

IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS

Tolga Ulusemre, and Xiaolei Xu,)
Plaintiffs,)

Vs.)

Case No. 50-2026-CV-001192

Carrie Myers, Julia Boge, Angela Tomas,)
Korene Ekstrand, and Eliot Holmes,)
Defendants,)

Proceeding Pursuant to K.S.A. Chapter 60

PETITION FOR DEFAMATION, INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS, AND CIVIL CONSPIRACY

Plaintiffs, serving as litigants pro se, for their cause of action against Defendant, states as follows:

1. Plaintiffs are individuals residing in Johnson County, Kansas.
2. Defendants are officials of the Blue Valley Education Association ("Teachers Association"), a teachers association representing professional employees in the Blue Valley Unified School District 229 ("Blue Valley), which is located in Johnson County, Kansas.
3. Carrie Myers, Julia Boge, Angela Tomas, and Korene Ekstrand comprise the Officer Team of the Teachers Association.
4. Eliot Holmes is an Executive Board Member of the Teachers Association. Eliot Holmes



is the only Association official who works at Wolf Springs Elementary ("WSE").

5. On and around February 10, 2023, Defendants conspired to frame Plaintiffs' children, 8-year-old D.U. and 10-year-old A.U., both of whom were Blue Valley students at the time at WSE, for planning to shoot up the school, and for trying to make bombs, respectively.
6. Defendants also conspired to frame Plaintiffs as hostile and abusive parents who threatened the school staff.
7. By doing so, Defendants aimed to force Plaintiffs not only out of WSE, but also out of the Blue Valley community, by getting their children expelled from school and by exposing the entire family to public hatred.
8. This incident, along with all the relevant events and occurrences, took place in Johnson County, Kansas.

FACTS FOR ALL COUNTS

9. On September 28, 2022, during a parent-teacher conference at WSE, Plaintiffs shared their concerns for the first time, about the way a teacher's aide called Stephanie Cleland, along with some peers who modeled their behavior on her, treated their son D.U. at school.
10. On the following days, D.U. was treated even worse, humiliated, and singled out by Stephanie Cleland, the aide of D.U.'s ELA teacher Kristin Kellerman, for minor or non-existent infractions, as well as for taking frequent restroom breaks, which were caused by a medical condition he was having at the time.

11. D.U. had a very bad day at school on October 6, 2022. The next day, on October 7, 2022, he had a breakdown before going to school. Shortly afterwards, Tolga Ulusemre sent an email to Kristin Kellerman and to the WSE principal, Meaghan Graber, accusing Stephanie Cleland of emotionally abusing D.U.
12. As mandatory reporters, Meaghan Graber and Kristin Kellerman were supposed to report the abuse allegations regarding D.U., but they did not.
13. From then onwards, Kristin Kellerman and Stephanie Cleland conspired with a number of school staff against Plaintiffs and their children, by misrepresenting the former as hostile and abusive parents, and the latter as disruptive students, with the ultimate aim of eliminating the family from the Blue Valley community.
14. For example, in late October 2022, Kristin Kellerman made D.U.'s Halloween writing assignment, which was hanging in the hallway at WSE, out to be a manifestation of D.U.'s thoughts of shooting up the school (see "Exhibit A").
15. Carrie Myers, the President of the Teachers Association, was the mastermind behind this scheme that aimed at forcing the family out of Blue Valley (see Exhibit B).
16. Carrie Myers' and the Teachers Association's support and guidance enabled Kristin Kellerman and Stephanie Cleland to easily recruit conspirators from the WSE staff to implement the scheme. Otherwise, Stephanie Cleland is a simple teacher's aide, whereas Kristin Kellerman had been a stay-at-home mother for several years prior to the 2022-2023 school year, which was her first year in Blue Valley.
17. As a result of this scheme, false rumors about the family became widespread among the WSE staff, including those who had no educational interest in A.U. and D.U., which was a clear violation of student privacy laws.

18. The scheme masterminded by the Teachers Association against Plaintiffs and their children bore fruit on February 10, 2023, when D.U. and A.U. had to leave school before the school day was over, due to the murder list and bomb allegations against them.
19. As explained in detail in an ongoing federal case, *Tolga Ulusemre and Xiaolei Xu v. Tonya Merrigan et al.*, Case No. 5:24-cv-04095-TC-ADM, Plaintiffs' two children A.U. and D.U. were traumatized and their education was disrupted by the murder list and bomb allegations against them, which were instigated by D.U.'s then ELA teacher Kristin Kellerman in February 2023.
20. Specifically, in February 2023, Kristin Kellerman told her sister-in-law Kathleen Baker, who is also a Blue Valley employee in another school, in a family function that A.U. was trying to make bombs and D.U. was going to shoot up the school, and the school did not take these threats seriously.
21. Consequently, Kathleen Baker filed a police report on February 10, 2023, and the ensuing criminal investigation unequivocally revealed that both A.U. and D.U. were completely innocent of the allegations against them.
22. However, Kristin Kellerman also spread the murder list and bomb hoaxes among the school staff and parents, which resulted in a parent mob that put pressure on Blue Valley to expel at least D.U.
23. Moreover, Kristin Kellerman also spread the false allegation that Plaintiffs had been threatening teachers among the WSE staff to turn them against the entire family (see "Exhibit C").
24. Moreover, Kristin Kellerman, along with another WSE teacher, presumably A.U.'s

ELA teacher Lily Bordoni, who actively participated in the scheme against Plaintiffs and their children, also shared her allegations against Plaintiffs with the Superintendent, and asked her to take action against Plaintiffs (see "Exhibit D").

25. In February 2023, Blue Valley had already been sharing the false allegations against Plaintiffs and their children with third parties and turning them against the entire family (see "Exhibit E").

26. As a result of Defendants' allegations against Tolga Ulusemre, Blue Valley' board attorney Melissa Hillman on February 18, 2023, banned him from communicating with WSE staff, and threatened to restrict his access to school altogether if he violated the ban.

27. To appease Defendants and the parent mob it incited through Kristin Kellerman, Blue Valley unilaterally transferred A.U., D.U., to another school called Cedar Hills Elementary (CHE) in late February, 2023. The sudden, unilateral, and involuntary transfer of A.U. and D.U. in the middle of the Spring semester, amidst a series of publicly humiliating announcements made to the entire community, amounted to a de facto expulsion and exposed the entire family to public hatred (see "Exhibit F").

28. At the same time, Xiaolei Xu, who was a teacher's aide in a general education classroom at WSE, was unilaterally transferred to a self-contained classroom in a middle school, which was meant for students with severe disabilities.

29. Moreover, Meaghan Graber made an announcement to the WSE staff, stating that both A.U. and D.U. made death threats, and that their parents consequently requested their transfers to another school.

30. Moreover, before A.U. and D.U. started attending CHE, Amy Farthing, a district

executive, suggested in an email that the parents consider alternative schooling options, namely virtual learning and homeschooling (see Exhibit G).

31. Meanwhile, Defendants felt threatened by and hence started targeting D.U.'s Chinese teacher at WSE, who said that D.U. was innocent of the allegations against him (see "Exhibit H").

32. As a result of Defendants' efforts to silence, sideline, and force out D.U.'s Chinese teacher, Meaghan Graber reported D.U.'s Chinese teacher to the Teachers Association, accusing her of poor classroom management.

33. As a result, D.U.'s Chinese teacher was made to attend a meeting with: Meaghan Graber; a representative from Blue Valley's HR; a representative from the Teachers Association. This meeting took place in March 2023, shortly after A.U. and D.U. were transferred from WSE.

