<u>September 28, 2022:</u> We talked to Kristin Kellerman, DU's ELA teacher, and Lei Cheng, Chinese teacher during the parent-teacher conference. We tried to tell them that DU was not able to settle in his new school in August and September. He was sensitive and depressed after school. He displayed school avoidance behavior in the morning before going to school. He was not happy and he wanted to move to another state. He had no friends and spent the recesses swinging by himself.

We told the teachers that the way his ELA teaching assistant Stephanie Cleland treated him was making him feel insecure and disrupting his transition into his new school. We also suggested that it was making DU a prey for the kids. We particularly mentioned JD and a group of kids associated with him following the lead of Stephanie Cleland and targeting DU.

October 3, 2022: This was the first day of school after the parent teacher conference. They had potato coins for lunch. All the kids were very excited and hyper in the lunch line. Stephanie Cleland saw DU and said "That is not calm body language, go to the end of the line!", which he complied without saying anything. When he finally got the potato coins and was going to his table, Stephanie Cleland stopped him and said "You took too many, you cannot eat more than four! Put them back!". He did not know he was supposed to take four. Many kids that day took more than four and none of them was stopped by Stephanie Cleland nor was made to put them back (which is not hygiene anyway).

October 6, 2022: DU was sent to the principal's office by his ELA teacher, Kristin Kellerman. DU's mother saw HS (the first friend DU made at Wolf Springs) upset about it. HS was defending him, repeatedly saying "he did not do anything". DU had a horrible day, and had a breakdown after he came home. School pictures were taken that day, and he looks visibly down in the photo. He said he could not get himself to smile while his picture was being taken.

October 7, 2022: DU cried in the morning and refused to go to his English class. He was convinced only after his mother suggested he could stay with the school counselor first.

I sent an email to Kristin Kellerman and Meaghan Graber with the subject line "Emotional abuse of DU", which was basically an unofficial complaint against Stephanie Cleland.

October 10, 2022: I and Meaghan Graber met in person and decided that Stephanie Cleland backs away from DU.

October 13, 2022: DU's mother received an email from the PE teacher about DU's behavior at lunchtime in the cafeteria. We had never received any emails or complaints from any teacher prior to that. That was the only email we ever received from the PE teacher. He was obviously told to send that email to us so that they could build a paper trail.

October 17, 2022: DU felt awkward when he came back to the classroom from a restroom break in the middle of a task. He was told not to do the task with everyone else and he was not

given an explanation. Stephanie Cleland took the sheet from him abruptly and said "No, you are not doing that." He just sat on his seat doing nothing but watching everyone doing their work, and he could not tell what was going on.

I sent an email to Kristin Kellerman and inquired about this awkward incident.

October 18, 2022: The music teacher sent an email complaining about DUs behavior in his class. Kristin Kellerman replied to my previous email. The music teacher was clearly nitpicking on minor or non-existing behavior issues that elementary teachers deal with every day. Also, for some reason, these behavior issues reportedly happened to emerge "recently", to be precise, after my emotional abuse email:

"Within the past few classes, I've seen quite a bit of talking or not paying attention while instruction is going on, and making a lot of unexpected sounds during class."

<u>October 19, 2022:</u> I replied to Kristin Kellerman's email. Her response to my email, combined with the incidents happening at school and with the unprecedented emails we received from two other teachers, told me that Stephanie Cleland was retaliating to my previous complaint.

Meaghan Graber replied to my email, suggesting that our agreement was still valid and that she was in charge.

October 26, 2022: I and my wife had an in-person meeting with Meaghan Graber and Kristin Kellerman. We requested to have a meeting to normalize our relationship with Kristin Kellerman, who turned out to be very defensive in the meeting. She took our accusations against Stephanie Cleland personally, and she looked very upset and uncooperative. Below is how I described her attitude in an email to Meaghan Graber afterwards:

"I am trying to stay positive, but unfortunately, the only positive message we got from the meeting today was from you. I do not remember the exact wording, but you said something about giving DU more room, being more tolerant, empathetic, and patient with him until he starts feeling accepted, until he stops being anxious, instead of pointing out all his faults and flaws and administering negative consequences for them.

We did not see any change in Ms. Kellerman's stance today and we felt like we spent half an hour talking in vain. In the meeting, she sounded like "I have a difficult job to do, and when DU gets in the way, when he is being silly, when he is disruptive, I do what I have to do". She maintained that DU is disruptive and that she cannot teach because of him. We did not see any willingness in her to help DU to feel accepted."

DU said he did not want to go to school tomorrow. We requested to observe him in class to his

so-called "disruptive behavior" for ourselves. Meaghan Graber approved our request, but said that she would observe DU herself first.

Making out DU to be a disruptive kid was Kristin Kellerman's and Stephanie Cleland's way of retaliating against our advocacy for DU, who was described as quiet and friendly by Kristin Kellerman in the parent-teacher conference as recent as a few weeks ago. They could only sell this new assertion that DU is a disruptive kid to the music and art teachers at the beginning. Unfortunately, the Wolf Springs administrators had bought into their assertion by January, 2023. Obviously, the administrators subsequently sold the assertion to the district administration, as the way the district treated us and DU during the murder list hoax shows. Consequently, by February, it became the district's official opinion that DU is a disruptive kid. We later found out that Kristin Kellerman and Stephanie Cleland also spread the rumors about us (i.e., DU's parents) being disruptive, which similarly became the district's official opinion about us by the time murder list hoax happened in February.

