

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

SANDRA GLOWACKI, on behalf of her minor children, **D.K.G.** and **D.C.G.**,

Plaintiffs,

v.

**HOWELL PUBLIC SCHOOL DISTRICT,
JOHNSON (“JAY”) MCDOWELL**, individually and in his official capacity as a teacher in the Howell Public School District,

Defendants.

COMPLAINT

[Civil Rights Action under 42
U.S.C. § 1983]

THOMAS MORE LAW CENTER
Robert J. Muise, Esq. (P62849)
Erin Chau, Esq. (P70886)
24 Frank Lloyd Wright Drive
P.O. Box 393
Ann Arbor, MI 48106
rmuise@thomasmore.org
(734) 827-2001

Plaintiff Sandra Glowacki, on behalf of her minor children, Plaintiffs D.K.G. and D.C.G., by and through their undersigned counsel, together bring this civil rights Complaint against the above-named Defendants, their employees, agents, and successors in office, and in support thereof allege the following upon information and belief:

INTRODUCTION

1. This case seeks to protect and vindicate fundamental constitutional rights. It is a civil rights action brought under the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983, challenging Defendants’ acts, policies, practices, customs, and/or procedures, which deprived Plaintiff D.K.G. of his right to freedom of speech and the equal protection of the law by discriminating against him because of his religious viewpoint on

the issue of homosexuality. These acts, policies, practices, customs, and/or procedures also infringe the constitutional rights of other students in the school district, including Plaintiff D.C.G., by chilling the exercise of their right to freedom of speech.

2. As set forth in this Complaint, the policies, practices, customs, and/or procedures of Defendant Howell Public School District (hereinafter referred to as “School District”) and its failure to adequately train and supervise its employees, including Defendant McDowell, were each a moving force behind the constitutional violations in this case.

3. Plaintiffs seek a declaration that Defendants violated Plaintiffs’ clearly established constitutional rights; a declaration that the training, supervision, policies, practices, customs, and/or procedures of the School District as set forth in this Complaint violate the United States Constitution; an injunction enjoining the unconstitutional application of the School District’s policies, practices, customs, and/or procedures as set forth in this Complaint; and a judgment awarding nominal damages for the past loss of Plaintiff D.K.G.’s constitutional rights. Plaintiffs also seek an award of their reasonable costs of litigation, including attorneys’ fees and costs, pursuant to 42 U.S.C. § 1988 and other applicable law.

JURISDICTION AND VENUE

4. This action arises under the Constitution and laws of the United States. Jurisdiction is conferred on this court pursuant to 28 U.S.C. §§ 1331 and 1343.

5. Plaintiffs’ claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, and by the general legal and equitable powers of this court. Plaintiffs’ claims for damages are authorized under 42 U.S.C. § 1983 and by the general legal and equitable powers of this court.

6. Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the

events or omissions giving rise to Plaintiffs' claims occurred in this district.

PLAINTIFFS

7. Plaintiff Sandra Glowacki is an adult resident of the State of Michigan. She is the mother and legal guardian of Plaintiffs D.K.G. and D.C.G., her minor children. Plaintiff Glowacki is a Catholic, and she raises her children in the Catholic faith. She brings this action on behalf of Plaintiffs D.K.G. and D.C.G. as their next friend.

8. Plaintiff D.K.G. is a minor. At all relevant times, he was a student at Howell High School, which is a school within the School District. Plaintiff D.K.G. is currently a senior at Howell High School. Plaintiff D.K.G. is a Catholic.

9. Plaintiff D.C.G. is a minor. At all relevant times, he was a student at Howell High School, which is a school within the School District. Plaintiff D.C.G. is currently a sophomore at Howell High School. Plaintiff D.C.G. is a Catholic.

DEFENDANTS

10. The School District is a public entity established and organized under, and pursuant to, the laws of the State of Michigan with the authority to sue and be sued in its own name. Howell High School is a school operated by and located within the School District.

11. The School District and its officials are responsible for creating, adopting, approving, ratifying, and enforcing the policies, practices, customs and/or procedures of the district, including the unconstitutional policies, practices, customs, and/or procedures set forth in this Complaint.