34. After this meeting, D.U.'s Chinese teacher stopped communicating with Xiaolei Xu and stopped making statements about D.U.'s innocence. She also left Blue Valley after the 2022-2023 school year, which was her first year in Blue Valley.

35. Defendants continued to implement their schemes against Plaintiffs in CHE. As a result, Defendants' false allegations against Plaintiffs and their children spread like wildfire in CHE (see "Exhibit I"). These false rumors included "D.U. got expelled for having a murder list", "A.U. got expelled for trying to make bombs", "A.U. and D.U. are disruptive because their parents overprotect them and do not let teachers discipline them", "Tolga Ulusemre threatens the teachers who try to discipline his children".

36. As a result, both A.U. and D.U. were traumatized and mistreated in their new

schools, while their parents were disfavored and shunned by the school staff. Blue Valley, however, refused to help A.U. and D.U. to settle into their new schools.

37. As a result, Plaintiffs' both children developed anxiety, and especially D.U. started having serious school avoidance issues and stopped going to school in March, 2023.

38. Then Plaintiffs bought a house in June 2023, and both A.U. and D.U. started going to their new "home schools" in August, 2023.

39. Defendants continued to implement their scheme against Plaintiffs at D.U.'s new school, Liberty View Elementary (LVE). As a result, Defendants' false allegations against Plaintiffs and their children spread also in LVE (see "Exhibit J").

40. As a result of Defendants' allegations, Melissa Hillman, on August 14, 2023, banned both Plaintiffs from accessing WSE and CHE property and personnel. Melissa Hillman also threatened to take further action, including a complete ban on Blue Valley property and personnel, if Plaintiffs did not comply with her instructions.

41. On August 15, 2023, Plaintiff T.U. went to LVE for the third time to meet with the principal, the school counselor, and D.U.'s home teacher, Suzanne Martin, Elizabeth Newell, and Maury Hernandez, respectively, before school started. The aforementioned LVE personnel treated Tolga Ulusemre differently than they did in the previous two meetings that occurred in the same month: Tolga Ulusemre received a lot of pushbacks from them, who acted as if D.U. was a bad kid and his parents were bad parents.

42. As a result of Defendants' allegations, D.U., who had already been suffering from school avoidance issues, was once again traumatized and mistreated after school

started on August 16, 2023, and stopped going to school after August 21, 2023.

43. Plaintiffs had been officially requesting LVE to extend accommodations to D.U. to help him to settle into his new school. As a result of this request, a meeting was held at LVE on September 1, 2023, at 12:00 pm.

44. Shortly before the meeting, at 11:18 am, LVE's principal Suzanne Martin sent an email to Plaintiffs, saying that Carrie Myers would be attending the meeting.

45. This last-minute email did not ask for Plaintiff's permission or consent to Carrie Myers' presence in the meeting, but merely informed Plaintiffs that Carrie Myers would be in the meeting, whether they liked it or not (see "Exhibit K").

46. Carrie Myers never met Plaintiffs nor their children before, and had no educational interests in Plaintiffs' either child whatsoever. Carrie Myers was not even a teacher at the schools that A.U. and D.U. had attended.

47. Therefore, Carrie Myers' presence in the meeting was completely out of place, and constituted a violation of student privacy laws.

48. Carrie Myers had nothing to contribute to the meeting, and hence never talked. However, she listened to the conversations, most of the time with an unpleasant facial expression, and then walked out of the meeting before it was over, without saying a word.

49. There is no doubt that Blue Valley knew beforehand, and had approved, Carrie Myers' improper participation in the meeting, as the district representative Kristin Asquith also attended the meeting.

50. In retrospect, it is clear to Plaintiffs that Carrie Myers' presence in the meeting was not motivated by professional concerns, but by a desire to complete the unfinished

job of eliminating the family from Blue Valley. Carrie Myers had obviously been tracking Plaintiffs since at least October, 2022, and had been turning Blue Valley employees against them and their children (see "Exhibit B").

51. Although Plaintiffs and the school staff agreed on a plan to help D.U. settle into LVE during the meeting, the plan was never implemented. In retrospect, Plaintiffs have no doubt that Carrie Myers attended the meeting only to sabotage Plaintiffs' efforts to work with the LVE staff to help D.U.'s to thrive at school.

52. Consequently, D.U. faced even a more hostile environment when he returned to school on September 6, 2023. As a result, his school avoidance worsened, and once again he stopped going to school after September 20, 2023.

53. In Fall 2023, Plaintiffs came to believe that Blue Valley's only intention was to misrepresent and isolate D.U., with the ultimate aim of forcing him out. Plaintiffs had no idea at that time that Defendants were the root cause of all their problems in Blue Valley.

54. On January 7, 2024, Tolga Ulusemre sent Defendants an email, reporting the misconduct of their members that resulted in the murder list and bomb hoaxes at WSE in February, 2023. Plaintiffs never heard back from Defendants (see "Exhibit L").

55. Shortly afterwards, on January 19, 2024, Defendants' allegations against Tolga Ulusemre resulted in an official no-trespass ban on him (see "Exhibit M").

56. Defendants' concerted efforts to force Plaintiffs out of Blue Valley eventually bore fruit: Plaintiffs unenrolled D.U. from Blue Valley in February, 2024 and then A.U. in May, 2025.

57. As a result, Plaintiffs had to enroll both D.U. and A.U. in a private school, and have been incurring private school tuition fees since then.

**COUNT I
DEFAMATION**

58. Plaintiffs incorporate by reference the allegations set forth in paragraphs 1 through 57 of this Petition as though fully set forth herein.

59. Defendants have communicated countless Blue Valley officials and employees that Plaintiffs threatened WSE staff.

60. All these communications by Defendants were false, and caused great damage to the reputations of Plaintiffs, thereby denying them all the benefits of social acceptance.

61. Defendants' false communications made Plaintiffs' presence in the Blue Valley community untenable, forcing them to unenroll their children from Blue Valley and to enroll them in private schools at their own expense.

62. Kansas courts have ruled that the statute of limitations for defamation begins to run not on the date of publication, but on the date of discovery, if the person commented on could not possibly access the publication due to its "confidential or inherently secretive nature" [*McKown v. Dun & Bradstreet, Inc.*, 744 F. Supp. 1046 (D. Kan. 1990); *Rickman v. Cone Mills Corp.*, 129 F.R.D. 181, 185 n. 5 (D.Kan.1989)].

63. Only after Blue Valley disclosed some internal emails in response to Tolga Ulusemre's Kansas Open Records (KORA) request in March 2026, Plaintiffs found out that they had an actionable defamation claim against Defendants.

64. Overall, the statute of limitations for the defamation claims stated in this Petition

accrued in March 2026, when Plaintiffs discovered the existence of defamatory statements, thereby making these claims timely.

COUNT II
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

65. Plaintiffs incorporate by reference the allegations set forth in paragraphs 1 through 64 of this Petition as though fully set forth herein.

66. In an attempt to force Plaintiffs out of Blue Valley, Defendants framed threat cases against them and caused them to be punished by Blue Valley. These punishments were in the form of restrictions on Plaintiffs' access to Blue Valley staff and property, including an official no trespass ban on Tolga Ulusemre in January, 2024.

67. Defendants framed threat cases against Plaintiffs' children D.U. and A.U., in an attempt to force Plaintiffs out of Blue Valley. In that sense, Defendants' real target was Plaintiffs, rather than their children, and hence Defendants' conduct was directed at Plaintiffs.

68. Defendants' conduct was extreme and outrageous.

69. Xiaolei Xu was physically present when D.U. was treated like a school shooter at school on February 10, 2023. Specifically, she witnessed D.U.'s seclusion and him being questioned about having a murder list. Moreover, she was told that a school resource officer was waiting outside to question D.U. The fact that her naïve and innocent 8-year-old son was treated as a criminal suspect inflicted extreme and severe mental distress on Xiaolei Xu.