<u>November 4, 2022:</u> Meaghan Graber observed DU in Kristin Kellerman's class. Her observation notes and email show that she did not see any disruptive behavior performed by DU.

<u>November 10, 2022:</u> My wife observed DU in Kristin Kellerman's classroom. She similarly did not see any disruptive behavior performed by DU.

After that, Kristin Kellerman and Stephanie Cleland kept a low profile for a while. As a result, DU became increasingly comfortable and confident and started making new friends. We did not have incidents at school, nor received emails from teachers for a long time. DU came back home from school happy almost every day. However, things started to change for the worse shortly before the Thanksgiving Holiday. Our entire family and especially DU were subject to persistent character assassination by Stephanie Cleland and Kristin Kellerman during that time. As a result, DU gradually lost all his friends, and most of his classmates and multiple teachers (namely the Music and Art teachers) turned against him by December, 2022.

**November 17, 2022:** One of DU's team mates cried during an activity in PE. MZ and AK told on him: they told the sub that DU made the girl cry. The sub made DU sit out for a long time.

DU does not share her name and did not know why she cried. He could not explain to us what he was accused of. He just knew when he was asked to put down the ball, he did not do it right away. After the PE sub let DU sit out for that, there were more students who went to tell on him. DU ended up sitting out most of the time in that PE lesson.

HS said that DU said the f word. Kristin Kellerman talked to him in the hallway. DU said he did not say the f word. Kellerman apparently believed him and said "it is okay then". Stephanie Cleland accused him of saying "you suck" and told him off. DU says he did not say anything like that. He would not say something like that. Not because it is too mean, but it simply does not exist in his vocabulary.

Much later, DU told us that the kids made him say "Sofa", and then "King", then told the teacher that he said the f word. We found that out when we went through the materials Blue Valley disclosed during the due process proceedings. He remembered it when he saw a writing by a classmate saying that "D... said 'so f...ing' and the teacher did not do anything about it."

<u>November 27, 2022:</u> We received emails from both the art teacher and the music teacher about DU's behavior in their classes. Again, the behavior they complain about was failure to follow directions accurately, promptly, and independently.

November 28, 2022: NB told DU that he could sit on their table. DU was told that the kids had talked to the teacher and the teacher had allowed it. When DU sat at their table, however, he was told off and made to leave the table by Stephanie Cleland. He could not explain what happened to Stephanie Cleland because, in his words, 'she was too shouty'. DU's mother saw him very upset and scared on the way back from lunch. He told her that Stephanie Cleland had shouted at him a few times.

He said Kristin Kellerman's sub was very mean today.

DU was doing some rock dancing movements in front of JD. Stephanie Cleland came very close to DU and told him "Stop getting in people's faces!" She was so close that she spat on his face.

When DU was talking to his mother, MZ was in front of DU. MZ told her that "DU keeps on getting on people's faces."

When DU turned on his chromebook, the page he opened was Crazy game page, which he had previously left unclosed. Someone immediately told Stephanie Cleland about that. She came and stood very close to him and told him that "You are not allowed to play crazy games". Because she was so close to him, she spat on him again.

<u>November 29, 2022:</u> DU hurt his ankle so he could not walk fast. While lining up and walking in line, DU was slower than the other kids. Stephanie Cleland blocked DU and let all the

other kids behind go in front of him.

November 30, 2022: When DU walked into the class, Stephanie Cleland was holding his chromebook. When DU was talking with NB, he saw Stephanie Cleland checking his computer and tapping on the 'Five night at Freddy's' shortcut. She was supposed to fix his classlink so that he could do his work. Instead, she took the computer to the library to delete the game shortcut. However, she did not get the classlink fixed, and DU could not do his work.

After recess, Stephanie Cleland asked DU to walk with her. He had to wait till everyone else left and went into the classroom to start walking. Stephanie Cleland just walked away by herself and did not wait for him. DU was left alone, walking back to the class alone.

<u>December 1, 2022:</u> At the end of the field trip, Stephanie Cleland told DU that he has been bugging EL the whole day. DU asked her: "When did I bug E...? At the stadium or on the bus?" Stephanie Cleland said: "All day!"

DU said he only asked EL whether they can sit together on the bus once. She was too close talking again and spat on his arm.

At the end of the field trip, Stephanie Cleland shouted at DU: "Stop talking!" DU told her that he was not talking. AK told him that "Don't talk back to the teacher". DU said "I was not talking back, I am just telling her the truth."

At the end of the day, DU's friend, EL told DU that 'Stop bugging me!'.

<u>December 4, 2023:</u> I shared our concerns with Meaghan Graber by email. An excerpt from the email is below.