12. The School District and its officials are responsible for the training and supervision of its teachers, including the training and supervision of Defendant McDowell. The

School District's failure to adequately train and supervise its employees, including Defendant McDowell, was a moving force behind the constitutional violations set forth in this Complaint.

13. The School District and the Michigan Education Association ("MEA"), which is a subsidiary of the National Education Association ("NEA"), along with the Howell Education Association ("HEA"), which is a chapter of the MEA, have forged a symbiotic relationship and have worked and operated together and in cooperation with one another to adopt, authorize, and/or approve policies, practices, customs, and/or procedures which promote homosexuality as acceptable behavior and as an acceptable lifestyle.

14. Similarly, the School District, the NEA, the MEA, and the HEA have forged a symbiotic relationship and have worked and operated together and in cooperation with one another to adopt, authorize, and/or approve policies, practices, customs, and/or procedures which disapprove of and prohibit religious opposition to homosexuality.

15. The NEA, the MEA, and the HEA have adopted a policy position that seeks to eradicate religious opposition to homosexuality from the public schools. The NEA, the MEA, and the HEA consider religious opposition to homosexuality to be the equivalent of bullying, hate speech, and homophobia. The School District, which is heavily influenced by and has created a symbiotic relationship with the NEA, the MEA, and the HEA, accepts, promotes, and endorses this policy position in its public schools.

16. Defendant Johnson ("Jay") McDowell was at all relevant times a teacher at Howell High School employed by the School District. As a teacher, Defendant McDowell is required to enforce the policies, practices, customs and/or procedures of the School District, including the unconstitutional policies, practices, customs, and/or procedures set forth in this Complaint. At all relevant times, Defendant McDowell was the President of the HEA. In his

capacity as a teacher and President of the HEA and in compliance with the School District's training, supervision, policies, practices, customs, and/or procedures, Defendant McDowell promoted and enforced the NEA, the MEA, and the HEA policies that favor homosexuality and disfavor religious opposition to homosexuality.

STATEMENT OF FACTS

17. Prior to October 20, 2010, and continuing to the present day, the School District, in cooperation with the NEA, the MEA, and the HEA, has adopted, authorized, and/or approved policies, practices, customs, and/or procedures that promote homosexuality as acceptable behavior and as an acceptable lifestyle. These policies, practices, customs, and/or procedures portray homosexuality in a positive light and prohibit any contrary viewpoint, such as Plaintiffs' religious viewpoint. Religious viewpoints that do not accept homosexuality, such as Plaintiffs' Catholic viewpoint, are considered harassment, bullying, hate speech, homophobic, or "gay abuse."

18. The School District, in cooperation with the NEA, the MEA, and the HEA, and through its training, supervision, policies, practices, customs, and/or procedures indoctrinate students to believe that homosexuality is normal and acceptable and that religious opposition to homosexuality is harassment, bullying, hate speech, and homophobic. This indoctrination creates a school environment that favors homosexuality and disfavors and/or is hostile toward religious opposition to homosexuality.

19. The NEA, through the MEA, the HEA, and affiliated public schools, designates October as the "bullying prevention month" and, by no coincidence, October is also "LGBT History Month," which is intended to "bring[] awareness to the problems and the achievements of gay, lesbian, bisexual, or transgendered people." According to the MEA, "LGBT History

Month not only serves as a time to study and celebrate gay, lesbian, bisexual and transgender history, but also to focus the public's attention [on] issues such as discrimination, marriage rights, AIDS and domestic partner benefits.”

20. October 20, 2010, was anti-bullying day at Howell High School.

21. Opposing homosexuality on religious grounds is considered “bullying” by the NEA, the MEA, the HEA, and Defendants.

22. In cooperation with the NEA, the MEA, and the HEA, and in furtherance of the national agenda of the Gay & Lesbian Alliance Against Defamation (“GLAAD”), the School District permitted the celebration of “Spirit Day” at Howell High School on October 20, 2010.

23. Spirit Day is promoted nationally by GLAAD, which is an activist group that promotes the acceptance of homosexuality as a behavioral norm. In particular, GLAAD focuses its political agenda on the public schools since it has the support of the NEA, which in turn influences local public schools through organizations such as the MEA and the HEA.

