

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

**JANE DOE, individually; JOHN DOE, a
minor, by and through his mother JANE
DOE**

c/o Correia & Puth, PLLC
1400 16th St. NW, Ste. 450
Washington, DC 20036

Plaintiffs,

v.

ST. ANSELM'S ABBEY SCHOOL, INC.,

4501 South Dakota Ave., NE

Washington D.C. 20017-2795

Registered Agent:

C T Corporation System

1015 15th St. NW, Suite 1000

Washington, DC 20005

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

**Race Discrimination, Disability Discrimination, and Retaliation in Violation of
the D.C. Human Rights Act, D.C. Code § 2-1401.01 *et seq.*;
Race Discrimination and Retaliation in Violation of
the Civil Rights Act of 1866, 42 U.S.C. § 1981**

COME NOW Plaintiffs Jane Doe and John Doe,¹ a minor, through their counsel, Correia & Puth, PLLC, Cohen Milstein Sellers & Toll, PLLC, and Public Justice, and for their complaint state to this Honorable Court as follows:

INTRODUCTION

1. For John Doe's entire year as a sixth grader at St. Anselm's Abbey School, students relentlessly harassed him because he is Black and autistic. Classmates publicly called him race- and

¹ Plaintiffs contemporaneously file a Motion to Proceed Pseudonymously.

disability-based slurs, including “burnt chicken nugget,” “n*gger,” “brown monkey,” and “autistic n*gger,” among others. These students expressed to John their disdain for Black and autistic people, harassed him in class-wide group text threads, threatened him, and physically assaulted him while at school, among other conduct. John and his mother, Jane Doe, repeatedly reported the harassment to school staff and administration. Yet St. Anselm’s, whose student body is overwhelmingly White, failed to take appropriate action to address it. As a result, the abuse escalated to the point that John was too afraid to ride the school bus, could not focus in class, and contemplated suicide.

2. To make matters worse, St. Anselm’s punished John and his mother for reporting the harassment—first suspending John for defending himself from an attack by four students, none of whom were Black and none of whom were punished, and then barring him from re-enrolling for the next school year. When Ms. Doe met with the headmaster to discuss the school’s decision to effectively expel John, the headmaster said that “the only thing [the school] did wrong was accept an autistic child” and that he “would have never accepted [John] if [he] knew [John] was autistic.”

3. This cruelty was not just an abdication of St. Anselm’s moral responsibility to its students. It was also illegal: St. Anselm’s violated the District of Columbia Human Rights Act, D.C. Code §§ 2-1402.41, 2-1402.61, and the Civil Rights Act of 1866, 42 U.S.C. § 1981.

PARTIES

4. Plaintiff John Doe is a minor male student who attended St. Anselm’s during the 2022-2023 school year.

5. Plaintiff Jane Doe is an adult female and John Doe’s mother. She signed contracts with St. Anselm’s for the 2022-2023 and 2023-2024 school years for John’s education.

6. Defendant St. Anselm’s Abbey School Inc. (“St. Anselm’s”) is a private corporation located and incorporated in Washington D.C. It holds itself out as “an independent Catholic,

Benedictine school for boys in grades 6 through 12.” St. Anselm’s is an “educational institution” within the meaning of D.C. Code § 2-1401.02(8).

JURISDICTION AND VENUE

7. This Court has jurisdiction pursuant to D.C. Code §§ 11-921 and 2-1403.16.

8. Venue lies with this Court because most or all of the acts complained of herein occurred in the District of Columbia.

FACTUAL BACKGROUND

9. When looking for a private school for John, Ms. Doe sought a program that would further her son’s academic and spiritual development. She and John had choices: Another area school had also admitted John. Ultimately, Ms. Doe chose St. Anselm’s for her son because of the school’s stellar academic reputation as well as its reputation for promoting strong Catholic values. Ms. Doe and John were Catholics, and they began attending the on-campus church, St. Anselm’s Abbey, once John enrolled at the school. Ms. Doe hoped John would be confirmed at that church.

10. John began attending sixth grade at St. Anselm’s in August 2022. He was the only Black student in his class—and one of two Black students in the entire sixth-grade year.

11. Prior to being enrolled at St. Anselm’s, John was diagnosed with autism. During St. Anselm’s admissions process, Ms. Doe told the school’s admissions officer, Patrick Granfield, that John was autistic. She also noted his disability in a health form submitted to the school prior to him starting.

St. Anselm’s ignores near-constant harassment from the start.

12. From the start of the 2022-2023 school year, students harassed John. Students repeatedly called John names like “burnt chicken nugget,” a reference to his skin color. Some

classmates screamed in his face. Others physically prevented John from going to class, and tripped, pushed, hit, kicked, and threw objects at him.