"I am writing to you because we are extremely concerned with D...'s standing in the Wolf Springs community. His friends, classmates (and potentially their parents), and teachers are increasingly turning against him. This coincides with the worsening attitude of Ms. Cleland's towards D... She basically stopped backing away from D... This past week she was particularly mean to D.., like she was before your intervention.

Ms. Cleland has been trying to vilify D... for a while. It seems that she has achieved some success with her "campaign", because D...'s peers and other teachers repeat the things she says about him. This newly found support has lowered her inhibitions recently. I cannot assess how much damage she has already inflicted on D...'s standing in the community and whether the damage is revocable. If the damage turns out to be irrevocable, it will be better for D... not to go to Wolf Springs next year and have a fresh start somewhere else. However, he will complete this academic year, and we will do our best to minimize the damage on his well-

being."

<u>December 5-6-7, 2022:</u> DU was very resistant to go to school in the morning. He told us: 'Mrs. Cleland only hates me! I don't want to go to school.' It took him very long time to get ready and leave home.

DU's mother saw Stephanie Cleland talking with EL gently for a long time at lunchtime. She normally does not have long, gentle conversations with students. DU and HS were at the same table but DU could not hear what the two were talking about.

AW and SB were chanting the Turkish f word repeatedly to DU. It does not mean anything in English, but it annoys DU, and that is the reason why they repeated that word to DU. He told them to stop. AW stopped, but SB continued. So DU told her that "if you say it one more time, I will kick you". The girl did not stop so DU pushed the chair to her leg. The girl went to the teacher and told her that she was kicked by DU. The teacher believed in the tattler and did not ask why or if DU hit her. She just told DU not to kick people.

<u>December 8, 2022:</u> DU and MZ were supposed to take a test together. MZ said that "I do not want to have a test with this stupid idiot". The teacher told them to stop talking and do their test. During the recess, a boy approached him and spat on his neck almost at point blank range and ran away. DU ran after him and punched him in the back and ran away himself. The teacher saw DU hitting the kid and told Kristin Kellerman and Stephanie Cleland. No one wanted to find out what was going on and why DU hit the boy.

<u>December 9, 2022:</u> A kid hit him during the recess and told the teacher that DU hit him. The teacher, however, had already seen the kid hitting DU. She told the kid about that. The kid cringed and walked away.

EL told DU that he was annoying. DU cannot tell why and how he annoyed EL.

He belched at lunchtime and said "excuse me." He was not loud, and no one said anything, but Stephanie Cleland stared at him. After that, in the English class, however, he accidentally broke wind. AK told Cleland that DU farted. Stephanie Cleland said out loud that "you need to say excuse me after you fart or it is rude". She made DU say 'Excuse me' out loud to the whole class. According to DU, the whole class giggled and laughed. After that, MZ said that DU's fart stinks. DU felt very humiliated.

<u>December 12, 2022:</u> In the morning, DU refused to get ready for school. He was as close to have another break down. It took him so long to leave home that his mother went to work late. In the Chinese class, DU broke wind again, but not loudly. The girl sitting next to him told AK about it. AK went to the teacher and told her that DU farted. The teacher dismissed the tattle by saying that it is human nature and everyone does it.

<u>December 13, 2022:</u> I filed a complaint against Stephanie Cleland with the principal, Meaghan Graber. Stephanie Cleland was removed from her position at Wolf Springs and did not come back to work in the Spring semester as a result.

<u>January 5, 2023:</u> I informed Meaghan Graber of the isolation, vilification, and criminalization DU is facing at school. I requested her to ask teachers to be positive and supportive towards DU to restore his socio-emotional well-being. I also requested Peggy Salts, the counselor to step in to facilitate positive relationships between DU and his peers.

January 12, 2023: NB asked DU to draw Sirenhead game from Roblox on his notebook, which DU did. Meaghan Graber saw and investigated the drawing of DU, and kept NB's notebook as evidence. We were alarmed by that and questioned her intentions in doing so. She explicitly stated in writing that the intent behind the drawing is not concerning, but the very drawing was subsequently used as evidence against DU by the district during the murder list hoax incident.

<u>January 13, 2023:</u> NB asked DU to draw on his notebook again. This time, DU refused. Then NB showed the word "a..hole" written in his notebook to the teacher and accused DU of writing it.

<u>January 14, 2023:</u> I informed both of DU's homeroom teachers, as well as the entire administration team at school (i.e., Meaghan Graber, Kelly Northup, the instructional design coach, and Peggy Salts, the counselor) of his unsustainable situation at school and of his school avoidance behavior. I told them that if the situation did not improve, we would not be able to send him to school.

<u>January 15, 2023:</u> When DU's unsustainable situation at school was not acknowledged by Meaghan Graber, I requested to observe DU and bring a third party with me.

<u>January 18, 2023:</u> AU was accused of playing with a guitar string winder he found on the floor by his longtime bully, RK. Although he denied playing with it like a gun, his ELA teacher favored bully's words over his words and sternly told him not to play with it like a gun. The ELA teacher took the guitar string winder and reported the incident to the principal, who kept the guitar string winder as evidence.