24. As part of its agenda, GLAAD is working “to fight anti-LGBT hateful speech” in the public schools. Plaintiffs’ religious viewpoint toward homosexuality is considered “anti-LGBT hate speech.”

25. Promoting Spirit Day in the public schools is one way in which Defendants, in cooperation with GLAAD, the NEA, the MEA, and the HEA, are fighting harassment, bullying, homophobia, and “hate speech.”

26. Spirit Day is a day in which activists exploit the tragic suicidal deaths of homosexual teenagers to promote acceptance of homosexuality in the public schools.

27. On Spirit Day, people who support the acceptance of homosexuality wear the color purple because, according to GLAAD, “Purple symbolizes ‘spirit’ on the rainbow flag, a symbol for LGBT Pride that was created by Gilbert Baker in 1978.”

28. GLAAD encourages people to wear purple in the public schools on Spirit Day “in memory of the recent suicides due to gay abuse.”

29. The School District and its officials had knowledge of and permitted the celebration of Spirit Day at Howell High School on October 20, 2010 (hereinafter “2010 Spirit Day”). School District officials understood that Spirit Day was an “anti-bullying” day in which teachers and students wore purple to stop homophobia.

30. The NEA, the MEA, the HEA, and GLAAD, with the cooperation of the School District, promote their pro-gay agenda under the guise of Spirit Day.

31. The School District has a written policy regarding “religious expression in the district,” which states that “School officials . . . should intercede to stop student speech that constitutes harassment aimed at a student group or a group of students” (hereinafter referred to as the “harassment speech” policy). This policy was a moving force behind the constitutional violations set forth in this Complaint.

32. Prior to the 2010 Spirit Day, the School District held an in-service for its teachers, including Defendant McDowell, in which the teachers were directed and trained pursuant to the School District’s “harassment speech” policy to intercede to stop student speech that they believed constituted harassment aimed at a student group or a group of students, including students who were homosexuals. Teachers were directed and trained to stop speech that was considered bullying, hate speech, homophobic, or otherwise not accepting of homosexuality.

33. On or before October 20, 2010, the School District permitted teachers and students to post materials in the Howell High School that promoted the 2010 Spirit Day.

34. On or before October 20, 2010, the School District permitted teachers at Howell High School to sell purple t-shirts with the slogan “Tyler’s Army” to other students and teachers to promote the 2010 Spirit Day at the high school.

35. “Tyler’s Army” is a reference to Tyler Clementi. While a freshman at Rutgers University, Tyler had sex with another male student in his dorm room. Tyler’s homosexual acts were captured on video and posted on the Internet. Embarrassed and ashamed, Tyler committed suicide by jumping from the George Washington Bridge.

36. The School District permitted teachers and students at Howell High School to wear purple “Tyler’s Army” t-shirts during the 2010 Spirit Day.

37. On October 20, 2010, Defendant McDowell wore a purple “Tyler’s Army” t-shirt in support of the 2010 Spirit Day. He wore this shirt during the entire school day at Howell High School, including while he taught classes.

38. School District officials knew that students and teachers would be wearing purple to school on October 20, 2010, in support of Spirit Day.

39. During all of his class periods on October 20, 2010, Defendant McDowell did not teach his students about economics or any other subject that was part of the educational curriculum. Instead, he promoted the pro-gay agenda of the NEA, the MEA, and the HEA, which was supported by the School District. In each of his classes, Defendant McDowell explained to his students that October 20th was nationally recognized as “anti-bullying” day, and he showed his students a movie about teenagers who committed suicide because they were homosexual.

40. The purpose of the “anti-bullying” day, the “Tyler’s Army” t-shirts, and the movie was to indoctrinate students into believing that homosexuality is normal and to shift the blame for the destructive lifestyle of homosexuals to those who believe it is wrong and immoral. In particular, the purpose is to make those who oppose homosexuality on moral and religious grounds to feel guilty for holding those beliefs and to portray those beliefs as intolerant, harmful, hateful, and destructive. In sum, the purpose of the “anti-bullying” campaign, which is sponsored, promoted, and endorsed by the NEA, the MEA, the HEA, GLAAD, and the School District, is to shift the blame, guilt, and shame felt by homosexuals onto those who oppose homosexuality on moral and religious grounds.

