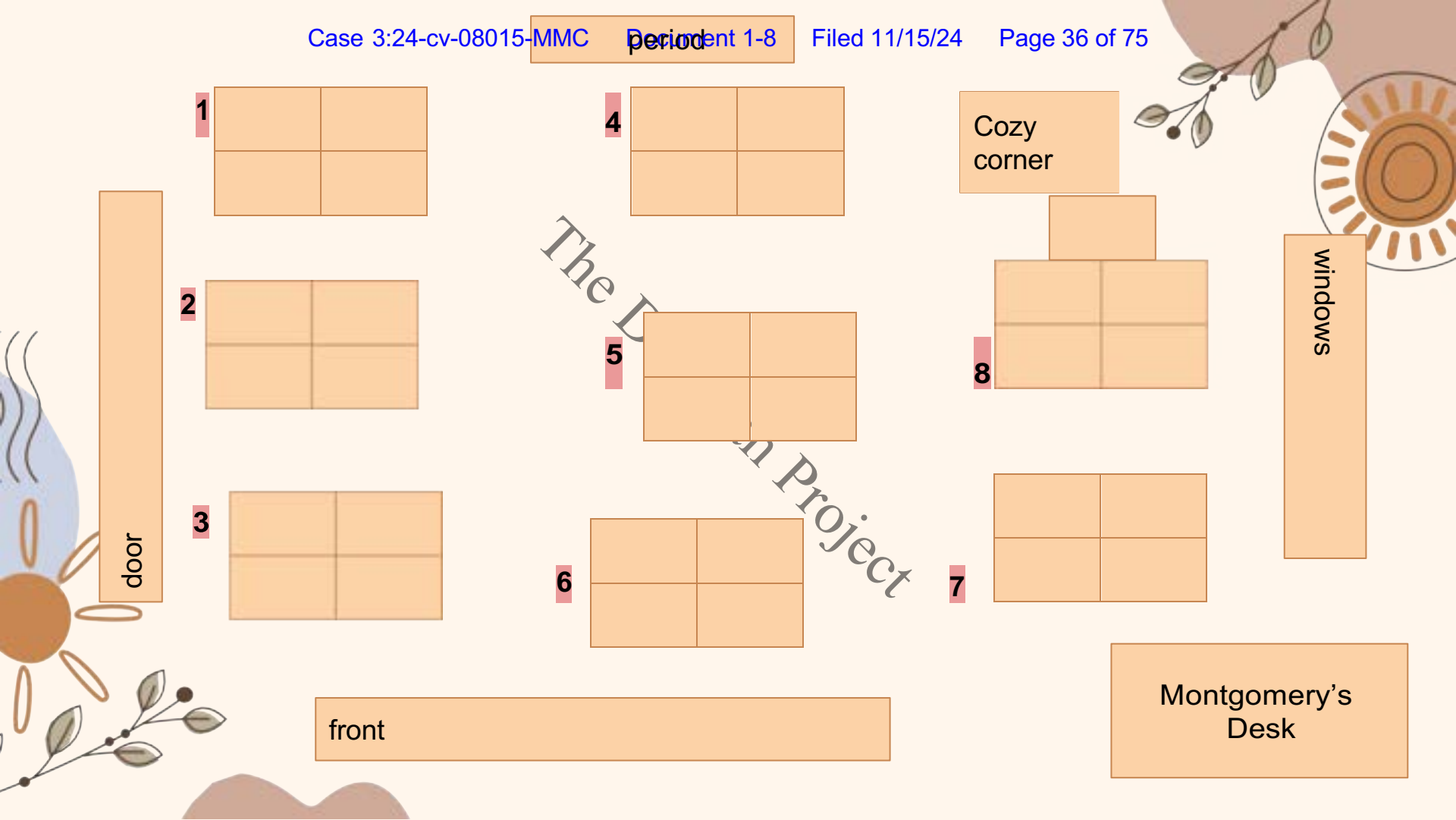
front

Montgomery's Desk

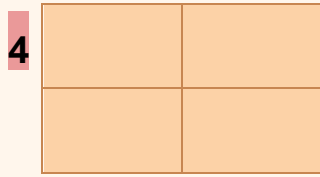
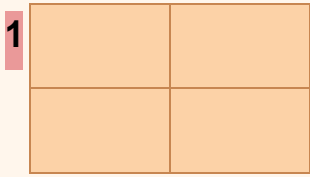
The Math Project



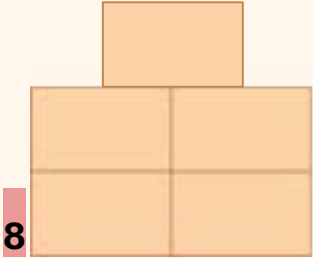
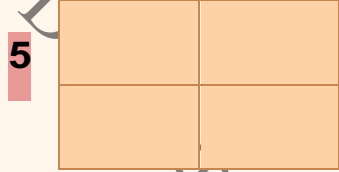
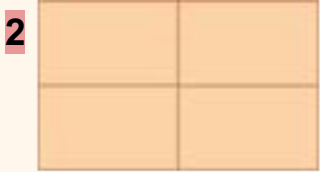
Period



The Brain Project

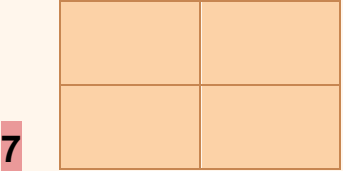
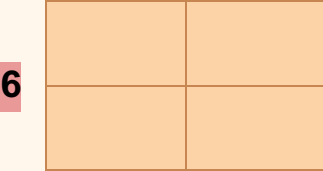
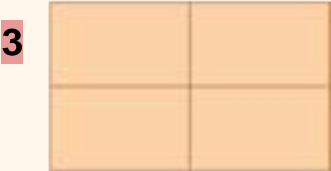


Cozy corner



windows

door



front

Montgomery's Desk

1.9 Warm Up

Turn and talk with your table group about the following questions. Be prepared to share with the whole class

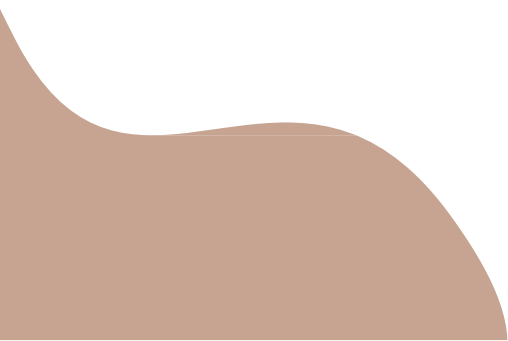
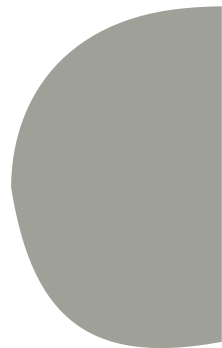
1. Introduce yourself to your new table mates. Make sure you all know each other's names!

My name is...

2. What is your favorite food?

My favorite food is...

The Deborah Project



1.9 Agenda

- Warm up / welcome / agenda / announcements
- Connect dominant and counter narratives to current events in Israel and Palestine
- Exit Ticket - turn in white packet

Objective: Define narrative, dominant narrative, and counter narrative to help us describe the ongoing conflict in Israel and Palestine.

The Deborah Project

News video



Narrative #3



a. Whose stories are being shared? / ¿De quién son las historias que se comparten? / Kimin hikayeleri paylaşılıyor? / 谁的故事正在被分享?

Palestinians

b. Are the people telling their stories people with power and privilege? Yes or no? (ex: white people, men, rich people) / ¿Las personas que cuentan sus historias son personas con poder y privilegios? ¿Sí o no? (ej: gente blanca, hombres, ricos) / İnsanlar hikayelerini güçlü ve ayrıcalıklı insanlar anlatıyor? Evet veya hayır? (örnek: beyaz insanlar, erkekler, zengin insanlar) / 讲述故事的人是拥有权力和特权的人吗? 是/不是? (例如: 白人, 男性, 富人)

Circle:

Yes / **No**

c. Is this a dominant narrative or a counter narrative?

counter

d. What is the message of this narrative? Summarize with 1-2 sentences. (The person who created this narrative is trying to say that _____) / ¿Cuál es el mensaje de esta narración? Resume con 1-2 oraciones. (La persona que creó esta narrativa está tratando de decir que _____) / Bu anlatımın mesajı nedir? 1-2 cümleyle özetleyin. (Bu anlatımı yaratan kişi şunu söylemeye çalışıyor _____) / 这个叙述的信息是什么? 用1-2句话概括。(请把这个叙述的人话概括)

e. If people only heard this narrative and no other narrative, which side would they support? / Si la gente sólo escuchara esta narrativa y ninguna otra, ¿a qué lado apoyarían? Eğer insanlar sadece bu anlatımı duyarsaydı ve başka bir anlatımı duymasaydı hangi tarafa desteklerlerdi? / 如果人们只听到这个叙述而没有其他叙述, 他们会支持哪一边?

If people only heard this narrative, they would support Palestine

The Deborah Project

Social media video



Narrative #4



a. Whose stories are being shared? / ¿De quién son las historias que se comparten? / Kimin hikayeleri paylaşıyor? / 谁的故事正在被分享?