January 19, 2023: AU was interrogated by Meaghan Graber for one hour, because his other long- time bully, RK's best friend, JV, reported that he said to her "I'll bring my gun and kill you!". His mother accompanied him during the interrogation, and said that she could hear his heart pounding. Meaghan Graber did not ask directly whether AU threatened to kill his bully. She instead started with questions such as "Are you frustrated with anyone at school?". It turned out the only thing AU said to his bully at lunch was "there is food on the floor". Still, Meaghan Graber said that the case was closed but inconclusive, as AU neither acknowledged nor denied saying "I'll bring my gun and kill you!".

<u>January 23, 2023:</u> I and my wife had a meeting with Meaghan Graber and Peggy Salts at school, regarding DU's situation, which was not acknowledged by them, who said that they could not force friendships when we asked her to intervene. We requested to observe DU all day, but only half an hour of pre-scheduled observation for each parent is allowed. My wife observed DU in the Chinese class for half an hour, and I observed him for half an hour in the English class. I witnessed first-hand that DU was a total outsider in class.

<u>February 1, 2023:</u> DU's tablemates accused DU of saying the f word at lunch and reported it to the supervisor. DU was told off by the supervisor even though he denied saying the f word. NB told his mother that DU said the f word and that DU said he would murder him. DU had nervous breakdown when he came home.

February 2, 2023: We did not send DU to school.

<u>February 3, 2023:</u> We again did not send DU to school. My wife talked to Meaghan Graber, who promised that she would tell the teachers to improve his social standing in class. Later, however, she checked that with one of DU's teachers, who said that the principal had never talked to them regarding DU.

<u>February 6, 2023:</u> We decided to send DU back to school, which we will regret for the rest of our lives. We sent him back before ensuring that the school was safe for him, and as a result he was framed for having a murder list five days later.

We met with the school's social worker, Jerri Courson. We asked her to observe and evaluate DU. My wife requested Meaghan Graber to have DU evaluated by the school psychologist for his social emotional well-being. Meaghan Graber declined in writing, saying that the school psychologist is for special education students only.

DD sometimes makes inappropriate moaning sounds, and JD kept on trying to get DU to make the same sounds at lunchtime. DU refused to do it and screeched instead.

<u>February 7, 2023:</u> JD again tried to get DU to make inappropriate moaning sounds at lunch. DU was accused by DD of stealing his rubric cube. NB joined in and started accusing DU too. The two went through DU's backpack when he was not present. They refused to return DU's backpack. DU had to empty his backpack in front of two adults (his mother and a classmate's mother) to prove that he had not stolen the rubric cube. Two teachers, Yuan Cheng and Lei Cheng, also witnessed DU proving that he had no rubric cube in his backpack.

<u>February 8, 2023:</u> A group of kids taunted AW by calling him gay, by chanting "A... is gay", and by holding up signs saying "A.. is gay". The taunts occurred on and off during the Chinese class in the morning.

I had lunch with DU and took him to the dentist afterwards. He told me at lunch what had happened in the Chinese class. He did not know the meaning of gay, but he could tell a bullying

was going on, and he stood up against the bullies. He was proud of doing that, and he felt like he won the approvals of some kids by doing that, even though he was called "fat cow" by MZ.

In the afternoon, the students wrote their reflections of the bullying incident during the ELA class. Since DU was out for the dentist appointment, he did not get to share his reflections with the class, nor to know of his classmates' reflections.

We signed a consent form that would allow the social worker, Jerri Courson, to provide care for DU.

<u>February 9, 2023:</u> It was a snow day. Still, Meaghan Graber called us around 7-8 pm and asked about AU typing the word "bomb" on Wikipedia. He had already told us that his search history included words that he would not have searched or he would not have known (e.g., Harry Potter characters, C4, etc.), and that he had never searched for bomb online. He added that his ELA teacher told him in class not to search for bomb in Wikipedia. Meaghan Graber said on the phone that typing the word bomb online is a serious safety issue and therefore she had to investigate it every time someone did it.

AU's Chinese teacher, Yuan Cheng, confirmed with my wife during a conversation that students sometimes use each other's chromebooks by mistake. They sometimes confuse someone else's chromebook with their own chromebooks. They can also use another student's chromebook on purpose. Moreover, teachers can remotely open and close tabs on students' chromebooks.

February 10, 2023: As far as DU was concerned, there was no incident in the morning in the Chinese class, because there were four adults present in the classroom: the principal; school counselor; his two Chinese teachers. However, he saw three girls (NH, SJ, HB, all of whom were favored by Stephanie Cleland and Kristin Kellerman and whom kept on reporting DU to teachers) being taken out of the classroom that morning. Then he saw two of them (SJ and NH) talking to the counselor in the hallway. He was taken to the counselor's office before lunch and was not allowed to leave. He had to eat his home lunch in the counselor's office. The principal and the counselor asked him about a murder list. He said, in front of his mother, that "What murder list? I do not have a murder list, I do not know anything about a murder list!". He did not even know what a murder list was, and neither were we, as we came from abroad, where there are neither school shooters nor murder lists.

