

**VIRGINIA:**

**IN THE CIRCUIT COURT OF LOUDOUN COUNTY**

**CLINT THOMAS; ABBIE PLATT;  
ERIN DUNBAR; AMY JAHR;  
MICHELLE MEGE; KATE  
O'HARRA; ALAINA FORSHEE;  
KATE O'HARRA; ELICIA BRAND;  
MEGAN RAFALSKI; ELIZABETH  
PERRIN; and ANDREW MISSLER,**

**Plaintiffs,**

**v.**

**Civil Case No. \_\_\_\_\_**

**THE LOUDOUN COUNTY PUBLIC  
SCHOOLS,**

Serve: Dr. Scott A. Ziegler  
Superintendent of LCPS  
21000 Education Court  
Ashburn, Virginia 20148;

**DR. SCOTT A. ZIEGLER**, in his  
official capacity as Superintendent of  
the Loudoun County Public Schools and  
in his individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**DR. ASIA R. JONES**, in her official  
capacity as Assistant Superintendent  
for the Department of Student Services  
of the Loudoun County Public Schools  
and in her individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**ASHLEY ELLIS**, in her official  
capacity as Deputy Superintendent for  
the Department of Instruction of the  
Loudoun County Public Schools and  
in her individual capacity,  
21000 Education Court

Ashburn, Virginia 20148;

**DR. DOUGLAS FULTON**, in his official capacity as Director of Administration for the Loudoun County Public Schools and in his individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**CLARK BOWERS**, in his official capacity as Director of Student Services for the Loudoun County Public Schools and in his individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**TINA HOWLE**, in her official capacity as Director of Professional Learning for the Loudoun County Public Schools and in her individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**LOTTIE SPURLOCK**, in her official capacity as Director of Equity for the Loudoun County Public Schools and in her individual capacity,  
21000 Education Court  
Ashburn, Virginia 20148;

**THE LOUDOUN COUNTY  
SCHOOL BOARD,**

Serve: Jeff Morse  
Chair  
21000 Education Court  
Ashburn, Virginia 20148;

Serve: Shari Byrne  
Clerk of the School Board  
21000 Education Court  
Ashburn, Virginia 20148;

**JEFF MORSE**, in his official capacity as Board Member and Chair of the Loudoun County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**IAN SEROTKIN**, in his official capacity as Board Member and Vice Chair of the Loudoun County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**DENISE CORBO**, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**ATOOSA REASER**, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**HARRIS MAHEDAVI**, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**ANDREW HOYLER**, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**JOHN BEATTY**, in his official capacity as Board Member of the Loudoun

County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

**TOM MARSHALL**, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148;

and

**BRENDA SHERIDAN**, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity;  
21000 Education Court  
Ashburn, Virginia 20148,

**Defendants.**

### Complaint

Plaintiffs state as follows:

1. Plaintiffs have a fundamental constitutional right in the nurture, upbringing, companionship, care, and custody of their children. Our constitutional system long ago rejected any notion that Plaintiffs' children are mere creatures of the state. Rather, Plaintiffs' constitutional liberty includes the right to direct the education, moral instruction, and upbringing of their children.

2. Plaintiffs' also have a constitutional right to a free public elementary and secondary education for their children under Art. VIII, § 1, cl. 1 of the Commonwealth's Constitution.

3. This action arises because Defendants have knowingly and intentionally interfered with these rights. As Justice Sonia Sotomayor points, schools exert great coercive power over children, who are “uniquely susceptible” and “particularly vulnerable” because of their emulation of teachers and peer pressure. Defendants have taken advantage of this susceptibility and vulnerability to willfully impose their own social, political, and psychological ideology and agenda to shape and control student attitudes, beliefs, and behavior relating to, *inter alia*, human sexuality, equal rights, and the relationship between a parent and his or her child. *Kennedy v. Bremerton School District*, 142 S. Ct. \_\_\_, \_\_\_ (2022) (Sotomayor, J., dissenting).

4. The Defendants’ policies and practices are intended to force or have the effect of forcing Plaintiffs into choosing between their fundamental right to direct the education, moral instruction, and upbringing of their children, and their right to free public elementary and secondary education.

5. These policies and practices include, but are not limited to:

- a) Requiring schools and teachers to secretly facilitate and support the “transition” of a child to a different gender.
- b) Providing psychological or psychiatric counseling or treatment to children without parental knowledge or consent.
- c) Changing a child’s name and pronoun without parental notice or consent.
- d) Soliciting and obtaining information about student attitudes, habits, traits, opinions, beliefs or feelings regarding sensitive regulated topics

such as sex, religion, race, and familial relationships without either express prior parental consent or a direct relationship to academic instruction.

- e) Intentionally and systematically using “social and emotional learning” and other similar methods and techniques for the purpose of affecting a child’s behavioral, emotional, or attitudinal characteristics related, *inter alia*, to race and gender without prior parental consent or direct relationship to academic instruction.
- f) Intentionally and invidiously using racial “balancing” and quotas to favor some children at the expense of others.
- g) Intentionally failing to provide Plaintiffs with a safe and orderly learning environment for their children.

6. Either the Loudoun County Public Schools District must provide Plaintiffs with a free public elementary and secondary education for their children that complies with applicable constitutional and statutory requirements—one that is consistent with Plaintiffs’ broad legal authority over the care, custody, education, and moral instruction of their minor children and that respects the constitutionally recognized relationship between parent and child—or it must, consistent with its obligations, pay for Plaintiffs to send their children to a school that does so.

### The Parties

7. Plaintiff Clint Thomas is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

8. Plaintiff Abbie Platt is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

9. Plaintiff Erin Dunbar is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

10. Plaintiff Amy Jahr is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

11. Plaintiff Michelle Mege is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

12. Plaintiff Alaina Forshee is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

13. Plaintiff Kate O'Harra is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

14. Plaintiff Elicia Brand is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

15. Plaintiff Megan Rafalski is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

16. Plaintiff Elizabeth Perrin is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

17. Plaintiff Andrew Missler is a resident of Loudoun County in the Commonwealth of Virginia and is a parent with school-aged children attending Loudoun County Public Schools.

18. Defendant Loudoun County Public Schools is a unit of the municipal government.

19. Defendant Loudoun County School Board is the governing body of Defendant Loudoun County Public Schools and is responsible for the policies of the district.

20. Defendant Dr. Scott A. Ziegler is the Superintendent of Loudoun County Public Schools.

21. Defendant Dr. Asia R. Jones is the Assistant Superintendent of the Department of Student Services of Loudoun County Public Schools.