13. On a school whitewater rafting trip in early September 2022, one student intentionally hit John on the head with an oar, causing onlooking classmates to laugh at him. John was disoriented and had headaches in the days that followed. The next day, Ms. Doe sent a message to St. Anselm's Dean of Students, Sean Lane, through the school's online portal about the incident, but she received no response.

14. As the Dean of Students, Dean Lane oversaw academic performance in class, student activities, and enforcement of school policies. She played a central role in St. Anselm's student discipline, including detentions. She was also John's computer science teacher.

15. On September 14, Ms. Doe emailed John Doe's advisor, John Goldberg, to ask that he "[p]lease assist [] in stopping the bullying of [John]." "[B]esides continually being called names like burnt chicken nugget," she wrote, "he is being physically tripped [and] pushed" with "kids coming within his space and screaming in his face." Ms. Doe was clear: "This is beyond the acceptable norm of playful teasing and these kids need to stop this behavior today."

16. As John Doe's advisor, Advisor Goldberg was responsible for helping John integrate and succeed academically and socially. He was also John's religion teacher.

17. Advisor Goldberg did not take any meaningful action to stop the conduct toward John. In response to Ms. Doe's email, he wrote he would speak to John "in private" "to make sure that we get to the bottom of this" and promised to "keep" Ms. Doe "updated as the process progresses."

18. A few days later, Advisor Goldberg emailed Ms. Doe that he "noticed a few other boys were making comments" about John in class, but he blamed John for "bringing a lot of unwanted attention to him[self]."

19. Nothing changed in the weeks that followed, except that the harassers became even bolder. They pushed, hit, and kicked John and began stealing and breaking his belongings, sometimes during class and with teachers present. For instance, in October, one harasser jumped onto John's backpack, cracking John's EpiPen.

20. Three White students—Student A, Student B, and Student C—were particularly aggressive toward John. They harassed him approximately every other day. Other students followed their lead, joining in the harassment.

21. Because of the harassment, John repeatedly spent his evenings crying at home with his mother.

22. Throughout September and October 2022, Ms. Doe consistently reported harassment in writing to Advisor Goldberg and Dean Lane.

23. In her emails to St. Anselm's, Ms. Doe provided specific details of incidents, named names, and explained that the harassment was unrelenting. For example, she wrote to Advisor Goldberg in an email that Student A and Student B were harassing John "the most." In another email, she further explained that Students A, B, and C were "target[ing] and hit[ting]" John, or "distract[ing]" him in class "[e]very other day . . . individually or in teams." She asked, "please tell me how this is going to be addressed as there should be zero tolerance for intentional physical harming."

24. Shortly thereafter, Ms. Doe emailed Dean Lane that Student A stood on John's backpack, damaging his inhaler and EpiPen, and Student B stole and threw John's textbook in the trash bin.

25. Advisor Goldberg and Dean Lane did not respond to most of Ms. Doe's emails.

26. The only specific action St. Anselm's administrators conveyed taking with respect to the harassers was speaking to them and trying to figure out what happened.

27. For instance, on October 6, 2022, in response to an email from Ms. Doe reporting that another student had aggressively kicked John's groin, Advisor Goldberg wrote that he, Dean Lane, and middle school principal James Leathers had met and would "investigat[e]" and "speak[] to all of these boys mentioned to get a full picture of what is happening."

28. As middle school principal, James Leathers was responsible for running the middle school, including ensuring students' academic progress, overseeing discipline, and escalating problems to the headmaster's office.

29. St. Anselm's never informed Ms. Doe or John about the results of this supposed investigation.

30. Upon information and belief, St. Anselm's did not discipline any student for kicking John's groin.

31. Advisor Goldberg also blamed John for the school's failure to act, writing in an email to Ms. Doe that the school could not rectify the conduct unless John himself reported it to an adult "in the moment" or "right after [it] happen[s]." According to Advisor Goldberg, reports that came "hours or days after [an] incident took place" were too "difficult" for St. Anselm's to address.

32. Nevertheless, St. Anselm's lackadaisical approach continued even when Ms. Doe provided the school with evidence substantiating the harassment reports.

33. For instance, at the end of September, one student added John to a class-wide text group so John could follow discussions about homework. Students repeatedly made clear that he was not welcome, asking who added him and threatening to leave the group if he remained in it.

34. Ms. Doe sent screenshots of the text thread to school administrators and asked that they intervene.

35. The school took no apparent action to stop students from harassing John in the class-wide text group. Instead, Principal Leathers admonished Ms. Doe over the phone for—in his view—overreacting to something insignificant.

36. On October 13, Ms. Doe met with school counselor Stacey Marnell, Advisor Goldberg, and Dean Lane to discuss the harassment of John. During the meeting, Ms. Marnell told Ms. Doe that John’s autism caused other students to harass him. Ms. Marnell said that, for this reason, John was responsible for the harassment.

