

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

**Tolga Ulusemre, and Xiaolei Xu, PLAINTIFFS**

V.

CASE NO. 2:25-cv-02407-HLT-TJJ

**Joseph Hatley,** DEFENDANTS

**Stephanie Bowman,**

**Madison Perry,**

**Spencer Fane, LLP,**

**Joann Woltman,**

**Clifford Cohen,**

**Robyn Butler,**

**Gregory Bentz,**

**Wallace Saunders,**

**Tish Taylor,**

**Anne Kindling,**

**Joseph Hollander & Craft, LLC,**

**Mike Fleming,**

**Kapke Willerth,**

**Kathleen Baker,**

**Catherine Singleton,**

**Brittany Jacobson,**

**Kali Kasprzyk,**

**Donald Hymer, in his individual and official capacity,**

**Maria Davies, in her individual and official capacity,**

### **SUPPORTING FACTS FOR ALL COUNTS**

1. Mike Fleming, Kapke Willerth, Joseph Hatley, Stephanie Bowman, and Madison Perry are citizens of the State of Missouri, whereas the rest of the Defendants are citizens of the State of Kansas.
2. Every single Defendant stated above is white, whereas Tolga Ulusemre is Turkish and Xiaolei Xu is Chinese.
3. A teacher clique and a group of parents conspired to frame criminal cases against Plaintiffs' two children, 10 year-old A.U. and 8 year old-D.U., who were students at Wolf Springs Elementary (WSE), a part of Blue Valley U.S.D. 229 ("Blue Valley"), in January and February, 2023.
4. These conspirators, motivated by a racial, invidiously discriminatory animus against Plaintiffs and their children, weaponized the criminal justice system as well as school disciplinary policies with the ultimate aim of eliminating the entire family from the school.
5. On February 8, 2023, an infamous bullying incident happened in the 3<sup>rd</sup> grade class of D.U., where a group of students stood on chairs and tables, chanted "A... is gay", and held signs saying "A... is gay".
6. The target of this bullying incident was A.W., the son of Joann Woltman, a Judge in Johnson County Courthouse, and one of the main parent conspirators. A.W. was a classmate of D.U.
7. At the time of the incident, A.U. was a 5<sup>th</sup> grader at WSE, and D.U.'s mother, Xiaolei Xu, was working in a general education classroom of the same school as an instructional

support paraprofessional.

8. The aforementioned bullying incident, which was confirmed by the school principal Meaghan Graber in her email exchange with Plaintiff Ulusemre, passed as anti-gay and created a big disruption in the community, and many parents mentioned the incident on social media.
9. The next day, February 9, 2023, was a snow day.
10. On February 10, 2023, out of the blue, D.U. was accused of having a murder list (“murder list hoax”) and was secluded, while A.U. was accused of attempting to make bombs (“bomb hoax”). As a result, Plaintiff Xu was forced to leave the school with her two children abruptly, before the school day was over. The three would never be able to go back to WSE ever again.
11. The parent conspirators led by Joann Woltman pressured Blue Valley into expelling D.U. Blue Valley appeased them by promising not to allow D.U. to return to WSE and to transfer him to another Blue Valley school, which was a de facto expulsion, an outcome that sufficed to content the parent conspirators.
12. Blue Valley officials sought to cover up the conspiracy and the consequent disruption at school by unilaterally transferring Plaintiffs’ two children to another district school, and by scapegoating them for all the disruptions that had happened at school, despite their spotless disciplinary records and their histories with no behavior issues.
13. Blue Valley also unilaterally reassigned Xiaolei Xu as a special education paraprofessional to the intense resource classroom of a third district school, which was exclusively meant for special education students with severe disabilities.
14. Since the transfer, Blue Valley has sought to cover up the murder list and bomb hoaxes by subjecting Plaintiffs and their children to harassment, by silencing, isolating, and defaming them, with the ultimate aim of forcing the entire family out of the district.

15. In retrospect, what Catherine Singleton, a Blue Valley parent, did to N.B., a classmate of D.U.'s and her son's, in the Fall of 2022, was a harbinger of what was going to happen to D.U. on February 10, 2023. Like D.U., N.B. is half-Asian boy, and was targeted by teachers, as well as by a group of peers, and hence by the parents of these peers.
16. One day, Kristin Kellerman, the teacher who targeted both D.U. and N.B., reported that N.B. brought nuts from home, took them out of his backpack, crushed them and spread them all over the Catherine Singleton's son, who has nut allergy. That did not happen in Kristin Kellerman's class, but in another teacher's class. That teacher thought that the incident was not a big deal, and Catherine Singleton's son had no allergic reaction, so that teacher just sent him to the restroom and did not report the incident.
17. D.U. was actually sitting at the same table with Catherine Singleton's son at the time of the incident, and he told his Plaintiffs that N.B. threw a single nut at the victim and missed. Then he picked up the nut and put it in the victim's hand. Yet, no one ever asked D.U. what he witnessed.
18. N.B.'s father subsequently told D.U.'s father that the nut was actually an acorn from their backyard, which is not known as a common allergen. N.B.'s father also said that N.B. actually had a mild nut allergy himself. D.U. does not know the difference between a nut and an acorn as he grew up in Hawaii. Therefore, he may have just called it a nut when he shared the incident with Plaintiffs.
19. Kristin Kellerman evidently exaggerated this "nut incident" to vilify and criminalize N.B. She reportedly took Defendant Singleton's son to the restroom and helped him to wash off the so-called nut remnants way after the fact. Then she informed Catherine Singleton and other teachers of the incident in a dramatic way.
20. Catherine Singleton subsequently filed a police report against N.B., arguing that N.B. assaulted her son and used nuts as a weapon. Catherine Singleton was reportedly

enraged, while N.B.'s parents were broken and subsequently decided to take their children out of the District and homeschool them.

21. Another half-Asian classmate who used to be friends with D.U. and N.B. immigrated to New Zealand with his family the following year.
22. Overall, Catherine Singleton, jointly with Kristin Kellerman, took an inappropriate behavior or a silly prank by an 8-year-old and tried to turn it into a criminal case of attempted murder. Catherine Singleton was the leader of the campaign against N.B., whereas Joann Woltman was the leader of the campaign against D.U.
23. To defend D.U. against the completely groundless disciplinary action Blue Valley had been taking against him, Plaintiff Ulusemre retained self-described student-rights lawyer Clifford Cohen, on February 13, 2023.
24. Clifford Cohen did nothing to defend D.U., but did everything to convince Plaintiffs to accept the outcome predetermined by Blue Valley, i.e., D.U.'s transfer from WSE to another Blue Valley school.
25. On February 21, 2023, Blue Valley's board attorney, Melissa Hillman, informed Clifford Cohen of their decision to transfer D.U. and A.U. from WSE to another Blue Valley school, as well as to reassign Xiaolei Xu to a third Blue Valley school.
26. On the same day, Clifford Cohen informed Plaintiff Ulusemre that he was withdrawing his representation as he did not litigate and as he believed Blue Valley's disciplinary action to be final and irrevocable.
27. In the aftermath of the publicly humiliating and abrupt transfers, which were de facto expulsions, both A.U. and D.U. were traumatized, and could never settle into their new schools. Both A.U. and D.U. started new schools in Blue Valley in August, 2023.
28. To overcome the trauma and to get extra support for their children's smooth transition into their new respective schools, Plaintiffs requested Blue Valley to extend their

children Section 504 accommodations related to anxiety and to start psycho-educational evaluations of their children in August, 2023.

29. That entitled Plaintiffs to file due process complaints against Blue Valley with the Kansas State Department of Education (“KSDE”). On May 9, 2024, Plaintiffs filed a due process complaint with KSDE against Blue Valley.
30. This complaint entitled parents to an administrative hearing presided over by an Administrative Law Judge (ALJ) called a “Hearing Officer”, who is chosen and compensated by school districts.

#### **CONSPIRACY INVOLVING KSDE’s ALJ ANGELA GUPTA**

31. Angela Gupta, a lawyer working in a firm based in Topeka and Kansas City, was appointed as the Hearing Officer for the Plaintiff’s due process complaint.
32. Angela Gupta previously worked for Spencer Fane LLP, who has been representing Blue Valley since at least 2020.
33. In line with K.S.A. 72-3416(c), and pursuant to K.S.A. 72-3419(b), Tolga Ulusemre requested the Hearing Officer to issue a subpoena for the production of raw data that underlay the private psycho-educational evaluations of D.U. and A.U., which were conducted by Tish Taylor.
34. Plaintiffs’ intent to serve a subpoena on Tish Taylor faced no opposition, either from Blue Valley or from the Hearing Officer. Quite the opposite, Blue Valley’s trial lawyer, Stephanie Bowman, suggested Plaintiffs to informally request Tish Taylor to produce the raw data, rather than by serving a subpoena on her. Tolga Ulusemre replied that they were proceeding with the issuance of a subpoena as Tish Taylor stonewalled their requests for the raw data.
35. Besides Stephanie Bowman, Blue Valley was also represented by Madison Perry in the

proceeding, and Melissa Hillman actively participated in the conferences and communications related to the proceeding.

36. A subpoena was served on Tish Taylor on August 1, 2024. Yet, Tish Taylor's lawyer, Anne Kindling, filed a motion with the Hearing Officer to quash the subpoena on August 30, 2024.
37. On September 4, 2024, in response to the aforementioned motion to quash, the Hearing Officer issued an *Order to Show Cause why July 21 Subpoena should not be Quashed*, which indicated that the raw data that underlay Tish Taylor's evaluation results was not relevant to the due process proceeding, and that Parents got the subpoena issued not for the due process proceeding but for a medical malpractice claim they intend to make against Tish Taylor.
38. The order also stated that "*In light of the matters raised by Dr. Taylor, the undersigned orders that, on or before September 9, 2024, Parents shall show cause in writing why the July 21 Subpoena should not be quashed.*" That meant Plaintiffs were given three business days to respond to the order. There was no justification for such a tight deadline, as Tish Taylor's motion to quash absolved her obligation to meet the deadline for the document production set by the subpoena.
39. Plaintiffs responded to Tish Taylor's motion to quash by filing their motion to compel discovery on September 5, 2024. Plaintiffs could not mentally assimilate the fact at the time that Angela Gupta had ordered them to explain the relevance of the raw data of a psychoeducational evaluation to a special education hearing.
40. Raw data serves as the foundation for generating results, which represent the processed and interpreted form of raw data. As a general principle, a researcher or analyst is supposed to disclose the raw data that he/she derives his/her conclusions from, to ensure the transparency and integrity of his/her research/analysis.

41. For example, in *Beers v. USD 512 Shawnee Mission*, No. 21-2604-DDC-TJJ (D. Kan. Mar. 17, 2023), the parents obtained the raw data that underlay the school district's evaluation results in discovery and found out that the school district had manipulated the data to downplay the student's deficiencies, so that it could cut corners on the services it had to provide the student. Without the raw data, the parents would have never known that their child's evaluation reports were fudged.
42. Considering that, and pursuant to K.S.A. 72-3416(c), which states that "At any reasonable time prior to the hearing, the parent and the counsel or advisor of the involved child shall be given access to all records, tests, reports or clinical evaluations relating to the proposed action.", it was not Parents who was supposed to explain why they sought her raw data, but it was Tish Taylor who was supposed to explain why she was fighting so hard not to disclose her raw data.
43. The reason why Tish Taylor fought so hard not to disclose her raw data was because she manipulated the data to obtain the results that Melissa Hillman wanted and that would cover up the murder list hoax. In that regard, Tish Taylor incorporated the input she obtained from Melissa Hillman, who is a board attorney and who did not know D.U. at all, into her evaluation of D.U., which, as a result, greatly misrepresented D.U. as an aggressive bully with social deficiencies.
44. On September 1, 2024, while their first due process proceeding was going on, Plaintiffs filed a second due process complaint, which basically included three allegations: Blue Valley unequivocally and firmly refused to include bullying in an IEP meeting's agenda in May 2024; Blue Valley unequivocally and firmly declined Plaintiffs' request to hold an IEP meeting in August, 2024; it was the Assistant Superintendent Mark Schmidt, who is not a member of the IEP team, and who does not have any general or expert knowledge related to D.U., that declined Plaintiffs' request to hold an IEP meeting. The third issue

was mainly what triggered Plaintiffs' second complaint.