41. Plaintiffs are Catholic. As Catholics, they are morally bound to follow the universal, consistent moral teaching of the Roman Catholic Church.

42. The Catholic Church’s teaching on marriage and on the complementarity of the sexes reiterates a truth that is evident to right reason and recognized as such by all the major cultures of the world.

43. The Catholic Church teaches that marriage is not just any relationship between human beings. It was established by the Creator with its own nature, essential properties, and purpose. No ideology can erase from the human spirit the certainty that marriage exists solely between a man and a woman, who by mutual personal gift, proper and exclusive to themselves, tend toward the communion of their persons. In this way, they mutually perfect each other in order to cooperate with God in the procreation and upbringing of new human lives.

44. According to the Catholic Church, the marital union of man and woman has been elevated by Christ to the dignity of a sacrament. The Church teaches that Christian marriage is an efficacious sign of the covenant between Christ and the Church.

45. Basing itself on Sacred Scripture, which presents homosexual acts as acts of grave depravity, Catholic teaching and moral tradition have always declared that homosexual acts are intrinsically disordered. They are contrary to the natural law. They close the sexual act to the gift of life. They do not proceed from a genuine affective and sexual complementarity. Under no circumstances can they be approved.

46. As Catholics, Plaintiffs have a duty and obligation to defend their faith in public, including a duty to speak the truth about homosexuality. On October 20, 2010, Plaintiff D.K.G. was punished for doing so.

47. On October 20, 2010, during his sixth hour economic class in which Plaintiff D.K.G. was a student, Defendant McDowell explained to the students that it was the national “anti-bullying” day and that the students were going to watch a movie about teenagers who committed suicide because they were homosexual.

48. At the beginning of the instruction and in front of the entire class, Defendant McDowell confronted a female student who was wearing a Confederate flag belt buckle. Defendant McDowell directed the student to remove the article of clothing because he considered it offensive. The female student had worn this belt and buckle to class on several prior occasions without receiving a reprimand.

49. In light of Defendant McDowell’s opening remarks to the student about “anti-bullying” day and tolerance, Plaintiff D.K.G. raised his hand and asked Defendant McDowell why it was permissible to display a rainbow flag, which is offensive to some people, but not a Confederate flag, which Defendant McDowell found offensive.

50. Offended by the question, Defendant McDowell curtly responded by stating that the rainbow flag represents the gay community, but the Confederate flag “represents killing people and hanging and skinning people alive,” or words to that effect.

51. Defendant McDowell then asked Plaintiff D.K.G. whether he “supported” or “accepted gays,” or words to that effect. Plaintiff D.K.G. responded by stating that his religion does not accept homosexuality and that he could not condone that behavior. Angered by the response, Defendant McDowell told Plaintiff D.K.G. that his religion was “wrong,” or words to that effect, and ordered Plaintiff D.K.G. to leave his classroom under threat of suspension.

52. After ordering Plaintiff D.K.G. to leave the classroom, Defendant McDowell asked the remainder of the class whether anyone else did not accept homosexuality. A student raised his hand, and Defendant McDowell ordered him out of the classroom as well.

53. After Defendant McDowell ordered the two students out of his classroom, he continued discussing religious views and homosexuality with the remainder of the class, using his position of authority within the School District to promote the pro-gay agenda supported by the NEA, the MEA, the HEA, and the School District. He ended his class by showing the movie about homosexual teen suicides.

54. By ordering the two students out of his classroom, Defendant McDowell was executing the School District’s policy regarding “harassment speech” and its policy on snap suspensions.

55. Following the expulsion of Plaintiff D.K.G. from his classroom, Defendant McDowell stated that he would be willing to let Plaintiff D.K.G. return to class after a discussion with him that would lead Defendant McDowell to believe that Plaintiff D.K.G. would not “discriminate” against any students when he returned. Defendant McDowell wanted to be

certain that Plaintiff D.K.G. was willing to comply with the School District's "harassment speech" policy.

56. Following the expulsion of Plaintiff D.K.G. from his classroom, Defendant McDowell acknowledged his efforts to indoctrinate the students, stating, "I was hoping [Plaintiff D.K.G.] wouldn't voice his opinion again. The purpose was for him to learn he wouldn't answer the question that way. You can't say in class, my religion doesn't accept gays or accept the gay lifestyle," or words to that effect.