37. At the October 13 meeting, Ms. Marnell also said that John’s harassers, nearly all of whom were White, were “good” in nature and from “good” families, and thus John must be the problem.

38. The harassment affected John’s ability to participate in school. He was unable to focus during class because he was scared and worried that students would harass him.

39. John also became afraid to take the bus with his classmates for fear of experiencing harassment during the hour-long commute. As a result, Ms. Doe drove him to and from school—in total, approximately four hours of driving per day—despite her demanding job.

The harassment escalates while St. Anselm’s refuses to act.

40. In November 2022, a student repeatedly threatened to stab John with a pen. Also in November 2022, Student C spread a rumor to classmates that John was failing three subjects. (He was not.) That same month, Student C and another student shoved and hit John after gym class. On another occasion in November, two other students attacked John in the hall right before gym class, putting him in a headlock and punching him.

41. Ms. Doe repeatedly reported each of these incidents, and others, to Advisor Goldberg, Dean Lane, and Principal Leathers via email.

42. No one responded to most of Ms. Doe’s emails.

43. When they did answer, administrators dismissed Ms. Doe, minimized her concerns, or faulted John. In doing so, they often expressed skepticism that the reported incidents had occurred, even while acknowledging that John was the subject of continued harassment.

44. For instance, Ms. Doe emailed Principal Leathers about an incident in which classmates put John in a headlock, sent pictures of John's injuries, and asked how the school would respond. In response, Principal Leathers acknowledged that John was "hurt." But he minimized the harassment and lay blame at John's feet, writing that John "has been at the middle of more conflicts than any other student in the middle school this year." Principal Leathers also castigated Ms. Doe for not demonstrating "the requisite level of trust" in St. Anselm's—despite the school's repeated failures to address her past harassment reports.

45. Upon information and belief, St. Anselm's did not discipline the students who put John in a headlock or otherwise take meaningful action to address the harassment.

46. After the headlock incident, Principal Leathers advised John, however, to be mindful of where he was walking on campus and to travel in groups rather than walk around alone.

47. Throughout November and December, Student A and Student B continued to target John during and outside of class. Among other things, they stole and destroyed John's belongings, as well as pushed and threw items at him.

48. In December, Student A told John before class that he could "call him the 'N word' whenever he wanted" and, in the following week, called John a "brown monkey."

49. John overheard classmates telling each other that he "didn't belong" at St. Anselm's.

50. Classmates also made racist jokes about John's hair texture and hairline, both of which are culturally significant. For example, the classmates regularly (and inaccurately) called John "bald."

51. On December 6, Ms. Doe emailed Principal Leathers and Dean Lane, “[Student A] is making racist remarks and repeatedly pushing and harassing my son because my son is black and this is unacceptable.”

52. Principal Leathers responded only to say that he would follow up with Ms. Doe, but did not say what, if anything, St. Anselm’s would do to address the harassment.

53. On December 8, three students held the door of a classroom closed to prevent John and another sixth-grade student, Student D, from leaving.

54. Headmaster John Corrigan witnessed it and told the students to apologize to John and Student D. After the students apologized only to Student D and not to John, Headmaster Corrigan allowed them to leave.

55. Pursuant to school policy, as headmaster, Mr. Corrigan was “ultimately responsible for all matters concerning the school community.” He had authority to “suspend or remove a student from the school community in response to a student’s behavior.”

56. Ms. Doe emailed Principal Leathers about the incident, emphasizing that “my son is still being bullied at school almost on a daily basis.” Principal Leathers responded that he had told Dean Lane about it and “we are dealing with it.”

57. Student D’s mother also emailed the school about her son being locked in the classroom. Similar to Ms. Doe, Student D’s mother had previously contacted the school to discuss harassment toward Student D. Like the harassment of John, students’ harassment of Student D involved verbal harassment and physical assaults, although it was less severe and less frequent than the harassment directed toward John. In response to the concerns of Student D’s mother, the school had already taken remedial action, including changing Student D’s seat in class so that he was farther from certain harassers.

58. Student D is White and, upon information and belief, did not at the time have a disability of which St. Anselm's was aware.

59. By this point in the winter, John no longer wished to go to school and would make excuses for why he could not attend.

60. On the commute to St. Anselm's with his mother, he would occasionally panic, struggle to breathe, and experience pain, which caused Ms. Doe to divert to the emergency room twice.

61. When at home, John was constantly worried about having to face harassment in school, which distracted him from studying.

62. In January 2023, Student A continued to target John by, among other things, stealing John's belongings in class and throwing them on the floor and bothering John at recess despite John's asking to be left alone. Student A also threatened to smear a dirty tissue in John's face when John asked that he return property that John saw him steal from another student.