Meaghan Graber, the school principal, told DU's mom that a police officer was waiting right outside of the school and ready to talk to DU. She refused that as she had the feeling that they would just pressure DU to confess something that he did not know and that he did not do.

Based on the police report filed dated 02/10/2023 (which we were able to access later through litigation, as it is not open to public), Meaghan Graber clearly knew that the allegations against DU were false: there was no threat, no murder list, and DU knew nothing about a murder list. She had questioned all the students that were reported to have been threatened by DU and all

the other students who were possibly threatened by DU. These students told her they did not receive a threat from DU or see a list; they just heard it from someone else. Only SB reportedly heard first-hand DU mentioning 'murder' or a 'murder list', but she did not remember when, and she said she did not think he was serious about murdering anyone. By then, however, the false rumors about DU and AU had spread among parents.

<u>February 11, 2023:</u> We were notified by Meaghan Graber by email that DU was not allowed to go back to school until an investigation into the allegations against him was complete.

Meaghan Graber's notification hardly provided any details, and we did not understand whatsoever how his removal from the educational setting was justified. He had never been accused of bullying, hurting, or scaring anyone before. Then, all of a sudden, on February 10, he started threatening to murder his peers? When and where did he threaten anyone, and in what context? How many students did he threaten? How did these incidents come to light? How many students reported him? Are these students the same students who had been bullying DU and who had been making false accusations against him for months? We would not be able to find the answers to these questions until I talked to the SRO who investigated into the murder list allegations in November, 2023.

<u>February 12, 2023:</u> Meaghan Graber made an announcement to the entire school community. The announcement mentioned a murder list created by a student; stated that the allegations were reported to her on Friday; stated that an investigation is under way with the assistance of Overland Park and Blue Valley Police Departments (which, combined with the "murder list" label, caused a great deal of paranoia and panic in the community); implied that the accused student was a 3rd grader; stated that the accused student would not be allowed at school until the ongoing investigation was complete. This announcement alone made it clear to many people that the accused student was DU, as many knew that he was separated from his classmates on Friday in the middle of the day and never came back afterwards.

<u>February 13, 2023:</u> A second announcement was made, again to the entire school community, reiterating the messages in the first announcement, and implying that the aforementioned investigation was not yet complete.

I hired a lawyer to defend DU.

This so-called student rights lawyer, Clifford Cohen, turned out to be a fraud, a middleman who brokers deals between Blue Valley and parents/students by leveraging his personal relationship with Blue Valley's board attorney, Melissa Hillman. Clifford Cohen has no litigation history in the Johnson County Courthouse, and his lawyers refused to disclose his litigation history, and even his CV to us. His lawyers also refused to answer our interrogatories regarding how many of his clients were Blue Valley students/parents and how much of his income came from these Blue Valley clients.

<u>February 14, 2023:</u> The district originally wanted to have a so-called re-entry meeting with us on Tuesday or Thursday. However, because I was not available on Tuesdays and Thursdays, we asked for a meeting on Wednesday. However, the district did not want a meeting on Wednesday due to the Chiefs Super Bowl Parade. Consequently, the re-entry meeting was delayed till February 17, Friday.

<u>February 17, 2023:</u> Many district bigwigs participated in the re-entry meeting, including Shelly Nielsen (in lieu of Amy Farthing, who was in charge of Wolf Springs but absent that day), the Executive Director of School Administration; the Head of Security, Dan Carney; the Chief Legal Officer, Melissa Hillman; Meaghan Graber, who was off contract day but who reportedly volunteered to attend the meeting to support our family. They held the meeting at the District Office rather than the school due to safety concerns. We kind of guessed it would not be safe for anyone in our family to go back to school after all those announcements made on February 12 and 13, but we could not imagine it would come to that.

During that meeting, we got to know Dan Carney's M.O. for the first time. His M.O. is building a case by fishing for anything that can be construed as evidence, no matter how weak it is, including kids' gossips, artwork, gestures from a footage that is interpreted out of context, recent news regarding a 6-year-old in Virginia shooting his teacher, etc. He then ties all the weak evidence together to make them look strong (to be able to say "where there is smoke there is fire") and to cast doubt on and to throw mud at a 9-year-old. On a side note, Dan Carney apparently placed a gag order on the Blue Valley Officer (Anthony Garcia) who investigated the murder list hoax at Wolf Springs to stop him from revealing the truth to me. Officer Garcia told me to speak to Mark Schmidt, the Assistant Superintendent instead.

The main evidence against DU, as presented to us during the meeting, was his artwork, which involved lavatorial jokes such as poopy pants, and which was inspired by things such as Transformers, Dave and Buster's video game called Rampage (which I used to play on my Commodore 64 when I was at his age), etc. Instead of just asking him to explain the pictures and listening to his answers, Meaghan Graber attempted to interject by asking questions such as "how do you think this drawing will make your classmates feel?". She did the same when she interrogated his older brother before. She started the interrogation by asking "are you frustrated by anyone at school?".