Palestinians

b. Are the people telling their stories people with power and privileges? Yes or no? [ex: white people, men, rich people] / ¿Las personas que cuentan sus historias son personas con poder y privilegios? ¿Sí o no? (ej: gente blanca, hombres, ricos) / İnsanlar hikayelerini güçlü ve ayrıcalıklı insanlar anlatıyor? Evet veya hayır? (örnek: beyaz insanlar, erkekler, zengin insanlar) / 讲述故事的人是拥有权力和特权的人吗? 是还是不是? (例如: 白人, 男性, 富人)

Circle:

Yes / **No**

c. Is this a dominant narrative or a counter narrative?

counter

d. What is the message of this narrative? Summarize with 1-2 sentences. (The person who created this narrative is trying to say that _____) / ¿Cuál es el mensaje de esta narración? Resume con 1-2 oraciones. (La persona que creó esta narrativa está tratando de decir que _____) / Bu anlatının mesajı nedir? 1-2 cümleyle özetleyin. (Bu anlatıyı yaratan kişi şunu söylemeye çalışıyor _____) / 这个叙述的信息是什么? 用1-2句话概括。 (创造这个叙述的人试图说_____)

e. If people only heard this narrative and no other narrative, which side would they support? / Si la gente sólo escuchara esta narrativa y ninguna otra, ¿a qué lado apoyarían? Eğer insanlar sadece bu anlatıyı duysaydı ve başka bir anlatıyı duymasaydı hangi tarafa desteklenirdi? / 如果人们只听到这个叙述而没有其他叙述, 他们会支持哪

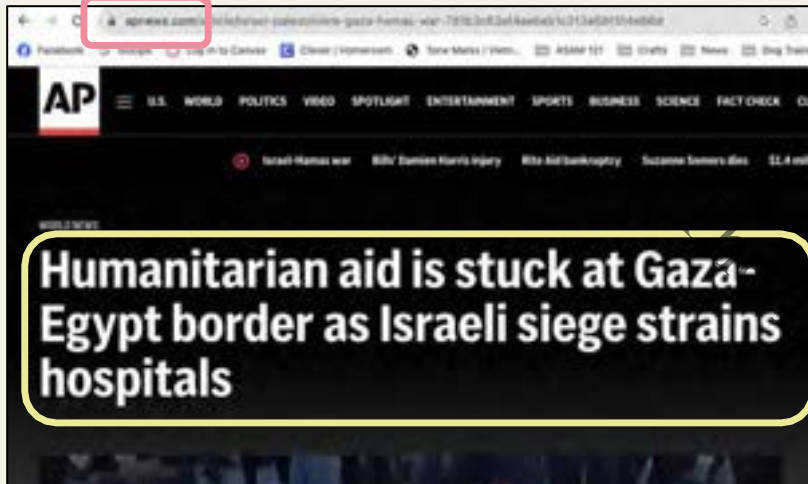
If people only heard this narrative, they would support Palestine

The Deborah Project

Research:

You will read news articles and analyze whose narratives are being shared.

The Deborah Project



Hospitals in Gaza are expected to run out of generator fuel in the next 24 hours, endangering the lives of thousands of patients, according to the U.N. Gaza's sole power plant shut down for lack of fuel after Israel completely sealed off the 40-kilometer (25-mile) long territory following the Hamas attack.

The World Health Organization said hospitals are "overflowing" as people seek safety. "We are concerned about disease outbreaks due to mass displacement and poor water and sanitation," it said. Four hospitals in northern Gaza are no longer functioning and 21 have received Israeli orders to evacuate. Doctors have refused, saying it would mean death for critically ill patients and newborns on ventilators.

The WHO said water shortages caused by Israel's decision to cut off water supplies, combined with a lack of fuel for pumps and desalination stations, put thousands of hospital patients at risk.

1. Name of website: AP News

2. Title of Article: Humanitarian aid is stuck at Gaza-Egypt Border as Israeli Siege Strains Hospitals

3a. Name of person interviewed: <u>World Health Organization</u>	3b. Description of person interviewed: <u>A group for public health</u>	3c. Does this person have power and privilege? Circle: Yes / No / <u>not sure</u>	3d. Why did you choose that answer for 3c? <u>The organization has power but less power than the government</u>
3e. Summary of what the person is saying: <u>They are saying the war will cause disease and death.</u>			
4a. Name of person interviewed:	4b. Description of person interviewed:	4c. Does this person have power and privilege? Circle: Yes / No / not sure	4d. Why did you choose that answer for 4c?
4e. Summary of what the person is saying:			
5. Does this news article show one narrative or multiple narratives?			

Deborah Project



news about israel and palestine interview

Google Search

I'm Feeling Lucky

The Deborah Project

1. Search “News about Israel and Palestine interview” on Google.
2. Pick any article. The article must include quotes from at least two different people.
3. Answer the questions on your paper.



Submit the white packet as your exit ticket!!!

The Brain Project

1

Alicia	

4

Stella	Emma
Kira	Addy

Cozy corner

2

Patrick	Claire
Henry	Peter

5

Beau	Joey
Marlo	Nirma

8

Paul	Armando
Amay a	

windows

3

Ella	Elise
William	Lev

6

Cleo	Cole
Miya	Kevin

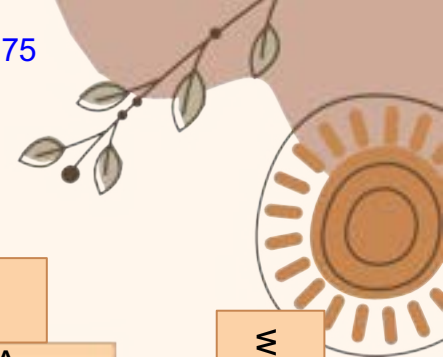
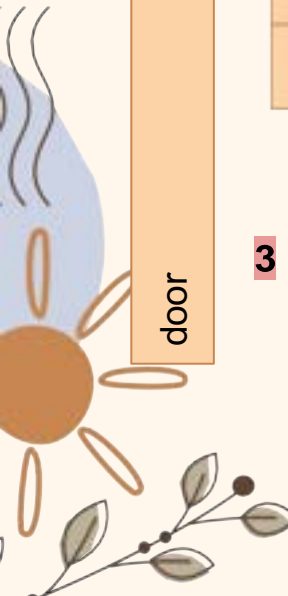
7