22. Defendant Ashley Ellis is the Deputy Superintendent for the Department of Instruction of Loudoun County Public Schools.

23. Defendant Dr. Douglas Fulton is the Director of Administration for the Loudoun County Public Schools.

24. Defendant Clark Bowers is the Director of Student Services for the Loudoun County Public Schools.

25. Defendant Tina Howle is the Director of Professional Learning for the Loudoun County Public Schools.

26. Defendant Lottie Spurlock is the Director of Equity for the Loudoun County Public Schools.

27. Defendants Jeff Morse, Ian Serotkin, Denise Corbo, Atoosa Reaser, Harris Mahedavi, Andrew Hoyler, John Beatty, Tom Marshall, and Brenda Sheridan are all current, voting Board Members of Loudoun County Public Schools.

### **Jurisdiction and Venue**

28. The subject matter of this complaint took place in Loudoun County, Commonwealth of Virginia. All Plaintiffs are residents of Loudoun County, and all Defendants are employees and agents of Loudoun County Public Schools. Thus, jurisdiction and venue are proper.

## **Background**

### **Virginia Law**

29. Plaintiffs have a fundamental liberty interest in the care, custody, and control of their children, and to direct the upbringing and education of children under their control. *See Wyatt v. McDermott*, 283 Va. 685 (2012).

30. Plaintiffs' rights pursuant to the Constitution of Virginia include the right to direct their children's upbringing, education, and moral instruction—to establish a home, to bring up children, and to control the education of their own. *Willis v. Mullett*, 263 Va. 653, 657 (2002) (“The due process guarantees of Article I; Section 11 of the Constitution of Virginia are virtually the same as those of the United States Constitution.”); *see also, Meyer v. Nebraska*, 262 U.S. 390, 399, 401 (1923); *Prince v. Massachusetts*, 321 U.S. 158 (1944); *Pierce v. Society of Sisters*, 268 U.S. 510, 534-535 (1925).

31. Virginia law expressly recognizes that “[a] parent has a fundamental right to make decisions concerning the upbringing, education, and care of the parent's child.” VA Code § 1-240.1. It requires instruction relating to human sexuality promote parental involvement. VA Code § 22.1-207.1C. It further requires parents receive no less than thirty days prior notification, in writing, regarding the nature, types of questions, purposes, and age appropriateness of any questionnaire or survey requesting students' sexual information, mental health information, medical information, information on health risk behaviors or any other information that the school board deems to be sensitive in nature, as well as the nature and types of

questions included in the questionnaire or survey, the purposes and age-appropriateness of the questionnaire or survey, how information collected by the questionnaire or survey will be used, who will have access to such information, the steps that will be taken to protect student privacy, and whether and how any findings or results will be disclosed. Parents also have the right to review the questionnaire or survey in a manner mutually agreed upon by the school and the parent and exempt their child from participating in the questionnaire or survey. VA Code § 22.1-79.3C. It further requires that education be conducted in an atmosphere free of disruption and threat to persons or property, and supportive of individual rights. VA Code § 22.1-279.3.

32. Parents, not the state, have the right to teach their children about the world and to instill the moral values that they believe will allow them to succeed as adults in society. *See Wyatt v. McDermott*, 283 Va. 685 (2012).

33. The Constitution of Virginia prohibits the Defendants from unlawful discrimination on the basis of religion, race, sex, or national origin. Art. I, § 11, cl. 3.

34. Plaintiffs' have the right to a free public elementary and secondary education for their children. Va. Const. Art. VIII, § 1, cl. 1, VA Code § 22.1-3.

### **Defendants' Malfeasance**

35. The primary role of parents to direct the education and upbringing of their children has been established beyond debate as a constitutionally protected right. No parent can be lawfully forced to choose between this right and a free public elementary or secondary education.

36. Nevertheless, Defendants have knowingly and intentionally implemented policies and engaged in practices to violate Plaintiffs' rights. And, at least with respect to matters relating to sex and race, they affirmatively interfere with the relationship between them and their minor children.

37. Repeatedly—and without parental permission or other legal sanction—Defendants have blurred or erased the line between their proper, limited role of providing academic instruction and teaching reading, writing, math, science, and the arts, and Plaintiffs' constitutional right to provide moral instruction and to teach their children about religion, race, sex, gender identity, and culture.

38. To shape or gain control over the attitudes and views of the children who attend the Loudoun County Public Schools, and to deny Plaintiffs the transparency needed to adequately exercise their rights, Defendants have knowingly and intentionally concealed changes in the curriculum from parents. At every step, they have knowingly and intentionally blocked Plaintiffs from obtaining critical information about the material being taught daily to their children.

39. Defendants disregard for parental rights manifests itself in the way that the school district adopted Policy 8040, and subsequently Regulation 8040, in the fall of 2021. Policy 8040 is attached as Exhibit A. Regulation 8040 is attached as Exhibit B.

40. Loudoun County Public Schools maintains a policy that “[s]taff must support student privacy and safety and not disclose a student’s gender identity or transgender status to other students or other parents.” Exhibit B at 3.

41. As a matter of policy, Defendants willfully and knowingly conceal critical medical and psychological information from Plaintiffs and other parents about their children. “Privacy and confidentiality are critical for transgender students who have families that do not support or affirm their gender identity... If a student is not ready or able to safely share with their family about their gender identity, this should be respected.” Exhibit C at 6.

42. Under Policy and Regulation 8040, Defendants allow children to use bathrooms and locker rooms of their choice, creating unnecessary safety risks for children and emotional stress for Plaintiffs. The Policy and Regulation 8040 have even led to sexual assault in a school bathroom.