70. Both Plaintiffs had to go through a school investigation and a re-entry meeting that resulted in a forced transfer to another elementary school in the middle of the Spring semester. The entire ordeal, as well as its outcome, which was a de-facto expulsion, inflicted extreme and severe mental distress on both Plaintiffs.

71. As a direct result of Defendants' unlawful actions, Plaintiffs have suffered extreme and severe mental distress, and 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 III CIVIL CONSPIRACY

72. Plaintiffs incorporate by reference the allegations set forth in paragraphs 1 through 71 of this Petition as though fully set forth herein.

73. Defendants conspired to eliminate Plaintiffs from Blue Valley.

74. Towards this aim, Defendants had a meeting of the minds on defaming Plaintiffs and their children, as well as on framing threat cases against them.

75. At least Carrie Myers used the political power of the Teachers Association to gain leverage over Blue Valley officials and staff, so that she could get them to carry out Defendants' conspiracy against Plaintiffs. Her participation in various internal email communications regarding Plaintiffs over the years, without their knowledge, her out of place participation in a meeting that was held to discuss D.U.'s educational needs, the Teachers Association's adversarial actions against D.U.'s Chinese teacher, all prove this.

76. Overall, Defendants conspired to frame Plaintiffs and their children for engaging in disruptive and threatening behavior, and then eliminate the family from Blue Valley by creating a hostile environment, by weaponizing criminal and disciplinary investigations, as well as by weaponizing communication and access restrictions. See (*Taiwo v. Vu*, 249 Kan. 585, 592 (1991)).

77. The widespread rumors about Plaintiffs being horrible parents with horrible children, denied Plaintiff Xiaolei Xu the opportunity to work in the community. As a result, Xiaolei Xu was forced to quit her job in Blue Valley and started working for a school in Missouri in 2023.

78. As a direct result of Defendants' unlawful actions, Plaintiffs have suffered extreme and severe mental distress, and 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.

WHEREFORE, Plaintiffs pray for judgment against Defendants for a fair amount for damages, together with their reasonable attorney fees; and for whatever further relief the Court deems proper.

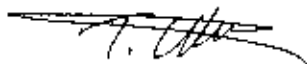
JURY DEMAND

Plaintiffs demand a trial by jury as to all claims so triable.

REQUEST ON THE JUDGE ASSIGNMENT

Plaintiff has publicly accused the following judges of showing bias towards Blue Valley,
Rev. 6/2017 KSJC

and hence requests them not to be assigned to this case: Jennifer Ashford, Rhonda Mason, and Joann Woltman.




Tolga Ulusemre, Plaintiff *pro se*

13982 W 147th St

Olathe, KS 66062

912-481-8074

tulusemre@gmail.com



Xiaolei Xu, Plaintiff *pro se*

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Olathe, KS 66062

912-481-8011

xiaolei.xu2017@outlook.com

Authority

K.S.A. 60-207; 60-208; 60-210; 60-211.



THE DAY A

mummy came to school

When he got to school he found

teacher and turned her into a

potion. He drank it and turned into

mega Mummy! He trashed the entire

school. He turned the school

into a mummy school!

He went to another school

and turned smaller. He

broke every wall and

ate cake! He smashed

his way through to the

caterina. He was mad

there was no cake.

He drank another potion

and he turned the

lunch lady into cake!

He left and found the

copy and skate. They

locked him in jail. He

stayed until his hands

came off. The end.

From: Graber, Meaghan A.
Sent: Tuesday, October 25, 2022 1:06 PM
To: Kellerman, Kristin A.
Subject: Re: Question about Parent Meeting

Hi Kristin,

Thanks for reaching out. I would recommend that we meet with the parents, you, and myself initially. I am confident that we will be able to move forward in a positive direction, however, if it turns, I will not hesitate to end the meeting. In their email, they asked to meet to "resolve differences" and to discuss reading progress, how grades are determined, etc. I anticipate that much of the discussion will be around DU's specific reading goals and growth.

I would be happy to meet with you and Carrie to debrief after the meeting, if you think that would be helpful. Let me know your thoughts.

Thanks!
Meaghan

From: "Kellerman, Kristin A." <KAKellerman@bluevalleyk12.org>
Date: Tuesday, October 25, 2022 at 12:39 PM
To: "Graber, Meaghan A." <MAGraber@bluevalleyk12.org>
Subject: Question about Parent Meeting

Hi Meaghan,

I hope your daughter is doing ok. Carrie Myers is aware of the parent meeting tomorrow and has asked me if she should attend. She said that her role would be to take notes. What are your thoughts on her attending? Since I didn't receive the email from Mr. Ulusemre, I'm not sure what to expect and what would be appropriate.

Thank you,

Kristin Kellerman
3rd Grade Chinese Immersion Teacher
Wolf Springs Elementary
Error! Filename not specified.

From: Graber, Meaghan A.
Sent: Wednesday, November 9, 2022 10:06 AM
To: Kellerman, Kristin A.
Subject: Parent Observation

Hi Kristin,

I have confirmed an observation for D■■■■'s parent on Thursday from 9-9:30am. Tolga let me know that Xiaolei will do the observation, as he will be unavailable.

I sent the following information to the family:

It is important that the guidelines listed below are followed to ensure the least amount of disruption to the educational process during your visit.

- *Individuals observing in a classroom may be accompanied by another staff member.*
- *Individuals observing will not engage in any interaction with the teacher or students in the classroom. Any questions should be addressed to the staff member accompanying the visitor. Any suggestions should be submitted in writing after the observation.*
- *All aspects of the individual student confidentiality must be preserved and respected.*
- *All recording devices are prohibited.*

Let me know if you have any questions or concerns. I'll be joining the parent and am happy to support in other ways, too!

Meaghan



From: Graber, Meaghan A.
Sent: Monday, November 7, 2022 12:20 PM
To: Kellerman, Kristin A.
Subject: Re: hold off on confirming observation

Yes. I'd like to follow up by this afternoon, if possible.
Thanks!
Meaghan

From: "Kellerman, Kristin A." <KAKellerman@bluevalleyk12.org>
Date: Monday, November 7, 2022 at 11:48 AM
To: "Graber, Meaghan A." <MAGraber@bluevalleyk12.org>
Subject: hold off on confirming observation

Hi Meaghan - Can you please hold off on confirming with D [REDACTED]'s parents for a bit? I would like to at least put Carrie in the loop since she has told me to keep her up to date on any contact.

Thank you,

Kristin Kellerman
3rd Grade Chinese Immersion Teacher
Wolf Springs Elementary



From: Kellerman, Kristin A.
Sent: Wednesday, February 8, 2023 2:00 PM
To: Brown, Anne K.; Hafner, Jill R.
Subject: parents picking up children

I know today was a weird circumstance. If that father comes into the building in the future, will you please call me to let me know? Also, I am not comfortable being alone with him ever. He walked from the lunchroom to my classroom alone with D [REDACTED] at the end of lunch. Fortunately, I was already walking up to get my class, so he wasn't in the room with me. However, I don't want him to feel like he can just walk into my room whenever he wants.

Kristin Kellerman
3rd Grade Chinese Immersion Teacher
Wolf Springs Elementary

From: Kellerman, Kristin A.
Sent: Wednesday, February 15, 2023 7:20 PM
To: Merrigan, Tonya M.
Subject: Parent Threats
Attachments: Email Documentation.pdf

Dr. Merrigan,

Good evening. I know my coworker has shared the situation that is going on at WSE with you. I was encouraged to pass along my side of the parent correspondences as well, to help bring together the full picture of what we have been experiencing from this particular family all year.

