

## KANSAS GENERAL AFFIDAVIT

We, Tolga Ulusemre, and Xiaolei Xu, residing at 13982 W 147<sup>th</sup> St, Olathe, KS 66062, being of lawful age and sound mind, do hereby make this Affidavit to provide a written statement in lieu of oral testimony.

### **Statement of Facts**

We understand that this Affidavit is made under oath and that any false statements made herein are subject to penalties of perjury. The following facts are true and correct to the best of our knowledge, information, and belief:

1. In February 2023, Blue Valley framed our then 8-year-old for attempting to shoot up the school and our then 10-year-old for trying to make bombs. Then Blue Valley unilaterally and abruptly transferred the two children from Wolf Springs Elementary (“WSE”) to another school amidst publicly humiliating announcements, thereby indicating their guilt to parents and staff members, as well as to the community at large.
2. Simultaneously with that, Blue Valley improperly, unilaterally, and abruptly transferred Xiaolei Xu, who was an instructional support paraprofessional in a general education classroom at WSE, to a self-contained classroom in a middle school, meant for students with severe learning, intellectual, and developmental disabilities, as a special education paraprofessional. Xiaolei Xu quit her job in Blue Valley after that school year.
3. Blue Valley similarly framed Tolga Ulusemre for threatening Blue Valley officials and faculty.

4. The false accusations Blue Valley made against us and our children spread like a wildfire throughout the community, thereby exposing our entire family to bias, bullying, and harassment.
5. Consequently, Blue Valley poisoned the well, turned our family's life upside down, and changed the educational and developmental trajectories of our children. Thus, our family has endured, and is still enduring great pain, suffering, and financial loss.
6. To get our lives and our children's education back on track, we need to clear our names from the false accusations Blue Valley made against us and get reimbursement for our children's private school tuitions. All the lawsuits we have filed in Kansas are towards this aim.
7. The number of lawsuits we have filed and the number of Defendants in these lawsuits is not an indication of our ill-intentions, but of Blue Valley's political clout, which resulted in several allies/accomplices/proxies covering up for Blue Valley's wrongdoings against our family.
8. All the lawsuits we have filed in Kansas stem from three false accusations Blue Valley made against us: our then 8-year-old was going to shoot up the school, our then 10-year-old was trying to make bombs, and Tolga Ulusemre threatened Blue Valley officials and faculty.
9. Thus, all our lawsuits will easily and swiftly fall apart if Blue Valley produces evidence supporting the allegations it has been making against our family.
10. Similarly, all our lawsuits will conclude in our favor if we are allowed to proceed to discovery and prove Blue Valley's lies and wrongdoings. Thus, Blue Valley and its

allies/accomplices/proxies have fought incredibly hard to obtain improper court orders that forestall discovery, such as discovery stay, dismissals, quashing subpoenas, etc., and the same applies to Blue Valley's latest attempt to impose filing restrictions on us, both in the state court and in the federal court.

11. Blue Valley and its allies/accomplices/proxies have managed to forestall discovery in all our existing lawsuits. However, their latest attempt to impose filing restrictions on us, to the best of our understanding, are aimed at preempting the Kansas Open Records Act ("KORA"), the Individuals with Disabilities Education Act ("IDEA"), and the HR retaliation lawsuits that we have the right to file anytime in the future. That is because the KORA, IDEA, and HR retaliation lawsuits we can file in the future can enable us to circumvent the barriers Blue Valley and its allies/accomplices/proxies have erected to prevent us from conducting discovery.
12. For example, one email or a report we obtain through a KORA request or a lawsuit or through an IDEA lawsuit will reveal the truth, and will bring all our lawsuits to an end.
13. Blue Valley reported us to the Department of Children and Families (DCF) for educational neglect, and to the District Attorney's Office for truancy, thereby shifting the blame for D.U.'s school avoidance onto us.
14. The District Attorney's Office sued us for truancy, without ever investigating nor even inquiring about why D.U. did not go to school, although we provided them with ample information and evidence explaining why.
15. The truancy judge Jennifer Ashford threatened to take away D.U. from us if we did not

obtain out-of-pocket mental evaluations of ourselves. Judge Jennifer Ashford also ordered us to sign release of information forms with the Guardian Ad Litem, Dennis Stanchik, prior to the evaluations, so that Dennis Stanchik could contact the evaluator and fish for the results Jennifer Ashford wanted.