43. Defendants’ malfeasance includes, but is not limited to:

- a) Failing to provide a physically safe and secure learning environment;
- b) Failing to maintain a single standard for student discipline to ensure orderly classrooms;
- c) Engaging in racial discrimination and racial balancing with respect to advanced level classes and special academic programs;
- d) Without connection to academic instruction, promoting radical gender ideology through, *inter alia*, classroom activities, teacher and staff training, library books, and other actions, aimed at children beginning in the earliest grades of elementary school, while denying Plaintiffs and other parents prior notification or a meaningful opportunity to opt-out of such lessons and activities;

- e) Without connection to academic instruction, promoting critical race theory in combination and conspiracy with persons including the Equity Collaborative, Inc., classroom activities, teacher and staff training, library books, and other steps, aimed at children beginning in the earliest grades of elementary school while denying Plaintiffs and other parents prior notification and/or a meaningful opportunity to opt-out of such lessons and activities;
- f) Without connection to academic instruction, requiring children to watch video celebrating “drag queens” in homeroom as a part of “Pride Month” while denying Plaintiffs and other parents prior notification and/or a meaningful opportunity to opt-out of such lessons and activities;
- g) Denying children access to student-led Bible study and subjecting them to humiliating and controls and restrictions in retaliation for complying with the Virginia mask executive order;
- h) Providing psychological and psychiatric treatment to children without prior notification to parents or obtaining specific parental consent;
- i) In combination and conspiracy with outside persons, including but not limited to the Equity Collaborative, Inc., creating a hostile environment that, *inter alia*, encourages and rewards children for identifying as a member of an oppressed or minority group in order to receive preferential treatment and that classifies men, adults, white people,

children of a two-parent family, U.S. born, “average or thin”, “able-bodied”, as “privileged” and “oppressors”;

- j) Retaliating against students for their parent’s advocacy at school board meetings and/or political beliefs;
- k) Hiding the ready availability of sexually explicit books in school libraries from parents;
- l) Hiding curriculum materials from parents;
- m) Refusing and/or ignoring parents’ requests to opt children out of socio-emotional learning lessons and surveys;
- n) Administering surveys about the sex life of students as young as 12-years old without notifying Plaintiffs and other parents;
- o) Engaging in a general pattern and practice of conduct, not directly related to academic instruction, that is designed to elicit information about students’ attitudes, habits, traits, opinions, beliefs or feelings regarding matters including, *inter alia*, political affiliations; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom the student has close family relationships; or income, for the purpose of affecting students’ behavioral, emotional, or attitudinal characteristics, without notification to or consent from parents.
- p) Allowing teachers to, and using instructional material designed to, discriminate against and ostracize parents and students based on

political beliefs (for example, calling parents who complain about critical race theory in the schools “conspiracy theorists on Facebook”);

- q) Directing parents who questioned Defendants’ practices to either be silent or leave the public school system;
- r) Creating and amplifying social anxiety among students who are afraid to say “the wrong thing” for fear of being retaliated against, cancelled, or ostracized;
- s) Billing a plaintiff \$36,000 to provide documents looking for communications that contained the terms “sexual assault” or “rape” in a six-month period.

44. With intentional disregard for their legal duties and obligations to Plaintiffs and other parents, Defendants have used and are using taxpayer money to advance a “woke” agenda of racial and gender indoctrination, disconnected from any legitimate academic purpose. In the name of “social justice,” Defendants are knowingly, intentionally, systemically, and unlawfully violating Plaintiffs’ rights, and the rights of all other Loudoun County Public school parents.

45. As a result, multiple plaintiffs have, at different times, taken their children out of LCPS, or plan to in order to prevent further indoctrination and to allow for better learning opportunities for their children.

**COUNT I**  
**For Violation of Constitution of Virginia’s Liberty Interest Protections:  
Parents’ Rights**

46. Plaintiffs repeat paragraphs 1 – 45.

47. Pursuant to the Virginia Constitution, Plaintiffs have a fundamental liberty interest and legal right in the custody, care, and upbringing of their children. This includes the right to direct the education and moral instruction of their children.

48. Defendants have knowingly and intentionally interfered with and violated Plaintiffs' rights.

Plaintiffs ask for relief as requested below.

**COUNT II**  
**For Violation of the Constitution of Virginia's Guarantee of Due Process:  
Racial Discrimination**

49. Plaintiffs repeat paragraphs 1 – 48.

50. The Constitution of Virginia guarantees “the right to be free from any governmental discrimination upon the basis of religious conviction, race, color, sex, or national origin.” Art. I, Sec. 11.

51. The Defendants have implemented selection criteria for advanced level classes, including admission into the Academies of Loudoun, which discriminates against students in violation of this section.

52. The Defendants exclude qualified students from advanced-level courses, including denying admission into the Academies of Loudoun, based upon the race, sex, national origin, and/or religion of the student.

53. At least one plaintiff has a student who was denied admission and at least one plaintiff has a student who is not applying because they do not believe they will be admitted because they are the “wrong race.”

Plaintiffs ask for relief as requested below.

**COUNT III**  
**For Tortious Interference with Parental Rights**

54. Plaintiffs repeat paragraphs 1 – 53.

55. Plaintiffs are parents of children who attend the Loudoun County Public Schools.

56. Plaintiffs at all times relevant had a fundamental right to maintain a parental relationship with their children.

57. Defendants at all times are a party outside of the relationship between the Plaintiffs and their children.

58. Defendants have intentionally interfered with Plaintiffs' parental relationships with their children by adopting policies preventing Plaintiffs from exercising their parental rights.

59. Regulation 8040 prevents teachers from disclosing a student's gender identity to the student's parent. This prevents Plaintiffs from having meaningful conversations with their children and maintaining a parental relationship with their children.

60. Among other things, the Defendants intentionally interfere with parents' ability to seek and provide professional assistance their children may need by hiding from parents that their child is dealing with gender identity issues.

61. The Defendants, by requiring schools and teachers to secretly support the transition of a child to a different gender, by providing psychological or psychiatric counseling or treatment, and by changing a child's name and pronoun without parental notice or consent, directly interfere with the parent/child relationship, the

parents' ability to make health-related decisions for their child, and the parents' fundamental right to make decisions concerning the care, custody, and control of their children.

62. Additionally, Defendants have continuously denied Plaintiffs' the right to view the materials being taught to their children.

63. Defendants' actions directly and proximately caused Plaintiffs' injuries in the form of interference with their parental rights and damages.

64. Thus, Defendants have tortiously interfered with Plaintiffs' parental rights.

Plaintiffs ask for relief as requested below.

**COUNT IV**  
**For Violation of Va. Code § 1-240.1**

65. Plaintiffs repeat paragraphs 1 – 64.

66. Va. Code § 1-240.1 provides that parents have a fundamental right to make decisions concerning their children's upbringing, education, and care.

67. Defendants' actions have prevented Plaintiffs from controlling the decisions concerning their children's upbringing, education, and care by concealing important information from parents.

68. Among other things, Defendants' Policy and Regulation 8040 prevents Plaintiffs from knowing their children's gender identity while they are in school. This prevents Plaintiffs from having the right to control the upbringing of their children.

69. Further, Defendants have concealed curriculum materials from parents, preventing Plaintiffs from knowing the education their children are receiving and from controlling their children's upbringing.

70. Thus, Defendants have violated Va. Code § 1-240.1.

Plaintiffs ask for relief as requested below.