Navid	Milan
Mariela	Elena

door

front

Montgomery's Desk



Period 4

1

4

door

2

Jazmin	Ashley
Yaneisis	Jocelyn

5

Cole	Aiden
Marco	Alejandro

Cozy corner

Emily

8

Josie	Ruby
Lucca	Armando

windows

3

Cam	Sofia
Sebastian	Juliana

6

Alex	Sasha
Alexa	Aarushi

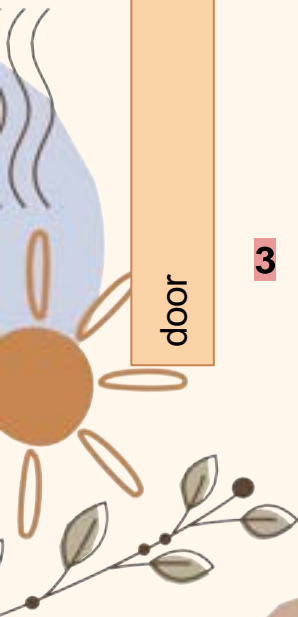
7

Cinthia	Valentin
Daniella	Andrew

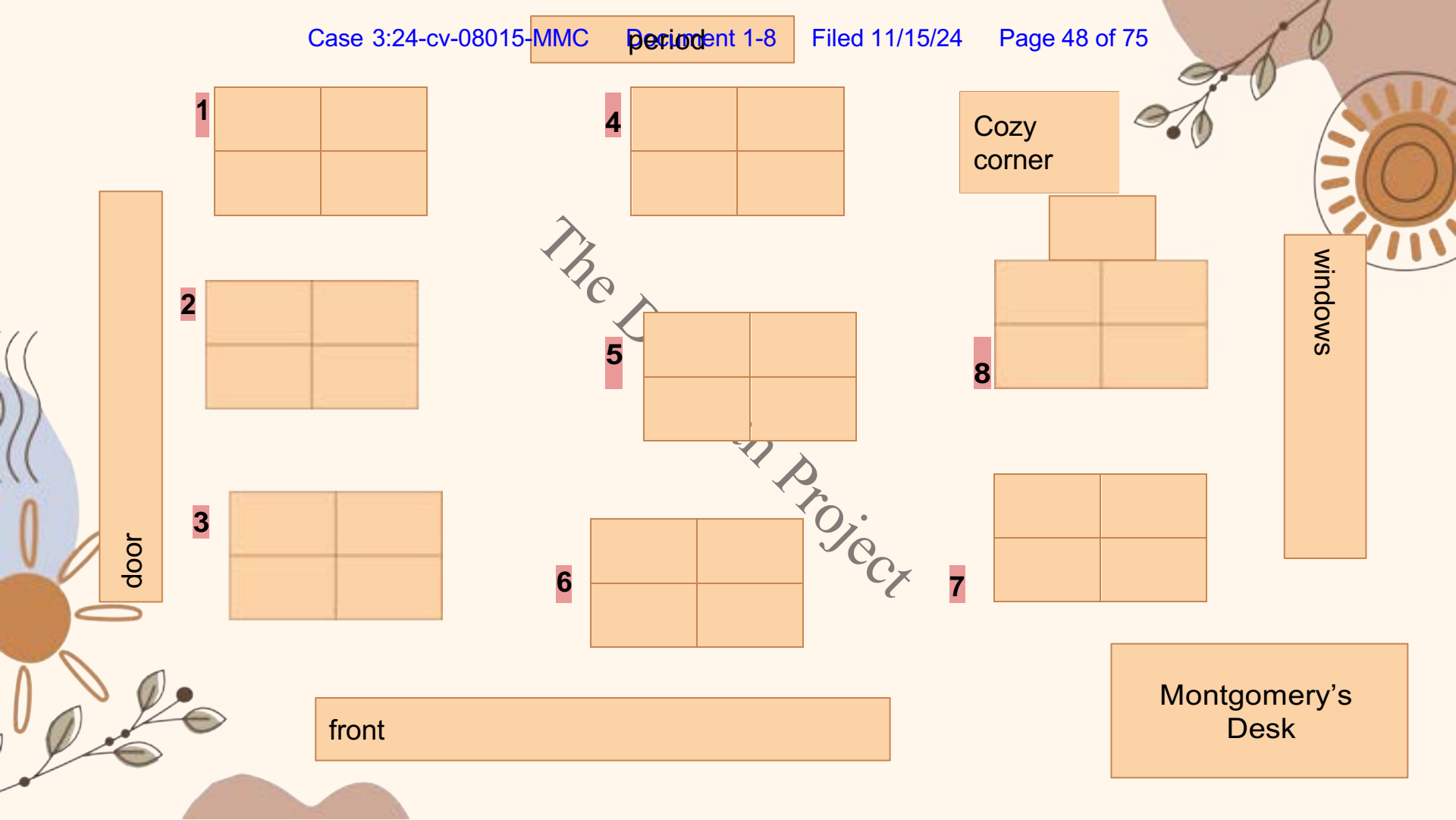
front

Montgomery's Desk

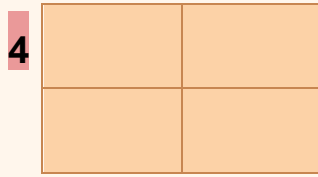
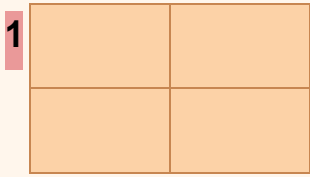
The Math Project



Period

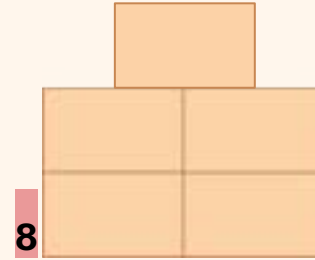
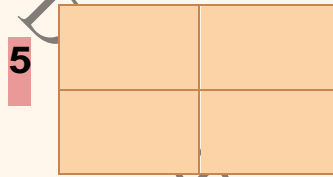
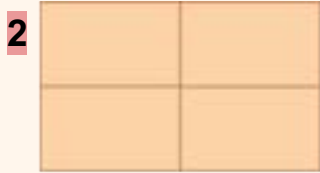


The Brain Project

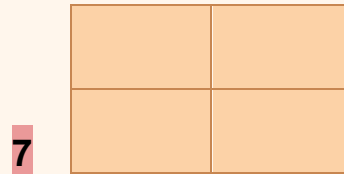
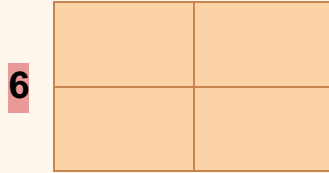
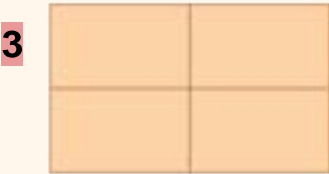


Cozy corner

door



windows



front

Montgomery's Desk

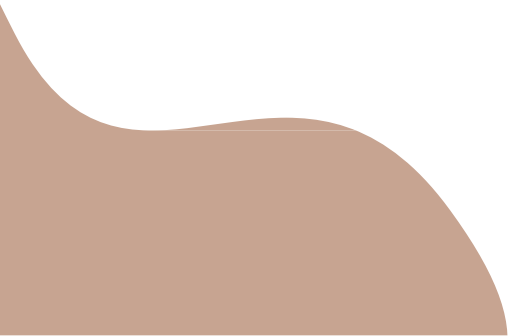
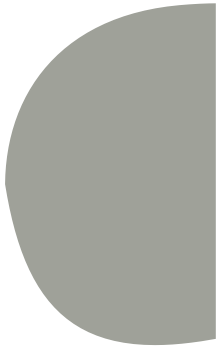
1.10 Warm Up

Turn and talk with your table group about the following questions. Be prepared to share with the whole class

What's your favorite thing about winter?

What is your favorite class so far?

The Deborah Project



1.10 Agenda

- Warm up / welcome / agenda / announcements
- Start Timeline to Ethnic Studies
- Exit Ticket - turn in white packet

Objective: Create a timeline to help us understand how Ethnic Studies became a class at our school.

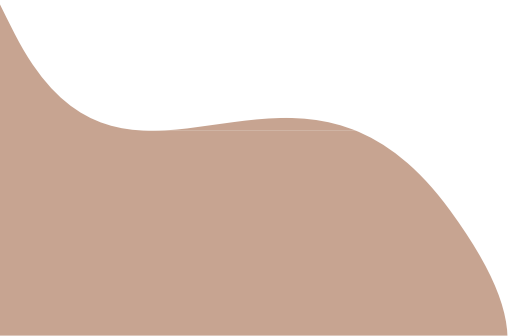
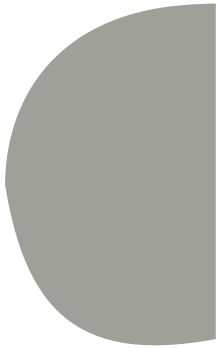
The Debrah Project

Counselors coming today

Expectations:

- Show them your respect and attention
- Electronics away
- One mic

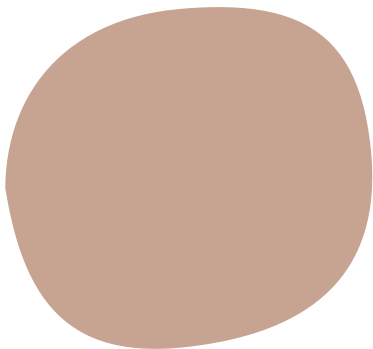
The Deborah Project





Timeline Work Time

The Deborah Project



Exit Ticket

- Collect your timeline cards with a paperclip / put them in an envelope
- Clean up the area around your desks



The Deborah Project



Period 3

1

Alicia	

4

Stella	Emma
Kira	Addy

Cozy corner

2

Patrick	Claire
Henry	Peter

5

Beau	Joey
Marlo	Nirma

8

Paul	Armando
Amayra	

3

Ella	Elise
William	Lev

6

Cleo	Cole
Miya	Kevin

7

Navid	Milan
Mariela	Elena

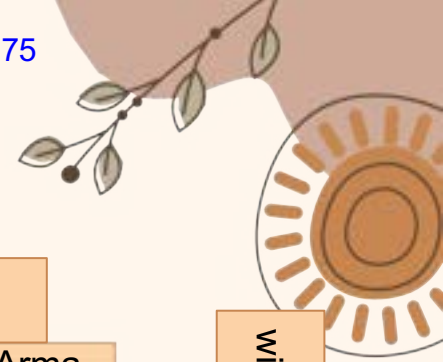
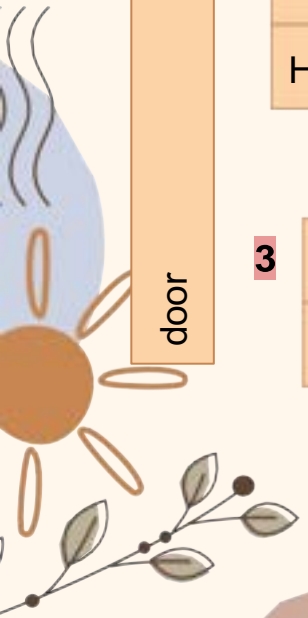
door