I know you are very busy and that the situation is being looked into closely. I just wanted to ensure that all relevant documents are available to the district for review.

Thank you for your time,

Kristin Kellerman
3rd Grade Chinese Immersion Teacher
Wolf Springs Elementary

EXHIBIT E

FW: Ulusemre

Clifford Cohen <cac@studentrightslawyers.com>

Mon 02/20/2023 12:46

To: Tolga Ulusemre <tulusemre@msn.com>

Tolga,

Here is the school district's response. I don't think you will know until tomorrow what their actual decision is. Their lawyer called me yesterday to disclose that school officials and faculty feel threatened by the language and tone of your Facebook posts from Friday night. I don't have access to those but she quoted you as posting "I will defend my children and we will all regret it the rest of our lives." It seems they are considering what placement is best for your children and your wife's employment and will not be negotiating with you about their decisions.

I have now spent a little over \$2,000 of time against your deposit of \$1625. I do not litigate in court anymore and so I don't know what additional help I could be in this process but I will be willing to discuss the situation with you tomorrow after you get their decision.

Cliff



Clifford A. Cohen
 Cohen & Duncan Attorneys, LLC
 7015 College Blvd., Ste. 375
 Overland Park, KS 66211
 913.302.0152

From: Hillman, Melissa D. <MHillman@bluevalleyk12.org>

Sent: Monday, February 20, 2023 12:33 PM

To: Clifford Cohen <cac@studentrightslawyers.com>

Subject: Ulusemre

Cliff,

Thank you for your email. I have discussed the family's proposed conditions with the Blue Valley administrative team, and we cannot accept all of the conditions proposed. Below is an itemized response to each condition:

1. The District will send out the announcement it deems appropriate and transparent with our community.
2. The District does not disclose personally identifiable information of any student in this type of communication.
3. As stated above, the District will send communication that it believes is appropriate.
4. The District is revoking the boys' transfer to Wolf Springs. I will be in touch Tuesday morning with additional information regarding their school assignment.

Human Resources will reach out to Ms. Ulusemre tomorrow to discuss her work assignment.

Thank you for your continued assistance with this matter. The School District is focused on ensuring a safe and nondisruptive school and work environment for everyone in our schools. Our priority is moving forward while focusing on the best interests of these boys, and we appreciate your cooperation to assist with these efforts.

EXHIBIT F

Important Message for WSE families**Meaghan Graber <MAGRABER@BLUEVALLEYK12.ORG>**

Sun 02/12/2023 12:38

To: Wolf Springs Elementary Recipients <recipients@bluevalleyk12schools.parentlink.net>

Dear Wolf Springs families,

I am writing to you today to address concerns circulating in our Wolf Springs community. Several families have either called or emailed about what was reported to me on Friday as a "murder list" allegedly created by a student. I'm sharing this message with all families due to the serious nature of this report and wanted to communicate this with all WSE families.

A threat of this nature is concerning and calls for further investigation, which began on Friday. Supporting us through the investigation are officers from the Overland Park Police Department and Blue Valley's Police Department.

As a part of the investigation, I have been talking to 3rd grade students and parents who may have information based on something their child saw or heard. If I have not already spoken with you and you have first-hand information that would be helpful, please email me as soon as possible. Please be patient with my response to emails due to the volume. I hear your concerns and I am reading every email and will follow-up with any parent who has first-hand information that would assist us in the investigation.

As we plan for Monday, we have plans in place to ensure all students are safe while the investigation continues. This will include additional adult support in the impacted classroom and a school resource officer familiar with the school on campus. Any student allegedly responsible for this or related comments of threat will not be allowed at school until the investigation is complete. It is my hope that I will be able to provide an update to families by the end of day Monday.

Please know that the safety and security of our students' physical and emotional health is our number one priority and something we take very seriously. Thank you for your patience and support.

Meaghan

You are receiving this email because of your relationship with Wolf Springs Elementary. If you wish to stop receiving email updates sent through the Blackboard service, please [unsubscribe](#).

Wolf Springs Elementary | 9300 W 178th St, Bucyrus, KS 66013 | 913-624-2400

Important Message for WSE Families 2.13.23**Meaghan Graber <MAGRABER@BLUEVALLEYK12.ORG>**

Mon 02/13/2023 16:41

To: Wolf Springs Elementary Recipients <recipients@bluevalleyk12schools.parentlink.net>

Wolf Springs families,

I wanted to reach out this afternoon with a few updates to yesterday's email from me.

First, it is important that you know we had a good day at Wolf Springs. There were many smiles (and maybe a few yawns) thanks to last night's Super Bowl victory.

As mentioned, one of our school resource officers familiar with WSE joined us today and additional adult support was available in the impacted classroom. Throughout the day, I was able to visit with several families and students who had first-hand information related to the investigation. Thank you to those who reached out to share information with me. I continue to have interviews to conduct that are important to complete before concluding the investigation. Please know that if we were to become aware through investigation that your child's name was included in a threat of violence you would be contacted. The Overland Park Police Department and Blue Valley's Police Department are partnering with us through this process.

We continue to put the highest priority on the safety and security of our students and staff. Please know that the school resource officer will be present during times our school building is open while the investigation continues. And, any student allegedly responsible for threats of harm or related comments will not be allowed at school until the investigation is complete.

I am committed to providing an additional update to families when the investigation has concluded. Thank you for your continued patience and support.

Meaghan

You are receiving this email because of your relationship with Wolf Springs Elementary. If you wish to stop receiving email updates sent through the Blackboard service, please [unsubscribe](#).

Wolf Springs Elementary | 9300 W 178th St, Bucyrus, KS 66013 | 913-624-2400

Important Message for WSE Families

Meaghan Graber <MAGRABER@BLUEVALLEYK12.ORG>

Mon 02/20/2023 13:30

To: Wolf Springs Elementary Recipients <recipients@bluevalleyk12schools.parentlink.net>

Wolf Springs families,

I hope your family has had a wonderful extended weekend and enjoyed the beautiful spring-like weather. I come to you today with an update from last week's emails.

I would like to start by thanking those who came forward to share concerns and first-hand information that was crucial to the investigation. With the support of the Overland Park Police Department and Blue Valley's Police Department, we have concluded our investigation. It has been determined that there was not a criminal threat at Wolf Springs.

Although there is not a criminal threat, the reports we received are concerning and something the school and district take very seriously. Please know we have heard your concerns and have kept the safety of students and staff at the forefront of our planning and response. It is my hope that you can understand and appreciate that I can not share any information related to individual students. What I can share is that school-level consequences are a private matter between the school, the student(s), and the family and any action taken is consistent with the findings of an investigation.

As we prepare to welcome students back Tuesday, a school resource officer will continue to join our WSE family this week as we come together in a learning environment where all students feel safe.

Enjoy the rest of your extended weekend!

Meaghan

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Wolf Springs Elementary | 9300 W 178th St, Bucyrus, KS 66013 | 913 624 2400



On Feb 22, 2023, at 3:25 PM, Farthing, Amy K. <AFarthing@bluevalleyk12.org> wrote:

To the parents of [redacted] and [redacted] U [redacted]

I understand you received previous communication via your attorney regarding the revocation of school transfer to Wolf Springs Elementary School for your children. The boys have been assigned back to their homeschool, Cedar Hills Elementary School. The staff are prepared to meet you and the children to begin a successful transition. The children can start this week or they can wait to attend school starting this Monday, February 27, 2023. You and the boys are welcome to visit Cedar Hills for a tour of the building and an opportunity to meet their teachers and the building administrators before beginning. Kate Burrow, Assistant Principal, will reach out to schedule the tour if the boys are interested. The boys' school supplies and personal items at Wolf Springs have been gathered and will be provided to them at Cedar Hills.