45. On September 4, 2024, Blue Valley requested KSDE official Crista Grimwood to consolidate the two complaints made by Plaintiffs. Crista Grimwood told the parties to bring the issue before Angela Gupta.
46. Blue Valley consequently filed a motion to consolidate the two complaints on September 5, 2024, asking for an expedite ruling by September 9, 2024.
47. On September 4, 2024, Angela Gupta held a conference, where Tolga Ulusemre (Xiaolei Xu was not available due to her teaching schedule) was presented with a fait accompli by Blue Valley, which sought to outsource the email search arising from Plaintiffs' discovery request to a third party and shift the cost to Plaintiffs, as if they were not conducting discovery in a legal proceeding but making an open records request. Angela Gupta seemed pre-informed about Blue Valley's fait accompli, and she almost vouched for whatever vendor Blue Valley would find.
48. On the same day, Tolga Ulusemre replied to Blue Valley's responses to Plaintiffs' discovery request regarding Blue Valley's internal emails:  
*BVSD contracting with a vendor that they choose for doing the search and demanding us to pay the vendor for the search is a fait accompli. This is not what we agreed to, and we did not spend so much time on narrowing down the search many times over a period of months for this outcome. If a vendor is going to be contracted and we are going to pay for it, then we will choose the vendor and we will conduct a search in line with our original request, i.e., BVSD's all non-privileged correspondence about us and our children with anyone. In that case, the search should have started back in June, when we requested it."*
50. Plaintiffs did not reply to Blue Valley's motion to consolidate, because, to the best of their understanding and knowledge, it was improper and unlawful to consolidate the

complaints. Still, Plaintiffs explained their position to Angela Gupta, Blue Valley, and Crista Grimwood in an email on September 12, 2024, saying that:

51. *“Pursuant to K.S.A. 72-3415 (f) (1) and (2), ‘Nothing in this section shall be construed to preclude a parent or an agency from filing a separate due process complaint on an issue different from issues presented in a due process complaint already filed...Upon motion of either party and if deemed appropriate by the due process hearing officer presiding in the initial hearing, the issues raised in the separate complaints may be considered and resolved in the same due process hearing.’*
52. *“In other words, hearing officers do not have the authority to consolidate complaints, but to bifurcate or streamline complaints. Mrs. Bowman’s motion to consolidate complaints is moot. Thus, we will not be filing a motion to oppose BVSD’s motion to consolidate, but wait for the proper process to work, i.e., we will wait for the names of multiple hearing officers provided to us for the new complaint, unless there is a rule regarding the appointment of the same hearing officer if complaints are filed within 12 months of each other. If there is such a rule, then Mrs. Gupta should automatically be assigned the hearing officer for the second complaint.”*
53. None of Blue Valley, Angela Gupta, and Crista Grimwood explained in their motions, rulings, emails, etc., how K.S.A. 72-3415 justified the consolidation of the two complaints by Angela Gupta. Blue Valley and Angela Gupta merely argued that the consolidation of the complaints is warranted due to the overlap between the issues they raised.
54. Plaintiffs, as they always do, stood by their beliefs and principles, and refused to be a part of an improper, unlawful consolidation. However, Angela Gupta granted Blue Valley’s expedited motion to consolidate on September 10, 2024.
55. On September 15, 2024, Angela Gupta issued an order scheduling a conference regarding

the consolidation of complaints for September 19, 2024. On September 12, 2024, before the order, Tolga Ulusemre had sent an email expressing Plaintiffs' disinclination to participate in the consolidation.

56. *"We do not feel inclined to attend the conference since when we do, we feel that our voice is not heard, and even worse, we find ourselves presented with a fait accompli, like BVSD's hiring of a vendor to do an already very restricted email search."*
57. On September 18, 2024, Xiaolei Xu informed Angela Gupta and Blue Valley of their unavailability on September 19, 2024, but the meeting took place as ordered, without Plaintiffs' participation.
58. On October 4, 2024, Angela Gupta ordered Plaintiffs to show cause why their second due process complaint should not be dismissed, as they failed to submit an updated pre-hearing order that involved the allegations and legal theories of the second due process complaint.
59. As always, Plaintiffs stood by their beliefs and principles, and refused to do anything that would legitimate the unlawful and improper consolidation. As a result, Angela Gupta dismissed the second due process complaint with prejudice on October 16, 2024.
60. On October 7, 2024, Plaintiffs filed a motion for disqualification, alleging in good faith that they believed communications between KSDE and Angela Gupta occurred about Plaintiffs' case, thereby requesting Gupta to recuse herself. Plaintiffs also requested in this motion for a disclosure of all the future communications occurring between KSDE and Angela Gupta, if the latter did not recuse herself from the proceeding.
61. Angela Gupta refused to both recuse herself and disclose her future communications with KSDE. Despite admitting that she had communicated with KSDE regarding the Plaintiffs' case, she asserted that these communications did not concern the merits of the case.

62. Overall, Angela Gupta effectively barred Plaintiffs from: filing new due process complaints, which is a parent right guaranteed by the IDEA; getting the raw data that underlay the private evaluations that they paid for, another parent right guaranteed by the IDEA, but somehow she just did not see the “relevancy” of private evaluation data to a special education proceeding; knowing how Blue Valley teachers portrayed their children in the email communications they sent to each other and to Blue Valley officials.

63. School’ district’s internal emails can play a crucial role in a due process complaint.

Another KSDE Hearing Officer’s decision (Case No. 22 DP 259-001) exemplifies this:

*“...discovery in this case revealed numerous internal emails exchanged by District personnel at two different schools mocking and/or showing hostility to K and Complainants... The Hearing Officer finds this hostility and mocking to be quite troubling, considering that these exchanges were about a disabled child desperately in need of help...”*

*“...The Hearing Officer also notes that it is worth remembering the District’s machinations to exit/withdraw K from the District, behind the scenes...”*

*“...The Hearing Officer agrees with Complainants that the District has poisoned the well; even ignoring that Complainants’ placement of K at LRA qualifies for reimbursement under the law, the Hearing Officer finds that the District has disqualified itself from further educating K due to its conduct as to this child and his family, and it simply cannot be trusted with K, his education, and his future.”*

64. On October 18, 2024, Angela Gupta ordered Plaintiffs to respond by October 22, 2024, stating whether they intend to move forward with the claims they asserted in the first due process complaint. Her order stated that *“the failure to respond by October 22, 2024, may result in the dismissal of the problems/claims asserted in their initial complaint with prejudice, without further notice to the parties.”*

65. This order effectively forced Plaintiffs to make a choice among the three options: a) they go through an unfair hearing meant for covering up Blue Valley's and KSDE's wrongdoings, b) they voluntarily dismiss their due process complaint by the deadline set by the order, c) Angela Gupta dismisses their due process complaint with prejudice after the deadline.
66. Plaintiffs chose option b and filed a motion to voluntarily dismiss their first due process complaint on October 21, 2024. Still, Angela Gupta ordered a dismissal with prejudice on October 22, 2024. In that sense, Plaintiffs were given "a carrot and a stick" to choose from, and they went for the carrot, but were still given the stick.
67. Overall, Angela Gupta, Blue Valley, and KSDE together engineered the outcome of "dismissal with prejudice" by persistently bullying and gaslighting Plaintiffs, thereby wearing them down, and ultimately manipulated them into giving up by using a carrot and stick approach.
68. Plaintiffs have sued Angela Gupta, who is represented by KSDE's lawyers, which is solid evidence showing that Hearing Officers are not independent of KSDE, a violation of K.S.A. 72-3416, and hence of the impartiality of Hearing Officers. This evidence also indicates that Angela Gupta communicated with KSDE about the merits of the Plaintiffs' case, and KSDE now wants to keep this secret "in the family". That is because if Angela Gupta had her own lawyer, he or she would have to serve Angela Gupta's best interests, but now Angela Gupta's lawyers are serving KSDE's best interests, not hers.
69. In a prehearing conference, in or around June 2024, Angela Gupta mentioned that "the murder list incident was very hard for both Plaintiffs and Blue Valley, wasn't it?" Although Plaintiffs shared information about their experiences related to the murder list hoax, Blue Valley never mentioned in their motions, other written communications, or during the prehearing conferences, about it being a rough time for Blue Valley. Quite the

opposite, Plaintiffs only heard Blue Valley minimizing the murder list incident, which Blue Valley portrayed as a “resolved case”. They similarly minimize the impact of it on Plaintiffs and their children, and instead put it as “just a transfer from one building to another building to avoid further disruption to the brothers’ education”.

70. Some states explicitly ban any communications about substantive and procedural issues between a Hearing Officer and the state department of education, and require communications about logistical issues to be disclosed to the parties to the matter. Unfortunately, Kansas does not have such regulations that govern communications between Hearing Officers and KSDE.

71. In her response to Plaintiffs’ motion for disqualification, Angela Gupta refused to disclose her future communications with KSDE, stating that “Petitioners have not presented circumstances requiring the undersigned to disqualify herself from serving as Hearing Officer and/or report the details of every past or future communication with KSDE relating to this due process proceeding.” Thus, Angela Gupta chose to be less, not more, transparent, in the face of questions and accusations, which only served to heighten Plaintiffs’ conviction that she was receiving instructions from KSDE.

72. Overall, it is evident that Blue Valley indirectly communicated with Angela Gupta through KSDE while she presided over Plaintiff’s due process proceedings.

73. Overall, Melissa Hillman’s, Madison Perry’s, and Stephanie Bowman’s motions, arguments, and accusations against Plaintiffs were so nonsensical and brazen that they indicate they knew beforehand that they would obtain favorable rulings from Angela Gupta, no matter what the facts and laws were.

74. Overall, Angela Gupta took the side of the aforementioned lawyers of Blue Valley against Plaintiffs in every dispute and gaslighted them about almost every action they took in the proceeding.

75. Overall, Melissa Hillman, Crista Grimwood, Angela Gupta, Madison Perry, Stephanie Bowman, all acted as if they have to cover for each other and stand in unity against Plaintiffs, who they treated as fundamentally dissimilar and lesser people.

76. Overall, the arguments Tish Taylor and Anne Kindling made in their motion to quash were so nonsensical and brazen that they indicate they knew beforehand that they would obtain a favorable ruling from Angela Gupta, no matter what the facts and laws were.

77. Overall, Melissa Hillman, Tish Taylor, and Anne Kindling, all acted as if they have to cover for each other and stand in unity against Plaintiffs, who they treated as fundamentally dissimilar and lesser people.

**COUNT I: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF**

**THEIR RIGHT TO PETITION**

**(STEPHANIE BOWMAN AND MADISON PERRY)**

78. Plaintiffs reallege Paragraphs 1 through 77 as if fully set forth herein.

79. There was a meeting of minds by Melissa Hillman, Crista Grimwood, Angela Gupta, Madison Perry, and Stephanie Bowman to deprive Plaintiffs of their right to a fair due process hearing.

80. The aforementioned individuals, motivated by a racial and religious invidious discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from: obtaining Blue Valley's internal emails; obtaining their children's private evaluation data; filing a new due process complaint; holding a public due process hearing.

81. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair hearing. As a result, they could not resolve the issues with their children's education and were forced out of the public school system. As a result, they had to enroll their children

in a private school and incur tuition fees.

**COUNT II: NEGLIGENCE (SPENCER FANE, LLP)**

82. Plaintiffs reallege Paragraphs 1 through 81 as if fully set forth herein.
83. Spencer Fane has the duty to employ lawyers who comply with the ethical code of conduct for lawyers.
84. Spencer Fane breached this duty by failing to monitor and correct Stephanie Bowman's and Madison Perry's unethical conduct, which included colluding with the ALJ Angela Gupta.
85. As a direct and proximate result of Spencer Fane's failure to monitor and correct Stephanie Bowman's and Madison Perry's unethical conduct, Plaintiffs were denied a fair legal proceeding that would have resolved the issues with their children's education in Blue Valley.
86. As a result, Plaintiffs were forced out of the public school system, had to enroll their children in a private school, have suffered extreme emotional distress, have incurred legal and private school tuition expenses, and will continue to suffer such injuries and losses in the future.

**COUNT III: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF  
THEIR RIGHT TO PETITION  
(TISH TAYLOR AND ANNE KINDLING)**

87. Plaintiffs reallege Paragraphs 1 through 86 as if fully set forth herein.
88. There was a meeting of minds by Melissa Hillman, Tish Taylor, Anne Kindling, and Angela Gupta, to deprive Plaintiffs of their right to a fair due process hearing.
89. The aforementioned individuals, motivated by a racial and religious invidious

discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from obtaining their children's private evaluation data.

90. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair hearing. As a result, they could not resolve the issues with their children's education and were forced out of the public school system. As a result, they had to enroll their children in a private school and incur tuition fees.

**COUNT IV: NEGLIGENCE (JOSEPH HOLLANDER & CRAFT, LLC)**

91. Plaintiffs reallege Paragraphs 1 through 90 as if fully set forth herein.

92. Joseph Hollander & Craft has the duty to employ lawyers who comply with the ethical code of conduct for lawyers.

93. Joseph Hollander & Craft breached this duty by failing to monitor and correct Anne Kindling's unethical conduct, which included colluding with the ALJ Angela Gupta.

94. As a direct and proximate result of Joseph Hollander & Craft's failure to monitor and correct Anne Kindling's unethical conduct, Plaintiffs were denied a fair legal proceeding that would have resolved the issues with their children's education in Blue Valley.

95. As a result, Plaintiffs were forced out of the public school system, had to enroll their children in a private school, have suffered extreme emotional distress, have incurred legal and private school tuition expenses, and will continue to suffer such injuries and losses in the future.

**CONSPIRACY INVOLVING JOHNSON COUNTY JUDGE JENNIFER  
ASHFORD**

96. On September 22, 2023, Blue Valley official Amy Farthing reported D.U. as a truant to the Office of District Attorney (DA).

97. In response, Assistant DA Donald Hymer filed a truancy petition with the Johnson County District Court on October 4, 2023.
98. On October 5, 2023, Dennis Stanchik was assigned as the Guardian Ad Litem of D.U. by the truancy court.
99. Dennis Stanchik talked to Plaintiffs only once, on November 3, 2023. Their conversation was via Zoom and lasted half an hour.
100. Dennis Stanchik never talked to D.U. He saw D.U. only once, through Zoom, when D.U. appeared during his first truancy hearing on November 9, 2023.
101. To the best of the Plaintiffs' knowledge, Dennis Stanchik never interviewed D.U.'s therapist. It is not even clear if he ever interviewed his case manager from the Johnson County Mental Health Center, or anyone else who knows D.U. To the best of Plaintiffs' knowledge, Dennis Stanchik never went to school to meet with or observe D.U.
102. Yet, Dennis Stanchik attributed D.U.'s truancy to the so-called mental health issues going on in the family. As a result, he demanded mental evaluations of D.U. and Plaintiffs during a truancy hearing in early January, 2024.
103. Dennis Stanchik also requested the Plaintiffs to sign release of information forms with the evaluators so that he could "prime" them (by letting them know what is "wrong" with Plaintiffs) before they conduct the evaluations. He made it clear that he wanted to reach out to the evaluators prior to the evaluation, rather than after the evaluation.
104. When the Plaintiffs challenged Dennis Stanchik's rationale during the truancy hearing, Judge Jennifer Ashford threatened to take D.U. away from Plaintiffs if they did not proceed with the mental evaluations. Judge Jennifer Ashford explicitly ordered the Plaintiffs during at least one hearing to do the mental evaluations for D.U. and for themselves, as well as to sign the release of information papers for Dennis Stanchik so that he could access the evaluators.