63. On January 11, 2023, Ms. Doe reported these incidents to Dean Lane by email.

64. Dean Lane did not respond.

65. On January 23, Ms. Doe wrote to Principal Leathers and Dean Lane again, explaining, "I did not receive a reply to my prior email but I would like to make you aware that [Student A] continues to harass [John] and ignore his requests for [Student A] to stay away from him in the classroom. He purposely tries to sit next to [John] to bother him, tries to take [John]'s personal items and inserts himself and takes the ball or refuses to leave when [John] is playing and minding his own business."

66. Two days later, Principal Leathers wrote back to Ms. Doe, "Just wanted to let you know that we are in receipt of your email and we appreciate you continuing to let us know about this. We are working on improving this situation further."

67. The “situation” did not improve, as Student A and other classmates relentlessly targeted John in the months that followed.

68. Towards the end of January, Student C and another student punched and hit John on the head with a textbook.

69. In addition, Student B smeared a handprint of Nutella on the back of John’s pants, telling other students that John “pooped his pants.”

70. In late January, Student C told John that he could kill John if he wanted to and knew how to do it, and that his dad had guns and takes him to the shooting range.

71. On or about January 31, Ms. Doe reported many of these incidents—as well as other incidents involving other students—to Dean Lane and Principal Leathers by email.

72. Principal Leathers responded to “[t]hank” Ms. Doe “for sharing these anecdotes” and said that the school was “following up with the students as appropriate.” The principal then blamed John for not reporting the incident to the school “in the moment.” He concluded, “I hope we can try to emphasize for John the benefit of handling problems himself here at school and advocating for himself when needed, rather than going home to tell you and addressing these behaviors in a roundabout way.”

73. But between November and January, John had made multiple reports directly to administrators and teachers. The school, including Principal Leathers, responded to his reports with hostility or indifference.

74. For example, in December 2022, when John reported to Principal Leathers that a student had stolen from him, the principal told John that he was “mak[ing] every little issue into a big problem” and that “it [was] beginning to annoy” him.

75. When Ms. Doe confronted Principal Leathers in an email about his response to John's report about stealing, Principal Leathers admitted that he "was frustrated" with John and "should have been more patient."

76. In the days and weeks following Ms. Doe's email reporting the many instances of harassment throughout January, St. Anselm's did not take any meaningful action to stop or prevent students from harassing John.

St. Anselm's expresses its disdain for those with autism, punishes John, and refuses to let him continue at the school.

77. In early February 2023, Ms. Doe took John to a psychiatrist, who diagnosed him with an episode of a major depressive disorder, other specified anxiety disorder, and unspecified trauma- and stressor-related disorder.

78. On February 6, 2023, Ms. Doe sent an email to Headmaster Corrigan requesting "urgent" action. She recounted the worst instances of harassment, such as the racist slurs (including "brown monkey" and "burnt chicken nugget") and comments hostile towards John's autism; the physical violence (including being "put in a headlock" and "punched and kicked"); and the destruction of John's property (including "cracking his epipen"). She wrote that she had repeatedly reported these concerns to Principal Leathers, which had "not brought an[] end to my son[']s harassment." She also wrote to Headmaster Corrigan that Ms. Marnell "told me on two occasions that my son has a part to play in his attacks by other students" because he is autistic.

79. Ms. Doe further wrote that, though administrators had blamed John for not reporting harassment immediately, Principal Leathers had twice expressed annoyance when John came to him to report such incidents during the school day.

80. On or around February 6, 2023, Ms. Doe met with Headmaster Corrigan and Principal Leathers and again recounted the race- and disability-based harassment that John had endured from the first weeks of school to the present.

81. Ms. Doe shared with Headmaster Corrigan and Principal Leathers a letter from John's psychiatrist explaining that John was suffering from anxiety and stress disorders due to the harassment.

82. Headmaster Corrigan tossed the letter to the side and said that he did not believe Ms. Doe, John, or John's doctor. He then told Ms. Doe that St. Anselm's "do[es] not know how to deal with autism."

83. During the meeting, Headmaster Corrigan and Principal Leathers rejected Ms. Doe's suggestions for how it could address the harassment, such as bringing in a local psychiatrist to help the school develop a response. The headmaster and principal said they would try to prevent future harassment, but they did not commit to any specific measures. To Ms. Doe and John's knowledge, St. Anselm's did not take any new steps to prevent the harassment after this meeting.

84. It is no surprise, given the school's decision not to take action, that students continued the same harassing behavior, trapping John inside another classroom just a few weeks later.

85. The following month, on or around March 16, 2023, Ms. Doe received, signed, and returned a contract for John to continue his education at St. Anselm's. Despite her misgivings about school's failure to act in response to the harassment of John, Ms. Doe decided to re-enroll him for seventh grade because of the school's elite education and because of the school's emphasis on faith-based teachings.

86. That same day, John was walking from one school building to another for his next class. Student A and three other students—none of whom were Black—began chasing John, threw rocks at him, called him a "stinky autistic," and tried to prevent him from getting to class.