**COUNT V**  
**For Common Law Civil Conspiracy**

71. Plaintiffs repeat paragraphs 1 – 70.

72. Defendants acted in combination and conspiracy with third parties in a concerted effort for the purpose of knowingly, intentionally, and unlawfully interfering with Plaintiffs' constitutional and statutory rights, all as described herein.

73. Defendants' acts in furtherance of this conspiracy include, but are not limited to, Policy and Regulation 8040; an "Action Plan to Combat Systemic Racism"; relaxation of classroom discipline standards; racial quotas in the "Academies of Loudoun"; denying Plaintiffs and other plaintiffs ready and transparent access to teacher training and curriculum materials; and denying Plaintiffs advance knowledge of race and gender indoctrination and/or a meaningful opportunity to opt-out from same; and using "diversity, equity, and inclusion" to change the composition of classroom libraries with a specific focus on indoctrinating students with specific views and attitudes regarding race and sex.

74. Defendants' actions lack any direct or meaningful connection to academic instruction. Rather, they are taken for the express purpose of changing student attitudes, habits, traits, opinions, beliefs, or feelings, and affecting their

behavioral, emotional, or attitudinal characteristics, all knowingly and willfully without Plaintiffs' permission and in violation of Plaintiffs' rights.

75. Plaintiffs have suffered emotional harm and economic damage due to Defendants' violations of their legal rights.

Plaintiffs ask for relief as requested below.

**Count VI**  
**For Declaratory Relief and Request for a Special Master and/or**  
**Commissioner**

76. Plaintiffs repeat paragraphs 1 – 75.

77. Plaintiffs have a liberty interest, protected by the Constitution of Virginia and Virginia statutes, in raising and educating their children.

78. Plaintiffs have a right to free public elementary and secondary education for their children under Art. VIII, § 1, cl. 1 of the Commonwealth's Constitution.

79. Through their actions, Defendants have forced Plaintiffs to choose between two constitutional rights: the right to raise their child and the right to a free public education.

80. Plaintiffs request that this Court appoint a Special Master for the Loudoun County Public School district and/or Commissioner in Chancery, with the authorities deemed necessary and appropriate by this court, to ensure its compliance with applicable constitutional requirements.

**Prayer for Relief**

Plaintiffs request that this Court enter judgment on its behalf and as follows:

- (1) Pursuant to Virginia Code § 8.01-184, a declaration that Defendants have violated and are violating Plaintiffs' Virginia constitutional and other legal rights. This includes, but is not limited to, a declaration that Policy and Regulation 8040, as adopted, is unlawful.
- (2) Enjoin Defendants from depriving Plaintiffs of their Virginia constitutional and legal rights.
- (3) Appoint a Special Master and/or Commissioner in Chancery over the Loudoun County Public School District, to monitor its activities, and to report to the Court regarding its compliance with its legal obligations.
- (4) Declare that until such time as Defendants cease violating Plaintiffs' constitutional rights, Defendants must pay for Plaintiffs' children to obtain a constitutionally compliant education in another school.
- (5) A judgment against Defendants, jointly and severally, in a dollar amount to be proven at trial but not less than \$1,500,000 for Plaintiffs' damages due to Defendants' Virginia constitutional, statutory, and common law violations.
- (6) Pre-judgment and post-judgment interest at the statutory rate of 6 percent per annum assessed against Defendants on the judgment amount entered.
- (7) Plaintiffs' fees and costs for bringing this action.
- (8) Any further relief that this Court deems just and reasonable.

Dated: June 28, 2022

Plaintiffs  
By Counsel

BINNALL LAW GROUP, PLLC



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*Counsel for Plaintiffs*

# **EXHIBIT A**

## RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

Loudoun County Public Schools (LCPS) is committed to providing an equitable, safe and inclusive learning environment for all students. All students shall be treated with dignity and respect, regardless of their sex, sexual orientation, transgender status, or gender identity/expression. LCPS is committed to supporting student privacy and providing equal educational opportunities including access to LCPS programs, activities, and facilities.

Pursuant to the Code of Virginia, [22.1-23.3](#), LCPS endorses policies, procedures, and practices for an inclusive school environment that are consistent with the Virginia Department of Education's publication, [Model Policies for the Treatment of Transgender Students in Public Elementary and Secondary Schools](#) issued by the Virginia Department of Education.

### A. Student Identification - Names and Pronouns.

LCPS staff shall allow gender-expansive or transgender students to use their chosen name and gender pronouns that reflect their consistently asserted gender identity without any substantiating evidence, regardless of the name and gender recorded in the student's permanent educational record. School staff shall, at the request of a student or parent/legal guardian, when using a name or pronoun to address the student, use the name and pronoun that correspond to their consistently asserted gender identity.

The use of gender-neutral pronouns are appropriate. Inadvertent slips in the use of names or pronouns may occur; however, staff or students who intentionally and persistently refuse to respect a student's gender identity by using the wrong name and gender pronoun are in violation of this policy.

### B. Access to Activities.

LCPS [Policy 8350](#), Student Activities, states that interscholastic, co-curricular, and extra-curricular activities are part of the educational program and are subject to school supervision and regulation. All students are expected to display good sportsmanship in competitive activities, whether they are participants or spectators, and they shall conduct themselves in a manner demonstrating respect for persons and property. LCPS staff shall allow gender-expansive and transgender students to participate in such activities in a manner consistent with the student's gender identity.

All students, including transgender and gender-expansive students, participating in programs sponsored by the Virginia High School League (VHSL) or other interscholastic organization shall comply with policies and rules outlined by those organizations.

## RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

C. Access to Facilities.

All students are entitled to have access to restrooms and locker rooms that are sanitary, safe, and adequate, so that they can comfortably and fully engage in their school programs and activities. Students should be allowed to use the facility that corresponds to their consistently asserted gender identity. While some transgender students will want that access, others may want alternatives that afford more privacy. Taking into account existing school facilities, administrators should take steps to designate gender-inclusive or single-user restrooms commensurate with the size of the school.

LCPS shall modernize school restrooms and locker rooms to improve student privacy and to promote the creation of single-user restrooms that are available to all students in a ratio appropriate for the enrollment and size of the school. LCPS shall form an advisory group to make recommendations on improvements to ensure privacy, modesty, and safety for all students in these spaces. New schools shall be designed and constructed in a manner consistent with this policy. All renovation projects should be completed within five years.

D. Professional Development and Training. All LCPS staff shall complete training on topics relating to LGBTQ+ students, including procedures for preventing and responding to bullying, harassment and discrimination based on gender identity/expression.