windows

front

Montgomery's Desk

The Brain Project



The ... Project

1

4

door

2

Jazmin	Ashley
Yaneisis	Jocelyn

5

Cole	Aiden
Marco	Alejandro

Cozy corner

Emily

8

Josie	Ruby
Lucca	Armando

windows

3

Cam	Sofia
Sebastian	Juliana

6

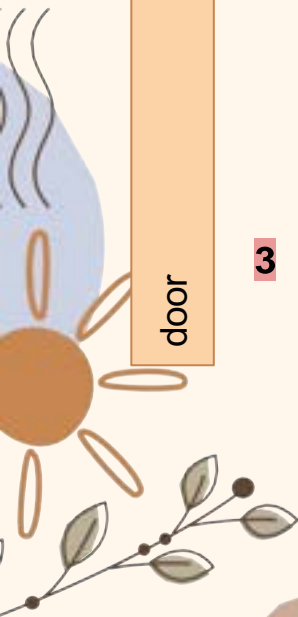
Alex	Sasha
Alexa	Aarushi

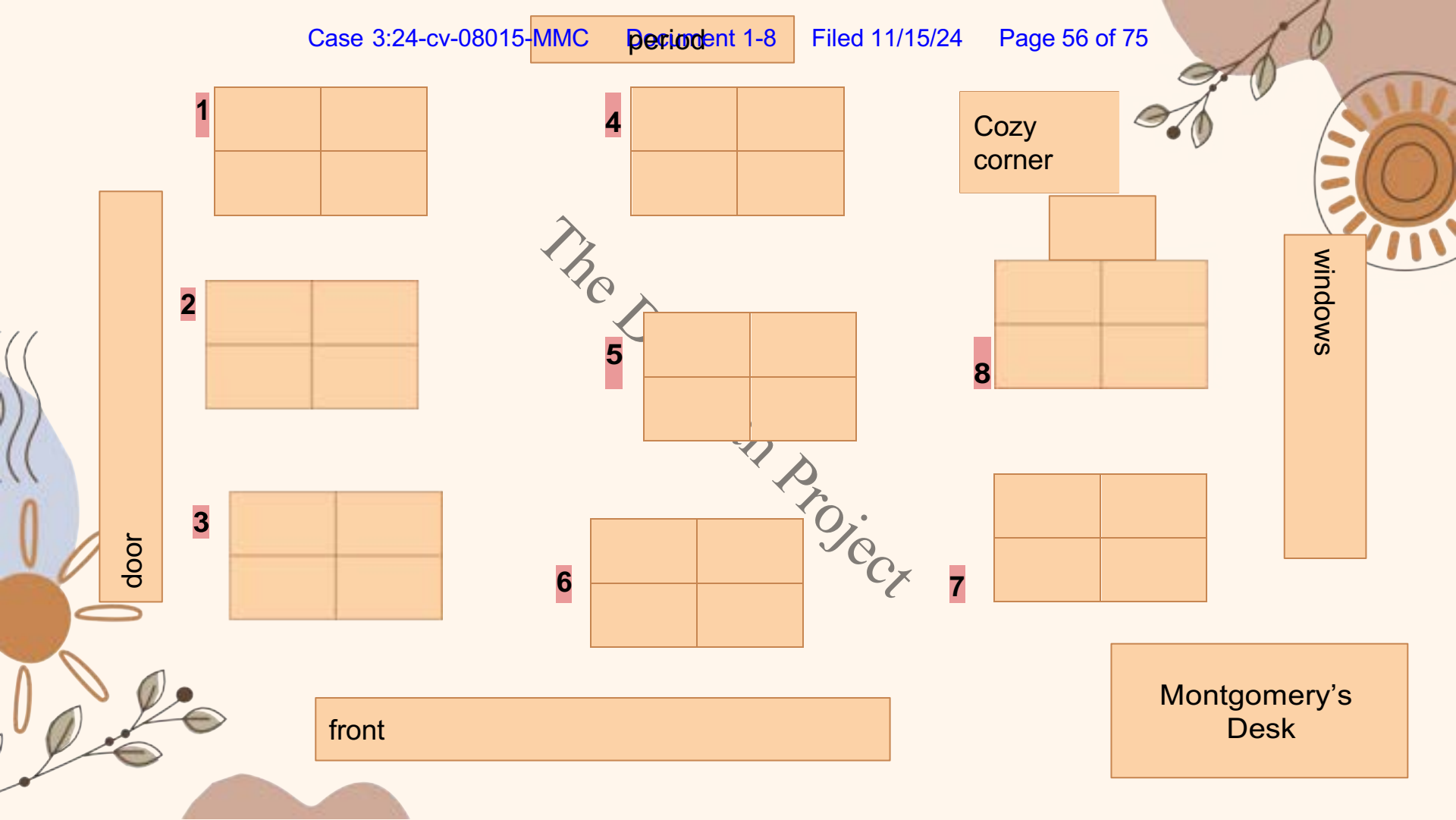
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Cinthia	Valentin
Daniella	Andrew

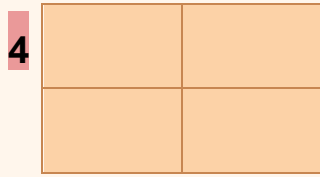
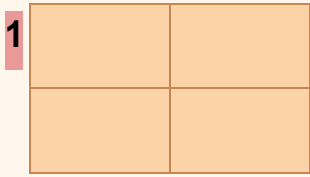
front

Montgomery's Desk

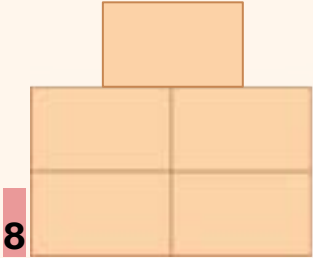
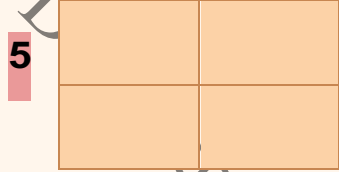
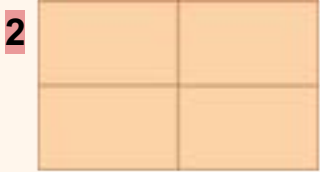




The Dream Project

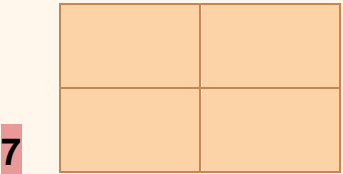
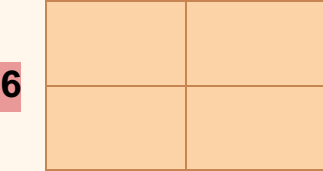
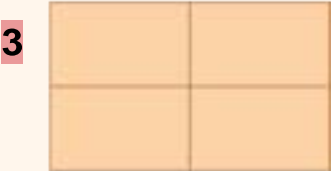


Cozy corner



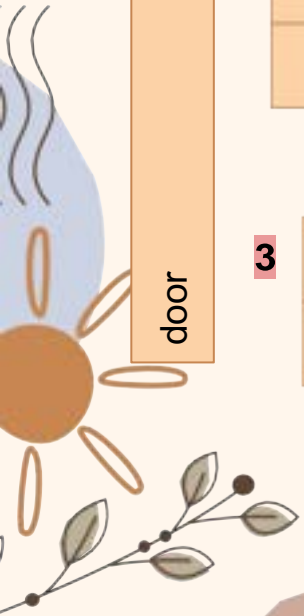
windows

door



front

Montgomery's Desk



1.11 Warm Up

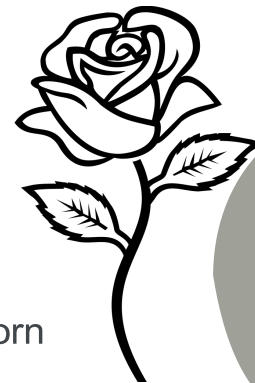
Turn and talk with your table group about the following questions. Be prepared to share with the whole class

What is one thing you heard in the news this week?

One thing I heard in the news this week was ...

What was a rose (highlight), bud (something you are looking forward to), and thorn (challenge) of this week?

This week my rose was when _____, something I'm looking forward to is _____, and a thorn would be _____.



The Deborah Project

1.11 Agenda

- Warm up / welcome / agenda / announcements
- Finish Timeline to Ethnic Studies
- Backfire Effect Notes
- Exit Ticket - turn in pink packet

Objective: Create a timeline to help us understand how Ethnic Studies became a class at our school.

Define backfire effect to prepare us for difficult conversations in Ethnic Studies.



Timeline Work Time

The Deborah Project

Compare your answers with another group to complete the final column
Answer the reflection questions

The Backfire Effect

The Deborah Project

What is the Backfire Effect and how can we combat it in society (and this course)?



What was the dominant narrative that the kids knew?
What was the counter-narrative?
How did students react to the counter-narrative (finding
out Santa isn't real)

The Social Project

Emotional Barometer

You will be reflecting on how you feel about each of the facts below using an emotional barometer. A 1 on the barometer means the statement had no effect on your emotions, a 3 means the statement had little effect on you, and a 5 means your emotions are off the chains.

No Effect (1)

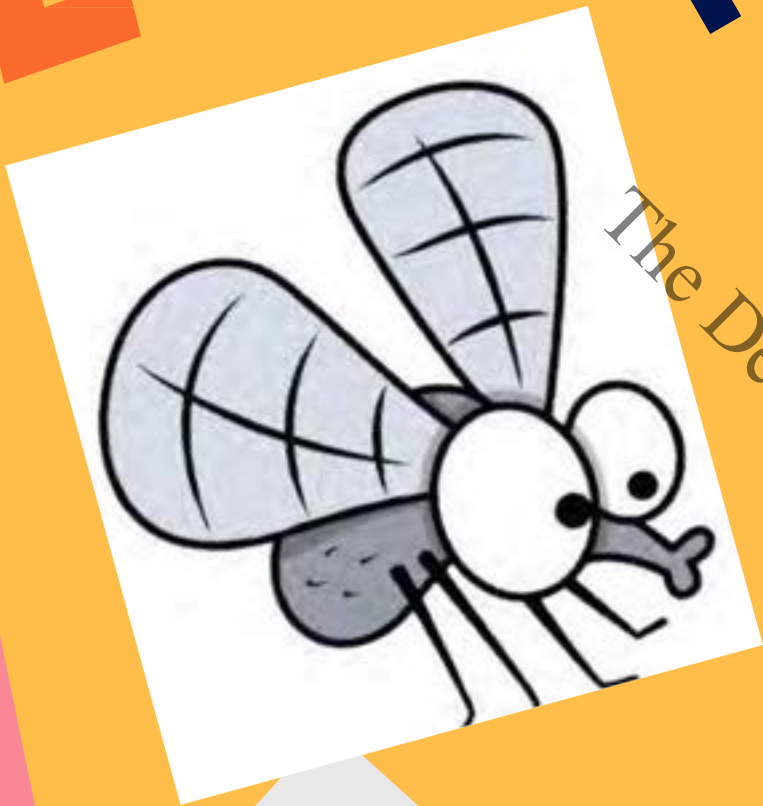


Somewhat (3)



WOW! (5)