Dr. Eric Punswick, Chief Human Resource Officer, informed me today that the children are happiest at home. If you choose to have the boys learn from home, the district can assist you in enrollment in the Greenbush Virtual option offered by the district. Mr. Adam Wessel or I can assist you in that process. If you choose to provide homeschooling for your children, please notify us of your intent to do so.

In lieu of the parent teacher conferences their former WSE teachers will be providing a summary of their previous work and performance. I will arrange for those items to be available for you at Cedar Hills for pick up.

We truly hope this gives your family an opportunity to make a fresh start and provides a school environment that is both safe and free of disruption for the boys.

Respectfully,
Amy



AMY FARTHING
EXECUTIVE DIRECTOR OF SCHOOL ADMINISTRATION

15020 Metcalf Avenue | Overland Park, KS 66204
afarthing@bluevalleyk12.org

913.239.4082

www.bluevalleyk12.org @bvschoc

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EXHIBIT
H



April 9th, 2023

Lily: You child is innocent!

Xu: I wish we could win! Clear his name! Also you don't need to be affected because of this.

I just want to give you a heads-up. I will keep you updated with progress.

Lily: I wish May 26th summer break is coming soon! I would feel much more relaxed after I quit. You, your husband and the kids all take care!

Xu: All right. Thank you! You, too!

April 10th, 2023

Lily: They (females) were really bad! Through this thing, I clearly see their true colors.

Xu: We cannot believe but in reality so many things had happened. We already filed complaints. If there is any other weird things happen, please let me know!

April 10th, 2023

Xu: Can we meet somewhere? You can decide on the

time and place.

Lily: We will see after the summer break starts. Wish you safe and happy!

Stigma transfer from Wolf Springs to Cedar Hills

Tolga Ulusemre <tulusemre@msn.com>

Wed 03/01/2023 21:50

To: cchace@bluevalleyk12.org <cchace@bluevalleyk12.org>; kburrow@bluevalleyk12.org <kburrow@bluevalleyk12.org>

Cc: rainxxl@hotmail.com <rainxxl@hotmail.com>; Farthing, Amy K. <AFarthing@bluevalleyk12.org>

12 attachments (2 MB)

10_19_2022_email.pdf; D■■■■ Parent-Teacher conference notes.pdf; D■■■■'s log.pdf; D■■■■'s standing deteriorating.pdf; First meeting with the principal.pdf; January Meeting review.pdf; Last week's incident.pdf; Mrs. Graber's Observation of D■■■■ 11_3.pdf; Official complaint.pdf; The infamous incident.pdf; Unofficial complaint.pdf; Unsustainable situation.pdf;

Dear Mr. Chace and Ms. Burrow,

The meeting we had on Monday was reassuring and we felt like we could have a fresh start at Cedar Hills. Both A■■■■ and D■■■■ say that their teachers and classmates have been nice to them in the past two days.

However, it seems impossible to have an entirely fresh start. A staff member from Wolf Springs seems to have spread rumors at Cedar Hills about A■■■■ and D■■■■. Further, yesterday, the librarian asked both A■■■■ and D■■■■, whether they were from Wolf Springs. The music teacher today told A■■■■ that she knew he transferred from Wolf Springs. I understand that the fact that they transferred from Wolf Springs appears in the computer, which their teachers have access to. However, why do they need to bring that up in front of the other kids out of the blue in the past two days?

We told you on Monday about the bullying, rumors, and false accusations by peers that D■■■■ had to endure at Wolf Springs. However, we did not tell you the fact that it all started with his English para, Stephanie Cleland, who emotionally abused D■■■■ from the beginning. As a result, D■■■■ could not settle into his new school like his brother: he did not like school, he did not want to go to school in the morning, he could not make friends, and he was sensitive and depressed when he came back home from school. Also, a small group of kids started to bully him in September. We told about the situation to D■■■■'s teachers during the parent-teacher conference, and hoped Stephanie Cleland's behavior could change. She actually retaliated and started to treat him even worse right after the conference. I felt compelled to intervene and reported Stephanie Cleland's abuse to D■■■■'s English teacher, Kristin Kellerman, and to the principal, Meaghan Graber. Kristin Kellerman was extremely defensive and denied the whole thing, while Meaghan Graber promised that Cleland would back away from D■■■■, although she did not acknowledge the emotional abuse. Cleland did back away from D■■■■ as promised, and D■■■■ started liking school and making friends. He was very happy from that point till around Thanksgiving.

After that, however, Cleland and Kellerman started to vilify D■■■■ and to spread rumors about him. They portrayed him as a disruptive kid and turned a number of teachers against him, including the music teacher, Benjamin Wang, the art teacher, Polly Blair, the counselor, Peggy Salts, the instructional coach, Kelly Northup, and the principal, Meaghan Graber. Up to that point, no teacher, including Kellerman, said that D■■■■ was disruptive or had any behavioral issues or reported anything to us. After I reported Cleland's abuse, however, they started to hold meetings regarding D■■■■'s so-called behavioral issues (i.e. cannot sitting still during the entire class; talking while teacher is talking; needing reminders sometimes), about which they reported nothing to us. In one of those meetings, they decided to use a

behavioral chart on D ■■■, which they never informed us about or asked our permission. We actually heard about the behavioral chart from D ■■■.

As the aforementioned teachers' attitude toward D ■■■ worsened, so did his peers'. As those teachers picked on D ■■■, so did his peers. The kids got encouraged to bully D ■■■ and got rewarded every time they accused D ■■■ of something or reported his mistakes to those teachers. D ■■■ became more and more isolated and started losing his existing friends around Thanksgiving. He eventually became an outcast in December and no one wanted to be associated with him anymore. From December to February, D ■■■ was subject to consistent blaming, spreading rumors, false accusations, and slander. One kid would just make up an accusation against D ■■■ and the rest would just jump on the bandwagon during those days. If it were the Wild West, D ■■■ would have been lynched by his peers at Wolf Springs. The murder list hoax at the end was just the culmination of that pro-longed teacher-led, teacher-assisted peer bullying campaign.

I do understand why Cleland and Kellerman tried to vilify, isolate, and frame D ■■■. They wanted to turn the kids and the teachers against him so that they could shift the blame to him, clear their names, and exact their revenge.

I did post some of the incidents above in a private group on Facebook. Only Wolf Spring parents have access to those posts. If we keep on facing prejudice wherever we go after Wolf Springs, however, I will name names and share the truth with public so that I can clear my kid's name and they will not have to face prejudice and stigma any longer.

We would like counselor to step in so that both A ■■■ and D ■■■ can speed up their transition into their new environment. Also, we would like to have brief weekly meetings with their teachers, Ms. Burrow, Mr. Chace, and the counselor. If Cedar Hills teachers and staff members have any concerns about our children, we would like them to share it with us. We know from experience that there is something wrong if the teachers avoid communicating with us or do not feel comfortable in our presence. We would like to see every week that the teachers have no problem facing us and sharing their concerns about our kids with us. We can have our first meeting on Fridays, Mondays, or Wednesdays. They should take 5-10 minutes, unless teachers have serious concerns to share with us.

Finally, I would like to clarify that Cedar Hills is not responsible for what happened to us at Wolf Springs. We do not wish Cedar Hills to be a part of this. We only wish for a positive experience for our kids and for us at Cedar Hills during the rest of the semester.

Respectfully,
Tolga

From: Merrigan, Tonya M.
Sent: Friday, August 11, 2023 3:40 AM
To: Kellerman, Kristin A.
Cc: Myers, Carrie A.
Subject: Re: Complaint against Kristin Kellerman, Polly Blair, Peggy Salts, Kelly Northup, and Meaghan Graber

Kristin-

I am sorry this parent did this once again. You do not need to respond. We will work on responding to him to make it clear to not contact you as this matter is done and you have no contact with either of his children any longer.