16. Johnson County Mental Health Center abruptly ceased following the plan they had for D.U., withdrew their support from D.U., refrained from going to D.U.'s school to avoid witnessing the treatment he received at school, and allowed Blue Valley to force him out of school.
17. DCF turned a blind eye to everything Blue Valley had been doing to our children, and instead investigated us. The DCF investigator Michelle Merritt went to our children's schools, but not to see the treatment they were receiving at school, to interrogate them so that she could dig up dirt on us.
18. Michelle Merritt pushed us to obtain the out-of-pocket mental evaluations Judge Jennifer Ashford wanted, indicating that she was totally informed about the schemes taking place in our truancy proceedings.
19. The push for mental evaluations, truancy charges, as well as the educational neglect investigation against us all stopped, when we unenrolled D.U. from Blue Valley. Therefore, all these schemes were part of the broader scheme that was aimed at forcing D.U. out of Blue Valley.
20. On September 9, 2024, in our first ever court hearing in the Johnson County District Court, Judge Rhonda Mason treated us with great contempt, and had a law enforcement officer present in the courtroom. Rhonda Mason acted as if we were

belligerent, dangerous parents filing frivolous, vexatious lawsuits, where we should have instead accepted the consequences of having a child who attempted to shoot up the school, although it was impossible to reach such a conclusion from the pleadings.

21. Judge Toby Crouse manifested similar assumptions in a hearing held on June 2, 2025, when he referred to the so-called “sordid” relationship Tolga Ulusemre had with Blue Valley, although it was impossible to reach that conclusion from the pleadings. Besides, Judge Toby Crouse did not even know the basic facts stated in the pleadings. E.g., he did not even know who the defendant Joann Woltman was, and did not know that Blue Valley was improperly representing her, a judge parent, in a way that supported our allegations regarding a conspiracy between Joann Woltman and Blue Valley targeting our family.
22. The Review Officer Matthew Spurgin, who was assigned to review our due process complaint, manifested similar assumptions in his ruling on by stating that “D.U. and his family have an extended history of conflict with USD229.”, although it was impossible to reach such a conclusion from the records available to him.
23. The staff of the Attorney General’s Office manifested similar assumptions, on multiple occasions, when they mocked and ridiculed Tolga Ulusemre for reporting the student privacy violation, criminal false communication and the hoax Blue Valley committed after it publicly made false accusations against his son, although it was impossible for the Attorney General’s Office to reach that judgment from the evidence and information Tolga Ulusemre provided.
24. Judge Rhonda Mason and the Johnson County District Court unlawfully sabotaged our


subpoenas to prevent us from exposing Blue Valley's wrongdoings.

25. Overall, we reach the conclusion that all the aforementioned members of the legal community in Kansas were given the same tips, probably by the same person, who is an insider, i.e., a reputable member of the legal community in Kansas, whose words are treated as "inside information", or invaluable intelligence, whose mere words carry way more weight than the information and evidence we provide.
26. In a lawsuit filed by a parent against Blue Valley, Spencer Fane was able to get a federal judge to improperly order an 8-year-old sexual harassment victim to be deposed by them regarding a sexual harassment incident that happened two years ago when she was a kindergartener. This deposition was obviously aimed at impeaching and tormenting the victim and her parents, thereby coercing the parents into giving up.
27. Such rulings signal to the legal community Spencer Fane's undue influence over decisionmakers, thereby deterring lawyers from taking on Blue Valley and Spencer Fane. In line with that, we have witnessed over the years how bringing up the name of Blue Valley alone is enough to discourage lawyers from taking our cases.
28. Since we have been similarly observing in our litigations for years the emphasis Spencer Fane has been putting on obtaining undue influence over judges and ALJs, and since we know that Joseph Hatley from Spencer Fane has been talking to the Attorney General's Office about us and about our cases, we believe that Joseph Hatley in particular, and Spencer Fane in general, have been exercising undue influence over the members of the legal community in Kansas to obtain rulings and decisions in favor of their clients, including Blue Valley.

29. In that sense, Spencer Fane is in the center of a nefarious, elite network that rules Kansas, and hence can be compared to Jeffrey Epstein in that regard. If Spencer Fane is the Jeffrey Epstein of Kansas, then Joseph Hatley is the Ghislaine Maxwell of Kansas.
30. Blue Valley and Spencer Fane are similar to organizations such as Enron and Arthur Andersen, and hence are likely to share a similar fate to them.

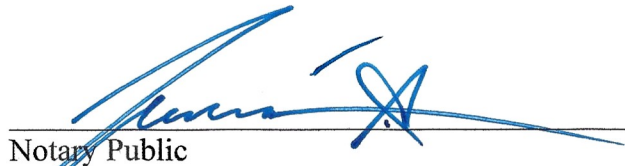
SWORN SIGNATURES

STATE OF Kansas )  
 ) ss:  
COUNTY OF Johnson )

  
Printed Name: Tolga Ulusemre

Xiaolei Xu  
Printed Name: Xiaolei Xu

The foregoing were subscribed and sworn to before me this 22<sup>nd</sup> day of  
December, 2025.

  
Notary Public

My commission expires:

8/23/28