105. When Tolga Ulusemre subsequently went to the District Courthouse and made an inquiry with one of the clerks, however, he was told that there was no such court order. Moreover, Plaintiffs received the previous court orders by mail before December 2023, but they received no court orders in writing afterwards. All the court orders from January, 2024 onwards were stated by the judge orally during the hearings, all of which took place via Zoom.

106. Neither Judge Ashford nor Dennis Stanchik elaborated on their allegations against Plaintiffs, i.e., why D.U. and his parents needed mental evaluations, despite the multiple inquiries the Plaintiffs made during hearings and in writing.

107. The truancy court also triggered an educational neglect investigation on Plaintiffs by falsely reporting them to the Department for Children and Families (from hereinafter “DCF”). DCF subsequently ruled that the educational neglect allegation against Plaintiffs was not substantiated.

108. On January 29, 2024, D.U. got punched in the back by a strange student in the bathroom when he was walking towards the sink to wash his hands after urinating. When he turned around, he got kicked in his genital area very hard twice. He told about the incident to his friends in the classroom, who encouraged him to report the incident to the classroom teacher, Maury Hernandez, which he did.

109. After school, however, the school principal Suzanne Martin sent Plaintiffs an email saying that D.U. was given an out of school suspension because he made derogatory remarks about a classmate (specifically, D.U. said that she was mean) and violated her personal space.

110. On January 30, 2024, D.U. did not go to school to serve his one day out of school suspension unfairly and improperly given by the principal, even though Plaintiffs were given a court order that prohibited D.U. from out of school suspensions. On December

20, 2023, however, the same principal explicitly said that she had changed D.U.’s out of school suspension (similarly unfair and improper) to in-school suspension due to the same court order.

111. Between January 31 and February 2, 2024, D.U. saw doctors to get the impact of the bathroom attack checked, which included an ultrasound check as recommended by his pediatrician.

112. On February 10, 2024, the Head of Security at Blue Valley, Dan Carney, sent an email to Tolga Ulusemre, referring to Tolga Ulusemre’s “intrusion” into school cafeteria on January 4, 2024, saying that *“This letter will serve as a final warning that you are not to enter upon the premises of Liberty View Elementary School at any time for any purpose other than to transport D.U. to and from school. You are not to enter the school building. If you choose to ignore this warning and not follow it, you will not be allowed to enter upon the school premises for any purpose, including transporting your son to and from school.”*

113. On February 14, 2024, the students were allowed to have second helpings at lunch, except for D.U. The lunch lady refused to serve D.U. the second helping, saying that he was not allowed. D.U. told a supervising teacher that he could not receive his second helping, and the two went to the lunch lady together. The lunch lady repeated that D.U. was not allowed to take the second helping. She did not explain why he was not allowed but simply refused to serve D.U. This incident exemplifies of the widespread rumors and prejudice against D.U. at LVE. The lunch lady does not deal with D.U., the two have no history, and D.U. had not done anything to her, but she still saw and treated him differently from other students.

114. On February 12, 2024, Suzanne Martin shared another write-up with Plaintiffs, alleging that D.U. stepped on a classmate’s fingers and said “I’ll kill you!”. D.U.’s father

saw that classmate (who was D.U.'s best friend until recently) when he picked up D.U. from school. The classmate seemed very scared, running away from D.U., as if D.U. was going to seriously harm him. D.U., however, was far away from him and was minding his own business. The two used to come out of school together and looked very intimate until recently.

115. Plaintiffs subsequently found out that the classmate's mother had been told that D.U. stepped on his son's fingers on purpose. She also received write-ups from school staff about D.U.'s alleged bullying of her son, which were never shared with Plaintiffs.

116. On February 21, 2024, Plaintiff succumbed to the pressure the family had been receiving from Dennis Stanchik as well as from the truancy court, disenrolled D.U. from LVE, and registered for D.U. homeschooling. As a result, the truancy case against D.U. was dismissed.

117. Marie Davies represented the Office of DA in every truancy proceeding and sided with Dennis Stanchik and Jennifer Ashford against Plaintiffs in every issue mentioned previously.

**COUNT V: 42 U.S.C. § 1983-SUBSTANTIVE DUE PROCESS VIOLATION**

**(DONALD HYMER AND MARIE DAVIES)**

118. Plaintiffs reallege Paragraphs 1 through 117 as if fully set forth herein.

119. Under the Fourteenth Amendment, Plaintiffs have a right to direct their children's education.

120. Joann Woltman and Blue Valley developed schemes to force Plaintiffs and their children out of the district, as they saw the family as a threat that had the potential to reveal the truth about the murder list hoax and expose their liability arising from their roles in it.

121. That is why Joann Woltman is represented by Blue Valley's lawyers in another lawsuit related to the murder list hoax, although she has no affiliation with the district as a Blue Valley parent and as a Johnson County judge.

122. Joann Woltman, as a fellow, higher-ranking judge in the same courthouse, pressured Judge Jennifer Ashford and Dennis Stanchik into acting in accordance with her and Blue Valley's schemes aimed at covering up the murder list hoax.

123. Donald Hymer and Marie Davies, acting under color of state law, played along with the schemes of Joann Woltman, Jennifer Ashford, Dennis Stanchik, and Blue Valley, to make Plaintiffs subject to threats and harassment by weaponizing the Child In Need of Care (CNIC) procedures, with the ultimate aim of coercing Plaintiffs into unenrolling their children from Blue Valley schools.

124. During D.U.'s truancy, neither Donald Hymer nor Marie Davies did a single thing to help D.U. They achieved their actual objective and hence aborted all the truancy and CNIC procedures when D.U. was unenrolled from Blue Valley and started being homeschooled.

125. Donald Hymer's and Marie Davies' conduct was malicious, outrageous, and shocking to the conscience.

126. Defendants' initiation of the imposition of the power of the state on the Plaintiffs private lives violated their Fourteenth Amendment guarantees to due process.

127. As a direct and proximate result of Defendants' unlawful actions, Plaintiffs have suffered extreme emotional distress, have incurred legal and medical expenses as well as private school tuition fees, and will continue to suffer such injuries and losses in the future.

**COUNT VI: 42 U.S.C. § 1983-PROCEDURAL DUE PROCESS VIOLATION**

**(DONALD HYMER AND MARIE DAVIES)**

128. Plaintiffs reallege Paragraphs 1 through 127 as if fully set forth herein.
129. Plaintiffs reported the murder list hoax and the abuse of D.U. by Blue Valley to Donald Hymer, Marie Davies, and the DA's Office countless times, both before and during the truancy proceedings. Donald Hymer, Maries Davies, and the DA's Office turned a blind eye on the extensive evidence and information Plaintiffs shared with them about the murder list hoax.
130. Blue Valley does not report every unexcused absence that rises to the level of truancy to the DA's Office. In other words, Blue Valley selectively reports truancy cases to the DA's Office, thereby weaponizing the truancy reporting, and the latter knows that.
131. Not a petition is filed in every truancy case, nor in a CNIC case. CNIC procedures are used only in the cases of abuse and neglect by parents, which did not apply to D.U. and Plaintiffs, and Donald Hymer and Marie Davies were in knowledge of that.
132. The point of all the CNIC and truancy procedures are to primarily help the child, and then the parents, not to cover up school's harassment of them by attributing the blame for school absences to them and by attaching mental disorder labels to them.
133. Overall, Donald Hymer and Maries Davies, acting under color of state law, violated Plaintiffs' procedural due process rights by prosecuting Plaintiffs in bad faith, and by weaponizing the CNIC and truancy procedures to absolve Blue Valley of its wrongdoings, to cover up the murder list hoax, and to shift the blame on Plaintiffs and D.U., instead of acting in D.U.'s best interests.
134. If it was not for the threat Plaintiffs posed to Blue Valley due to their references to the murder list hoax, Donald Hymer and Marie Davies would not have prosecuted Plaintiffs, and would not have deprived them of their procedural due process rights guaranteed by the Fourteenth Amendment.

**CONSPIRACIES INVOLVING JOHNSON COUNTY JUDGE RHONDA MASON:  
THE BAKER ET AL. AND THE COHEN CASES**

135. On July 24, 2024, Tolga Ulusemre filed a legal malpractice lawsuit against Clifford Cohen in the Johnson County Courthouse.
136. On the same day, Tolga Ulusemre started a civil action against the parent conspirators at WSE including Catherine Singleton and Brittany Jacobson by filing a Petition in the Johnson County Courthouse, alleging the torts of false light invasion of privacy, intentional infliction of emotional distress, and civil conspiracy.
137. Judge Rhonda Mason was appointed to both cases shortly afterwards. The case against Clifford Cohen was numbered 24CV03464 (from hereinafter “the Cohen case”), while the tort case against the parent conspirators was numbered 24CV03546 (from hereinafter “the Baker et al., case”).
138. The defendants in the Baker et al. case was represented by Mike Fleming, whereas Clifford Cohen was represented by Gregory Bentz and Robyn Butler.
139. In the Cohen case, Plaintiff Ulusemre aimed to prove Clifford Cohen’s negligence by showing that: D.U. and his family were innocent of causing a disruption, as opposed to Blue Valley’s allegations; it was in fact the aforementioned parent and teacher conspirators who caused disruption by spreading a hoax threat targeting D.U.; Clifford Cohen did not even bring up the foregoing allegations to Blue Valley while he represented the family, let alone making an effort to assert or prove them.
140. Specifically, during Clifford Cohen’s representation of the family, Blue Valley accused D.U. of having a murder list, A.U. of attempting to make bombs, Tolga Ulusemre of threatening faculty and staff.
141. There was an overlap between the Cohen case and Baker et al. case: the

allegations that D.U. and his family were transferred from WSE not because they did something wrong but because a group of parents conspired to frame a threat case against D.U. with the aim of eliminating him from WSE were central to both cases.

142. These fundamental allegations can easily be supported or refuted through a simple and quick discovery that Plaintiffs requested in both cases. Yet, almost every single discovery request Plaintiffs made in both cases to prove these fundamental allegations faced stiff resistance from both the defendants and non-party witnesses, and in every single discovery dispute, Judge Rhonda Mason unequivocally sided with the non-party witnesses and defendants against Plaintiffs.

### **THE BAKER ET AL. CASE**

143. In the Baker et al., case, Mike Fleming, initially representing Brittany Jacobson only, reached out to Tolga Ulusemre to schedule a phone conversation, which took place towards the end of July, 2024.

144. During the phone conversation, Mike Fleming tried to intimidate Tolga Ulusemre into withdrawing his lawsuit against Brittany Jacobson. He said that he would file an ANTI-SLAPP motion to strike, and believed that he would prevail. In the case that he did not, he said that all the bets would be off, and he would obtain D.U.'s medical history and make it public.

145. Mike Fleming wanted to ensure that Tolga Ulusemre did not have any direct contact with his clients, with or without his presence. He cited Rule 4.2 of the Kansas Rules of Professional Conduct in that regard, which does not really apply to Tolga Ulusemre as he is not a lawyer. To the best of his knowledge, there is no rule that prohibits parties to a lawsuit from meeting with each other.

146. Overall, Mike Fleming's efforts to prevent any direct contact between his clients

and Tolga Ulusemre were excessive and anxiety-filled.

147. In the Baker et al. case, the defendants filed a motion to strike pursuant to K.S.A. 60-50320, to which Plaintiffs initially responded by filing a motion for specified discovery on August 21, 2024, and subsequently by filing an amended motion for specified discovery on August 30, 2024.

148. The latter motion had 23 exhibits, most of which suggesting that the allegations against D.U. were baseless, including: D.U.’s impeccable education record, which showed no history of aggression, nor behavior and learning issues prior to the murder list hoax at Wolf Springs Elementary; a log that Tolga Ulusemre kept while D.U. was at Wolf Springs Elementary, that showed the details of social bullying he was subjected to by his peers and teachers; correspondence between D.U.’s mother and other WSE staff suggesting that D.U. were innocent of the allegations against him, and that these allegations in fact constituted a hoax threat.

149. A hearing related to the defendants’ motion to strike was held on September 9, 2024.

150. In the hearing, Judge Mason ordered the sealing of the court documents. She stated that her reason for sealing these court documents was to protect the privacy of minors involved, which is non-objectionable. However, she could have found an alternative way to protect the minors’ privacy, such as ordering Plaintiffs to redact the minors’ names.

151. At the beginning of the hearing, Plaintiffs, unaware of the courtroom etiquette, were sitting together at the Plaintiff table. Judge Mason contemptuously told Xiaolei Xu to leave the Plaintiff’s table and to sit in the spectator’s area instead, as she was not included in the Petition as a plaintiff.

152. In the same hearing, Judge Mason referred to D.U. in visible contempt, when she said “your son”. Also, there was a law enforcement officer in the courtroom. Plaintiffs

never again saw a law enforcement officer after that hearing in Judge Mason's courtroom.

153. Judge Mason also gaslighted Tolga Ulusemre by stating that he was supposed to be disciplined for making claims on behalf of D.U., but that was not possible as he was not a member of the bar and had not acted as the lawyer of D.U. besides filing a Petition that also included claims related to himself.

154. Altogether, the way Judge Mason dealt with Plaintiffs in the first hearing indicates a predisposition, which in turn indicates that she had been "tipped" by her fellow judge Joann Woltman about the murder list, and about Plaintiffs being "horrible parents" with "horrible children", in line with the false rumors spread by the parent conspirators at WSE.