Please try not to let this parent taint your excitement for the new year! Im happy to talk about this more if you have questions and feel free to contact me anytime.

Tonya

Dr. Tonya Merrigan
Blue Valley Superintendent

On Aug 10, 2023, at 9:10 PM, Kelleman, Kristin A. <KAKelleman@bluevalleyk12.org> wrote:

Good Evening Dr. Merrigan,

I'm sorry to forward you these emails on our first day back to school, but I remember you saying that any future contact I received from Tolga Ulusemre should be sent directly to you. I just received this email tonight, along with 2 others that I will also send to you.

I appreciate all of your support through this.

Thank you,

Kristin Kellerman

Begin forwarded message:

From: Tolga Ulusemre <tulusemre@gmail.com>
Date: August 10, 2023 at 8:26:59 PM CDT
To: "Grabber, Meaghan A." <MAGrabber@bluevalleyk12.org>
Cc: "Blair, Polly" <PBlair@bluevalleyk12.org>, "Kellerman, Kristin A." <KAKelleman@bluevalleyk12.org>, "Northup, Kelly M." <KNorthup@bluevalleyk12.org>, "Salts, Peggy J. 01" <PSalts01@bluevalleyk12.org>
Subject: Fwd: Fw: Complaint against Kristin Kellerman, Polly Blair, Peggy Salts, Kelly Northup, and Meaghan Graber

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

From: Tolga Turk <tturk2023@outlook.com>
Sent: Tuesday, May 23, 2023 10:42 PM
To: BOE@bluevalleyk12.org <BOE@bluevalleyk12.org>
Cc: dacarney@bluevalleyk12.org <dacarney@bluevalleyk12.org>;
mnielsen@bluevalleyk12.org <mnielsen@bluevalleyk12.org>;
afarthing@bluevalleyk12.org <afarthing@bluevalleyk12.org>;
kmcollier@bluevalleyk12.org <KMCollier@bluevalleyk12.org>;
klhayden@bluevalleyk12.org <klhayden@bluevalleyk12.org>;
ccchace@bluevalleyk12.org <ccchace@bluevalleyk12.org>;
kaburrow@bluevalleyk12.org <kaburrow@bluevalleyk12.org>; michelle.merritt@ks.gov
<michelle.merritt@ks.gov>; mdombrosky@ksde.org <mdombrosky@ksde.org>
Subject: Re: Complaint against Kristin Kellerman, Polly Blair, Peggy Salts, Kelly Northup, and Meaghan Graber

Dear Members of the Board of Education,

I am writing to you to report the social bullying D■■ U■■ was subject to at Wolf Springs Elementary. Specifically, D■■ was bullied through spreading rumors, isolation, exclusion, humiliation, vilification, and false accusations. Although most of these bullying acts were committed by his classmates, the evidence points Kristin Kellerman, Polly Blair, Meaghan Graber, Peggy Salts, and Kelly Northup as the leaders of the social bullying campaign against D■■ in January and February. The social bullying campaign culminated in a fake murder accusation against D■■ on February 10, which has since traumatized him and stigmatized our family, and ruined our children's future prospects.

The initiator and the original leader of the social bullying campaign against D■■ was Stephanie Cleland, his ELA para. I filed a complaint against her in December 2022 (see the attachment "official complaint"). After my complaint, Cleland was removed from her position at Wolf Springs and did not come back to work in the Spring semester. However, accusing a well-connected, well-liked para of emotional abuse made me enemies. In that regard, the aforementioned teachers and administrators acted as members of a vengeful, girls' high school clique rather than professional educators.

First, Kristin Kellerman, took my accusations against Cleland personally, and she was very protective of Cleland when I first reported Cleland to her in October 2022. From then on, Kellerman and Cleland together tried to vilify and isolate D■■ and our family and turn other teachers against us. Shortly, the music teacher, Benjamin Wang, and the art teacher, Polly Blair, started to pick on and single out D■■. I leave the former out of this complaint because he was an impressionable, brand-new teacher, and the latter was his superior. Also, Benjamin Wang's attitude towards D■■ changed in the Spring semester.

Kristin Kellerman, Stephanie Cleland, and Polly Blair consistently vilified, picked on, and singled out D■■ from October 2022, till the day he was thrown out of



Tolga Ulusemre <tulusemre@gmail.com>

C. Meyers is joining us

2 messages

Martin, Suzie <SDMartin@bluevalleyk12.org>

Fri, Sep 1, 2023 at 11:18 AM

To: Tolga Ulusemre <tulusemre@gmail.com>, XL Xu <xiaolei.xu2017@outlook.com>, xu xiaolei <rainxxl@hotmail.com>

Good morning,

We are ready to meet here at Liberty View a little later this morning. We will be meeting in the Counseling Center. Mrs. Hernandez will be able to join us this morning. In addition, we are having Mrs. Carrie Myers join us. Carrie supports all teachers across the district. Because D [REDACTED] has the opportunity to interact with many teachers, she would like to be a part of the conversation.

I will see you soon!



Suzie Martin

Principal



BLUE VALLEY SCHOOLS
Liberty View Elementary

- 14800 S Greenwood St, Olathe, KS, 66062
- (913) 239-7715
- SDMartin@bluevalleyk12.org

Blue Valley Schools - Education Beyond Expectations

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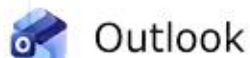
Tolga Ulusemre <tulusemre@gmail.com>

Sat, Apr 25, 2026 at 10:51 AM

To: xu xiaolei <rainxxl@hotmail.com>

Our meeting was at 12 pm.

[Quoted text hidden]



The principal violates the laws regarding false reports and hoaxes and contributes to a child's misconduct

发件人 Guzin Urkmez <gurkmez@yahoo.com>

日期 周日 2024/1/7 13:51

收件人 cmyers@bluevalleyk12.org <cmyers@bluevalleyk12.org>;
kkekstrand@bluevalleyk12.org <kkekstrand@bluevalleyk12.org>;
jboge@bluevalleyk12.org <jboge@bluevalleyk12.org>;
atomas@bluevalleyk12.org <atomas@bluevalleyk12.org>

抄送 ekholmes@bluevalleyk12.org <ekholmes@bluevalleyk12.org>

📎 5 个附件(2 MB)

Artwork.pdf; Email not delivered to Farthing.pdf; Melissa Hillman defames me.pdf; Murder list announcements.pdf; Restrictions on parent participation.pdf;

Sub: The principal violates the laws regarding false reports and hoaxes and contributes to a child's misconduct, at Wolf Springs Elementary School, Overland Park, KS; The Blue Valley School District tries to whitewash the hoax and the principal's actions

Dear BVEA Officers,

Meaghan Graber, the principal of Wolf Springs Elementary, framed my son, D.U., a 3rd grader at her school at the time, for having a murder list on February, 10, 2023. Even though she knew that D.U. posed no threat, she made announcements to the entire school community (including staff and parents) that conveyed the false message that a school shooting was imminent. I believe that she had both personal and political reasons for doing so.

Meaghan Graber contributed to a child's misconduct by encouraging some students to spread false information regarding D.U. having a murder list and threatening to murder other students. All these allegations were made by a classmate of D.U., and there was no physical evidence or adult witness. To the best of our knowledge, the student who made the allegations was H.B. (see the Overland Park Police Department's police report with case no: 2023002771), who is the daughter of a district employee. She had been favored by

Meaghan Graber and her staff over D.U., and as a result had felt encouraged to make false accusations against D.U. She tried to find faults in everything that D.U. said and did because she knew she would be acknowledged and favored by Meaghan Graber and her staff every time she made accusations against D.U.