Until our re-entry meeting on February 17, we were led to believe that there was a physical murder list, and we kept on questioning DU about such a list, as well as the threats he allegedly uttered. That was a very traumatic one week for our family: our son was accused of doing horrible things, but we knew hardly anything about the accusations and about the evidence against him. Then in the re-entry meeting, we were told that there was no murder list.

In the meeting, the district bigwigs used a carrot-and-stick approach to persuade us to request for a transfer to any Blue Valley Elementary School without a Chinese Immersion program. The carrot was the prospect of a fresh start in another school, while the stick was suspension

and imposition of strict rules on DU such as assigning a monitor to him, not allowing him to bring a backpack, frequent inspections, etc. We did not take their deal, so they basically kicked our children out of the immersion program and used bureaucratic tricks to make it look like they were revoking a transfer that they honored previously (there was no transfer in practice, although most Chinese immersion students have to fill out some transfer paperwork to attend the immersion program).

I reported the wrongdoings of the Wolf Springs teachers to the district administrative team, including Tonya Merrigan, the Superintendent, and cc'd the teachers in the email. Melissa Hillman accused me of harassing and threatening the teachers and of disrupting the educational environment at Wolf Springs a great deal, and she instructed me to cease and desist communications with Wolf Springs. She threatened to restrict my access to school altogether otherwise. In short, she tried to criminalize me, like she criminalized my children.

<u>February 19, 2023:</u> I made a counter offer to the district via our lawyer. I told him that my children would transfer to another school as long as their names are cleared from the accusations. The district rejected my offer. They said they would make the announcement they deem appropriate, and "revoke" my children's transfer to Wolf Springs and send them back to their so-called "home school", Cedar Hills. In reality, my children had not attended Cedar Hills a single day in their lives.

Our lawyer told me that Melissa Hillman suggested I posted comments on Facebook that made school officials and faculty threatened. He said that she quoted me as posting "I will defend my children and we will all regret it the rest of our lives." She made me look like a potential school shooter, as what they did to my children.

I can prove that Melissa Hillman lied about me making threats, however, my posts are in the possession of Kali Kasprzyk, the administrator of the Facebook group where my posts are, who refuses to share them with me. I hope that someday she will come to her senses, follow her moral compass, stop covering for rotten people, and disclose my posts, so that we can resolve the issue without taking any legal action.

Melissa Hillman continues to defame to this day, by portraying me as an uncivil, threatening parent who distresses Blue Valley faculty. She even put restrictions on my access to school personnel and property in that regard: I am allowed to neither enter the school property nor communicate with staff members in-person or via email. That effectively blocks my participation in my children's education.

In fact, she already blocked/censored all my emails incoming to Blue Valley between April and August 2023, without informing neither me nor the Blue Valley personnel I was trying to communicate with. That created a lot of confusion, as I was trying to communicate with the staff members in three schools (as both my children were transitioning to other schools at the time), as well as with the district administrators. E.g., I asked the Cedar Hills principal to let me

view my children's education records, which is my legal right, and did not receive a reply. Then I contacted Amy Farthing to make the same request, and again did not get a reply. Both later said that they did not receive my emails. Similarly, I was not able to complete the school registration in one school in a timely manner because the office personnel did not receive my emails regarding registration, and I had no idea that they were not receiving my emails. I thought all those people were procrastinating or stonewalling my inquiries and requests. Likewise, those people did not receive my responses to their questions and requests.

Melissa Hillman also tells people such as Dr. Tish Taylor (and God knows who else) that the murder list hoax at Wolf Springs was not a hoax and the allegations against DU were true. She engages in defamation of a minor by telling such lies, and effectively denies DU of his right to education.

We see more and more staff members, students, and parents turning against us as a result of this ongoing defamation campaign against us, which makes school an extremely unsafe, hostile environment for our entire family, thereby denying our children their right to education.

<u>February 20, 2023:</u> Meaghan Graber made another announcement, suggesting that although there was no "criminal threat", the allegations against accused student was sustained and the student was given a punishment consistent with the findings of the investigation. This announcement, combined with the fact that he was removed from the educational setting on the day the murder list was reported to her, as she stated in the first announcement, and never came back, sparked the ridiculous "expulsion" rumors about DU in the community.

We found out later that Meaghan Graber emailed both AU's and DU's teachers and told them that the two brothers both made death threats and consequently requested a transfer. This is despite the fact that she previously told us in writing that the case regarding AU making death threats was closed.

<u>February 21, 2023:</u> Melissa Hillman, via our lawyer, informed me that my children can begin attending their "home school", Cedar Hills, on February 23, or they can wait till February 27, if we prefer to start a new school on a Monday. Our lawyer told me that this decision could not be appealed and that it marked the end of the services he could provide us.

Our experience with our attorney, Clifford Cohen, during the murder list accusations suggests that the relationship between him and Melissa Hillman is open to question. Collusion would be an appropriate label to describe such a relationship. Even in the re-entry meeting, in front of all the district bigwigs, he mentioned multiple times that he had grandkids in Blue Valley schools. Why would a student's attorney say something like that in that context? We also find it strange that we never signed a contract with him. Moreover, he never acted like our advocate. Rather, he seemed very subservient to Melissa Hillman in his interactions with her and acted as if he was her representative, not ours.