57. On or about October 27, 2010, Plaintiff Glowacki requested that her son, Plaintiff D.K.G., be removed from Defendant McDowell's class "as soon as possible." The School District complied with the request.

58. Defendant McDowell went on a public campaign to defend his actions and to harm the reputation of Plaintiff D.K.G., portraying Plaintiff D.K.G. as a "homophobe." In support of this campaign, Defendant McDowell posted his version of the events on his Facebook page, which had the intended effect of creating a media frenzy. He elicited the assistance and support of the MEA. And he encouraged those who supported gay rights to speak out against Plaintiff D.K.G. and in support of his actions. In fact, the NEA ran a story on its website in which it described Plaintiff D.K.G. as someone "who made anti-gay remarks." Defendant McDowell also told a news reporter that Plaintiff Glowacki should not comment to the media in support of her son because "it was gonna bring a whole shit storm down on [Plaintiff D.K.G.]," or words to that effect.

59. The news of Defendant McDowell's actions spread to the national media. Defendant McDowell was hailed as a hero by the gay community, and Plaintiff D.K.G. was ridiculed and accused of homophobia and gay bashing.

60. In or about February 2011, the School District held a mandatory assembly for all juniors at Howell High School on the issue of bullying. Plaintiff D.K.G., who was a junior at the time, was required to attend. During this assembly, the School District promoted the propaganda that “homophobia” was causing teenagers to commit suicide. It further supported its “harassment speech” policy to end homophobia. And it referenced the incident between Defendant McDowell and Plaintiff D.K.G. to support the claim that hate speech was masquerading as religious speech.

61. Upon mentioning the October 20, 2010 incident, a large number of students turned their attention to Plaintiff D.K.G., causing him to get up and leave the assembly due to the pressure and embarrassment.

62. Plaintiff Glowacki was not informed prior to the assembly that it was going to take place or that her son was required to attend. After the assembly was over, she received an automated call from the School District informing her about the event. Had she known that this assembly was going to take place, she would have demanded that her son not attend.

63. The School District, in cooperation with the NEA, the MEA, and the HEA, has created a school environment that favorably promotes the agenda of gay rights activists while creating an environment that is hostile toward and disfavors students and families that oppose homosexuality on moral and religious grounds.

64. The School District’s policies, practices, customs, and/or procedures encourage school officials, including Defendant McDowell, to silence and disparage opinions, ideas, and viewpoints that disfavor homosexuality, such as the religious viewpoint held by Plaintiffs.

65. The School District trains and supervises its employees, including Defendant McDowell, to silence and disparage opinions, ideas, and viewpoints that disfavor homosexuality, such as the religious viewpoint held by Plaintiffs.

66. The School District's training, supervision, policies, practices, customs, and/or procedures and the actions of Defendant McDowell, which were done pursuant to the training, supervision, policies, practices, customs, and/or procedures of the School District, have had a chilling effect on the expression of religious viewpoints that oppose homosexuality, including the expression of the viewpoint held by Plaintiffs D.K.G. and D.C.G. as set forth in this Complaint.

FIRST CLAIM FOR RELIEF

(Freedom of Speech—First Amendment)

67. Plaintiffs hereby incorporate by reference all stated paragraphs.

68. By reason of the aforementioned training, supervision, acts, policies, practices, customs and/or procedures created, adopted, and enforced under color of state law, Defendants deprived Plaintiffs of their right to freedom of speech in violation of the First Amendment as applied to the states and their political subdivisions under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

69. On or about October 20, 2010, Defendant McDowell, acting pursuant to School District training, supervision, policies, practices, customs, and/or procedures, humiliated, punished, and spontaneously suspended Plaintiff D.K.G. from class for exercising his right to freedom of speech. Defendants' actions injured Plaintiff D.K.G. in a way likely to chill a person of ordinary firmness, including Plaintiff D.C.G. and other students in the School District, from further participation in that speech activity. Plaintiff D.K.G.'s constitutionally protected speech

motivated Defendant McDowell's adverse actions. Consequently, Defendant McDowell acted with a retaliatory intent or motive.