E. Other Considerations. The Superintendent is authorized to develop implementing regulations and school procedures to ensure consistency in practices.

Adopted: 8/11/21

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Leg Refs: Code of Virginia §[22.1-23.3](#), [8.01-217](#), [32.1-269\(E\)](#)

Cross Refs: [Policy 8250](#), Bullying Prevention and Education; [Policy 8210](#), Introduction to Student Discipline; [Policy 8-6](#), Sex Discrimination and/or Sexual Harassment (Policy 8030 when adopted); [Policy 8610](#), Student Records; [Policy 8640](#), Disclosure of Personally Identifiable Information; [Policy 8270](#), Student Dress Code; [Policy 8350](#), Student Activities; [Policy 8250](#), Bullying Prevention and Education; [Policy 1040](#), Equal Opportunity for Equitable, Safe and Inclusive Environment; [Policy 7560](#), Professional Conduct

**EXHIBIT B**

RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

The purpose of this regulation is to establish procedures for LCPS employees in their efforts to support transgender and gender-expansive students as required by School Board [Policy 8040](#), the Code of Virginia [22.1-23.3](#), and other applicable federal and state laws. All LCPS employees shall treat all students with respect and dignity. In accepting employment with LCPS, staff members agree to abide by and uphold LCPS policies and procedures, as well as federal and state laws. Staff members are responsible for taking prompt and effective steps to prevent and respond to reports of discrimination and harassment of any kind in accordance with LCPS policy.

A. Definitions. Transgender and nonbinary students may use different terms to describe their lives and gender experiences. While terminology and language differ and evolve based on region, language, race or ethnicity, age, culture, and other factors, for purposes of this document, the following terms are used:

1. **Cisgender**: An adjective describing a person whose gender identity corresponds with the gender society typically associates with the sex they were assigned at birth.

2. **Gender**: A set of social, psychological, and emotional traits that classify an individual as typically masculine or feminine, although the social construct of gender may be more diverse across a continuum rather than as a binary system.

3. **Gender-expansive/gender-diverse/gender-fluid/gender nonbinary/agender**: Terms that convey a wider, more inclusive range of gender identity and/or expression than typically associated with the social construct of a binary (two discrete and opposite categories of male and female) gender system.

4. **Gender Expression**: The manner in which a person represents or expresses their gender identity or role to others, often through appearance, clothing, hairstyles, behavior, activities, voice, or mannerisms. Gender expression may change over time and from day-to-day and is not necessarily related to the person's gender identity.

5. **Gender Identity**: A person's internal sense of their own identity as a boy/man, girl/woman, another gender, no gender, or outside the male/female binary. Gender identity is an innate part of a person's identity and can be the same or different from the sex they were assigned at birth.

6. **Gender Nonconformity**: A person who does not conform to gender stereotypes. Their gender expression differs from society's expectations associated with the sex assigned at birth. Being gender nonconforming is distinct from being transgender, though some transgender people may consider themselves to be gender nonconforming.

RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

7. Gender Transition: The process of shifting toward living according to their gender identity, rather than the sex assigned at birth. Transitions can be at different levels, including social transition, such as new names, pronouns, appearance, and clothing. Some people may undergo medical transitions, such as hormone therapy or surgery.

8. LGBTQ+: An acronym for “lesbian, gay, bisexual, transgender, queer/questioning, and others.”

9. Nonbinary: a term used to refer to people whose gender identity is not exclusively male or female, including those who identify with a different gender, a combination of genders, or no gender. Nonbinary may be considered a subset of transgender or a distinct identity. Other similar terms may include genderqueer, gender fluid, agender, or Two-Spirit (for Native American Indian, Alaska Native, First Nation, or Indigenous communities).

10. Sex Assignment: A label, generally “male” or “female,” that is typically assigned at birth on the basis of a cluster of physical and anatomical features. Intersex refers to someone whose combination of chromosomes, gonads, hormones, internal sex organs, and genitals differs from the two expected patterns of male or female.

11. Transgender: A self-identifying term that describes a person whose gender identity is different from their sex assigned at birth. A transgender girl is a girl who was presumed to be male when she was born, and a transgender boy is a boy who was presumed to be female when he was born. Note that there is a wide range of gender identities in addition to transgender male and transgender female, such as nonbinary. A transgender student is a student who consistently and sincerely asserts a gender identity different from the gender associated with the student’s sex assigned at birth.

B. Student Identification - Names and Pronouns. Transgender and gender-expansive students have the right to affirming learning environments. School staff shall, at the request of a student or parent/legal guardian, use a student’s chosen name and gender pronouns. However, in the situation when a parent/legal guardian of a minor student does not agree with a student’s request to use their chosen name and gender pronouns that reflect their consistently asserted gender identity, staff will discuss and may develop an alternative that respects both the student and the parent/legal guardian. This process will require consideration of solutions to address the student’s emotional needs to be affirmed at school as well as the goal of assisting the family in developing solutions in their student’s best interest.

RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

C. Student Privacy and Confidentiality. Staff shall follow and adhere to legal standards of confidentiality relating to information about a student's gender identity, transgender status, legal name, or sex assigned at birth. Staff must support student privacy and safety and not disclose a student's gender identity or transgender status to other students or other parents. A student's gender identity or transgender status should not be shared without the student's consent, even internally among school personnel except to those with a legitimate educational interest or need to know.

To ensure consistency, staff will update student classroom records (class rosters for substitutes, etc.) with the student's consistently asserted chosen name and, where applicable, appropriate gender marker.

D. Non-Binary Gender Marker. The Virginia Department of Education has established a third gender code of "Non-Binary" for students. Parents/legal guardians, or students 18 years or older, may complete the Gender Marker Change Request form to request an update from their current gender marker ("female" or "male") to "Non-Binary." The link to the "Non-Binary" Gender Marker Change Request Form is located online on the LCPS webpage. Once the form is completed, LCPS will review and update the gender marker request accordingly. Questions can be directed to the Supervisor for Student Assistance Services within the Department of Student Services.

E. School Records. School staff shall adhere to legal standards of confidentiality to protect the student's privacy, and to prevent accidental disclosure of the student's transgender status.

1. Permanent educational records shall be maintained in accordance with [Policy 8610](#), Student Records. The educational record includes the student's legal name and sex assigned at birth. LCPS staff may be required to report the student's legal name and sex assigned at birth in some situations. In situations where school staff is required to use or to report a transgender student's legal name or sex assigned at birth, such as for purposes of standardized testing or data reporting to the Virginia Department of Education, school staff shall adhere to legal standards of confidentiality to avoid the inadvertent disclosure of such information.