In that regard, he kept on trying to convince us to take the deal offered by her, which was to request a transfer from Wolf Springs to another elementary school in Blue Valley that does not have a Chinese Immersion Program. They were practically forcing my children out of Wolf Springs and throwing them out of the Chinese Immersion Program in which my child had been doing very well for three years, and making it look like it was us who requested a transfer. That also denied us the right to have a due process.

We were shocked by the way the district handled the whole thing and about the way we were treated, but our attorney always tried to defend and explain the district's actions and tried to convince us to take their offer. According to him, the district did not do a single thing wrong and was merely exercising their rights. He did not even defend me when Melissa Hillman tried to frame me for threatening the Blue Valley teachers with violence, just like they tried to frame my children. They obviously went through my emails and combined excerpts from different emails to make it look like that. That was a very pathetic and clumsy attempt to frame me, just like their investigation into the murder list hoax at Wolf Springs, and my attorney never opposed or criticized it (e.g., the artwork was the main evidence for the murder list allegations against DU, which he never opposed).

Further, I told him that the school violated FERPA by identifying DU in the announcements. He said that they would have violated FERPA only if they had mentioned his name. That is not true: name alone is sufficient but not necessary for identifying a student. The announcements provided a combination of personal information about DU that enabled many people in the community to identify him.

I also told my former lawyer that DU's ELA teacher, Kristin Kellerman, and her former assistant, Stephanie Cleland, violated FERPA by spreading rumors about us and turning other staff members and administrators against us. E.g., she even turned AU's teachers against us, although we had a good relationship with them. However, Kristin Kellerman had no educational interests in AU, and AU's teachers had no educational interests in DU. Thus, they were not supposed to gossip about the two children and their parents with each other. Yet, my attorney told me that they would have violated FERPA only if they had discussed our children with other parents. He said that the district employees were free to talk about all the students and parents with each other.

In addition, Kristin Kellerman and Stephanie Cleland turned a lot of students and parents against us as well by defaming DU and our entire family. I also told my lawyer that the school district defamed DU by making him look like a potential school shooter. He said that defamation is a matter of personal injury, which does not apply to minors. He added that because minors do not make money, a damage to their reputation does not translate into financial harm, and therefore compensatory or punitive damages that are the main motivations for personal injury lawsuits cannot be awarded in the case of minors. This also was not correct: financial harm is not the only damage caused by defamation, emotional distress is also a type of

damage that is applicable to minors.

Moreover, our attorney did not challenge Melissa Hillman when she threatened to restrict my access to school if I did not stop communicating with Wolf Springs teachers. He instead acted like Blue Valley's spokesperson and tried to make us accept the outcome that was predetermined by the district. Considering that, all the Blue Valley cases he has accepted in the past are open for discussion, as most of his clients are likely to have received a similar treatment from him and to have been persuaded to accept the outcome that the district wanted for them.

<u>February 22, 2023:</u> The district executive Amy Farthing stated in her email that our children were happiest at home, and brought up the virtual learning and homeschooling options for us to consider.

<u>February 27, 2023:</u> We toured Cedar Hills with Cade Chace, the principal and the assistant principal. After the trauma and extensive school absences, we decided to expose our children to their new school gradually, and to let them start school one day after the tour. We were concerned about rumors from Wolf Springs reaching Cedar Hills, and shared our concerns with the principals. They told us that teachers cannot view students' disciplinary records, but that they can view the schools a student has attended in the computer. They did not seem to share our concerns at all.

I also requested a meeting with the counselor, who was absent that day. I requested the principals to have her step in urgently and smoothen and accelerate our children's transition (especially DU's) into Cedar Hills before the rumors arrive and destroy their reputations, thereby isolating them and making them prey for bullying. They were newcomers in a school where most students had been studying in the same school and living in the same community for long years. Not to mention they were starting this new school in the middle of the Spring semester after a traumatic event: they were both anxious and needed immediate emotional support. Again, the principals did not share our concerns at all.

<u>February 28, 2023:</u> On their first day at school, the librarian asked both of my children whether they came from Wolf Springs in front of everyone.

<u>March 1, 2023:</u> The music teacher similarly told DU's brother in front of everyone that she knew he had transferred from Wolf Springs.

I sent an email to the principals explaining how damaging it was for the teachers to publicly share such confidential and sensitive information of our children. There is no point of changing schools if the stigma follows our children to their new school. I also requested the principals to have the counselor to step in and to arrange weekly brief meetings with our children's homeroom teachers as well as with the counselor. The principals did not respond to my requests.

<u>March 7, 2023:</u> The counselor touched base by email. I responded and let her know what kind of support our children needed.

<u>March 13-17, 2023:</u> Spring Break – No School

<u>March 21-22, 2023:</u> DU was singled out by Mary Brown and got into a lot of trouble for small things, such a being slow or doing the wrong work.