155. During the hearing, Judge Mason mostly focused on Tolga Ulusemre's standing to sue the defendants on behalf of D.U. Consequently, Tolga Ulusemre did not have the chance to make his case but was instead put in a situation where he had to justify his standing to sue the defendants. Judge Mason stated that Tolga Ulusemre, as a litigant pro se, could not make claims against the defendants related to D.U. She gave Tolga Ulusemre two weeks to amend his Petition to include claims only related to himself, and gave him one month to find a lawyer if he wanted to make claims related to D.U.

156. Tolga Ulusemre complied with this order and amended his Petition by removing the claims related to D.U., by including claims related to himself and his wife Xiaolei Xu, as well as by adding her as the second Plaintiff, before the deadline set by Judge Mason.

157. The defendants had also filed a motion to dismiss in addition to their motion to strike, but no ruling was ever made on either the latter motion nor on Tolga Ulusemre's motion for specified discovery. Consequently, no discovery ever took place in the Baker

et al. case.

158. On the other hand, in the Cohen case, Cohen's lawyers started discovery by swamping Tolga Ulusemre with written interrogatories and requests for production of documents on August 15, 2024.

159. Tolga Ulusemre began responding to Clifford Cohen's discovery requests and at the same time started to make his own discovery requests by filing six notices of intent to issue subpoenas on August 27, 2024.

160. Three of these intended subpoenas for production of documents were meant for the defendants in the Baker et al. case. The rest were meant for the Overland Park Police Department, Blue Valley, and Kali Kasprzyk, the admin of the WSE parents' Facebook group. None of these notices received any objection from Clifford Cohen.

161. Tolga Ulusemre anticipated that the subpoenas meant for the defendants in the Baker et al. case would reveal information that would support his allegations in the Cohen case that it was the defendants who caused disruption at WSE by spreading a hoax threat, not Tolga Ulusemre or his family. This in turn was going to prove the professional negligence of Clifford Cohen.

162. However, Mike Fleming, the lawyer of the defendants in the Baker et al. case, filed a "Motion for Order to Appear and Show Cause for Failure to Comply with Discovery Stay" on September 12, 2024, pursuant to K.S.A. 20-1204a, alleging that Tolga Ulusemre committed a contempt of court by continuing to pursue claims related to D.U. as a litigant pro se and by serving subpoenas on his clients, who were under the protection of the pending motion to strike.

163. Judge Mason granted Mike Fleming's motion and she issued an order commanding Tolga Ulusemre to attend the related hearing on September 18, 2024. This order was just filed with the court and not served on Tolga Ulusemre in the way required

by K.S.A. 20-1204a(b).

164. Tolga Ulusemre tried to explain that he was not conducting discovery in the Baker et al., case but in the Cohen case, and that he was no longer making claims related to D.U. in either case.

165. During the hearing, Judge Mason treated Tolga Ulusemre as if he was indeed held in contempt of court, but Judge Mason did not make a clear statement about or elaborate on why Tolga Ulusemre was in contempt of court. For instance, Judge Mason was more than willing to allow Mike Fleming to lay an ambush by having him read out an email sent by Tolga Ulusemre to him, making it look like Tolga Ulusemre was threatening his clients and filing a lawsuit against them only for the purpose of harassment, even though Tolga Ulusemre had proposed deals to Mike Fleming multiple times to settle the lawsuit before the hearing.

166. In the same hearing, Tolga Ulusemre asked Judge Mason whether he was allowed to get subpoenas issued to obtain the social media posts in the private Facebook group composed of WSE parents. This group contained the posts of Tolga Ulusemre, who was removed from the group after the murder list hoax at WSE, of the defendants, as well as of other WSE parents. Judge Mason responded that he was not allowed to serve subpoenas on the defendants themselves pursuant to their Motion to Strike, and that the Court would determine other issues separately. This was clear in the sense that the Motion to Strike did not automatically ban Tolga Ulusemre from serving subpoenas on other non-party witnesses in the Cohen case than the defendants in the Baker et al. case.

167. Yet, Judge Mason acted as if the defendants' Motion to Strike make them untouchable, as if it gives them discovery immunity in any and all cases, thereby reassuring Mike Fleming and the defendants that Tolga Ulusemre would not be able to reveal the truth about the murder list hoax under any circumstances, regardless of the

case he pursues and regardless of the jurisdiction where he pursues it.

168. Overall, Mike Fleming's motion and accusations against Tolga Ulusemre, which were reinforced by Judge Mason's attitude towards Mike Fleming and with her attitude against Tolga Ulusemre during the hearing, combined with the order quashing the subpoenas served on the defendants, signaled to Mike Fleming and to the defendants that Tolga Ulusemre would not be allowed to make any progress towards revealing the truth about the murder list hoax.

169. On January 31, 2025, Tolga Ulusemre sent an email to the court clerk Stacy Crist, inquiring about the status of the Motion to Strike and Motion to Dismiss in the Baker et al. case.

170. Tolga Ulusemre and Xiaolei Xu were baffled with Stacy Crist's reply stating that "I don't think that there has been a hearing on Defs Supplemental Suggestions in Support of Their Motion to Dismiss and Plts Joint Motion to Deny Defs Motion to Dismiss and Motion to Strike."

171. A similarly baffled Mike Fleming replied to Stacy Crist by stating that "*When we had a hearing on September 9, 2024, the Judge provided Mr. Ulusemre 14 days to amend his petition. In anticipation that I would file another Motion to Dismiss, which I did following the Amended Petition, the Judge said another hearing would not be necessary. At least that is my recollection and the explanation for why I didn't notice my motion up hearing. My memory has failed me in the past and could be failing me now. If the Judge would like a hearing, please let us know her availability in February.*"

172. Stacy Crist did not reply to this email, and no hearing was held regarding the Motion to Dismiss and Motion to Strike that Mike Fleming filed.

173. On March 3, 2025, Tolga Ulusemre and Xiaolei Xu filed a due process complaint with KSDE against Blue Valley, seeking reimbursement for the private school tuition

that they had incurred and would incur in the future as a result of Blue Valley's failure to provide a meaningful education benefit to D.U.

174. Pursuant to K.S.A. 72-3419(b) as well as to the instructions of the ALJ or the Hearing Officer who presided over the due process complaint, Tolga Ulusemre initiated discovery in the proceeding by getting 11 subpoenas issued on March 21, 2025. Three of these subpoenas were meant for the defendants in the Baker et al. case.

175. In response to these subpoenas, on March 25, 2025, Mike Fleming filed a Motion to Appear and Show Cause and asked Stacy Crist to schedule a hearing as soon as possible.

176. Stacy Crist contacted the parties to schedule a hearing, but Tolga Ulusemre replied by indicating that Mike Fleming's motion interfered with the processes of KSDE's administrative hearing, and that he would make a Section 1985 claim against Mike Fleming for that reason.

177. In same email chain, Tolga Ulusemre asked Stacy Crist whether he was being ordered to appear to show cause, and if so, he would make a Section 1983 claim against Judge Mason (see "Exhibit C").

178. The hearing that Mike Fleming called for was never scheduled or held, and Judge Mason dismissed the Baker et al. case with prejudice on April 3, 2025.

179. Overall, Mike Fleming's motions, arguments, and accusations against Tolga Ulusemre were so nonsensical and brazen that they indicate he and his clients knew beforehand that they would obtain favorable rulings from Judge Mason, no matter what the facts and laws were.

180. Overall, Judge Mason took Mike Fleming's and his clients' side against Plaintiffs in every dispute and gaslighted them about almost every action they took in the proceeding.

181. Overall, Mike Fleming, Joann Woltman, Rhonda Mason, Brittany Jacobson, Catherine Singleton, and Kathleen Baker, all acted as if they have to cover for each other and stand in unity against Plaintiffs, who they treated as fundamentally dissimilar and lesser people.

**COUNT VII: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF**  
**THEIR RIGHT TO PETITION IN THE BAKER ET AL. CASE**  
**(MIKE FLEMING, JOANN WOLTMAN, BRITTANY JACOBSON, CATHERINE**  
**SINGLETON, KATHLEEN BAKER)**

182. Plaintiffs reallege Paragraphs 1 through 181 as if fully set forth herein.

183. There was a meeting of minds by Mike Fleming, Joann Woltman, Rhonda Mason, Brittany Jacobson, Catherine Singleton, and Kathleen Baker, to deprive Plaintiffs of their right to petition.

184. The aforementioned individuals, motivated by a racial and religious invidious discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from obtaining any information that would have revealed the truth about the murder list hoax, by improperly using ANTI-SLAPP motion to strike, contempt of court, and Rule 4.2 of the Kansas Rules of Professional Conduct.

185. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair legal proceeding, justice, and closure, and were unable to redress grievances arising from the murder list hoax.

186. As a result, Plaintiffs have suffered extreme emotional distress, have incurred legal expenses, and will continue to suffer such injuries and losses, as long as they are unable to redress grievances arising from the murder list hoax.

**COUNT VIII: NEGLIGENCE (KAPKE WILLERTH)**

187. Plaintiffs reallege Paragraphs 1 through 186 as if fully set forth herein.
188. Mike Fleming's appearance in the Baker et al. case was not meant to serve his clients, but to serve the hidden agenda of preventing Joann Woltman from being revealed the leader of the parent conspiracy responsible for the murder list hoax.
189. Kapke Willerth has the duty to employ lawyers who comply with the ethical code of conduct for lawyers.
190. Kapke Willerth breached this duty by failing to monitor and correct Mike Fleming's unethical conduct, which included colluding with Judge Rhonda Mason, as well as serving hidden agendas of hidden clients such as Joann Woltman, instead of acting in the best interests of his actual clients in the Baker et al. case.
191. The best interests of Mike Fleming's clients required him to negotiate with Plaintiffs for a stipulated dismissal, as Plaintiffs proposed multiple times, which would have given both his clients and Plaintiffs closure by revealing the truth about the murder list hoax. However, his priority was to keep Joann Woltman's role in the murder list hoax unknown to Plaintiffs.
192. As a direct and proximate result of Kapke Willerth's failure to monitor and correct Mike Fleming's unethical conduct, Plaintiffs were denied a fair legal proceeding, justice, and closure, and were unable to redress grievances arising from the murder list hoax.
193. As a result, Plaintiffs have suffered extreme emotional distress, have incurred legal expenses, and will continue to suffer such injuries and losses, as long as they are unable to redress grievances arising from the murder list hoax.

**THE COHEN CASE**

194. Tolga Ulusemre proceeded with discovery in the Cohen case by having a

subpoena served on the Overland Park Police Department (OPPD) on September 16, 2024. OPPD produced the police report on the murder list investigation on September 23, 2024. This report unequivocally showed that D.U. was completely innocent of the allegations against him.

195. Yet, in a correspondence with the U.S. Equal Employment Opportunity Commission, Blue Valley's board attorney, Melissa Hillman, stated that "Ms. Xu and her husband, Tolga Ulusemre, believe there is some bizarre and mystical conspiracy occurring within Blue Valley. They repeatedly claim Blue Valley has engaged in a 'hoax' against their son. Their nonsensical perspective has resulted in the Ulusemre/Xu family pursuing a host of claims against or related to Blue Valley."

196. According to the aforementioned police report, the School Resource Officer and the principal Meaghan Graber who investigated the murder list allegations on February 10, 2023 shared the same "bizarre", "mystical", and "nonsensical" perspective as Tolga Ulusemre and Xiaolei Xu.

197. Kali Kasprzyk was served a subpoena on September 16, 2024. The subpoena commanded Kali Kasprzyk, the admin of the private Facebook group composed of WSE parents, to produce "all social media postings in the Facebook group 'Wolf Springs Elementary Starting 2019 Class' between September 1, 2022 and May 31, 2023."

198. On September 23, 2024, at 11:08 am, Kali Kasprzyk filed an objection to the subpoena by herself, as a non-party, without a lawyer. She objected to the subpoena mainly on the grounds that the timeframe for the requested posts was too long, going a few months beyond the date on which D.U. left WSE, and that she was worried about compromising families' privacy, issues that could have easily been addressed. Therefore, Tolga Ulusemre did not read the objection Kali Kasprzyk filed with the court as a motion to quash at all.

199. On September 23, 2024, at 12:58 pm, Kali Kasprzyk emailed Tolga Ulusemre, informing him of the objection she filed with the court. She cc'd Judge Mason's assistant Stacy Crist on her email, and stated that "I believe Ms. Stacy Crist who is cc'ed on this email will be in touch to set a hearing regarding this matter."

200. On September 23, 2024, at 1:26 pm, Stacy Crist sent an email regarding a hearing that she wants to schedule due to the objection Kali Kasprzyk filed to the subpoena.

201. On September 23, 2024, at 6:48 pm, Tolga Ulusemre told Stacy Crist in an email that "*I am writing to let you know that I have not yet received Ms. Kasprzyk's written objection. I might file a motion to compel, or try to resolve the issue informally if possible, or accept her objection, depending on the reasons she provided for her objection.*"

202. On September 24, 2024, at 3:48 pm, Stacy Crist replied to Tolga Ulusemre's aforementioned email by stating that "*You can file a response to her objection but the Court will hear this. Here are dates/times available by zoom.*"

203. On September 24, 2024, at 4:59 pm, Tolga Ulusemre sent an email to Kali Kasprzyk and proposed to develop a protective order to allay her concerns over the families' privacy. On the same day, at 5:23 pm, Kali Kasprzyk replied by stating that "*I believe it would be best to discuss these concerns at the upcoming hearing, which is currently being scheduled through the court. I'm confident that during the hearing, we can address both your concerns and mine in a manner that respects all parties involved.*"

204. On October 2, 2024, Tolga Ulusemre filed with the court a *Motion to Compel Discovery with Protective Order*, including a proposed protective order, to accommodate Kali Kasprzyk's concerns. Yet, as can be seen above, both Kali Kasprzyk and Judge Mason were adamant about holding a hearing as soon as possible, and did not give Tolga

Ulusemre any chance to resolve the issue without a court hearing.