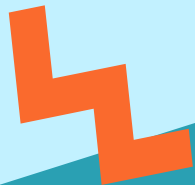




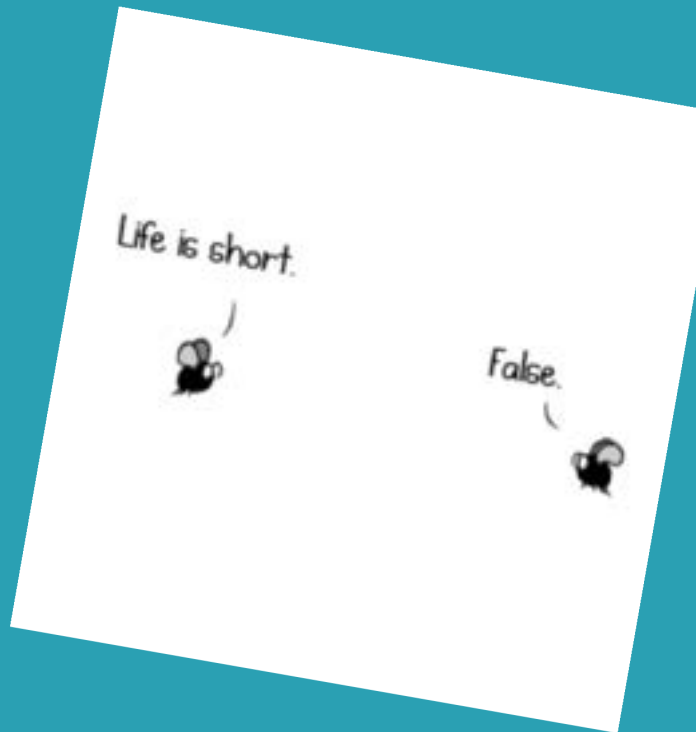
The Deborah Project

WHAT HAVE YOU HEARD
ABOUT ...

THE LENGTH OF THE LIFE OF
A HOUSE FLY?



**What if I told you...
THAT HOUSE FLIES
LIVE FOR ABOUT A
MONTH AND NOT JUST
24 HOURS?**

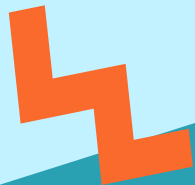




The Deborah Project

WHAT HAVE YOU HEARD
ABOUT ...

NAPOLEON BONAPARTE'S
HEIGHT?



What if I told you...

**THAT NAPOLEON WAS
NOT SHORT. HE WAS 5'7",
WHICH WAS TALLER
THAN THE AVERAGE
FRENCHMAN AT THE
TIME.**





The Deborah Project

WHAT HAVE YOU HEARD
ABOUT ...

GEORGE WASHINGTON'S
TEETH?



What if I told you...

**THAT WASHINGTON DID
SOMETIMES WEAR
DENTURES THAT WERE
MADE OUT OF GOLD, LEAD,
HIPPOPOTAMUS IVORY,
HORSE AND DONKEY
TEETH?**

The Deborah Project

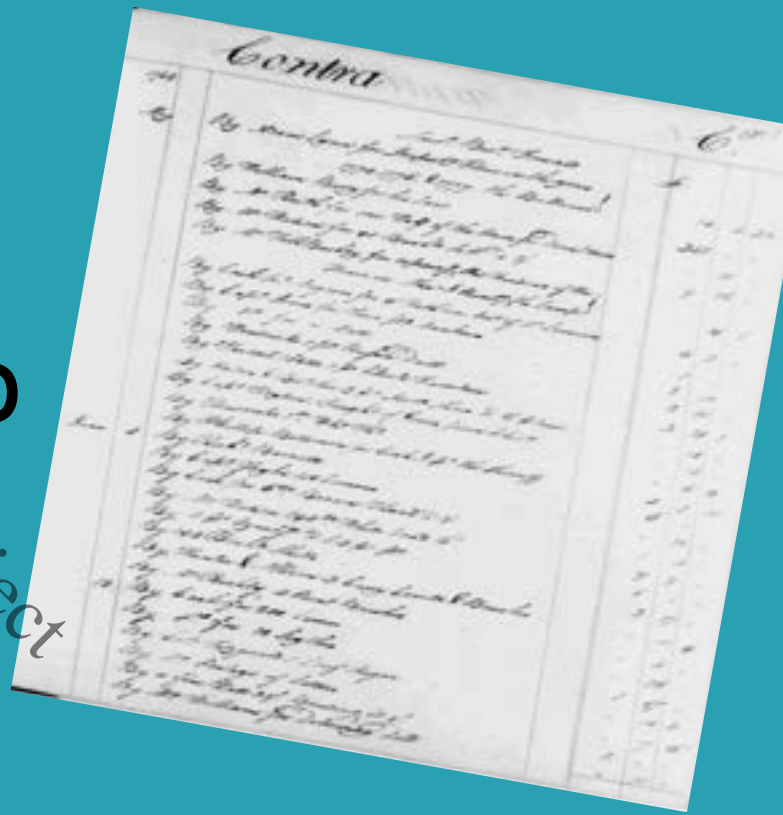




What if I told you...

THAT GEORGE WASHINGTON'S TEETH ALSO CAME FROM ENSLAVED PEOPLE'S MOUTHS?

According to George Washington's ledger, on May 8, 1784, he paid 6 pounds 2 shillings to "Negros for 9 Teeth on Acct of Dr Lemoin". This money went to the dentist, not the enslaved person's.



The Deborah Project

REFLECTION QUESTIONS

Fact 1: House flies live for about a month

Fact 2: Napoleon was not short

Fact 3: Washington had metal and animal dentures

Fact 4: Washington had dentists implant the teeth of slaves into his mouth

1. Were the first three facts easier to accept than the fourth?
2. Did you have a different feeling when you heard the fourth fact?
3. Did you have an urge to go and research that Washington's teeth were from the mouths of slaves?
4. Why is it hard for us to believe evidence that counters our beliefs?
5. Can you think of any beliefs that people have that you know are not factual and yet they still believe the information?
6. How do you feel after learning about the Backfire Effect?

The Backfire Effect

- Well-documented psychological behavior
- USC conducted a study where participants were placed in an MRI and were presented with counterarguments to strongly held political beliefs
 - “Gay marriage should not be legalized”
- Brains scanned for activity
- Same part of the brain that responds to physical threat responds to intellectual ones
 - Called the amygdala
- Our core beliefs are beliefs which people cherish most deeply
 - These beliefs usually develop from childhood and solidify through life experiences
 - They can be inflexible, rigid, and sensitive to being challenged

The Backfire Effect

- **You may have held the worldview that Washington was a patriot and hero, but you were just presented with negative information**
 - This might not fit in your brain and causes your brain to backfire
- **Another term for the backfire effect is cognitive dissonance**
 - Cognitive dissonance causes feelings of unease and tension, and people attempt to relieve this discomfort in different ways.
 - Examples include “explaining things away” or rejecting new information that conflicts with their existing beliefs.

backfire effect

a psychological phenomenon that occurs when contradicting evidence challenges our deepest convictions - our beliefs get stronger and trigger an emotional rather than a reasoned response



Exit Ticket - Turn in both worksheets!

The Deborah Project

EXHIBIT 9
The Deborah Project

From: [Karen van Putten](#)
To: [Lori Lyle](#)
Cc: [REDACTED]; [Shawneece Stevenson](#); [Sathvik Nori](#); [REDACTED]; [Scott Lyle](#); [Marina Bershteyn](#); [REDACTED]; [Jen Reit](#); [REDACTED]; [REDACTED]; [Cara Klackle](#); [Wendy Porter](#); [Charles Velschow](#)
Subject: Re: Woodside TV Live Video - March 21st
Date: Friday, March 29, 2024 11:13:46 PM

Dear Mrs. Lyle and Parents,

This is a follow up to your original email dated March 25, 2024, my response dated March 25, 2024, and your recent email with additional questions dated March 28, 2024. The original questions you asked are listed below with my original responses along with additional information that we gathered:

- **Did the teachers involved know about the content of the segment before it was aired?**

Yes, students in the Digital Filmmaking class have been working on the project since November in collaboration with KQED and the teacher/advisor of the class. Students chose a local, national or global issue and pitched their idea to KQED Education staff, drafted a script which went through several revisions, received feedback and fact checks from WHS teacher/advisor and KQED staff/mentors both in-person on our WHS campus and at the KQED studios. Audio was recorded in the KQED studio and students produced the final products in March.

The video came out of a [KQED Youth Media "Call for Change"](#) Challenge:

- In the Call for Change commentary project, students combine a personal connection to an issue with research-based evidence and then express their ideas for how to make the world a better place.

Every year, our journalism and digital film-making students go on a field trip to KQED headquarters in San Francisco and their mentors come and work with our students at WHS. One of the media challenges is this project: *Call for Change*. Students share their footage and record on their professional-grade video and sound equipment, and receive critical feedback.

- **How did the movie get approved for public consumption by the school administration?**

Our journalism and digital filmmaking programs center students' voices and we rely on the instructors to provide guidance and oversight. Woodside HS administration is typically not directly involved in the review process for student projects. In this case of the airing of the student-produced video on March 21st on Woodside TV Live, our teacher/advisor followed the

- **Who reviews and approves the public announcements?**

Woodside TV Live daily announcements is a student-led and student-run organization. Students write the daily scripts for the show, produce all the content and run each episode live daily. Students are assigned deadlines by the teacher/advisor, and students submit rough draft edits of content that is reviewed by peers in the class. After watching, students suggest feedback that can go into the final edits. Then, those segments included in a video will see the final edit and either approve or disapprove of its publication. These factors are considered before being released on Youtube which is then shared with the staff to show during 4th or 5th period each day.