- On February 1, 2023, D.U. was falsely accused by a student (probably H.B.) of saying the f word and making death threats. The accusations were reported to the lunch supervisor, who told off D.U., even though she did not hear anything and D.U. denied the allegations. D.U. was extremely upset that an adult believed a peer's lies about him and his words carried no weight.
- I reported the incident on the same day by email to the school administrators, namely Meaghan Graber (the principal), Peggy Salts (school counselor), and Kelly Northup (instructional design coach), as well as to D.U.'s primary teachers, namely Cheng Lei (Chinese teacher) and Kristin Kellerman (ELA teacher). No investigation was conducted in response, and no one talked to D.U. about the incident.
- D.U. had a nervous breakdown when he came home from school that day and did not go to school during the next two days.
- Nine days later, on February 10, D.U. was taken to the school counselor's office before lunch and was not allowed to leave. He had to eat his home lunch in the counselor's office. The principal and the counselor asked him about a murder list. He said, in front of his mother, that "What murder list? I do not have a murder list, I do not know anything about a murder list!". He did not even know what a murder list was, and neither did we, as we do not watch the news and we come from abroad, where there are neither school shooters nor murder lists.

That day, the school principal told D.U.'s mom sternly that she would decide on his consequences. She also told her that an SRO was waiting right outside of the school and ready to talk to D.U. Since the principal insisted on questioning D.U. and acted as if he had been found guilty, even though he had firmly denied the allegations many times, D.U.'s mom believed that they were just pressuring D.U. to confess something that he did not know and that he did not do. As a result, D.U.'s mom refused to allow him to be questioned by the SRO. Since she was told that D.U. was not allowed to go back to the educational setting until the investigation was complete, she and D.U. went home at that point, before the school day was over.

- On February 12, 2023, Meaghan Graber sent an email announcement to the entire school community (see "Graber's 1st announcement" attached). The announcement mentioned a "murder list" created by a student; stated that the allegations were reported to her on Friday; stated that an investigation is under way with the assistance of Overland Park and Blue Valley Police Departments.
- The announcement caused a great deal of paranoia and panic in the community. We heard reports of many students expressing their worry about the murder list on the next day, February 13, 2023. We were also told by a number of people, including the SRO from the Overland Park Police Department who conducted the investigation, that many students were absent from school on February 13.
- Meaghan Graber knew that there was no credible evidence against D.U. On February 10, even before talking to D.U, the SRO concluded that there was no credible threat and D.U. could go back to the educational setting. Despite that, she continued the investigation till February 13. She made another announcement on February 13 that reiterated the messages in the first announcement (see "Graber's 2nd announcement" kq). Even though the investigation was complete on February 13, she did not make a concluding announcement until February 20.
- Meaghan Graber also knew that D.U. had been subject to social bullying, especially to false accusations, rumors, and social isolation. We reported countless false accusations against D.U. to her. These accusations and our reports of them occurred almost on a daily basis in January and February, 2023. The murder list allegations were the culmination of that prolonged social bullying.
- On January 18, 2023, D.U.'s brother was accused of playing with a guitar string winder he found on the floor by R.K., one of his two longtime bullies. Although he denied playing with it like a gun, their ELA teacher, Lily Bordoni, favored R.K.'s words over D.U.'s brother's words, as she always did, and sternly told him not to play with it like a gun. Lily Bordoni took the guitar string winder and reported the incident to Meaghan Graber, who kept the guitar string winder as evidence.
- On January 19, 2023, D.U.'s brother was interrogated by Meaghan Graber for one hour, because his other long-time bully, J.V. (the best friend of R.K.), reported that he said to her "I'll bring my gun and kill you!" at lunch. His mother accompanied him during the interrogation,

and said that she could hear his heart pounding. Meaghan Graber did not ask directly whether D.U.'s brother threatened to kill J.V. She instead asked questions such as "Are you frustrated with anyone at school?". It turned out that the only thing D.U.'s brother said to J.V. at lunch was "there is food on the floor". Still, Meaghan Graber said that the case was closed but inconclusive, as D.U.'s brother neither acknowledged nor denied saying "I'll bring my gun and kill you!". However, D.U.'s brother was talking to his friends during the entire lunch, and they were surrounded by a number of students. Therefore, there were witnesses, and it was not a he said, she said situation at all.

- Meaghan Graber and Lily Bordoni both contributed to a child's misconduct in this case by encouraging J.V. and R.K. to spread false information about D.U.'s brother verbally and non-verbally threatening to kill other students. These two students had been consistently encouraged by Meaghan Graber and Lily Bordoni to make false accusations against D.U.'s brother. The two students tried to find faults in everything D.U.'s brother said and did because they knew they would be acknowledged and favored by Meaghan Graber and Lily Bordoni every time they made accusations against D.U.'s brother.

- February 9, 2023, was a snow day. Still, Meaghan Graber called us around 7-8 pm and asked about D.U.'s brother typing the word "bomb" on Wikipedia on the chromebook allocated to him by the school. He had already told us that he went to the bathroom for a few minutes during the class, and when he came back, he was surprised to see the word "bomb" on his screen. Lily Bordoni told him sternly not to search for "bomb" on Wikipedia. Meaghan Graber said on the phone that typing the word bomb online is a serious safety issue and therefore she had to investigate it every time someone did it. Because of this, some middle school students still approach D.U.'s brother and tell him that "I've heard you were making bombs last year".

- Since November 2022, we had reported countless rumors and false accusations against D.U.'s brother made by J.V. and R.K., to both Meaghan Graber and Lily Bordoni. The allegations regarding bombs and school shooting were the culmination of that prolonged social bullying.

- We found out later that Meaghan Graber informed both D.U.'s and D.U.'s brother's teachers at Wolf Springs that the two brothers both made death threats and consequently requested a transfer. This is despite the fact that she previously told us in writing that the case regarding D.U.'s brother making death threats was closed.

The murder list incident has had a dramatic impact on D.U. and his brother: the rumors arising from the murder list incident have prejudiced the Blue Valley community against my family. As a result, both of my children have been bullied and harassed inside and outside school, by students and teachers alike. D.U. could not go to school and became a truant during the entire April, May, October, and November, as well as during parts of August, September, and December. Before the murder list hoax, D.U. has never had truancy/school avoidance issues.

The rest of this letter concerns how the school district dealt with the murder list hoax. Similar to Meaghan Graber, the school district tried to portray D.U. as a threat so that they could whitewash the hoax and justify the way it was dealt with.

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

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

In the meeting, the district bigwigs used a carrot-and-stick approach to persuade us to request for a transfer to any Blue Valley Elementary School without a Chinese Immersion program. The carrot was the prospect of a fresh start in another school, while the stick was suspension and imposition of strict rules on D.U. such as assigning a monitor to him, not allowing him to bring a backpack, frequent

inspections, etc. We did not take their deal, so they basically kicked our children out of the immersion program and used bureaucratic tricks to make it look like they were revoking a transfer that they honored previously (there was no transfer in practice, although most Chinese immersion students have to fill out some transfer paperwork to attend the immersion program).

During that meeting, Dan Carney tried to prove D.U.'s guilt by tying together students' gossips; D.U.'s artwork; D.U.'s motions from a footage, which they made out to be gun gestures (which they never showed to us but only talked about); recent news regarding a 6-year-old student in Virginia shooting his teacher. Then he said something that came down to "where there is smoke there is fire". On a side note, Dan Carney recently placed a gag order on the Blue Valley Officer who investigated the murder list hoax at Wolf Springs to stop him from revealing the truth to me.