205. Overall, both Tolga Ulusemre and Xiaolei Xu were very surprised by Kali Kasprzyk's apparent comfort and confidence in navigating a formal objection to a legal order, and her adamance about a court hearing. If ordinary people are served a legal order, they will just comply with it as much as they can, and object to it only if it clearly invades their privacy. They would not go straight for a hearing to challenge an order issued by the court.

206. The hearing related to Kali Kasprzyk was held on October 17, 2024. In the hearing, Judge Mason prejudicially accused Tolga Ulusemre of making a backdoor attempt to obtain information on the defendants in the Baker et al. case. Tolga Ulusemre tried to explain why the social media posts were integral to the underlying case of the legal malpractice case, but to no avail, at least partly because Judge Mason was not willing to listen, as she seemed to have made up her mind to quash the subpoena before the hearing began (see "Exhibit D").

207. The reason Judge Mason stated for quashing the subpoena was that parents' social media posts were not relevant to the legal malpractice case. However, these posts were clearly relevant to the case that underlay the legal malpractice case, as they would have revealed that D.U. was dismissed from WSE not because of something he did but because a group of parents spread a hoax threat to frame him and to get him expelled.

208. For example, Tolga Ulusemre remembers reading posts in the Facebook group making statements along the lines of "kids with IEPs have protections!", which apparently refers to the protectional safeguards afforded to students with disabilities. These "protections" make suspension and expulsion of students with disabilities more difficult than students without disabilities. Thus, the aforementioned post indicates the posting parent's frustration caused by his/her inability to get some students suspended or

expelled.

209. Tolga Ulusemre also remembers another Wolf Spring parent's post saying something along the lines of "If your child is an [effing] misfit, then do not send him to school and keep him at home!".

210. It is also very likely that some parents felt encouraged by Tolga Ulusemre's removal from the Facebook group and revealed afterwards a lot of information to the group about the roles they played in the murder list hoax. Considering that, Kali Kasprzyk's objection to the subpoena's timeframe was nonsensical and brazen.

211. Thus, if Tolga Ulusemre had been able to subpoena such posts, he could have easily argued in the Cohen case that the disruption, which Blue Valley attributed to his family and which it punished his entire family for, was actually caused by a group of parents spreading a hoax threat, and that Clifford Cohen did not do anything to prove his clients' innocence.

212. Clifford Cohen filed a motion to dismiss on October 22, 2024, five days after the Kasprzyk hearing. The main argument of this motion was that the damages Tolga Ulusemre alleged to have incurred cannot be awarded because they are too conjectural and speculative to form a sound basis for measurement, and "Because Plaintiff fails to seek remedies for his own injuries, Plaintiff lacks standing to assert a claim for legal malpractice against Defendant Cohen."

213. In response, on November 11-12, 2024, Tolga Ulusemre filed a Second Amended Petition, which included Xiaolei Xu as a Plaintiff in addition to him, along with a Motion for Leave. This Second Amended Petition was never accepted by Judge Mason, although she said in the hearing on December 12, 2024, that she was accepting it.

214. Xiaolei Xu was added as a plaintiff because Blue Valley unilaterally and abruptly transferred her to a way less desirable and fundamentally dissimilar position in another

school in the middle of the semester, and Clifford Cohen did nothing about it, except for pushing her to accept the outcome, right before prematurely and abruptly withdrawing from representation.

215. On October 30, 2024, Tolga Ulusemre filed with the court “*Motion to Compel Kali Kasprzyk to Produce T.U.’s Facebook Posts*”, in order to compel Kali Kasprzyk to produce his own posts in the Facebook group only, which were only a few, but which would have been crucial in proving his allegations that Blue Valley lied multiple times to Clifford Cohen about Tolga Ulusemre threatening Blue Valley officials and faculty on Facebook, thereby contributing “greatly to the disruption of the educational environment”. These lies could have easily been construed as a First Amendment retaliation claim or an intentional tort claim, but Clifford Cohen let Blue Valley defame his client and get away with it.

216. Tolga Ulusemre’s request for his own social media posts was a typical one that any former member of a private Facebook group would make of the group’s administrator, and hence did not even require an authorization or a legal order. Thus, in addition to filing a motion, Tolga Ulusemre also informally requested Kali Kasprzyk for his own posts. Tolga Ulusemre made this request and also served his motion to compel in an email he sent to Kali Kasprzyk on October 30, 2024, at 12:11 pm.

217. Strangely, Kali Kasprzyk never responded to Tolga Ulusemre’s either informal request or motion. Yet, on the same day, October 30, 2024, at 1:26 pm, Stacy Crist shared a file stamped copy of the court order quashing the original subpoena served on Kali Kasprzyk.

218. The aforementioned order stated that "Plaintiff clearly stated on the record that the subpoena filed in this case was in attempt to discover information relating to another case.", which refers to the Baker et al. case. This could not be further from the truth, and

words were basically put in Tolga Ulusemre's mouth.

219. In order to correct the statements attributed to him in the order, Tolga Ulusemre filed a *Motion to Amend* on November 2, 2024, and served it on Clifford Cohen's lawyers and Kali Kasprzyk. Judge Mason never ruled on this motion, as it turned out that the clerk in fact never processed the motion, presumably due to the problematic transition into the new e-filing system at the time.

220. Much later, without any assistance from Kali Kasprzyk, Tolga Ulusemre was able to obtain his own Facebook posts, which unequivocally show that Melissa Hillman's allegations against Tolga Ulusemre were completely bogus.

221. Tolga Ulusemre proceeded with discovery in the Cohen case, and had deposition subpoenas served on four Blue Valley employees: Dan Carney, the Head of Security; Shelly Nielsen and Amy Farthing, executive administrators; Meaghan Graber, the principal of WSE. All these four individuals played leading roles in the murder list and bomb investigations, as well as in Blue Valley's decision to abruptly transfer A.U., D.U., and Xiaolei Xu from WSE to different Blue Valley schools on February 10, 2023. It was these individuals and Melissa Hillman who represented Blue Valley in the so-called re-entry meeting that took place on February 17, 2023.

222. In addition to the aforementioned four deposition subpoenas, Tolga Ulusemre had deposition subpoenas served on two former Blue Valley employees: Lei Cheng, D.U.'s homeroom teacher at WSE, who said he was innocent; Polly Blair, D.U.'s art teacher at WSE, who played an important role in building a case against D.U. by digging for dirt on him and by producing part of the evidence used against him, i.e., his silly artwork consisting of stick figures.

223. Furthermore, Tolga Ulusemre had a document production subpoena served on Blue Valley, requesting all the information related to the murder list allegations against

D.U.

224. In response to these subpoenas, Blue Valley filed motions to quash on October 10, 2024, on October 28, 2024, and on November 13, 2024.

225. These motions stated that the subpoenas were “an attempt to uncover evidence related to a different proceeding—and also appears to be an attempt to circumvent a discovery stay entered by this Court.”, referring to the pending motion to strike the defendants filed in the Baker et al. case.

226. Blue Valley made some nonsensical and brazen arguments in these motions. For example, its motion dated November 13, 2024 states that “The subpoena does not comply with K.S.A. 60-245(a)(1)(A)(iii) because it does not provide a specific time or place for production of requested documents. Rather, it generically lists Johnson County District Court as the place without indicating any specific room and generically lists ‘within two weeks of receiving this subpoena’ as the time. Neither includes the required specificity, especially given the confidential nature of the information requested. The Subpoena, therefore, should be quashed.”

227. Similarly, in its motion dated October 10, 2024, Blue Valley argued that two weeks was not sufficient deposition notice for non-party Polly Blair and hence violated K.S.A. § 60-245(c)(3)(A)(i).

228. Consequently, in its motion dated November 13, 2024, Blue Valley requested the Court to impose sanctions on Tolga Ulusemre, who it accused of abusing the discovery process and of imposing undue burden on non-party witnesses by harassing them with overbroad, irrelevant, inconvenient, and ill-intentioned discovery requests.

229. Also in response to these subpoenas, Clifford Cohen’s attorneys, on October 28, 2024, filed a motion to quash Tolga Ulusemre’s deposition subpoenas as well as a motion to stay discovery until the Court ruled on their motion to dismiss. The motion

states Tolga Ulusemre's violation of K.S.A. 60-230 and K.S.A. 60-226(b) as the reasons why his subpoenas should be dismissed, i.e., he did not give prior reasonable notice of the issuance of subpoenas, a procedural issue, and the subpoenas are not relevant to his legal malpractice claim, a substantive issue, respectively.

230. This motion stated that "*this Court dismissed Plaintiff's son's claims for damages because pro se Plaintiff is not a licensed attorney who can represent another individual. On September 9, 2024, the Court stayed discovery in the companion case pursuant to K.S.A. 60-5320(f) (a procedural remedy for parties who claiming harassment by a strategic lawsuit against public participation) ... Unable to proceed with discovery in the companion case, Plaintiff has turned to this legal malpractice action to conduct discovery in violation of the Court's Order in the companion case staying discovery. On September 18, 2024, the Court admonished Plaintiff that discovery for defendant is stayed in any and all cases until the motion to strike is ruled upon.*"

231. By filing this motion, Clifford Cohen's lawyers also sought a Protective Order, pursuant to K.S.A. 60-266(c)(1), "to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense." In other words, this motion argued that Tolga Ulusemre was harassing and oppressing Clifford Cohen's lawyers and non-parties by serving them procedurally and substantively deficient, ill-intentioned subpoenas.

232. Specifically, the motion requested the Court to appoint a special master at Plaintiff's expense, to attend any depositions and rule on any objections. That way, Clifford Cohen's lawyers sought to ensure that even if Tolga Ulusemre was allowed to proceed with discovery, he would still be prevented from obtaining any information from deponents proving his allegations.

233. A hearing related to the motions to quash was held on December 12, 2024. In the

hearing, Judge Mason granted all Blue Valley's and Clifford Cohen's motions and quashed all the subpoenas served by Tolga Ulusemre on Blue Valley, as well as on former and current Blue Valley employees.

234. Overall, the only discovery Tolga Ulusemre was allowed to conduct in the Cohen case was subpoenaing, at the outset of discovery, the police report on the murder list allegations against D.U. from the Overland Park Police Department, which unequivocally proved D.U.'s innocence. After the police report, Judge Mason did not allow Tolga Ulusemre to obtain any piece of information related to the actions Blue Valley took against his family, which Clifford Cohen was supposed to defend against as the family's lawyer, especially if Blue Valley's allegations against the family were baseless.

235. On January 29, 2025, Judge Mason dismissed the Cohen case with prejudice. Her order suggested Tolga Ulusemre's lack of standing to sue Clifford Cohen, his minor son's lawyer, as the main reason behind dismissal. The Order indicated that Clifford Cohen did not owe duty of care to Tolga Ulusemre.

236. Considering that Tolga Ulusemre initiated the legal malpractice action in late July 2024, it took Judge Mason 6 months and several discovery disputes to realize that he lacked standing.

237. Judge Mason's dismissal order referred to Xiaolei Xu as non-party, although she was allowed to sit at the Plaintiff's table in the hearing and make oral arguments on December 12, 2024. Further, in the same hearing, Judge Mason said that she would accept the Second Amended Petition that included Xiaolei Xu as a Plaintiff.

238. The order also stated that Tolga Ulusemre's motion to deny dismissal consists of a four page brief and 42 pages of exhibits...The exhibits attached to Plaintiff's *Motion to Deny* are mere hearsay, have no evidentiary value and are not relevant to the Court's

analysis under K.S.A. 60-212(b)(6). The documents have no bearing and are irrelevant to the issues of standing, duty or Plaintiff's failure to properly plead his claim, each of which calls for a dismissal."

239. This allegedly hearsay-ridden, shallow motion, actually contained three exhibits: 12 pages-long Second Amended Petition; 5 pages-long email exchanges between the family and Blue Valley officials that clearly show that the family was not allowed for due process, thereby proving Clifford Cohen's negligence; 24 pages-long original instructions given to the jury in 2017, to help them to reach a verdict in a legal malpractice case litigated in Johnson County Courthouse.

240. Overall, Blue Valley's lawyer's (Madison Perry) and Clifford Cohen's lawyers' (Gregory Bentz and Robyn Butler) motions, arguments, and accusations against Tolga Ulusemre in the Cohen case were so nonsensical and brazen that they indicate they knew beforehand that they would obtain favorable rulings from Judge Mason, no matter what the facts and laws were.

241. Overall, Judge Mason took the aforementioned lawyers' side against Plaintiffs in every dispute and gaslighted them about almost every action they took in the proceeding.

242. Overall, Madison Perry, Gregory Bentz, Robyn Butler, Clifford Cohen, and Rhonda Mason all acted as if they have to cover for each other and stand in unity against Plaintiffs, who they treated as fundamentally dissimilar and lesser people.

243. Overall, Kali Kasprzyk's instant, downright and bold objection to a reasonable subpoena and her subsequent dismissive attitude towards Tolga Ulusemre indicate that she received instructions and reassurances from Joann Woltman, whose main concern was to cover up the fact that she was behind the murder list hoax.

244. Overall, Kali Kasprzyk was acting together with Joann Woltman to protect the parent conspirators by covering up the murder list hoax, and knew beforehand that Judge

Mason would back her up and that the subpoena would be quashed.