Outside of the Call for Change project, different student-led clubs and organizations have also produced informational videos. For instance, the Board of Student Affairs (BOSA), Student Leadership class, Robotics Team 100, the Debate Club, Visual and Performing Arts classes, Science Olympiad and the AP Environmental Science class are among some of the groups who have produced videos that are promotional or public service announcements.

- **Have similar announcements been permitted for other marginalized groups?**

In terms of the "Call for Change" project, students got to choose a local or national issue. Not all students chose to represent marginalized groups, but there are other features about marginalized groups. For example, one other video was produced and already aired that addressed the topic of the closure and demise of small businesses in Redwood City. For this project, there have been a variety of topics that students have selected. These features are set to be published on the Woodside TV Live Youtube channel in the coming weeks.

Woodside TV Live is a student-run organization and all students have the opportunity to use the platform to promote or raise awareness on a variety of topics. In previous years, students produced videos that educated or raised awareness around monthly themes such as Black History Month or Women's History Month. Mostly, the daily announcements provide reminders about college rep visits, schedule updates, club meeting info, score reports, upcoming performances and ticket information. Sometimes the content is fun and entertaining while other segments address serious topics. Sometimes the content may offer a perspective, and not one that is wholly representative of the students who produce the daily announcements or that of Woodside High School.

The following questions are from your follow up email dated March 28:

The acknowledgement of our letter and the program description that produced the video prompted a few additional questions:

- **Before deciding to align with the KQED Call for Change program, did the**

school look into the backers / funders of the program? Did they vet the mentors that work with our kids in any way?

Woodside High School has been partners with KQED and their Education programs and their Youth Takeover series for several years, a partnership established with retired teacher/advisor Gwen Sidley. We have partnered with KQED in their "Youth Takeover" program providing students with opportunities to promote youth voice and youth media as well as the Call for Change projects. Last year, I had the opportunity to chaperone students on their field trip to KQED to observe first-hand the partnership between the KQED professionals and members of their education department as they worked with our student journalists and filmmakers. No--to my knowledge, we have never felt the need to vet the backers or funders of the program, but you can go directly to their website and find the list of their partners and funders which include the California Department of Education and San Mateo County office of Education: <https://www.kqed.org/education/partnerships-and-funders>

The KQED Education department has two dedicated staff members who support this work; one Youth Media Program Manager and one Youth Media Specialist who act as advocates, facilitators and producers on Youth Takeover projects and in classrooms and lead the Youth Advisory Board. The Youth Media Team act as intermediaries advocating for student-made content on KQED programs and do not make editorial decisions for what is ultimately broadcast.

- **Who actually created the video? Was it the students or was it KQED?**

The students created the video from start to finish.

It has also come to our attention that the journalism and digital filmmaking teachers reached out to the advisors of the JSU and asked to meet with the group, and that a meeting is set to happen this coming Monday (4/1) with the 2 student leaders of the group, the 2 teacher advisors, and the 2 teachers that leverage the KQED Call for Change program in their classroom. We are now hoping to understand from you the intention of this meeting. What do the teachers want to achieve by having this meeting? What do you and the administration hope to achieve during this meeting with our kids?

The JSU staff advisors, Mr. Filerman and Ms. Thomsen, have shared the main purpose of the meeting is to allow a time and place to hear student concerns and both JSU advisors will be present to facilitate the meeting and ensure that the purpose is met. The teacher/advisor of the Digital Filmmaking class and of Woodside TV Live, Mr. DeBets and Department Chair for the Digital, Visual and Performing Arts (DVPA), Mr. Kauffmann, will be joining the JSU students and any student who wishes to be present to listen to student concerns revolving around the Call for Change segment aired on the March 21 announcements. In a previous JSU club meeting, there was some interest expressed by the students in producing a video of their own and both Mr. DeBets and Mr. Kauffmann will offer support for the students if and when they decide they would like to pursue this option. The students have not expressed that they would like an administrator to be present, and I will honor that. The JSU student leaders are comfortable with going to their club advisors and should they request one of us to participate, we will.

In addition, the following are some reflections and next steps:

Providing the context and preparing the student and staff audience tuning in to Woodside TV Live's series of the KQED assignment: Call for Change would have been helpful. As with any classroom lesson, teachers provide context and prepare their students with social, historical and political context before introducing a perspective that may trigger, hurt or offend students in the audience. This is something we have all been reflective about and are working toward making improvements within the broadcasts. We are preparing a segment that provides the context for the "Call for Change" project and that these videos are showcasing "youth voice" and that we support all students in producing stories reflecting their diverse experiences.

I have suggested inviting students who could offer another perspective from a marginalized community within the parameters of the Call for Change project could be very powerful and positive as a learning opportunity to raise broader awareness of the many student voices of Woodside HS and that Woodside TV Live can continue to address tough topics. The Woodside HS admin team and I are not school leaders who would censor student produced news broadcast or publication; instead, we are committed to working on developing parameters around how we can be teaching and learning partners involved in offering feedback or suggestions to anticipate any potential problems or mitigate any misinformation.

We are committed to working directly with our students and staff to listen and make improvements with "intent" vs. "impact" and address any missed learning and teaching opportunities.

Respectfully,
Karen van Putten



H. Karen van Putten (she/her/ella)

Principal

Woodside High School | www.woodsidehs.org
199 Churchill Avenue | Woodside, CA 94062
(650) 367-9750 x40010

On Thu, Mar 28, 2024 at 1:13 PM Lori Lyle [REDACTED] wrote:

Ms. van Putten:

We are pleased to hear that the administration is in the process of gathering facts about this situation and we look forward to receiving, in writing, the results and parameters of the investigation this coming Friday (tomorrow). We are then looking forward to finding a mutually agreeable time for us to meet to discuss the results and to collaborate on a formal resolution to address what happened and ensure these kinds of incidents do not continue to occur on the WHS campus or community.

The acknowledgement of our letter and the program description that produced the video prompted a few additional questions:

- Before deciding to align with the KQED Call for Change program, did the

school look into the backers / funders of the program? Did they vet the mentors that work with our kids in any way?

- Who actually created the video? Was it the students or was it KQED?

Outside of the influence the KQED mentors can have on the students, we also understand from your note that there were WHS teachers who had oversight and approval authority over the video's release. It seems safe to assume that these teachers either did not see the video as problematic, or their own political ideology took precedence. Either way, this is concerning.

It has also come to our attention that the journalism and digital filmmaking teachers reached out to the advisors of the JSU and asked to meet with the group, and that a meeting is set to happen this coming Monday (4/1) with the 2 student leaders of the group, the 2 teacher advisors, and the 2 teachers that leverage the KQED Call for Change program in their classroom. We are now hoping to understand from you the intention of this meeting. What do the teachers want to achieve by having this meeting? What do you and the administration hope to achieve during this meeting with our kids?

Our kids created the JSU to have a safe space that they can share and manage on their own. However, it is important that the administration acknowledges that our kids feel overwhelmed and fearful at times by the ongoing instances of anti-semitism, politically charged one-sided rhetoric and hateful words and actions on campus and within the WHS community. For this reason, we parents will not tolerate normalizing this situation and will continue to pursue our own discussions with the administration and the school board to ensure that these types of behaviors do not continue to reoccur.

We look forward to getting more information from you tomorrow.

Sincerely,

Lori and Scott Lyle; Woodside parents of 11th grader
Marina and Igor Bershteyn; Woodside parents of 10th grader
Jennifer and Daniel Reif; Woodside parents of 11th grader
Loni and Brent Austin, Woodside parents of 12th grader
Sam and Andrea Kastle, Woodside parents of 12th grader
Sharone and Vadim Spector, Woodside parents of 11th grader
Laurence Marks and Karen Parker, Woodside parents of 10th grader
Lisa Joy Rosner, Woodside parent of 11th grader

Michele and Steve Harkov, Woodside parents of 9th grader
Larry and Shani Pascal, Woodside parent of 9th grader

On Mar 25, 2024, at 3:36 PM, Karen van Putten [REDACTED] wrote:

Hello Mrs. Lyle and Parents,

Thank you for your detailed and thoughtful email sharing your concerns around the March 21st airing of a student-produced video during our Woodside TV Live Announcements. This is a brief response acknowledging receipt of your email. The admin team has been working with the teacher of the filmmaking classes at Woodside that also produces the Woodside TV Live program since the airing. We have met with a few students who have come in to share their concerns and the admin team scheduled a meeting this afternoon to look into the questions and concerns you shared.

I can provide the following facts about the premise of the video project:

The video came out of a [KQED Youth Media "Call for Change"](#) Challenge:

- - In the Call for Change commentary project, students combine a personal connection to an issue with research-based evidence and then express their ideas for how to make the world a better place.
 - Students create an audio or video commentary or an editorial cartoon
 - Great for middle and high school classes in ELA, STEM, Civics, Health and more

Every year, our journalism and digital film-making students go on a field trip to KQED headquarters in San Francisco and their mentors come and work with our students at WHS. One of the media challenges is this project: *Call for Change*. Students share their footage and record on their professional-grade video and sound equipment, and receive critical feedback.

For this project, there have been a variety of topics that students have selected. For example, one other video was produced and already aired that addressed the topic of the closure and demise of small businesses in Redwood City.

The two guest teacher anchors, Ms. Thomsen (co-advisor to the Jewish Student Union) and Ms. Lee did not have any prior knowledge of the video content when they were reading the script introducing the video. As guest anchors, staff members come in to practice one run through and then we go live.