LCPS shall change a student's name and gender designation upon verification or submission of a legal document such as a birth certificate, state or federal issued identification, passport, or court order. Records of former students may also be re-issued with the submission of legal documents substantiating the amended name and gender.

2. Classroom records shall, upon the request of the student or parent/legal guardian, use the name and gender marker/gender consistent with the student's consistently asserted gender identity.

RIGHTS OF TRANSGENDER AND GENDER-EXPANSIVE STUDENTS

F. Access to Activities. Transgender and gender-expansive students have the right to equitable access to school sponsored events, after-school programs, and overnight field trips and shall be permitted to participate in accordance with the student's consistently asserted gender identity. Staff shall not require the student to stay in a single-occupancy accommodation when such accommodation is not required of other students participating in the same event. Students may be assigned to a room related to their consistently asserted gender identity. Any student uncomfortable sharing a sleeping area, shower, restroom, or any sex-segregated facility, shall, upon request, be provided with a designated safe, non-stigmatizing alternative.

Student participation in Virginia High School League (VHSL) sponsored programs is governed by current VHSL policies. Gender-expansive and transgender students shall participate in VHSL sponsored activities in accordance with these policies.

G. Access to Facilities. When schools have available gender-inclusive or single-user restrooms or private changing areas, these restrooms or areas should be accessible to all students without special codes or keys.

The Code of Virginia [22.1-6.1](#) requires that menstrual supplies be available at no cost to students in accessible locations in each elementary school, and in the bathrooms at the middle and high school. Such supplies should be available in gender-inclusive bathrooms.

If there is a request for increased privacy, the student should communicate with their school administrator or counselor and will be offered access to a reasonable accommodation such as a separate changing schedule, use of a nearby private restroom or clinic/health office.

Issued: 9/13/21

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Leg Ref: Code of Virginia [22.1-23.3](#)

**EXHIBIT C**

# **Loudoun County Public Schools**

## **Policy 8040 Rights of Transgender and Gender-Expansive Students**

**Department for Student Services  
Training Module for LCPS Employees  
Developed August 2021**

## Why was Policy 8040 adopted?

- ✓ LCPS is committed to providing an equitable, safe and inclusive learning environment for all students.
- ✓ All students shall be treated with dignity and respect, regardless of their sex, sexual orientation, transgender status, or gender identity/expression.
- ✓ Adherence to Virginia and U.S. laws
- ✓ Adherence to the Virginia Department of Education (VDOE) model policies

# Cross Referenced LCPS Policies

- ✓ Policy 1040 Equal Opportunity for Equitable, Safe and Inclusive Environment
- ✓ Policy 7560 Professional Conduct
- ✓ Policy 8-6 Sex Discrimination and/or Sexual Harassment
- ✓ Policy 8210 Introduction to Student Discipline
- ✓ Policy 8250 Bullying Prevention and Education
- ✓ Policy 8270 Student Dress Code
- ✓ LCPS Policy 8350 Student Activities
- ✓ Policy 8610 Student Records
- ✓ Policy 8640 Disclosure of Personally Identifiable Information

## What topics are included in Policy 8040?

Student Names and Pronouns

Access to Activities

Access to Facilities

Professional Development and  
Training

“When teachers are accepting of you, it means the world to you. You know that things will be OK and that they are there for you.”

*11<sup>th</sup> Grade Student, North Carolina*



*Supportive educators save students' lives. Just one visibly supportive educator in a school can help LGBTQ students feel safer and more seen.*

Source: GLSEN  
(Gay, Lesbian & Straight Education Network)

# Confidential and Supportive Approaches

- ✓ Privacy and confidentiality are critical for transgender students who have families that do not support or affirm their gender identity. Disclosing a student's gender identity can pose imminent safety risks, such as losing family support or housing.
- ✓ The school administrator and unified mental health team member(s) will need to consider the health and safety of the student in situations where students may not want their parents to know about their gender identity, and schools should address this on a case-by-case basis.
- ✓ If a student is not ready or able to safely share with their family about their gender identity, this should be respected. School staff should work with students to help them share the information with their family when they are ready to do so.
- ✓ School staff should provide information and referral to resources to support the student in coping with the lack of support at home, provide information and resources to families about transgender issues, seek opportunities to foster a better relationship between the student and their family, and provide close follow-ups with the family and student.

# Student Names and Pronouns

*Gender identity may or may not align with a student's assigned gender at birth, and it may also be non-binary. The use of gender-neutral pronouns is appropriate.*

- ✓ LCPS staff shall allow gender-expansive or transgender students to use their chosen name and gender pronouns that reflect their consistently asserted gender identity without any substantiating evidence, regardless of the name and gender recorded in the student's permanent educational record. (Class rosters, substitute plans, etc.)
- ✓ "Consistently asserted" involves more than a casual declaration of gender identity, but it does not necessarily require any substantiating evidence nor any required minimum duration of expressed gender identity.

*Research has shown that "chosen name used in more contexts was associated with lower depression, suicidal ideation, and suicidal behavior" (Russell, Pollitt, Li, & Grossman, 2018)*

# Student Names and Pronouns

*"Pronouns are basically how we identify ourselves apart from our name. It's how someone refers to you in conversation, and when you're speaking to people, it's a really simple way to affirm their identity."*

- Mary Emily O'Hara, GLAAD

- ✓ Inadvertent slips in the use of names or pronouns may occur; however, staff or students who intentionally and persistently refuse to respect a student's gender identity by using the wrong name and gender pronoun are in violation Policy 8040.
- ✓ A student's gender identity or transgender status should not be shared even internally among school personnel except to those with a legitimate educational interest (staff providing direct support to the student).
- ✓ Examples of gender pronouns include and are not limited to include she/her/hers, he/him/his, and they/them/theirs (neutral).

# Access to Activities

**EVERYONE** is a VIRGINIA LEARNER!



VIRGINIA DEPARTMENT  F EDUCATION

*VHSL and other interscholastic organizations sponsored programs have policies/rules that must be followed by participating students.*

✓ Staff shall allow gender expansive and transgender students to participate in activities in a manner consistent with the student's gender identity.

✓ Staff should make efforts to utilize inclusive approaches and reduce or eliminate gender-based practices to the extent possible (gender-based school dances, boys vs girls class activities, etc.) .

✓ Staff shall support any student with access to a reasonable accommodation should there be a request for increased privacy.