87. John then fled to a bathroom, using the back of his arm to push away one of the students chasing him in the process, and hid in a stall. Student A and two of the classmates followed, kicking open the bathroom stall door, blocking him in, and punching him.

88. One of the students involved called John an “autistic n*gger.”

89. John eventually pushed past them to escape, ran from the bathroom towards a classroom, and told a music teacher what had happened. The three harassers followed him and told the music teacher that John was lying. The music teacher sent all students to Dean Lane’s office.

90. Dean Lane asked each student to write down their version of what occurred. The classmates wrote that John had punched one of the boys in the face when he fled to the bathroom.

91. That was untrue: In self-defense, John had made contact with one of the students with the back of his arm when escaping to the bathroom. John had not punched him.

92. After reviewing the written accounts, Dean Lane sent the three students who pursued John back to class. She immediately sent John home and suspended him from school for the following day.

93. John’s alleged offense was the false allegation that he had punched one boy in the face as he fled to the bathroom. According to the school, hitting another student in the face warranted an automatic suspension.

94. St. Anselm’s did not inform either John or Ms. Doe that it disciplined any of the students who chased or attacked John.

95. That same evening, Ms. Doe telephoned the mother of the classmate whom John had pushed and apologized. The classmate’s mother, however, apologized to Ms. Doe, telling Ms. Doe that her son told her that he, along with the three other boys, had chased John and that she understood John had used the back of his arm to push her son away in self-defense. She told Ms. Doe that John had not punched her son in the face and that her son was not in pain.

96. The following day, on the morning of March 17, Ms. Doe wrote an email to Dean Lane reporting this information. She asked to meet with Dean Lane about the school's disciplinary decision immediately.

97. Dean Lane said she would try to call Ms. Doe "to get complete clarity about what happened yesterday," but the promised call never happened.

98. St. Anselm's did not rescind John's suspension. Upon information and belief, St. Anselm's did not discipline any of the classmates who assaulted John.

99. John was humiliated and distraught that he, the victim of the corroborated assault, was the one suspended.

100. After the assault, he missed days of school due to depression.

101. When in school, he was so anxious about being harassed that he began running from class to class so that students could not catch and harass him.

102. On or around March 17, 2023, Ms. Doe attempted to make a deposit to St. Anselm's through its online portal to secure John's spot for seventh grade, but the system would not let her complete the transaction. She sent an email to St. Anselm's Director of Finance and Operations, Mark Commins, seeking assistance.

103. On March 19, 2023, Mr. Commins responded to Ms. Doe that John's "contract is 'on hold,'" that she "will not be able to complete the process to acceptance," and that she needed to contact Headmaster Corrigan or Principal Leathers with any questions.

104. Ms. Doe immediately wrote an email to Principal Leathers and Headmaster Corrigan seeking an explanation.

105. Headmaster Corrigan responded the next day, writing: "An instructional program administration hold was placed on the contract for [John] by me because at this [time] me [and] his

teaching and administrative teams are concerned that St. Anselm's Abbey School may not be the correct institutional placement for [John].”

106. On March 21, Ms. Doe responded to Headmaster Corrigan asking for additional explanation. In this email, she also expressed concern that the school had not addressed the near-constant harassment she had reported for months. She asked the headmaster to explain the school's decision to suspend John and not the harassers who had recently assaulted John—even though she had provided the school with information corroborating John's account of the incident and undermining the school's justification for the suspension.

107. Headmaster Corrigan did not respond to Ms. Doe's email.

108. On March 30, Ms. Doe sent Headmaster Corrigan another email asking why John could not return the following year, especially given that, as she explained, John was excelling academically in nearly all his classes. She again asked for an explanation for John's suspension, explaining that John “was severely humiliated and heckled by the same bullies” because he had been suspended. Ms. Doe continued, “I would like a meeting with you as soon as possible to discuss anti-bullying measures to keep him safe as the regular bullying that I have been making the school aware of since the first month of school continues to escalate.”

109. Headmaster Corrigan finally responded and agreed to a meeting. He wrote that the hold was so “we all [can] decide if St. Anselm's is the right school for the boy.”

110. Ms. Doe met with Headmaster Corrigan and Principal Leathers, and she repeated her concerns that the school, through its inaction, had allowed the harassment to continue.

111. During the meeting, Headmaster Corrigan told Ms. Doe that “the only thing [the school] did wrong was accept an autistic child” and that he “would have never accepted [John] if [he] knew [John] was autistic.”

112. Headmaster Corrigan said he would not allow John to continue his education at St. Anselm's.

113. Principal Leathers added that "because the boys get even more naughty" as they get older, the school is "not a good fit for [John]."