After the meeting, I reported the wrongdoings of the aforementioned Wolf Springs teachers to the district administrative team, including the Superintendent, and cc'd the teachers in the email. Melissa Hillman accused me of harassing and threatening the teachers and of disrupting the educational environment at Wolf Springs a great deal, and she instructed me to cease and desist communications with Wolf Springs. She threatened to restrict my access to school altogether otherwise. In short, she tried to criminalize me, like she criminalized my children. I did not threaten anyone, and to this day, she refuses to answer when I ask her what part my of emails constitute harassment and threat (see "Restrictions on parent participation" attached).

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

Our lawyer told me that Melissa Hillman suggested I posted comments on Facebook that made school officials and faculty threatened. He said that she quoted me as posting "I will defend my children and we will all regret it the rest of our lives." (see "Melissa Hillman defames me" attached). This was a downright lie, and looked like it was constructed by combining excerpts from different emails, which gave me the impression that they went through all my emails to

find something they could use against me. Melissa Hillman basically made me look like a potential school shooter too by making such false statements to others.

Melissa Hillman continues to defame to this day, by portraying me as an uncivil, threatening parent who distresses Blue Valley faculty. We see more and more staff members, students, and parents turning against us as a result of this ongoing defamation campaign against us, which makes school an extremely unsafe, hostile environment for our entire family, thereby denying our children their right to education.

Melissa Hillman recently put restrictions on my access to school personnel and property in that regard: I am allowed to neither enter the school property nor communicate with staff members in-person or via email. That effectively blocks my participation in my children's education.

In fact, she already blocked/censored all my emails incoming to Blue Valley between April and August, without informing neither me nor the Blue Valley personnel I was trying to communicate with. That created a lot of confusion, as I was trying to communicate with the staff members in three schools (as both my children were transitioning to other schools at the time), as well as with the district administrators. E.g., I asked one principal to let me view my children's education records, which is my legal right, and did not receive a reply. Then I contacted Amy Farthing to make the same request, and again did not get a reply. Both later said that they did not receive my emails (see "Email not delivered to Farthing" attached).

Similarly, I was not able to complete the school registration in one school in a timely manner because the office personnel did not receive my emails regarding registration, and I had no idea that they were not receiving my emails. All those emails would go to my "sent" folder, and I never received any notification regarding any undelivered email. Therefore, I thought all those people were procrastinating or stonewalling my inquiries and requests. Likewise, those Blue Valley personnel did not receive any responses to the questions and requests they subsequently sent me by email, because my incoming emails were blocked.

February 21, 2023: Melissa Hillman, via our lawyer, informed me that my children can begin attending their "home school", Cedar Hills, on February 23, or they can wait till February 27, if we prefer to start a new school on a Monday. Our lawyer told me that this decision could

not be appealed and that it marked the end of the services he could provide us.

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

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

We were shocked by the way the district handled the whole thing and about the way we were treated, but our attorney always tried to defend and explain the district's actions and tried to convince us to take their offer. According to him, the district did not do a single thing wrong and was merely exercising their rights. He did not even defend me when Melissa Hillman tried to frame me for threatening the Blue Valley teachers with violence with no evidence.

Further, I told him that the school violated FERPA by identifying D.U. in the announcements. He said that they would have violated FERPA only if they had mentioned his name. That is not true: name alone is sufficient but not necessary for identifying a student. The announcements provided a combination of personal information about D.U. that enabled many people in the community to identify him. E.g., the announcement indicated that the accused student was a 3rd grader and was removed from the educational setting on February, 10, and was not allowed to come back. The final announcement stated that the accused student was given a punishment in line with the findings of the investigation, which led everyone to assume that D.U. was found guilty and kicked out of the

school as a result (because he never came back to school afterwards). That is what sparked the ridiculous "expulsion" rumors in the community.

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

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

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

If you think this email includes false statements, I urge you to file a defamation lawsuit, as I am going public with it. In any case, I believe you should investigate the matters and teachers and I report in this

email, namely Meaghan Graber, Lily Bordoni, Kristin Kellerman, and Stephanie Cleland.

I did not include my contact information and name in this email, because Melissa Hillman has blocked/censored the emails that I send to Blue Valley accounts. Otherwise, I do not mean to hide my identity, which is clearly shown in the attachments.

Thank you for your attention this matter,

- Attachments:
 - o Graber's 1st announcement
 - o Graber's 2nd announcement
 - o Graber's 3rd announcement
 - o Artwork
 - o Restrictions on parent participation
 - o Melissa Hillman defames me
 - o Email not delivered to Farthing



EXHIBIT
M

January 19, 2024

~~Tolga Ulusemre~~
13982 W. 147th Street
Olathe, KS 66062

Mr. Ulusemre:

On December 14, 2023, Melissa Hillman, Chief Legal Officer for the Blue Valley School District sent you an email which read in part, "Because your conduct has caused substantial distress for Blue Valley staff, you are no longer permitted to be on the premises of Liberty View Elementary School for any purpose other than to transport D [REDACTED] to and from school."

You acknowledged your receipt of that email by responding to it on December 14, 2023.

On January 4, 2024, Mrs. Suzie Martin, principal, reported that you entered Liberty View Elementary School with lunch for your son and proceeded to the cafeteria. Shortly thereafter, you were contacted by Mrs. Martin, who advised you would need to leave the building.

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 [REDACTED] 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.

Sincerely,

Dan Carney
Director of Safety & Security
Blue Valley School District

Self-Represented Litigant Certification Form

By signing this form, I certify that the attached filing complies with the certification requirements in the Temporary Rule for Filing in a District Court by a Self-Represented Litigant.

I CERTIFY: *(You must complete this section.)*

- I signed the attached filing and provided my name, address, telephone number, email address (if available), and fax number (if available).

I ALSO CERTIFY: *(Only complete one of the next two sections.)*

My document **does not contain prohibited personally identifiable information** ("PII"). I checked my document for PII and made sure that my document meets the requirements of the Temporary Rule. It meets those requirements because:

- my document does not include any of the items listed in [Supreme Court Rule 24\(b\)](#). *(This list is printed on the back of this form for reference.)*
- my document is a Kansas Judicial Council form and I have only provided information that is required on the form.
- the information in my document meets an exception in [Supreme Court Rule 24\(c\)](#). *(This list is printed on the back of this form for reference.)*

OR:

My document **may contain prohibited PII**, but I am asking the court to file it confidentially under seal for the following reason: *(Choose one.)*

- the court entered a prior order on _____ that seals this document.
- the document I am filing now asks the court to issue an order to seal a different document that is not yet filed *(describe the document without using PII)*: _____
- the document I am filing now asks the court to seal a document that is already filed in this case *(describe the document without using PII)*: _____

Date: 05/06/2026

Signature:  Xiaolei Xu

Name of Party: Tolga Ulusemre, Xiaolei Xu

Certification, pursuant to Local Rule 3.7

[Pursuant to Local Rule 3.7, the undersigned hereby certifies that no portion of the Petition titled *Tolga Ulusemre v. Carrie Myers et al.*, was drafted/prepared using Generative A.I.] ^{ef} a],

OR

[Pursuant to Local Rule 3.7, the undersigned hereby certifies that Generative A.I. was used to draft/prepare [Title of Document]. Specifically, [Name of A.I. tool] was used, in whole or in part, to draft/prepare this submission. The undersigned further certifies that he/she has independently verified the accuracy of every citation to the law or to the record and that any language drafted by Generative A.I., including quotations, citations, paraphrased assertions, and/or legal analysis has been included and submitted after considering the requirements of KSA 60-211 and any applicable ethical rules governing attorneys.

Respectfully submitted,

 Xiaoli Xu