# Access to Facilities

*All students are entitled to have access to restrooms and locker rooms that are sanitary, safe, and adequate, so that they can comfortably and fully engage in their school programs and activities.*

- ✓ Students will be allowed to use the facility that corresponds to their consistently asserted gender identity. However, some may prefer alternatives that afford more privacy.
- ✓ Gender-neutral restrooms and reasonable accommodations for increased privacy are available to all students. Staff will work with students to support each student based on the student's individual needs.
- ✓ When a student or parent/guardian informs the school about the student's transgender or gender-expansive status, a school-based support team meeting should be offered for the purpose of developing a plan to accommodate the student's needs.
- ✓ Administrators will address conduct violations using the Student Code of Conduct should students who do not identify as transgender or gender-expansive try to access a restroom that does not reflect their gender simply to test school limits or as a prank.

# Professional Development and Training

- ✓ As required by Policy 8040, all LCPS staff will complete training on topics relating to LGBTQ+ students, including procedures for preventing and responding to bullying, harassment and discrimination based on gender identity/expression.
- ✓ By completing this training module, you have been informed of employee expectations related to Policy 8040 requirements and of available resources to support students.
- ✓ The Department of Student Services and school-based unified mental health team members are available to answer questions and provide information regarding available resources to support families and students.
- ✓ Additional training will be provided to employees as related to the employee's position (job) responsibilities and the required levels of interaction with students .

# Additional Resources

- ✓ [Policy 8040 Rights of Transgender and Gender-Expansive Students](#)
- ✓ [Policy 8040 Frequently Asked Questions](#)
- ✓ [Model Policies for the Treatment of Transgender Students in Public Elementary and Secondary Schools](#)
- ✓ [Virginia Department of Education \(VDOE\) Gender Diversity Webpage](#)
- ✓ [Code of Virginia: 22.1-23.3. Treatment of transgender students; policies](#)
- ✓ Kognito *Step In, Speak Up!* course can be accessed in Schoology (Access Code: CVXV-T6Q7-SV6H4)

# Policy 8040 Rights of Transgender and Gender-Expansive Students

**Training Module Completed**  
**Please click this link to document your completion.**

COVER SHEET FOR FILING CIVIL ACTIONS  
COMMONWEALTH OF VIRGINIA

Case No. \_\_\_\_\_  
(CLERK'S OFFICE USE ONLY)

Loudoun County

Circuit Court

CLINT THOMAS, and

v./In re:

LOUDOUN COUNTY PUBLIC SCHOOLS, AND

PLAINTIFF(S)

DEFENDANT(S)

SEE ATTACHMENT

SEE ATTACHMENT

I, the undersigned  plaintiff  defendant  attorney for  plaintiff  defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

Subsequent Actions

- Claim Impleading Third Party Defendant
  - Monetary Damages
  - No Monetary Damages
- Counterclaim
  - Monetary Damages
  - No Monetary Damages
- Cross Claim
- Interpleader
- Reinstatement (other than divorce or driving privileges)
- Removal of Case to Federal Court

Business & Contract

- Attachment
- Confessed Judgment
- Contract Action
- Contract Specific Performance
- Detinue
- Garnishment

Property

- Annexation
- Condemnation
- Ejectment
- Encumber/Sell Real Estate
- Enforce Vendor's Lien
- Escheatment
- Establish Boundaries
- Landlord/Tenant
  - Unlawful Detainer
- Mechanics Lien
- Partition
- Quiet Title
- Termination of Mineral Rights

Tort

- Asbestos Litigation
- Compromise Settlement
- Intentional Tort
- Medical Malpractice
- Motor Vehicle Tort
- Product Liability
- Wrongful Death
- Other General Tort Liability

ADMINISTRATIVE LAW

- Appeal/Judicial Review of Decision of (select one)
  - ABC Board
  - Board of Zoning
  - Compensation Board
  - DMV License Suspension
  - Employee Grievance Decision
  - Employment Commission
  - Local Government
  - Marine Resources Commission
  - School Board
  - Voter Registration
  - Other Administrative Appeal

DOMESTIC/FAMILY

- Adoption
  - Adoption - Foreign
- Adult Protection
- Annulment
  - Annulment - Counterclaim/Responsive Pleading
- Child Abuse and Neglect - Unfounded Complaint
- Civil Contempt
- Divorce (select one)
  - Complaint - Contested\*
  - Complaint - Uncontested\*
  - Counterclaim/Responsive Pleading
  - Reinstatement - Custody/Visitation/Support/Equitable Distribution
- Separate Maintenance
  - Separate Maintenance Counterclaim

WRITS

- Certiorari
- Habeas Corpus
- Mandamus
- Prohibition
- Quo Warranto

PROBATE/WILLS AND TRUSTS

- Accounting
- Aid and Guidance
- Appointment (select one)
  - Guardian/Conservator
  - Standby Guardian/Conservator
  - Custodian/Successor Custodian (UTMA)
- Trust (select one)
  - Impress/Declare/Create
  - Reformation
- Will (select one)
  - Construe
  - Contested

MISCELLANEOUS

- Amend Death Certificate
- Appointment (select one)
  - Church Trustee
  - Conservator of Peace
  - Marriage Celebrant
- Approval of Transfer of Structured Settlement
- Bond Forfeiture Appeal
- Declaratory Judgment
- Declare Death
- Driving Privileges (select one)
  - Reinstatement pursuant to § 46.2-427
  - Restoration - Habitual Offender or 3<sup>rd</sup> Offense
- Expungement
- Firearms Rights - Restoration
- Forfeiture of Property or Money
- Freedom of Information
- Injunction
- Interdiction
- Interrogatory
- Judgment Lien-Bill to Enforce
- Law Enforcement/Public Official Petition
- Name Change
- Referendum Elections
- Sever Order
- Taxes (select one)
  - Correct Erroneous State/Local
  - Delinquent
- Vehicle Confiscation
- Voting Rights - Restoration
- Other (please specify)

Damages in the amount of \$ 1,500,000 are claimed.