**COUNT IX: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF  
THEIR RIGHT TO PETITION IN THE COHEN CASE  
(MADISON PERRY, ROBYN BUTLER, GREGORY BENTZ, AND CLIFFORD  
COHEN)**

245. Plaintiffs reallege Paragraphs 1 through 244 as if fully set forth herein.
246. There was a meeting of minds by Rhonda Mason, Madison Perry, Robyn Butler, Gregory Bentz, and Clifford Cohen to deprive Plaintiffs of their right to petition.
247. The aforementioned individuals, motivated by a racial and religious invidious discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from revealing the truth about the murder list hoax, by unlawfully getting all their subpoenas but one quashed.
248. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair jury trial, justice, and closure, and were unable to redress grievances arising from the murder list hoax.
249. As a result, Plaintiffs have suffered extreme emotional distress, have incurred legal expenses as well as private school tuition fees, and will continue to suffer such injuries and losses, as long as they are unable to redress grievances arising from the murder list hoax.

**COUNT X: NEGLIGENCE (SPENCER FANE, LLP AND WALLACE SAUNDERS)**

250. Plaintiffs reallege Paragraphs 1 through 249 as if fully set forth herein.
251. Spencer Fane and Wallace Saunders have the duty to employ lawyers who comply with the ethical code of conduct for lawyers.

252. Spencer Fane and Wallace Saunders breached this duty by failing to monitor and correct Madison Perry's, as well as Robyn Butler's and Gregory Bentz' unethical conduct in the Cohen case, respectively, which included colluding with Judge Rhonda Mason.

253. As a direct and proximate result of Spence Fane's and Wallace Saunderson's failure to monitor and correct their lawyers' unethical conduct, Plaintiffs were denied a fair legal proceeding, justice, and closure, and were unable to redress grievances arising from the murder list hoax.

254. As a result, Plaintiffs have suffered extreme emotional distress, have incurred legal expenses, and will continue to suffer such injuries and losses, as long as they are unable to redress grievances arising from the murder list hoax.

**COUNT XI: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF  
THEIR RIGHT TO PETITION**

**(JOANN WOLTMAN & KALI KASPRZYK)**

255. Plaintiffs reallege Paragraphs 1 through 254 as if fully set forth herein.

256. There was a meeting of minds by Joann Woltman, Rhonda Mason, and Kali Kasprzyk, to deprive Plaintiffs of their right to petition.

257. The aforementioned individuals, motivated by a racial and religious invidious discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from revealing the truth about the murder list hoax, by unlawfully getting all their subpoenas served on Kali Kasprzyk quashed.

258. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair jury trial, justice, and closure, and were unable to redress grievances arising from the murder list hoax.

259. As a result, Plaintiffs have suffered extreme emotional distress, have incurred legal expenses as well as private school tuition fees, and will continue to suffer such injuries and losses, as long as they are unable to redress grievances arising from the murder list hoax.

### **CONSPIRACY INVOLVING KSDE'S ALJ MIKE NORRIS**

260. Plaintiffs filed a third due process complaint with KSDE against Blue Valley on February 28, 2025.

261. Pursuant to K.S.A. 72-3416, Hearing Officers are appointed and paid by school districts.

262. Pursuant to K.S.A. 72-3417, when a due process complaint is filed, the school district produces its list of available Hearing Officers to the complainant, who is given the opportunity to disqualify one or all the Hearing Officers in the list. If Parents disqualify all the Hearing Officers in the list, then the school district requests Kansas State Department of Education (KSDE) to appoint a Hearing Officer.

263. In line with these rules, Blue Valley provided Parents with two Hearing Officers to choose from. One of them was Angela Gupta, who Parents had named as a defendant in another lawsuit against Blue Valley and KSDE. The other Hearing Officer was Larry Rute, the founder of the law firm in which Angela Gupta is a partner. Thus, the former is the current boss and mentor of the latter.

264. When Parents naturally disqualified both Angela Gupta and Larry Rute, Crista Grimwood appointed Mike Norris as the Hearing Officer on March 10, 2025.

265. The Hearing Officer, Mike Norris, is the mentor of Melissa Hillman, Blue Valley's board attorney.

266. Melissa Hillman worked for the law firm Mike Norris founded for 14 years. She

was a partner when she left the firm to work in Blue Valley in 2017. In that sense, Melissa Hillman was “brought up”, and then got inducted into the “Old Boy’s Club” by Mike Norris.

267. Mike Norris himself represents multiple school districts in Kansas, including Olathe, which neighbors Blue Valley and which is known to collaborate with Blue Valley on many issues.

268. Mike Norris’ law firm is located in Johnson County, which is the county that Blue Valley primarily serves. Mike Norris has extensive ties with the real estate lobby, which has vested interests in maintaining the prestige of the school districts in and around Johnson County. That is because prestigious school districts lure families to the region, thereby inflating real estate prices.

269. On March 18, 2025, Mike Norris held the first scheduling tele-conference of the proceeding. During the tele-conference, he kept on saying that he did not understand Tolga Ulusemre’s speech, and asked his wife Xiaolei Xu to respond to questions and to make propositions on behalf of him. Because of that, Tolga Ulusemre could hardly participate in the tele-conference.

270. On March 19, 2025, Plaintiffs filed a motion to disqualify Mike Norris, which he denied.

271. On March 21, 2025, Mike Norris held a second scheduling tele-conference. He started the conference by asking Plaintiffs whether they were recording it and not to record it without his knowledge. After Parents confirmed that they were not recording, Mike Norris went on to deliver a long monologue on statute of limitations and res judicata, trying to convince Plaintiffs that most of their complaint was barred either by statute of limitations or res judicata.

272. Again in this conference, he kept on deterring Tolga Ulusemre from participating

by repeatedly saying that he did not understand Tolga Ulusemre's speech and by asking Xiaolei Xu to speak instead. This prevented Plaintiffs from countering Mike Norris' and Blue Valley's lawyers' arguments, which by then was already mirroring each other, as Xiaolei Xu does not have sufficient knowledge of legal matters, although she knows the material facts as much as Tolga Ulusemre does.

273. Tolga Ulusemre does not remember another time when he had so much difficulty in getting his speech understood by a native English speaker. Mike Norris' persistent attempts to ask Xiaolei Xu, who is stereotypically regarded as a "docile Asian woman", to speak in lieu of Tolga Ulusemre, who is stereotypically regarded as a "belligerent Middle Eastern man", led the two to believe that he either tried to silence Tolga Ulusemre so that he and Blue Valley can dominate the discussions or could not help but display his prejudice against the two's national origins, or both.

274. Mike Norris never specified which claims in Plaintiffs' complaint were subject to statute of limitations, and which claims were subject to res judicata. Similarly, in his decision, he also does not specifically state which claim he dismissed due to statue of limitations and which he claims he dismissed due to res judicata.

275. That is because the violations Plaintiffs seek to adjudicate are ongoing. As for the statute of limitations, Plaintiffs do not make claims for violations that occurred and ceased more than two years ago. Mike Norris' ruling makes it look as if Plaintiffs make claims related to a specific violation that happened at WSE prior to February, 2023. It is crystal clear that Plaintiffs' due process complaint does not include any claims related to a specific incident that occurred at WSE.

276. On March 22, 2025, Plaintiffs informed Mike Norris about their intention to record the tele-conference. On March 24, 2025 Mike Norris, in an email, declined Plaintiffs' request to record the tele-conference.

277. On March 24, 2025, Mike Norris held a third tele-conference, which turned out to be the last conference of the proceeding, as he notified the parties about his decision to dismiss Parents' complaint on March 31, 2025. Again in this conference, he asked Xiaolei Xu to speak in lieu of Tolga Ulusemre as he stated he did not understand the latter. He also told Plaintiffs not to record the tele-conference.

278. It was a relief for Plaintiffs not to have another conference with Mike Norris, as they felt bullied, belittled, gaslighted, and manipulated by him. Their experience with Mike Norris between March 18, 2025 and April 2, 2025 distressed Parents so much that on April 4, 2025, Xiaolei Xu developed health problems that she did not have before in her life.

**COUNT XII: 42 U.S.C. § 1985(3)-CONSPIRACY TO DEPRIVE PLAINTIFFS OF  
THEIR RIGHT TO PETITION IN THE NORRIS HEARING**

**(JOSEPH HATLEY)**

279. Plaintiffs reallege Paragraphs 1 through 278 as if fully set forth herein.

280. There was a meeting of minds by Melissa Hillman, Crista Grimwood, Mike Norris, and Joseph Hatley to deprive Plaintiffs of their right to a fair due process hearing.

281. The aforementioned individuals, motivated by a racial and religious invidious discriminatory animus against Plaintiffs, acted together to sabotage the proceeding and to unlawfully prevent Plaintiffs from prosecuting their due process complaint.

282. As a result of the aforementioned individuals' actions, Plaintiffs were denied a fair hearing. As a result, they could not resolve the issues with their children's school education. As a result, they were forced out of the public school system. As a result, they had to enroll their children in a private school and incur tuition fees.

**COUNT XIII: NEGLIGENCE (SPENCER FANE, LLP)**

283. Plaintiffs reallege Paragraphs 1 through 282 as if fully set forth herein.
284. Spencer Fane has the duty to employ lawyers who comply with the ethical code of conduct for lawyers.
285. Spencer Fane breached this duty by failing to monitor and correct Joseph Hatley's unethical conduct in the previously mentioned due process hearing, which included colluding with the ALJ Mike Norris.
286. As a direct and proximate result of Spencer Fane's failure to monitor and correct Joseph Hatley's unethical conduct, Plaintiffs were denied a fair legal proceeding that would have resolved the issues with their children's education in Blue Valley.
287. As a result, Plaintiffs were forced out of the public school system, had to enroll their children in a private school, have suffered extreme emotional distress, have incurred legal and private school tuition expenses, and will continue to suffer such injuries and losses in the future.

**Exhibits:**

- Exhibit A: Anatomy of the collusion between lawyers and judges.
- Exhibit B: The elitist, favoritist fraternity that rules the legal system.
- Exhibit C: Contempt of court as joint gaslighting by Mike Fleming and Judge Mason.
- Exhibit D: "Lack of relevance" as joint gaslighting by Madison Perry, Clifford Cohen and his lawyers, and Judge Mason.
- Exhibit E: The bullying incidents that led up to the murder list hoax.



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## EXHIBIT

## A

## ANATOMY OF THE COLLUSION BETWEEN LAWYERS AND JUDGES

Case	Judge	Evidence Suppressed	Gaslighting Tool	Gaslighting Ruling	Outcome
KSDE Due Process Complaint	Angela Gupta	The raw data Tish Taylor used to obtain her evaluation results	Tish Taylor's Motion to Show Cause Why Subpoena Should not be Quashed	The raw data are not relevant to the case. Parents are trying to obtain it deviously to use it in another lawsuit.	Subpoena to Tish Taylor was quashed.
KSDE Due Process Complaint	Angela Gupta	Blue Valley's internal email communications regarding Plaintiffs and their two children	Series of orders progressively narrowing down the scope of email search discovery requests; Motion to shift the cost of email search to Plaintiffs	Undue burden relative to the prospective benefit of the internal emails	Blue Valley only produced the internal emails that it wanted to produce.
Baker et al. Case	Rhonda Mason	Parent conspirators' electronic communications about Plaintiffs, their children, and the murder list hoax	Motion to Appear and Show Cause why Plaintiffs should not be Held in Contempt of Court	Pending ANTI-SLAPP Motion to Strike prohibits discovery in <u>any and all</u> cases; the only motion that was ever ruled on was the Motion to Dismiss.	Plaintiffs cannot expose the parent conspiracy at WSE under any circumstances, regardless of the case they pursue and the jurisdiction where they pursue it.
Cohen Case	Rhonda Mason	Blue Valley's investigative findings in the murder list case	Blue Valley's Motion to Quash	D.U.'s innocence is not relevant to Cohen's professional negligence	Plaintiffs cannot obtain any evidence related to the underlying case.
Cohen Case	Rhonda Mason	Deposition of Blue Valley officials who investigated into the murder list allegations	Blue Valley's and Cohen's Motion to Quash	D.U.'s innocence is not relevant to Cohen's professional negligence	Plaintiffs cannot obtain any evidence related to the underlying case.
Cohen Case	Rhonda Mason	Deposition of Blue Valley teachers who taught D.U.	Blue Valley's and Cohen's Motion to Quash	D.U.'s innocence is not relevant to Cohen's professional negligence	Plaintiffs cannot obtain any evidence related to the underlying case.

**EXHIBIT****B**

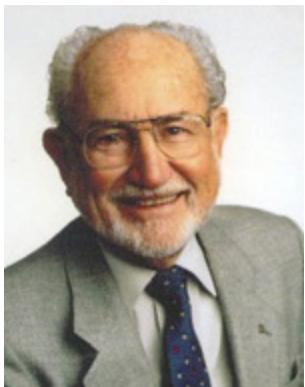
“The once-honorable profession of law now fully functions as a bottom-line business, driven by greed and the pursuit of power and wealth, even shaping the laws of the United States outside the elected Congress and state legislatures.”

-- *Justice John F. Molloy*

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## The Fraternity: Lawyers and Judges in Collusion

JUSTICE JOHN F. MOLLOY



**W**hen I began practicing law in 1946, justice was much simpler. I joined a small Tucson practice at a salary of \$250 a month, excellent compensation for a beginning lawyer. There was no paralegal staff or expensive artwork on the walls.

In those days, the judicial system was straightforward and efficient. Decisions were handed down by judges who applied the law as outlined by the Constitution and state legislatures. Cases went to trial in a month or two, not years. In the courtroom, the focus was on uncovering and determining truth and fact.

I charged clients by what I was able to accomplish for them. The clock did not start ticking the minute they walked through the door.

### Looking back

The legal profession has evolved dramatically during my 87 years. I am a second-generation lawyer from an Irish immigrant family that settled in Yuma. My father, who passed the Bar with a fifth-grade education, ended up arguing a case before the U.S. Supreme Court during his career.