Our journalism and digital filmmaking programs center students' voices and we rely on the instructors to provide guidance and oversight. The instructor vetted the video in its entirety through KQED and at least one department colleague.

Please allow our admin team this week to gather the facts around your questions listed in the email, and I welcome your partnership to collaborate moving forward.

Thank you,

Karen van Putten



H. Karen van Putten (she/her/ella)

Principal

Woodside High School | www.woodsidehs.org

199 Churchill Avenue | Woodside, CA 94062

(650) 367-9750 x40010

On Mon, Mar 25, 2024 at 9:04 AM Lori Lyle [REDACTED] wrote:

Dear Mrs. van Putten and Board:

On Thursday, March 21st, we parents received texts & videos from our distressed kids during the Woodside High School public video announcement. This announcement, made to all students, contained a segment called "Call for Change." While the voiceover of this segment seemed to imply an anti-hate and anti-islamophobia message, the images and video clips appeared to be "Free Palestine" propaganda.

The announcements were hosted by two Woodside school teachers identifying themselves as Ms. Thomsen and Ms. Lee. The teachers introduced the segment by mentioning the anniversary of the Civil Rights March led by Martin Luther King from Selma to Montgomery Alabama, telling students to "stay tuned" for a "Call for Change." In essence, the teachers, or those who wrote the script, seemed to equate the forthcoming activist message as analogous in its moral standing to Martin Luther King's famous civil rights march.

When finished, the teachers handed the segment over to students [REDACTED]

██████ and ██████████. The video segment began with a student narrating several islamophobic hate crimes, which was followed by Muslim and/or Arab students and teachers describing their concerns and experiences.

As the video segment progressed, it took an unexpected (and in our view, unacceptable) turn, when it incorporated images and interviews from "Free Palestine" protests, implying that fighting against islamophobia equates to aligning with the Free Palestine movement.

By hijacking this one-sided perspective on the Israeli/Hamas conflict, this type of video does not provide an example of how to combat islamophobia AND is damaging to your Jewish students - our children - who are already dealing with bullying and harassment on campus. In fact, the same teacher who was interviewed and featured as a victim of islamophobia in this video, ironically harassed one of our children the very same day with completely inappropriate and antisemitic remarks.

Airing this video to the entire school implies that the faculty and administration endorse this particular movement. And, most troubling of all, it seems some Woodside High School teachers had intimate prior knowledge of the film. This may not be the case, so we wanted to open up the dialogue.

https://www.youtube.com/live/vj2VYkaUcKE?si=0xuqnN5r8E6_HypK

For your reference, throughout the film, several visuals supporting the "Free Palestine" movement can be seen:

05:51 - Call for ceasefire poster with supporters

05:54 - "Israel Bombs, Stanford Profits" poster with supporters

07:12 - Palestinian protest images

07:16 - Images of Gaza war zone and children

07:26 - "Free Palestine" poster and supporters

07:48 - "Free Palestine" poster and supporters

07:55 - Posters "End all US aid to Apartheid Israel" and "Stand with Palestine, End the Occupation Now" with supporters.

07:58 - Poster enters into the frame "Release all Palestinian Political Prisoners"

08:15 - Poster "End the Occupation"

08:16 - Poster "There are no 2 sides to Genocide", "Let Gaza Live"

08:18 and on - More "Free Palestine"

08:20 - Dr. Susan Mather interviewed at Free Palestine protest: *"If it weren't for the youth, I don't think the movement would be as strong as it is right now. I'm going to do my part but I'm depending on the youth to be the leaders in this movement. I think it's your turn and I think you guys are killing it."*

We appreciate and empathize that the student in the film had been a target of hate, but this film is not one of solidarity and peace. This is not a "Call for Change," but rather part of the "Free Palestine" movement that is seemingly being force-fed to the entire school, in every classroom. And whether you (generally speaking) agree with what Israel is doing or not, this type of propaganda is influencing antisemitic attitudes and behaviors HERE in our school district - Woodside, RWC, etc.

Without getting into the history of the region, it is critical to note the following:

1. The Free Palestine movement was founded by an Islamic extremist, Yasser Qashlaq and is steadfastly opposed to the existence of Israel. Qashlaq refers to Jews as "human pieces of filth," and "dregs of European garbage."
2. It's naïve to think Free Palestine means a peaceful one or two state solution. It means the eradication of the Jews. Qashlaq says publicly that Israelis are a "gang of criminal murderers." He explains clearly that "You [Jews] will never be able to make peace with us," because "there is no reason for coexistence." Qashlaq even differentiates his movement from other Arab Palestinian leaders and their followers: "Even if some of our leaders or regimes sign [peace agreements] with you—we will never sign." What Qashlaq promotes, and what Woodside students are calling for, however inadvertently, is actual genocide, or at the very least the complete ethnic cleansing of Jews from the Middle East.
3. In the US, Free Palestine may call itself a human rights movement, but its origin is seeped in heavy hatred. In the video, the movement is made to look like a "pep rally" and is misrepresentative.

We are extremely concerned as to how this video segment was allowed to be shown and respectfully ask for your response to the following questions:

- Did the teachers involved know about the content of the segment before it was aired?
- How did the movie get approved for public consumption by the school administration?
- Who reviews and approves the public announcements?
- Have similar announcements been permitted for other marginalized

groups?

If the intention of the video was to promote peace and the coming together of our student body in pursuit of change, the images in the video should have looked very different. We look forward to working with you on how to offer an alternate view for those members of the Woodside community who have been deeply pained by what was shown, and others who have been grossly misinformed about the reality of what they were shown in this video.

We would like to request a meeting to discuss this in person. Ideally, we can work together towards a collaborative plan to address this.

Sincerely,

Lori and Scott Lyle; Woodside parents of 11th grader

Marina and Igor Bershteyn; Woodside parents of 10th grader

Jennifer and Daniel Reif; Woodside parents of 11th grader

Loni and Brent Austin, Woodside parents of 12th grader

Sam and Andrea Kasle, Woodside parents of 12th grader

Sharone and Vadim Spector, Woodside parents of 11th grader

Laurence Marks and Karen Parker, Woodside parents of 10th grader

Lisa Joy Rosner, Woodside parent of 11th grader

Michele and Steve Harkov, Woodside parents of 9th grader

Larry and Shani Pascal, Woodside parent of 9th grader

EXHIBIT 10

The Deborah Project



**Sequoia Union High School District
Uniform Complaint Procedures
COMPLAINT FORM**

I. Your Contact Information

Last Name: Lyle First Name: Scott

Address: [REDACTED] Apt. #: _____

City: [REDACTED] State: [REDACTED] Zip: [REDACTED]

Home Phone: [REDACTED] Work or Cell Phone: _____

Email: [REDACTED]

II. Complainant

You are filing this complaint on behalf of: [REDACTED] Lyle and WHS Jewish community

Parent/Guardian Pupil Witness to the Incident Other: _____

III. School Information

School Name: Woodside High School

Grade: 11 Principal: Karen Van Putter

IV. Basis of the Complaint

A. District violation of state or federal law or regulations/policies governing:

- | | |
|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> Accommodations for Pregnant and Parenting Pupils <input type="checkbox"/> Adult Education <input type="checkbox"/> After School Education and Safety <input type="checkbox"/> Agricultural Career Technical Education <input type="checkbox"/> Career Technical and Technical Education; Career Technical; Technical Training (State) <input type="checkbox"/> Career Technical Education (Federal) <input type="checkbox"/> Child Care and Development <input type="checkbox"/> Compensatory Education <input type="checkbox"/> Course Periods without Educational Content <input type="checkbox"/> Education Of Pupils In Foster Care, Pupils Who Are Homeless, Former Juvenile Court Pupils Now Enrolled In A School District, and Pupils Of Military Families | <ul style="list-style-type: none"> <input type="checkbox"/> Every Student Succeeds Act / No Child Left Behind (Titles I-VII) <input type="checkbox"/> Local Control and Accountability Plans (LCAP) <input type="checkbox"/> Migrant Education <input type="checkbox"/> Physical Education Instructional Minutes <input type="checkbox"/> Pupil Fees <input type="checkbox"/> Reasonable Accommodations to a Lactating Pupil <input type="checkbox"/> Regional Occupational Centers and Programs <input type="checkbox"/> School Plans For Student Achievement <input type="checkbox"/> School Safety Plans <input type="checkbox"/> School Site Councils <input type="checkbox"/> State Preschool <input type="checkbox"/> State Preschool Health And Safety Issues In LEAs Exempt From Licensing |
|---|--|

List the individuals involved in the incident(s) complained of:

See Attached

List any witnesses to the incident(s):

WHS Student Body, Administration, Internet users

What steps, if any, have you taken to resolve this issue before filing a complaint?

See attached

The Deborah Project

I understand that the District will maintain the confidentiality of this information, to the extent provided by law or the applicable collective bargaining agreement; that I will be protected from retaliation for filing this complaint; that the District may request further information about this matter; and if such information is available, I agree to present it upon request.

I understand that with the exception of pupil fee complaints, which may be filed within one (1) year of the alleged violation, all other complaints must be filed within six (6) months of the alleged occurrence. Pupil fees and LCAP complaints may be filed anonymously.

I believe that the forgoing is true and correct.