6/28/2022

DATE

Jesse R. Binnall

PRINT NAME

Binnall Law Group, PLLC, 717 King St., Suite 200

ADDRESS/TELEPHONE NUMBER OF SIGNATOR

Alexandria, Virginia 22314; (703) 888-1943

jesse@binnall.com

EMAIL ADDRESS OF SIGNATOR (OPTIONAL)

PLAINTIFF

DEFENDANT

ATTORNEY FOR

PLAINTIFF

DEFENDANT

\*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

**Civil Action Type Codes  
(Clerk's Office Use Only)**

Accounting .....	ACCT	Encumber/Sell Real Estate .....	RE
Adoption .....	ADOP	Enforce Vendor's Lien .....	VEND
Adoption – Foreign .....	FORA	Escheatment .....	ESC
Adult Protection .....	PROT	Establish Boundaries .....	ESTB
Aid and Guidance .....	AID	Expungement .....	XPUN
Amend Death Certificate .....	ADC	Forfeiture of Property or Money .....	FORF
Annexation .....	ANEX	Freedom of Information .....	FOI
Annulment .....	ANUL	Garnishment .....	GARN
Annulment – Counterclaim/Responsive Pleading..	ACRP	Injunction .....	INJ
Appeal/Judicial Review		Intentional Tort .....	ITOR
ABC Board .....	ABC	Interdiction .....	INTD
Board of Zoning .....	ZONE	Interpleader .....	INTP
Compensation Board .....	ACOM	Interrogatory .....	INTR
DMV License Suspension .....	JR	Judgment Lien – Bill to Enforce .....	LIEN
Employment Commission .....	EMP	Landlord/Tenant .....	LT
Employment Grievance Decision .....	GRV	Law Enforcement/Public Official Petition .....	LEP
Local Government .....	GOVT	Mechanics Lien .....	MECH
Marine Resources .....	MAR	Medical Malpractice .....	MED
School Board .....	JR	Motor Vehicle Tort .....	MV
Voter Registration .....	AVOT	Name Change .....	NC
Other Administrative Appeal .....	AAPL	Other General Tort Liability .....	GTOR
Appointment		Partition .....	PART
Conservator of Peace .....	COP	Permit, Unconstitutional Grant/Denial by Locality LUC	
Church Trustee .....	AOCT	Petition – (Miscellaneous) .....	PET
Custodian/Successor Custodian (UTMA) .....	UTMA	Product Liability .....	PROD
Guardian/Conservator .....	APPT	Quiet Title .....	QT
Marriage Celebrant .....	ROMC	Referendum Elections .....	ELEC
Standby Guardian/Conservator .....	STND	Reinstatement (Other than divorce or driving	
Approval of Transfer of Structured Settlement .....	SS	privileges) .....	REIN
Asbestos Litigation .....	AL	Removal of Case to Federal Court .....	REM
Attachment .....	ATT	Restore Firearms Rights – Felony .....	RFRF
Bond Forfeiture Appeal .....	BFA	Restore Firearms Rights – Review .....	RFRR
Child Abuse and Neglect – Unfounded Complaint ..	CAN	Separate Maintenance .....	SEP
Civil Contempt .....	CCON	Separate Maintenance – Counterclaim/Responsive	
Claim Impleading Third Party Defendant –		Pleading .....	SCRP
Monetary Damages/No Monetary Damages .....	CTP	Sever Order .....	SEVR
Complaint – (Miscellaneous) .....	COM	Sex Change .....	COS
Compromise Settlement .....	COMP	Taxes	
Condemnation .....	COND	Correct Erroneous State/Local .....	CTAX
Confessed Judgment .....	CJ	Delinquent .....	DTAX
Contract Action .....	CNTR	Termination of Mineral Rights .....	MIN
Contract Specific Performance .....	PERF	Trust – Impress/Declare/Create .....	TRST
Counterclaim – Monetary Damages/No Monetary		Trust – Reformation .....	REFT
Damages .....	CC	Uniform Foreign Country Money Judgments .....	RFCJ
Cross Claim .....	CROS	Unlawful Detainer .....	UD
Declaratory Judgment .....	DECL	Vehicle Confiscation .....	VEH
Declare Death .....	DDTH	Violation – Election Law .....	VEL
Detinue .....	DET	Voting Rights – Restoration .....	VOTE
Divorce		Will Construction .....	CNST
Complaint – Contested/Uncontested .....	DIV	Will Contested .....	WILL
Counterclaim/Responsive Pleading .....	DCRP	Writs	
Reinstatement – Custody/Visitation/Support/		Certiorari .....	WC
Equitable Distribution .....	CVS	Habeas Corpus .....	WHC
Driving Privileges		Mandamus .....	WM
Reinstatement pursuant to § 46.2-427 .....	DRIV	Prohibition .....	WP
Restoration – 3 <sup>rd</sup> Offense .....	REST	Quo Warranto .....	WQW
Ejectment .....	EJET	Wrongful Death .....	WD

**ATTACHMENT**

**Plaintiffs:**

CLINT THOMAS;

ABBIE PLATT;

ERIN DUNBAR;

AMY JAHR;

MICHELLE MEGE;

ALAINA FORSHEE;

KATE O'HARRA;

ELICIA BRAND;

MEGAN RAFALSKI;

ELIZABETH PERRIN; and

ANDREW MISSLER.

**Defendants:**

LOUDOUN COUNTY PUBLIC SCHOOLS;

DR. SCOTT A. ZIEGLER, in his official capacity as Superintendent of Loudoun County Public Schools and in his individual capacity;

DR. ASIA R. JONES, in her official capacity as Assistant Superintendent of the Department of Student Services of Loudoun County Public Schools and in her individual capacity;

ASHLEY ELLIS, in her official capacity as Deputy Superintendent for the Department of Instruction of Loudoun County Public Schools and in her individual capacity;

DR. DOUGLAS FULTON, in his official capacity as Director of Administration for the Loudoun County Public Schools and in his individual capacity;

CLARK BOWERS, in his official capacity as Director of Student Services for the Loudoun County Public Schools and in his individual capacity;

TINA HOWLE, in her official capacity as Director of Professional Learning for the Loudoun County Public Schools and in her individual capacity;

LOTTIE SPURLOCK, in her official capacity as Director of Equity for the Loudoun County Public Schools and in her individual capacity;

THE LOUDOUN COUNTY SCHOOL BOARD;

JEFF MORSE, in his official capacity as Board Member and Chair of the Loudoun County School Board and in his individual capacity;

IAN SEROTKIN, in his official capacity as Board Member and Vice Chair of the Loudoun County School Board and in his individual capacity;

DENISE CORBO, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity;

ATOOSA REASER, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity;

HARRIS MAHEDAVI, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;

ANDREW HOYLER, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;

JOHN BEATTY, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;

TOM MARSHALL, in his official capacity as Board Member of the Loudoun County School Board and in his individual capacity;

and

BRENDA SHERIDAN, in her official capacity as Board Member of the Loudoun County School Board and in her individual capacity.