The law changed dramatically during my years in the profession. For example, when I accepted my first appointment as a Pima County judge in 1957, I saw that lawyers expected me to act more as a referee than a judge. The county court I presided over resembled a gladiator arena, with dueling lawyers jockeying for points and one-upping each other with calculated and ingenuous briefs.

That was just the beginning.

By the time I ended my 50-year career as a trial attorney, judge and president of southern Arizona's largest law firm, I no longer had confidence in the legal fraternity I had participated in and, yes, profited from.

I was the ultimate insider, but as I looked back, I felt I had to write a book about serious issues in the legal profession and the implications for clients and society as a whole. *The Fraternity: Lawyers and Judges in Collusion* was 10 years in the making and has become my call to action for legal reform.

## Disturbing evolution

Our Constitution intended that only elected lawmakers be permitted to create law.

Yet judges create their own law in the judicial system based on their own opinions and rulings. It's called case law, and it is churned out daily through the rulings of judges. When a judge hands down a ruling and that ruling survives appeal with the next tier of judges, it then becomes case law, or legal precedent. This now happens so consistently that we've become more subject to the case rulings of judges rather than to laws made by the lawmaking bodies outlined in our Constitution.

This case-law system is a constitutional nightmare because it continuously modifies constitutional intent. For lawyers, however, it creates endless business opportunities. That's because case law is technically complicated and requires a lawyer's expertise to guide and move you through the system. The judicial system may begin with enacted laws, but the variations that result from a judge's application of case law all too often change the ultimate meaning.

## Lawyer domination

When a lawyer puts on a robe and takes the bench, he or she is called a judge. But in reality, when judges look down from the bench they are lawyers looking upon fellow members of their fraternity. In any other area of the free-enterprise system, this would be seen as a conflict of interest.

When a lawyer takes an oath as a judge, it merely enhances the ruling class of lawyers and judges. First of all, in Maricopa and Pima counties, judges are not elected but nominated by committees of lawyers, along with concerned citizens. How can they be expected not to be beholden to those who elevated them to the bench?

When they leave the bench, many return to large and successful law firms that leverage their names and relationships.

## Business of law

The concept of "time" has been converted into enormous revenue for lawyers. The profession has adopted elaborate systems where clients are billed for a lawyer's time in six-minute increments. The paralegal profession is another brainchild of the fraternity, created as an additional tracking and revenue center. High powered firms have departmentalized their services into separate profit centers for probate and trusts, trial, commercial, and so forth.

The once-honorable profession of law now fully functions as a bottom-line business, driven by greed and the pursuit of power and wealth, even shaping the laws of the United States outside the elected Congress and state legislatures.

## Bureaucratic design

Today the skill and gamesmanship of lawyers, not the truth, often determine the outcome of a case. And we lawyers love it. All the tools are there to obscure and confound. The system's process of discovery and the exclusionary rule often work to keep vital information off-limits to jurors and make cases so convoluted and complex that only lawyers and judges understand them.

The net effect has been to increase our need for lawyers, create more work for them, clog the courts and ensure that most cases never go to trial and are, instead, plea-bargained and compromised. All the while the clock is ticking, and the monster is being fed.

The sulling of American law has resulted in a fountain of money for law professionals while the common people, who are increasingly affected by lawyer-driven changes and an expensive, self-serving bureaucracy, are left confused and ill-served.

Today, it is estimated that 70 percent of low-to-middle-income citizens can no longer afford the cost of justice in America. What would our Founding Fathers think?

This devolution of lawmaking by the judiciary has been subtle, taking place incrementally over decades. But today, it's engrained in our legal system, and few even question it. But the result is clear. Individuals can no longer participate in the legal system.

It has become too complex and too expensive, all the while feeding our dependency on lawyers.

By complicating the law, lawyers have achieved the ultimate job security. Gone are the days when American courts functioned to serve justice simply and swiftly.

It is estimated that 95 million legal actions now pass through the courts annually, and the time and expense for a plaintiff or defendant in our legal system can be absolutely overwhelming.

Surely it's time to question what has happened to our justice system and to wonder if it is possible to return to a system that truly does protect us from wrongs.

A lawyer from Tucson, Arizona, John Fitzgerald Molloy (b. 1917) was elected to the Superior Court bench where he served for seven years as both a juvenile court and trial bench judge. He subsequently was elected to the Court of Appeals where he authored over 300 appellate opinions, including the final *Miranda* decision for the Arizona Supreme Court. During that period, he also served as president of the Arizona Judge's Association. After 12 years, Molloy returned to private practice to become president of the largest law firm in southern Arizona. His book has received widespread praise for its candor and disquieting truths. (Photo courtesy of Paragon House)

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From an Internet released preview of the book by John Fitzgerald Molloy, ***The Fraternity: Lawyers and Judges in Collusion***, Paragon House, St. Paul, Minnesota, 2004. Reprinted in accordance with the "fair use" provision of Title 17 U.S.C. § 107 for a non-profit educational purpose.

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JUICE & JUSTICE IN VEGAS

JUDGES HELPING LAWYERS

Close

JUDICIAL PARTISANSHIP

HOW TO BECOME A JUDGE

**— CRITIQUES OF THE JUDICIARY —**

Becoming a Judge, Part 1  
The Greylord Affair  
Revolting Judges  
Buying Judges  
Reggie and Scholarships  
Trips for Judges

Judicial Misconduct  
Jailed for Petitioning  
Curtailing Petition  
The Dream of Justice  
A Call for Reform  
Learning the Ropes

The Finest Judges...  
The Litigation Vortex  
Without Merit...  
The Demise of Justice  
Judicial Practices  
Secret Courts



## EXHIBIT

C

Tolga Ulusemre &lt;tulusemre@gmail.com&gt;

**Proposed orders related to Motion to Dismiss and Motion to Strike**

8 messages

**Tolga Ulusemre** <tulusemre@gmail.com>  
To: "Crist, Stacy, DCA" <Stacy.Crist@jocogov.org>  
Cc: Mike Fleming <mike@kapkewillerth.com>, XL Xu <xiaolei.xu2017@outlook.com>

Sun, Mar 23, 2025 at 6:23 PM

Ms. Crist,

You can find attached the proposed orders we were instructed to prepare in our last hearing.

Regards,  
Tolga Ulusemre

**2 attachments**

**Proposed Order Denying Defendants' Motion to Dismiss.docx**  
27K

**Proposed Order Denying Defendants' Motion to Strike.docx**  
27K

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**Crist, Stacy, DCA** <Stacy.Crist@jocogov.org>  
To: Tolga Ulusemre <tulusemre@gmail.com>  
Cc: Mike Fleming <mike@kapkewillerth.com>, XL Xu <xiaolei.xu2017@outlook.com>

Tue, Mar 25, 2025 at 10:47 AM

Thank you.

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**From:** Tolga Ulusemre <tulusemre@gmail.com>  
**Sent:** Sunday, March 23, 2025 6:24 PM  
**To:** Crist, Stacy, DCA <Stacy.Crist@jocogov.org>  
**Cc:** Mike Fleming <mike@kapkewillerth.com>; XL Xu <xiaolei.xu2017@outlook.com>  
**Subject:** Proposed orders related to Motion to Dismiss and Motion to Strike

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\*\*\* This email originated from outside the organization. Use caution when opening attachments, clicking links, or performing any actions requested in this message. \*\*\*

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[Quoted text hidden]

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**Mike Fleming** <mike@kapkewillerth.com>  
To: "Crist, Stacy, DCA" <Stacy.Crist@jocogov.org>, Tolga Ulusemre <tulusemre@gmail.com>  
Cc: XL Xu <xiaolei.xu2017@outlook.com>

Tue, Mar 25, 2025 at 4:32 PM

Ms. Crist,

Attached hereto are Defendants draft Journal Entry Orders on Defendants Motion to Dismiss and Defendants Motion to Strike Pursuant to K.S.A. 60-5320.

We recently discovered that Mr. Ulusemre recently filed a special action in Johnson County, Kansas (Case No. JO-2025-MV-000099) and had issued subpoenas for Defendant Catherine Singleton and Brittany Jacobson. Attached herewith is a Motion for Plaintiffs to Appear and Show Cause along with an affidavit from me. We would like a hearing date, as soon as possible, on our show cause motion so that we can plug that date into the Order we will have served upon the Plaintiffs.

Your prompt attention to this matter is greatly appreciated.

## Michael J. Fleming

Kapke Willerth | Attorney

**Phone:** 816-461-3800

**Cell:** 913-244-7205

**Email:** [mike@kapkewillerth.com](mailto:mike@kapkewillerth.com)

**Address:** 3304 NE Ralph Powell Road

Lee's Summit, Missouri 64064

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[Quoted text hidden]

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### 6 attachments

 [Journal Entry - Motion to Strike.docx](#)  
24K

 [Journal Entry of Judgment - Motion to Dismiss.docx](#)  
27K

 [Defendants Second Motion for Plaintiffs to Appear and Show Cause.pdf](#)  
78K

 [signed Affidavit Alleging Indirect Contempt of Court MF.pdf](#)  
114K

 [JO-2025-MV-000099 - ORD Subpoena - Clerk Signed - Brittany Jacobson.pdf](#)  
387K

 [JO-2025-MV-000099 - ORD Subpoena - Clerk Signed - Catherine Singleton.pdf](#)  
388K

4/12/25, 4:39 PM

**Tolga Ulusemre** <tulusemre@gmail.com>

To: Mike Fleming &lt;mike@kapkewillerth.com&gt;

Cc: "Crist, Stacy, DCA" &lt;Stacy.Crist@jocogov.org&gt;, XL Xu &lt;xiaolei.xu2017@outlook.com&gt;, "diane.schrader@jocogov.org" &lt;diane.schrader@jocogov.org&gt;

Tue, Mar 25, 2025 at 10:14 PM

Ms. Crist,

We have done nothing wrong and we object to another frivolous hearing. I am cc'ing Ms. Schrader here because Mr. Fleming erroneously contacted her regarding his Motion to Quash. Our explanation regarding the latest developments are as follows:

- We recently filed a due process complaint with the Kansas State Department of Education (KSDE) against Blue Valley.
- The reason for this due process complaint is that Blue Valley denied our right to a free public education, and we seek reimbursement for the private school tuition we have incurred and we will incur in the future.
- This is an administrative hearing, presided over by a Hearing Officer appointed by KSDE.
- This type of administrative hearing gives the Hearing Officer and the parties to contact the court clerk to get subpoenas issued, pursuant to K.S.A. 72-3419(b). Only depositions are not allowed.
- We were advised to use this right by the Hearing Officer, and we were also advised to bring forward the subpoena dates to make them in line with the scheduling order issued by the Hearing Officer.
- In our due process complaint, we basically allege that a group of parents, who are represented by Mr. Fleming, caused a widespread disruption by spreading a hoax threat targeting my son, and Blue Valley appeased these parents by scapegoating our family for the disruption they caused.
- By doing so, Blue Valley "poisoned the well", thereby making it impossible for my son to derive any meaningful education benefit at school, even to survive in the public school system in Johnson County, where we live, or even to enjoy the benefits of social acceptance.
- To support our allegations, we need to show that it was not my son or our family who caused the disruption, but this group of parents spreading the hoax threat who caused the disruption.
- To make our case, we need these parents, who are non-party witnesses in the KSDE hearing, to produce documents and give testimonies regarding the disruption.
- By filing frivolous motions and making baseless accusations, Mr. Fleming is harassing and oppressing us, deterring us from making our case in the KSDE hearing.
- By way of doing so, Mr. Fleming is depriving us of our First Amendment rights, and this is the second time he does that.
- Consequently, we are going to file a Section 1985 lawsuit against Mr. Fleming and his clients in the federal court.
- If this Court holds the hearing Mr. Fleming requested, we will add a Section 1983 claim to that lawsuit.

Regards,

Tolga Ulusemre

[Quoted text hidden]

**Mike Fleming** <mike@kapkewillerth.com>

Wed, Mar 26, 2025 at 7:11 AM

To: Tolga Ulusemre &lt;tulusemre@gmail.com&gt;

Cc: "Crist, Stacy, DCA" &lt;Stacy.Crist@jocogov.org&gt;, XL Xu &lt;xiaolei.xu2017@outlook.com&gt;, "diane.schrader@jocogov.org" &lt;diane.schrader@jocogov.org&gt;

Mr. Crist,

Notwithstanding Mr. Ulusemre's threats, directed at both the Court and the Defendants, we would like to be heard on our motion as soon as is possible.