Note: I understand that if I file a complaint right before Thanksgiving Recess, Winter Recess, Spring Recess or Summer Recess, that school staff will be on vacation and it will take longer to investigate; and I agree to extend the timeline for responding to my complaint by the number of days schools are closed. Initials _____

Scott Jyl
Signature of Person Filing Complaint

4-22-2024
Date

Please submit this complaint to:

Assistant Superintendent of Human Resources
Human Resources Department
480 James Avenue
Redwood City, CA 94062

April 22, 2024

To: [REDACTED]

Cc: [REDACTED]

Re: Uniform Complaint on Discrimination and Harassment

Dear Interim Superintendent Leach and Assistant Superintendent Beal,

We have attempted to resolve serious issues of discrimination and harassment at Woodside High School (WHS) by providing Karen Van Putten involving discriminatory behavior by employees and students. All our efforts to resolve this at the site level have been unsuccessful and the hostile school environment has continued. We are now filing a formal complaint with the district per Board Policy and Administration Regulation 1312.1 - Complaints Concerning District Employees. Additionally, we request that all of our previous discrimination complaints we filed directly with Ms. Van Putten regarding misconduct of WHS teachers and students be investigated by the district. More specifically, we request that, in addition to addressing the recent video incident, the continuing swastika vandalism be finally addressed as antisemitic and hate speech.

We believe Woodside High School has violated the following policies:

- Discrimination Prohibited - No person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
- Sequoia District Nondiscrimination Policy - The Board of Trustees of the Sequoia Union High School District is opposed to segregation in the public schools in any form, be it racial, socio-economic, political, religious, or based on sex, and will take such practical steps as appear feasible to provide all students with a broad exposure to all facets of a democratic society during their period of school attendance and to ensure equal educational opportunity according to the needs of individual students.
- [Policy 0410: Nondiscrimination In District Programs And Activities](#)
- [Regulation 5145.3: Nondiscrimination/Harassment](#)
- [SUHSD Policy 4119.21](#)
 - a. #2 - Engaging in harassing or discriminatory behavior towards students, parents/guardians, staff, or community members, or failing or refusing to intervene when an act of discrimination, harassment, intimidation, or bullying against a student is observed.

We would like all the complaints investigated by the district and a response within thirty days per your Uniform Complaint Policy:

- The District shall investigate complaints alleging failure to comply with such laws and/or alleging discrimination and shall seek to resolve those complaints in accordance with the district's uniform complaint procedures.

- Within thirty (30) days of receiving the complaint, the compliance officer shall prepare and send to the complainant a written report of the District's investigation and decision, together with corrective actions

We would like to ensure our identities remain confidential and that any type of retaliation will not be tolerated per your Uniform Complaint Policy:

- Complainants are protected from retaliation and the identity of the complainant alleging discrimination shall remain confidential, as appropriate.

Complaint Information:

1. Our Jewish children represent a very small and vulnerable minority at Woodside High School (WHS) which has repeatedly experienced harassment from both students and teachers alike. The pervasive discrimination against Jewish students has created a hostile school environment and the principal has failed to address or prevent further misconduct.
2. Teachers have made offensive, derogatory, and highly unprofessional remarks to our Jewish kids:
 - Pointing out Jewish physical characteristics.
 - Swastika graffiti on school grounds was dismissed by the administration as Buddhist Anime. Then subsequent swastika events have been reported on WHS campus.
 - Teachers have singled out Jewish students in Ethnic Studies, Social Studies, and History classes for debate about Israel.
3. On multiple occasions, Jewish parents and students met with Ms. Karen Van Putten, principal of WHS and the administration - but no corrective actions have been taken to our knowledge. This violates district policy as the principal failed to investigate and implement immediate measures necessary to stop the discrimination and ensure that all students have access to the educational program and a safe school environment.
4. On March 21st, WHS promoted an Arab-Muslim "tolerance" video to the student body that slandered and caused significant anxiety at the expense of our Jewish students:
 - While the narrative discussed islamophobia, it portrayed offensive imagery by of the "Free Palestine" movement, in other words, it attacked Jews and the Jewish State.
 - The "Free Palestine" organization has very dark roots and promotes the genocide of Jews in Israel. Its founder, Yasser Qashlaq, is famous for his antisemitic and genocidal comments about Jews, making many disturbing statements that include:
 - "You will never be able to make peace with us."
 - "There is no reason for coexistence."
 - "Those human pieces of filth."
 - The video contained explicit endorsements from academic authority figures with statements such as, "I'm depending upon the youth to be the leaders of this movement"
 - Letters to Karen Van Putten and the SUHSD Board have yielded no constructive or Productive material responses.
 - In a communication dated April 1, a small group of parents requested the following:
 1. Provide training regarding antisemitism to administrators, teachers, and subsequently, students.
 2. As guardrails, require proper history training by teachers and administrators so future mistakes can be identified before there is a problem. It should be widely understood that:

- a. Jews are an ethnic group indigenous to Israel with a continuous thousand-year history in the land, since 1200 BC, surviving countless occupiers (e.g. Assyrians, Babylonians, etc.).
- b. Under Roman occupation, Romans referred to Jews as Palestinians to strip them of their cultural identity. Arab conquest came 15 centuries later, in the 7th century AD. Under the Ottoman Empire, Jews lived as Dhimmi and paid taxes to live in their own country.
- c. In 1920, In the 1900s, during WWI and WWII the League of Nations, the UN, and the Allied Powers began to decolonize defeated powers utilizing an internationally accepted legal principle called “Uti Possidetis Juris”, which returns colonized territories to their previous “geopolitical boundaries”. In this process, the Ottoman Empire was decolonized into Iraq, Lebanon, Syria, Jordan, and Israel through a series of “mandates”.
- d. Yasser Arafat, founder of the PLO, did not adopt the term “Palestinian” for the Arabs who lived in that region until 1964. Prior to that time, everyone who lived in the region were understood to be either Palestinian Jews or Palestinian Arabs, but Palestinian referred only to the region of Palestine—it was never a sovereign country.
- e. Today, less than half of Israeli Jews are European diaspora Jews and Israeli Arabs have the same rights as Jews. (In 2022, Khaled Kabub became the first Muslim member to be permanently appointed to the Supreme Court of Israel.)

Until we are assured that administrators and teachers understand Jewish history, antisemitism, and how to discuss related topics, we suggest following San Mateo Union High School District’s lead by not allowing discussions about the Israel-Hamas war in the classroom:

1. Provide a tool for students to anonymously report antisemitism (and other hate) incidents and/or curricular violations.
2. Provide education for students and staff about the bounds of free speech in the classroom and the civil rights of individual students in a school setting.
3. Adopt the IHRA’s definition of antisemitism (already adopted by, for example, the US Department of State), without any modifications, and operationalize it in the district using this checklist developed by the by the National Education Association’s Jewish Affairs Caucus.
4. Transparency - We request that teachers make classroom material and assignments available on their online portal for all students and parents in their classes.

A letter was sent on April 3, 2024 to the advisors to the JSU (Jewish Student Union) with specific requests which were forwarded to Karen van Putten; confirmation that the email was forwarded in an email dated April 18th. The requests related to the video were as follows:

1. Every day the video remains live, another student could be influenced. In turn, the video should be taken down, which is still running on YouTube with 700 subscribers. Or, edit the video by stripping out the Free Palestine segments from the video.
2. If we wish to promote acceptance, and discourage hate, can we call out hate when we see it to educate and promote critical thinking? Make a follow-up announcement that the specific images represented a militia group from Syria called “Free Palestine” and share the previously documented comments made by its founder.
3. Encourage critical thinking and discourage emotional narratives and sound bites.
 - Going forward, could we establish guardrails to review “hot topic” content before it is published?

- Could we use this incident to make a public service announcement about Jew hate? We could even create combined Islamophobia/Antisemitism messages if there is concern about appearing biased in any way.
 - Could we invite an Arab Israeli (not a Jewish Israeli or an Arab Palestinian) to speak at the WHS to provide a legitimate and informed perspective on this complex subject?
 - Could we teach the history of Israel and Jews as an ethnic group starting from our first archeological record in 1206 BC? Here is an outline written for your consideration: [REDACTED]
4. There has been no formal restorative response from Karen van Putten or the Board to date since the video was shown. We request immediate action be taken to undo the damage done and prevent further antisemitic events.

We would like to point out that other school districts are seeing the groundswell of antisemitic events and are addressing it. Here are some very recent examples:

- On Thursday, April 4th a guest speaker at Wilcox High School in Santa Clara included an Arab Muslim born and raised in Israel, who presented on her personal story to the interested students. It offered an alternative, truthful account of Israel and the Jewish community.
- On Monday, April 15th, a Bowditch math teacher in Foster City engaged in a day of silence to express their disagreement with the current war in Gaza. Within a matter of days, the school had investigated, issued a school wide email and they are working to get antisemitism training.
- Chino Valley Unified Board President refuses to allow pro-Hamas supporters to hijack a school board meeting citing no jurisdiction when discussing school business.

These examples show a willingness by the respective school districts to educate the community, condemn racism and refuse to use schools as a platform to disseminate hate propaganda.

The hostile school environment at Woodside High School has caused significant harm to students and families. Ms. Van Putten knew about multiple incidents of discrimination of Jewish students at WHS for months and has failed to take appropriate action to stop the prohibited misconduct. We hope the district completes a thorough investigation and takes immediate action to prevent any further discriminatory misconduct by SUHSD employees and students.

Sincerely,

Scott and Lori Lyle
Steve & Michele Harkov
Jennifer and Daniel Reif
Rachel Freiberg
Sharone Mendes Nassi
Vadim Spector
Marina and Igor Bershteyn
Larry and Shani Pascal