114. After St. Anselm's put the contract on hold and Ms. Doe began applying to other schools, John repeatedly questioned why he "endured all the bullying" yet has "to leave and the bullies stay."

As the racist and disability-based harassment escalates, Ms. Doe is forced to withdraw John from school.

115. After that meeting, the harassment continued to escalate. Students, including Student B, threw objects at John's head during class, stole his backpack, and made cruel comments about John not "hav[ing] a dad."

116. Towards the end of March, Student B hit John during art class and then turned to others and said, "I don't even like touching autistic kids."

117. John reported this incident to Dean Lane right after it occurred.

118. In early April, Student C told John he could kill him with an axe.

119. Because of threats like this one, John often had nightmares or could not sleep through the night and would wake up thrashing.

120. Ms. Doe continued to report this harassment by email, usually to Dean Lane. In one email to Dean Lane, she wrote that she believed Student C targeted John "because of his disability."

121. Dean Lane and other administrators did not respond.

122. On April 5, 2023, classmates telephoned John more than twenty times in an hour. When he picked up, they laughed and hung up. Ms. Doe was with John when he received these calls and witnessed the entire event.

123. Once John started ignoring the calls, his classmates immediately started targeting John in a class-wide text group.

124. For instance, to make fun of John, students sent pictures of John in school, which students had taken surreptitiously and without his consent; numerous pictures of bald Black people, including one of a disabled Black baby with severe brain swelling; a TikTok video of a Black autistic child; and a picture of a large monkey.



125. One student also circulated a graphic of a “Cracker Pass”—a putative “coupon valid for one free pass at saying Cracker”—with a caption, “For the black people of this sub, you’re welcome.”



126. John believed that circulating the graphic of a “Cracker Pass” was intended to give permission for him to use a derogatory term for White people (“cracker”) in exchange for students calling him racist slurs.

127. Ms. Doe emailed screenshots of the text chain to Dean Lane and Principal Leathers. She explained the significance of the images of the bald Black individuals: that students “constantly tease [John] about his hair texture and short hair, calling him [] Mr. Egghead, brown M and M and baldy because his hairline is more visible than Caucasian hair.” Ms. Doe also explained that the pictures of children with disabilities was offensive because “the students tell [John] he is the mentally retarded type of autistic.”

128. Principal Leathers responded by email that they were “looking into these situations,” but “[w]ith regard to the group text messages, [his] strong recommendation would be for John to leave the group as soon as possible, as it seems to be a major source of negativity.”

129. After the cyber harassment, John became significantly more depressed, experienced heightened anxiety, and was even more frightened to go to school.

130. As a result, he missed even more school—weeks at a time.

131. Even at home, he constantly feared for his safety, frequently checking that doors were locked and that the alarm was on. At night, John frequently had nightmares and woke up crying.

132. The unchecked harassment eventually drove him to the point of suicidal ideation.

133. John’s doctors recommended that he withdraw from St. Anselm’s because of the school’s negative impact on his mental health.

134. On May 9, 2023, before the end of the school year, Ms. Doe withdrew John from St. Anselm’s.

135. When John withdrew from school, he also left the text chain with his classmates. His parting message: “Good luck to you all I pray that you all become kinder as you grow up.”

136. Because of St. Anselm's betrayal, Ms. Doe has since left the Catholic Church.

CAUSES OF ACTION

COUNT ONE

Race Discrimination (Harassment) in Violation of the D.C. Human Rights Act, D.C. Code § 2-1402.41 (on behalf of John Doe)

137. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

138. John Doe is Black.

139. St. Anselm's students harassed John Doe based upon his race when they repeatedly referred to him by racist slurs, sent him racist text messages, threatened him, physically assaulted him, and otherwise harassed him.

140. St. Anselm's had notice of the race-based harassment, including through reports by Jane Doe and John Doe, who repeatedly complained of the harassment to St. Anselm's administrators and employees, including its headmaster, dean of students, principal, counselor, and advisor.

141. Yet St. Anselm's failed to take reasonable action to stop the harassment, allowing it to continue and escalate. Indeed, rather than take action to remedy the harassment against John Doe, St. Anselm's suspended and eventually expelled him.

142. In addition, St. Anselm's responded more reasonably to harassment of a similarly situated White student than to harassment of John Doe.

143. In failing to respond reasonably to the racial harassment, St. Anselm's denied, restricted, and abridged John Doe's use of and access to St. Anselm's facilities, services, programs, and benefits based wholly or partially upon his race, in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.41.

144. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

145. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of John Doe's rights.

COUNT TWO
Race Discrimination (Discipline/Expulsion) in Violation of
the D.C. Human Rights Act, D.C. Code § 2-1402.41
(on behalf of John Doe)

146. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

147. John Doe is Black.

148. St. Anselm's denied, restricted, and abridged John Doe's use of and access to St. Anselm's facilities, services, programs, and benefits based wholly or partially upon his race when it suspended him, and not the non-Black students who attacked him, and when it refused to allow him to return to school for the 2023-2024 school year, in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.41.

149. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

150. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of John Doe's rights.

COUNT THREE
Disability Discrimination (Harassment) in Violation of
the D.C. Human Rights Act, D.C. Code § 2-1402.41
(on behalf of John Doe)

151. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

152. John Doe has a disability, Autism Spectrum Disorder.

153. St. Anselm's students harassed John Doe based wholly or partially upon his disability when they repeatedly made disparaging comments about his autism and autistic people, threatened him, physically assaulted him, and otherwise harassed him.

154. St. Anselm's had notice of the disability-based harassment, including through reports by Jane Doe and John Doe, who repeatedly complained of the harassment to St. Anselm's administrators and employees, including its headmaster, dean of students, principal, counselor, and advisor.

155. Yet St. Anselm's failed to take reasonable action to stop the harassment, allowing it to continue and escalate. Indeed, rather than take action to remedy the harassment against John Doe, St. Anselm's suspended and eventually expelled him.

156. In addition, St. Anselm's responded more reasonably to harassment of a similarly situated non-disabled student than to harassment of John Doe.

157. In failing to respond reasonably to the disability-based harassment, St. Anselm's denied, restricted, and abridged John Doe's use of and access to St. Anselm's facilities, services, programs, and benefits based wholly or partially upon his disability, in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.41.

158. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs,

lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

159. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of John Doe's rights.

COUNT FOUR
Disability Discrimination (Discipline/Expulsion) in Violation of
the D.C. Human Rights Act, D.C. Code § 2-1402.41
(on behalf of John Doe)

160. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

161. John Doe has a disability, Autism Spectrum Disorder.

162. St. Anselm's denied, restricted, and abridged John Doe's use of and access to St. Anselm's facilities, services, programs, and benefits based wholly or partially upon his disability when it refused to allow him to return to school for the 2023-2024 school year, in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.41.

163. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

164. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of John Doe's rights.

COUNT FIVE
Retaliation in Violation of
the D.C. Human Rights Act, D.C. Code §2-1402.61
(on behalf of John Doe)

165. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

166. Both Jane Doe and John Doe engaged in protected activity when they repeatedly reported to St. Anselm's the race- and disability-based harassment of John Doe, and when Ms. Doe repeatedly reported to St. Anselm's that it was not adequately addressing the race- and disability-based harassment of John Doe.

167. St. Anselm's headmaster, dean of students, principal, counselor, advisor, and others were aware of John Doe and Jane Doe's protected activity, and they informed, participated in, or made the decision to cancel the contract for John Doe to return to St. Anselm's for the 2023-2024 school year.

168. The decision to cancel the contract was an action adverse to Jane Doe and John Doe.

169. St. Anselm's retaliated against Jane Doe and John Doe because they engaged in protected activity when it cancelled the contract for John Doe to return to St. Anselm's for the 2023-2024 school year.

170. In doing so, St. Anselm's retaliated against Jane Doe and John Doe for having exercised and enjoyed their rights under the D.C. Human Rights Act, in violation of D.C. Code § 2-1402.61.

171. As a direct and proximate result of St. Anselm's retaliatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

172. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of John Doe's rights.

COUNT SIX
Race Discrimination (Harassment) in Violation of
the Civil Rights Act of 1866, 42 U.S.C. § 1981
(on behalf of all Plaintiffs)

173. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

174. Jane Doe and John Doe are Black.

175. Jane Doe had a contract with St. Anselm's pursuant to which St. Anselm's agreed to provide educational and related services and programs to her son, John Doe, for the 2022-2023 school year. St. Anselm's also offered Ms. Doe a similar contract for the 2023-2024 school year, which she signed.

176. St. Anselm's students harassed John Doe based upon his race when they repeatedly referred to him by racist slurs, sent him racist text messages, threatened him, physically assaulted him, and otherwise harassed him.

177. St. Anselm's had notice of the race-based harassment, including through reports by Jane Doe and John Doe, who repeatedly complained of the harassment to St. Anselm's administrators and employees, including its headmaster, dean of students, principal, counselor, and advisor.

178. Yet St. Anselm's failed to take reasonable action to stop the harassment, allowing it to continue and escalate. Indeed, rather than take action to remedy the harassment against John Doe, St. Anselm's suspended and eventually expelled him.

179. In addition, St. Anselm's responded more reasonably to harassment of a similarly situated White student than to harassment of John Doe.

180. In failing to respond reasonably to the racial harassment, St. Anselm's denied Jane Doe and John Doe the same right to make and enforce contracts, including the right to the enjoyment

of all benefits, privileges, terms, and conditions of the contractual relationship, as is enjoyed by non-Black students and families, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981.