70. The School District's policies, practices, customs, and/or procedures as set forth in this Complaint were the moving force behind the violation of Plaintiff D.K.G.'s right to freedom of speech, and these policies, practices, customs, and/or procedures have had a chilling effect on the free speech rights of other students, including Plaintiff D.C.G., in violation of the First Amendment.

71. The School District's failure to adequately train and supervise its employees as set forth in this Complaint was a moving force behind the violation of Plaintiff D.K.G.'s right to freedom of speech, and this failure to adequately train and supervise has had a chilling effect on the free speech rights of other students, including Plaintiff D.C.G., in violation of the First Amendment.

72. By favoring speech that approves of and promotes homosexuality over Plaintiffs' religious speech, Defendant McDowell's violation of Plaintiff D.K.G.'s right to freedom of speech was viewpoint based in violation of the First Amendment.

73. The School District's training, supervision, policies, practices, customs, and/or procedures that were the moving force behind the violation of Plaintiff D.K.G.'s right to freedom of speech were viewpoint based in violation of the First Amendment.

74. Defendants' "harassment speech" policy was selectively enforced against Plaintiff D.K.G. on account of his religious viewpoint on homosexuality in violation of the First Amendment.

75. Defendants' "harassment speech" policy as applied against Plaintiff D.K.G.'s religious speech on or about October 20, 2010, violated the First Amendment.

76. As a direct and proximate result of Defendants' violation of the First Amendment, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief. Additionally, Plaintiff D.K.G. is entitled to nominal damages for the past loss of his constitutional rights.

SECOND CLAIM FOR RELIEF

(Equal Protection—Fourteenth Amendment)

77. Plaintiffs hereby incorporate by reference all stated paragraphs.

78. By reason of the aforementioned training, supervision, acts, policies, practices, customs, and/or procedures created, adopted, and enforced under color of state law, Defendants have deprived Plaintiffs of the equal protection of the law guaranteed under the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

79. By favoring speech that promotes and approves of homosexuality and punishing Plaintiffs' less favored religious view toward homosexuality, Defendants have violated the Equal Protection Clause of the Fourteenth Amendment.

80. Defendants' "harassment speech" policy was selectively enforced against Plaintiff D.K.G. on account of his religious viewpoint on homosexuality in violation of the Equal Protection Clause of the Fourteenth Amendment.

81. Defendants' "harassment speech" policy as applied against Plaintiff D.K.G.'s religious speech on or about October 20, 2010, violates the Equal Protection Clause of the Fourteenth Amendment.

82. By favoring speech that approves of and promotes homosexuality over Plaintiffs' religious speech, Defendant McDowell deprived Plaintiff D.K.G.'s of the equal protection guarantee of the Fourteenth Amendment.

83. The School District's training, supervision, policies, practices, customs, and/or procedures that were the moving force behind the violation of Plaintiff D.K.G.'s fundamental constitutional rights deprived Plaintiff D.K.G. of the equal protection guarantee of the Fourteenth Amendment.

84. As a direct and proximate result of Defendants' violation of the Equal Protection Clause, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief. Additionally, Plaintiff D.K.G. is entitled to nominal damages for the past loss of his constitutional rights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ask this court:

A) to declare that Defendants violated Plaintiffs' fundamental constitutional rights as set forth in this Complaint;

B) to declare that Defendants' training, supervision, policies, practices, customs, and/or procedures that promote a school environment that favors homosexuality and disfavors religious viewpoints that oppose homosexuality violate Plaintiffs' fundamental constitutional rights to freedom of speech and the equal protection of the law as set forth in this Complaint;

C) to declare that Defendants' "harassment speech" policy is unconstitutional as set forth in this Complaint;

D) to permanently enjoin Defendants' "harassment speech" policy as applied to religious expression as set forth in this Complaint;

E) to award Plaintiff D.K.G. nominal damages against all Defendants;

F) to award Plaintiffs their reasonable attorney fees, costs, and expenses pursuant to 42 U.S.C. § 1988 and other applicable law;

G) to grant such other and further relief as this court should find just and proper.

Respectfully submitted,

THOMAS MORE LAW CENTER

/s/ Robert J. Muise

Robert J. Muise, Esq. (P62849)

Erin Chau, Esq. (P70886)

Counsel for Plaintiffs