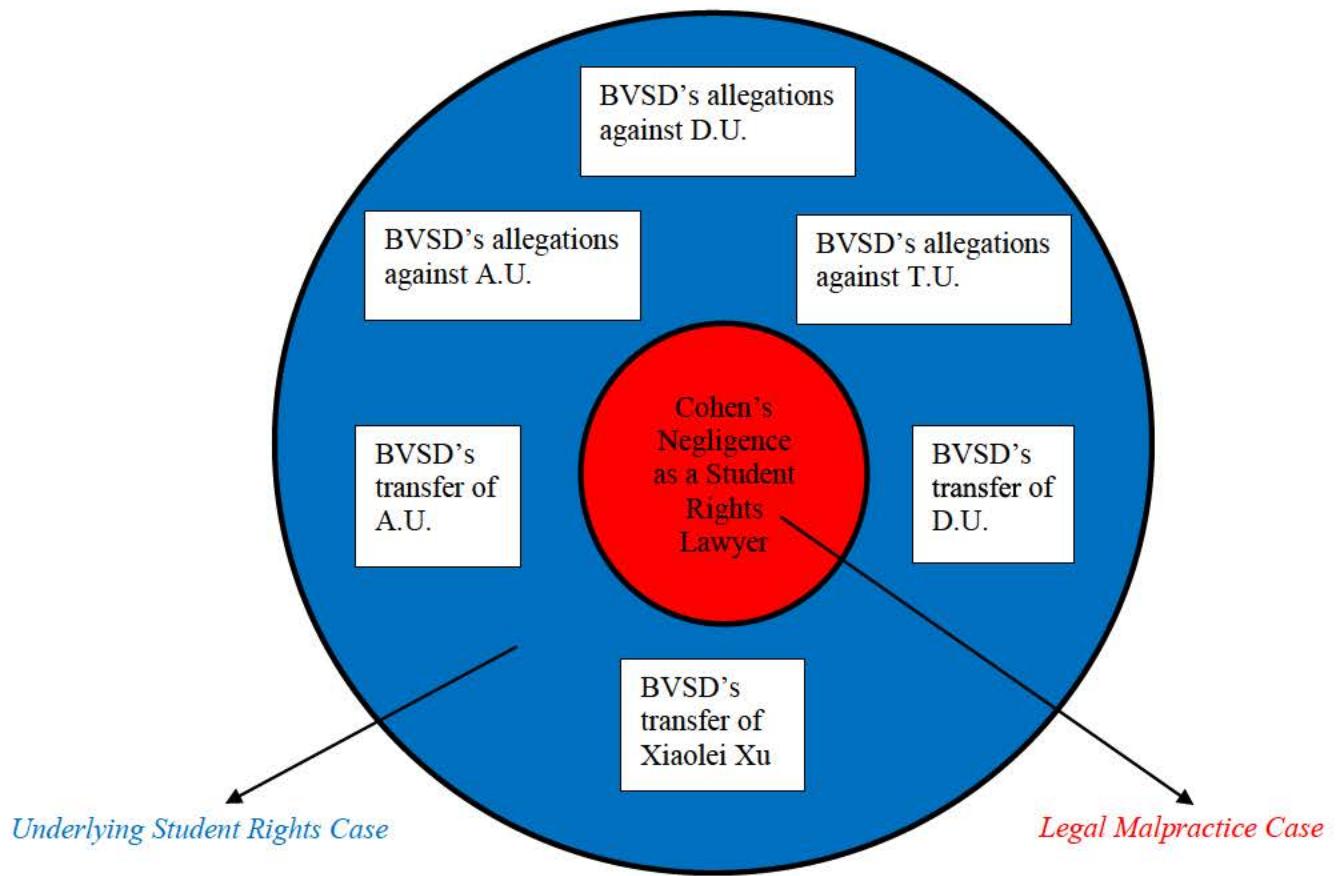
Have a great day.

**Michael J. Fleming**

**EXHIBIT****D**

Cohen does not seek such evidence is that he knows that THERE IS NONE. Therefore, the only way for Defendant Cohen to win this case is by manipulating the Court's power to sabotage Plaintiff's discovery and to whitewash his negligence in defending T.U., A.U., and D.U. from the allegations against them, as well as his failure to defend Xiaolei Xu when there was no allegation against her.

**Figure 1. Plaintiff's Legal Malpractice Claim against Defendant Cohen and the Underlying Student Rights Case**



As a litigant *pro se*, Plaintiff operates like an attorney and the injured party at the same time: he speaks the truth in his motions, in hearings, affidavits, and he will not enjoy any attorney-client privilege when he takes the stand and gets cross-examined. This is in striking contrast to

**Re: Tattle-bullying (teacher-assisted peer bullying) today****From** Tolga Ulusemre <tulusemre@msn.com>**Date** Sat 02/04/2023 13:21**To** Gruber, Meaghan A. <MAGruber@bluevalleyk12.org>; Kellerman, Kristin A. <KAKellerman@bluevalleyk12.org>; Salts, Peggy J. 01 <PSalts01@bluevalleyk12.org>; Cheng, Lily <LCheng02@bluevalleyk12.org>; Northup, Kelly M. <KNorthup@bluevalleyk12.org>**Cc** rainxxl@hotmail.com <rainxxl@hotmail.com>

D [REDACTED]'s mother talked to Mrs. Gruber yesterday, and based on that conversation, we decided to send D [REDACTED] to school on Monday. Frankly, I have my doubts about this, but we will give it a try. If things do not improve, I will keep him at home again.

If D [REDACTED] is treated fairly at school, then you will have done the right thing, he will be well at school, he will like school, he will like his teachers, he will have friends, and he will come back home happy. Then we will be happy, his classmates will be happy, his teachers will be happy, and the school administrators will be happy, and we will leave WSE at the end of the semester in peace and will not look back. If D [REDACTED] is not well at school, everyone will be unhappy, and will remain unhappy for the rest of their lives, no matter which school or state they are in, or whether they are retired or not. I do not know why it is so hard to get this message across every time. History just keeps on repeating itself.

Truth never perishes,

**From:** Gruber, Meaghan A. <MAGruber@bluevalleyk12.org>**Sent:** Friday, February 3, 2023 08:42**To:** Tolga Ulusemre <tulusemre@msn.com>; Kellerman, Kristin A. <KAKellerman@bluevalleyk12.org>; Salts, Peggy J. 01 <PSalts01@bluevalleyk12.org>; Cheng, Lily <LCheng02@bluevalleyk12.org>; Northup, Kelly M. <KNorthup@bluevalleyk12.org>**Cc:** rainxxl@hotmail.com <rainxxl@hotmail.com>**Subject:** Re: Tattle-bullying (teacher-assisted peer bullying) today

Good morning,

Our school psychologist does not have an assessment tool that will provide the information you've requested. It might also be helpful to know that our school psychologist's testing load spans across two elementary schools and consists of students receiving Special Education services rather than General Education students in our building. We can, however, provide social-emotional check-ins for D [REDACTED] throughout his day for the next week. This would help us assess his well-being and allow us to respond appropriately throughout his days.

During the school day, there are many opportunities for D [REDACTED] to bond and form connections with peers: recess, lunch, class activities, etc., all of which are supervised by WSE staff members. With D [REDACTED]'s input, and the agreement of the peers, we could facilitate other opportunities for building connections with classmates.

As you know, it is never the intention of the staff for a student to feel judged, scolded, or shamed. There are instances in classrooms when students need redirection to maintain a safe and productive learning environment.

In those instances, students receive reminders regarding the classroom expectations. Any student, including D█, who needs redirection, will be provided with reminders in a respectful manner. Everyone on this email is aware of your concerns and wants interactions to be positive. It is also important to mention that D█ will be expected to follow the same expectations for safe and expected behaviors in the classroom as all the other students. We will continue to provide positive and supportive feedback to him as he joins back into the classroom. However, if there are times when he is not following the expectations, we will redirect and follow up as we do with all students. As school staff, it is our professional responsibility to follow up on reports from students. However, this does not always mean that there is a consequence.

Classroom teachers continue to work to ensure that all students are safe and welcome in their classroom-- including consistent positive praise for students. It is exciting to hear that he is sharing positive school experiences at home!

We will honor your request that the positive reward chart that had been used for D█ will not continue.

Please recognize that WSE staff is supportive of a safe and welcoming learning environment, but we are not able to force friendships from other students. We can create opportunities for experiences to create ties and bonds and we will focus on this. The genuine relationships that form between students will be fostered, however, if a peer is not interested in engaging with D█ beyond what is expected for positive classroom interactions, it is our responsibility to respect their decision to be provided with that space and work to help him initiate different bonds.

Meaghan

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**From:** Tolga Ulusemre <tulusemre@msn.com>  
**Date:** Thursday, February 2, 2023 at 7:08 PM  
**To:** "Graber, Meaghan A." <MAGraber@bluevalleyk12.org>, "Kellerman, Kristin A." <KAKellerman@bluevalleyk12.org>, "Salts, Peggy J. 01" <PSalts01@bluevalleyk12.org>, "Cheng, Lily" <LCheng02@bluevalleyk12.org>, "Northup, Kelly M." <KNorthup@bluevalleyk12.org>  
**Cc:** "rainxxl@hotmail.com" <rainxxl@hotmail.com>  
**Subject:** Re: Tattle-bullying (teacher-assisted peer bullying) today

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender.

Thank you for making the efforts to support D█ today!

The problem is not really D█'s feelings or mine. D█ is NOT welcome at WSE. D█ was singled out by Cleland and her allies over a long period of time. That is why his peers do not see him as one of them, as their equal anymore, and we told you that this would happen if those teachers were not stopped. D█ is not going back to WSE until you show that you are committed to alleviating his standing among his peers so that he will be their equal, so that he will be one of them. WSE can show its commitment to D█'s well-being by doing the things below:

- The impact of prolonged peer and teacher bullying on D█ is assessed by the school psychologist immediately, i.e., tomorrow or next Monday. D█ will go to school tomorrow if you inform us that the assessment will take place tomorrow.
- D█ has a bonding activity with a peer for at least 15 minutes everyday until the situation is normalized (until he is an equal member of his class). This activity can be supervised by any teacher or staff member that D█ does not disapprove (it does not have to be the counselor)
- Until the situation is normalized (until he is an equal member of his class), D█ will not be punished, told off, shamed, scolded, judged, by any adult at school. He also will not be accused or suspected of any wrongdoing: there will be no investigations on D█.

- Chinese and English teachers have to make an effort to promote D█ so that his status will be equal to his classmates. How they do it is up to the teachers. E.g., they can praise him in front of the whole class for something he does well. Anything the teachers do, D█ will know, his classmates will know, and we will know (he always shares positive things that happen at school with us).

- No chart or any other tool that will single him out and make him look bad will be used on him.

If you accept these requests, you will greatly contribute to the well-being of an innocent, harmless, loving, compassionate 9 year old. Otherwise, I am not sending him to school to be tormented.

**From:** Gruber, Meaghan A. <MAGruber@bluevalleyk12.org>

**Sent:** Thursday, February 2, 2023 15:11

**To:** Tolga Ulusemre <tulusemre@msn.com>; Kellerman, Kristin A. <KAKellerman@bluevalleyk12.org>; Salts, Peggy J. 01 <PSalts01@bluevalleyk12.org>; Cheng, Lily <LCheng02@bluevalleyk12.org>; Northup, Kelly M. <KNorthup@bluevalleyk12.org>

**Cc:** rainxxl@hotmail.com <rainxxl@hotmail.com>

**Subject:** Re: Tattle-bullying (teacher-assisted peer bullying) today

Tolga,

It has been noted that you feel that we continue to have concerns due to an issue that precipitated in October.

I am sorry to hear that D█ is not feeling welcome or heard at school. Teachers are continuing to reinforce positive peer relationships with D█'s class. I was able to visit with his class today to also reinforce the expectations for how we treat one another in order to have a safe learning environment for everyone.

We hope to see D█ back at school tomorrow.

Meaghan

**From:** Tolga Ulusemre <tulusemre@msn.com>

**Date:** Thursday, February 2, 2023 at 8:23 AM

**To:** "Kellerman, Kristin A." <KAKellerman@bluevalleyk12.org>, "Gruber, Meaghan A." <MAGruber@bluevalleyk12.org>, "Salts, Peggy J. 01" <PSalts01@bluevalleyk12.org>, "Cheng, Lily" <LCheng02@bluevalleyk12.org>, "Northup, Kelly M." <KNorthup@bluevalleyk12.org>

**Cc:** "rainxxl@hotmail.com" <rainxxl@hotmail.com>

**Subject:** Re: Tattle-bullying (teacher-assisted peer bullying) today

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender.

Hello,

This is to let you know that D█ is not going to school until we know it is a safe place for him. The bullying and tattle-bullying problem has not been solved because the source of the problem has never been acknowledged. The kids turned against him over time because he was vilified by multiple teachers. In fact, Cleland actively put a lot of effort in vilifying him and casting him out, and her efforts were complemented by multiple teachers.

Back in October, we warned you about this. We said that if you continued to make a bad kid out of him, the kids would turn against him, and he would be ostracized and broken. That was explicitly stated in our

email exchanges back then. That was the worst-case scenario, our nightmare at that time, which has now become a reality.

---

**From:** Tolga Ulusemre

**Sent:** Wednesday, February 1, 2023 22:24

**To:** Kristin Kellerman <KAKellerman@bluevalleyk12.org>; Meaghan Gruber <MAGruber@bluevalleyk12.org>; Salts, Peggy J. 01 <PSalts01@bluevalleyk12.org>; Lei Cheng <LCheng02@bluevalleyk12.org>; Northup, Kelly M. <KNorthup@bluevalleyk12.org>

**Subject:** Tattle-bullying (teacher-assisted peer bullying) today

Hi All,

Today D [REDACTED]'s peers who were sitting at the same lunch table accused him of saying the f word. They told the lunch supervisor about it. D [REDACTED] said he did not say the f word, but the lunch supervisor did not believe in him and told him off.

Further, D [REDACTED] was accused of threatening to murder his classmates today. The kid said to his mother that he said the f word and said that he would murder them.

D [REDACTED] cried when he arrived at home today and repeatedly said that he would not go to school tomorrow.

I am deeply grateful for Dr. Northup's efforts to stop bullying, but unfortunately it only amounts to managing the symptoms of the disease. D [REDACTED]'s reputation has to be restored to treat this tattle-bullying disease once and for all. Tattle-bullying, bullying, and ostracism that D [REDACTED] has had to endure is all because of the teachers who defamed him and turned his peers against him. Those teachers are responsible for ruining D [REDACTED]'s reputation, and hence they are also responsible for restoring it.

I again thank Dr. Northup very much for her efforts, and urge everyone to assist her efforts to stop tattle-bullying,

Tolga

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Blue Valley Schools - Education Beyond Expectations

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Blue Valley Schools Education Beyond Expectations

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