181. As a direct and proximate result of St. Anselm's discriminatory actions, Jane Doe suffered and continues to suffer transportation expenses, medical expenses, educational expenses, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

182. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

183. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of the rights of Jane Doe and John Doe.

COUNT SEVEN
Race Discrimination (Discipline/Expulsion) in Violation of
the Civil Rights Act of 1866, 42 U.S.C. § 1981
(on behalf of all Plaintiffs)

184. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

185. Jane Doe and John Doe are Black.

186. Ms. Doe had a contract with St. Anselm's pursuant to which St. Anselm's agreed to provide educational and related services and programs to her son, John Doe, for the 2022-2023 school year. St. Anselm's also offered Ms. Doe a similar contract for the 2023-2024 school year, which she signed.

187. St. Anselm's discriminated against John Doe and Jane Doe on the basis of race when it suspended John Doe, and not the non-Black students who attacked him, and when it revoked his

contract to return for the 2023-2024 school year, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981.

188. In suspending John Doe and refusing to permit him to return for the 2023-2024 school year, St. Anselm's denied Ms. Doe and John Doe the same right to make and enforce contracts, including the right to the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship, as is enjoyed by non-Black students and families, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981.

189. As a direct and proximate result of St. Anselm's discriminatory actions, Jane Doe suffered and continues to suffer transportation expenses, medical expenses, educational expenses, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

190. As a direct and proximate result of St. Anselm's discriminatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

191. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of the rights of Jane Doe and John Doe.

COUNT EIGHT
Retaliation in Violation of
the Civil Rights Act of 1866, 42 U.S.C. § 1981
(on behalf of all Plaintiffs)

192. Plaintiffs repeat and incorporate by reference all of the allegations contained in paragraphs 1-136 of this Complaint as if set out here in full.

193. Jane Doe and John Doe are Black.

194. Ms. Doe had a contract with St. Anselm's pursuant to which St. Anselm's agreed to provide educational and related services and programs to her son, John Doe, for the 2022-2023 school

year. St. Anselm's also offered Ms. Doe a similar contract for the 2023-2024 school year, which she signed.

195. Both Jane Doe and John Doe engaged in protected activity when they repeatedly reported to St. Anselm's race-based harassment of John Doe, and when Ms. Doe repeatedly reported to St. Anselm's that it was not adequately addressing the race-based harassment of John Doe.

196. St. Anselm's headmaster, dean of students, principal, counselor, advisor, and others were aware of Jane Doe and John Doe's protected activity, and they informed, participated in, or made the decision to cancel the contract for John Doe to return to St. Anselm's for the 2023-2024 school year.

197. The decision to cancel the contract was an action adverse to Jane Doe and John Doe.

198. St. Anselm's retaliated against Jane Doe and John Doe for engaging in protected activity when it revoked the contract for John Doe to return to St. Anselm's for the 2023-2024 school year, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981.

199. In suspending John Doe and revoking his contract to return for the 2023-2204 school year, St. Anselm's denied Jane Doe and John Doe the same right to make and enforce contracts, including the right to the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship, as is enjoyed by non-Black students and families, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981.

200. As a direct and proximate result of St. Anselm's retaliatory actions, Jane Doe suffered and continues to suffer transportation expenses, medical expenses, educational expenses, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

201. As a direct and proximate result of St. Anselm's retaliatory actions, John Doe suffered and continues to suffer lost educational opportunities and benefits, increased medical costs, lost future

earnings and earning capacity, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life.

202. St. Anselm's conduct was malicious, wanton, reckless, and in willful disregard of the rights of Jane Doe and John Doe.

REQUEST FOR RELIEF

WHEREFORE, the premises considered, Plaintiffs respectfully pray that this Honorable Court:

1. Enter judgment in favor of Plaintiffs Jane Doe and John Doe and against Defendant St. Anselm's Abbey School, on each of their claims;
2. Declare Defendant's conduct in violation of the D.C. Human Rights Act, D.C. Code § 2-1401.01 *et seq.*, and the Civil Rights Act of 1866, 42 U.S.C. § 1981;
3. Award Plaintiffs compensatory damages in an amount to be determined by a jury, for lost educational opportunities and benefits, increased medical costs, lost future earnings and earning capacity, transportation expenses, humiliation, embarrassment, shame, pain, suffering, anguish, indignity, and loss of enjoyment of life;
4. Award Plaintiffs punitive damages in an amount to be determined by the jury;
5. Award Plaintiffs their court costs, expenses, reasonable attorneys' fees, pre-judgment interest, and post-judgment interest; and
6. Grant any other and further relief as this Court may deem just and proper.

DATED: June 17, 2025

Respectfully submitted,

/s/ Andrew M. Adelman

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JURY DEMAND

Plaintiffs demands a trial by jury on all issues contained herein.

/s/ Andrew M. Adelman

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