<u>March 22, 2023:</u> My wife sent an email to Mary Brown asking whether DU was okay at school. She complained about DU being slow and inattentive, missing verbal instructions, and needing reminders, very similar to Benjamin Wang's and Polly Blair's write-ups, Kellerman's comments in October and November, 2022.

March 24, 2023: One fifth grade boy approached AU in the bathroom and asked him whether he has a brother in 3rd grade. He answered yes and the boy asked: "Did he threaten to murder his classmates in his previous school?". AU told him the truth that his brother did not do that. Then AU saw the same boy was talking to other students and sharing the same thing with them.

March 27, 2023: I had lunch with DU and witnessed how the kids were treating him. They were treating him like the way a Nazi would treat a Jew. They treated him like he was less than human.

My wife sent an email to the counselor saying that the kids that our children often played with stopped playing with them on that day.

My wife sent an email to Amy Farthing about her concerns about the rumors spreading about children at Cedar Hills and in the community. Amy Farthing said something that amounts to "District employees talk to each other": "I appreciate your email and how it must feel when any conversations return about the incidents at Wolf Springs. We know school communities do have some connections across the buildings in the district."

March 28, 2023: A girl pinched DU, who was made to change seats. Then a boy falsely accused DU of saying the f word. Then a bunch of classmates jumped in and accused DU of a variety of wrongdoings, such as giving them the finger and punching kids randomly. The sub teacher (who was substituting Mary Brown) singled out DU by writing down his name, taking away his chromebook, and excluding him from the class activities. She told him to read a book. It was only DU's name that was written down in that class. My wife sent an email to DU's teacher, Mary Brown, the principals, and the counselor, requesting an urgent meeting.

I sent an email to the counselor, saying that our children's socialization and acceptance at Cedar Hills by their peers is an urgent issue.

<u>March 29, 2023:</u> I repeated my wife's request for an urgent meeting, saying that a downward spiral had started in regards to DU's classmates' treatment of him.

DU had a breakdown in the morning and did not go to school. We had a meeting with the principals, who reassured DU. We showed the video of DU we took in the morning to the principals, who did not seem concerned. The principal said that DU was fine and it was us who was upset, not him. He said that we were projecting our own worries and sensitivities on him. He said that we were exaggerating his feelings and that the situation at school was not like how we described it.

Mary Brown declined to have a meeting with us.

March 30, 2023: This was DU's last day at Cedar Hills. DU's classmates told him that they knew he was from Wolf Springs because Mary Brown told them that he had been expelled from Wolf Springs.

DU came out of the school building in a defensive posture, as if anyone could physically attack him anytime.

I informed the principals, Mary Brown, the counselor, and Amy Farthing about that. DU's classmates' allegations regarding Mary Brown spreading rumors about DU's expulsion have not been denied by anyone to this day.

The counselor finally offered to have lunch bunch with DU sometime in early April, after he had already stopped going to school. At that time, DU did not even want to go near Cedar Hills, and when he had to go with his mother to pick up his brother, he wanted to wear a mask to conceal his identity.

<u>April 8, 2023:</u> A girl in the tennis class asked DU whether he had been expelled from Wolf Springs. DU did not respond to the girl, but he was very upset and did not want to go to that tennis class again. The aforementioned girl is not even from Wolf Springs, however, there is another girl called ZS in the same tennis class who is from Wolf Springs.

**April 9, 2023:** I filed a complaint with the Kansas Department of Children and Families against the Blue Valley School District.

April 12, 2023: Cade Chace, the principal, threatened to report DU's truancy to the DA's Office if we did not send him back to school or choose the virtual learning option or transfer him to another school. I responded by making the requests below to make school safe for DU. He never responded to my requests.

- Mrs. Brown sincerely accepts and endorses DU and we have brief weekly meetings for the rest of the semester. If she cannot, a long-term sub who will accept and endorse DU must replace her.
- The school counselor keeps up the regular lunch bunch and other activities that will facilitate positive interactions between DU and his peers.

- You make an announcement to all CHE families, clearing DU's name and acknowledging his victimization at Wolf Springs.
- You make a similar announcement to the whole school in person.

If his name was not cleared and rumors were not dispelled, DU would continue to be targeted by his peers and teachers alike. He did not go to school for the entire April and May. Having been ostracized, humiliated, and ganged up on, DU was broken and depressed. He had become a different child. He lost his joy and stopped wanting to do anything.

**April 15, 2023:** I reported Blue Valley's violation of student privacy laws to the Student Privacy Office.

**April 17, 2023:** I emailed all the board members of the Kansas Department of Education and informed them of the wrongdoings of the Blue Valley School District.

<u>April 20, 2023:</u> I reported Blue Valley School District's violations of student privacy to the Johnson County District Attorney's Office and to the Kansas Attorney General's Office. The latter decided that my complaint fell under the jurisdiction of the former, and forwarded my complaint to them.

May 5, 2023: I emailed all the board members of the Kansas Department of Education again, reminding them of my complaint against the Blue Valley School District. I have never heard back from them until February, 2024, when Jodie Dietz emailed me to dismiss my requests and concerns, and instead to blame me for making Blue Valley officials and teachers concerned by sending vexatious emails to them.