

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

CHRISTY COLE, on her own behalf and
on behalf of her minor daughter, K.C.

Plaintiffs,

– Versus –

WEBSTER PARISH SCHOOL
BOARD; JOHNNY ROWLAND, in his
official capacity as Superintendent of the
Webster Parish School District; and
DENNY FINLEY, in his official
capacity as Principal of Lakeside
Junior/Senior High School,

Defendants.

NUMBER:

JUDGE:

MAGISTRATE JUDGE:

COMPLAINT

INTRODUCTION

1. The First Amendment to the United States Constitution prohibits public schools from proselytizing, sponsoring prayer, or otherwise promoting religion. When public schools engage in these unconstitutional activities, they harm schoolchildren by coercing them into religious practices and subjecting them to

unwelcome indoctrination and religious messages; they harm parents by usurping their right to control the religious upbringing of their children; and they harm children, families and the community as a whole by sending a divisive message of religious favoritism for those who adhere to school officials' preferred faith.

2. In spite of these harms and well-established law, the Webster Parish School District has a longstanding custom, policy, and practice of promoting and inculcating Christian religious beliefs by sponsoring religious activities and conveying religious messages to students, including by broadcasting prayers daily over school speakers.

3. So engrained is official promotion of religion at Webster Parish schools that virtually all school events—such as sports games, pep rallies, assemblies, and graduation ceremonies—include school-sponsored Christian prayer, religious messages and/or proselytizing. Graduation ceremonies are frequently held in houses of worship, and at times they resemble religious rituals that include Bible verses and Christian prayers.

4. Since enrolling two of her daughters in the Webster Parish School District more than 12 years ago, Plaintiff Christy Cole has become increasingly alarmed by the pervasive religious indoctrination to which students in the District are subject.

5. Christy Cole believes her daughter and all students should be able to attend public school without exposure to government-sponsored religious practices and messages, and without harassment for their religious beliefs. Matters of faith are deeply personal and the decision regarding which religious beliefs to follow—if any—belongs to students and their families, not school officials. Indeed, the Establishment Clause of the United States Constitution guarantees that public-school students have an unequivocal right to attend school free from official imposition or promotion of religion.

6. Accordingly, Plaintiffs seek a declaratory judgment that the Defendants' policies and practices are unconstitutional because they are religiously coercive, endorse and promote religion, and have the purpose and effect of advancing religion. Plaintiffs further seek preliminary and permanent injunctive relief enjoining Defendants from continuing their unlawful practices; compensatory damages; and other relief as set forth below.

JURISDICTION AND VENUE

7. Plaintiffs bring this matter under 42 U.S.C. § 1983 for violations of civil rights under the First and Fourteenth Amendments to the U.S. Constitution.

8. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 (federal question); 1343 (civil rights); and 2201-2202 (Declaratory Judgment Act).

9. Venue is proper in this district under 28 U.S.C. § 1391(b)(1) and (2), and the Local Civil Rules for the Western District of Louisiana. Plaintiffs and Defendants reside in this district and division, and the unlawful practices that give rise to the claims herein occurred within this district and division.

PARTIES

10. Plaintiff Christy Cole resides in the Webster Parish School District. She is the natural tutrix of minor Plaintiff K.C.¹ Ms. Cole sues on her own behalf and on behalf of K.C.

11. Ms. Cole was raised as a Baptist and deeply values her religious beliefs. She objects to and is offended by Defendants' conduct because it promotes beliefs to which she and her daughter do not subscribe, co-opts her faith for official government purposes, promotes religious favoritism, and usurps her parental role.

12. Ms. Cole feels shunned and unwelcome within the Webster Parish Schools community because she objects to the schools' religious activities. Those activities have angered and upset her directly, and she has also suffered the emotional distress of witnessing the effect of the schools' activities on her daughters.

13. Plaintiff K.C. is a junior currently enrolled in the Webster Parish School District at Lakeside Junior/Senior High School ("Lakeside") in Sibley, Louisiana.

¹ The initials of Ms. Cole's minor child are used herein pursuant to Local Rule 5.7.12(b).

14. From August 2006 to the present, K.C. has been a student at schools in Webster Parish, where she has been subject to Defendants' customs, policies, and practices complained of herein.

15. Although she was raised among Methodists and Baptists, K.C. today considers herself agnostic.

16. Ms. Cole believes, and K.C. was taught at home by her mother, that praying in public is a sin, based on Matthew 6:5-6.

17. K.C. has felt and feels coerced, both directly and indirectly, to participate in religious activities and expression that did not and do not comport with her personal beliefs. She feels that she has been subjected to unwelcome indoctrination.

18. K.C. has been mocked by teachers for questioning religious doctrine they espoused, and she feels ostracized among her peers for her recent acts of dissent and because she does not share the religious beliefs promoted by her teachers and the school. She feels the negative judgment of her peers, and she feels as if she does not belong in her own school. Her experience of her schools' religious practices has made her depressed, exhausted, upset, and distraught.

19. Defendant Webster Parish School Board (the "Board") is a Webster Parish governmental organization with the power to sue and be sued.

20. The Board controls, operates, and supervises all District schools, including Lakeside. The Board is responsible for prescribing and enforcing rules and regulations at all District schools.

21. Defendant Johnny Rowland is a resident of Webster Parish and Superintendent of the Board. He is responsible for, among other things, implementing and enforcing Board rules, regulations, and policies. He is sued in his official capacity.

22. Defendant Denny Finley is a resident of Webster Parish and the Principal of Lakeside. He is the decision-maker on day-to-day operational issues at Lakeside and is responsible for enforcing school rules, regulations, and policies. He is sued in his official capacity.

23. At all relevant times, Defendants were acting and continue to act under color of law.

FACTUAL ALLEGATIONS

24. Plaintiffs re-allege and incorporate by reference all of the preceding paragraphs in this Complaint as if fully set out herein.

25. Defendants have a custom, policy, and practice of promoting and inculcating Christian religious beliefs and inculcating religious favoritism by sponsoring prayer, proselytizing, and other religious activities and messages throughout Webster Parish District schools.

26. Defendants were aware of, condoned, carried out, endorsed, and enabled the religious activities described herein.

27. Since enrolling in Webster Parish Schools, K.C. has been subjected to school-sponsored Christian prayer, proselytizing, and other religious inculcation on numerous occasions.

28. In connection with her parental duties and community membership, Christy Cole also has been exposed to official school promotion or Christian prayer and religious messages.

29. In 2004, Ms. Cole enrolled one of her daughters, Ana Lopez-Cole, at Webster Parish's Stewart Elementary School in Minden, Louisiana.

30. Ms. Cole became aware that teachers were showing in-class videos from the series "VeggieTales," animated cartoons of anthropomorphic fruits and vegetables who convey Christian religious messages, such as through their retelling of Bible stories.

31. Ms. Cole was surprised to learn that a student, selected by the school, read a Christian prayer daily over the school public-address system, and other students were expected to stand and recite the prayer.

32. To spare her children being targeted for retaliation, Ms. Cole decided at first not to complain.

33. In December 2006, Ms. Cole and her family moved to Sibley, and two of her daughters, Ana Lopez-Cole and K.C., enrolled at Webster Parish's Central Elementary School ("Central") in Dubberly, Louisiana.

34. When K.C. was in first grade at Central in 2007, she witnessed an argument between a teacher and a male student. When a Christian prayer was read over the school public-address system, the male student sat down. A teacher who had noticed became angry and aggressive because the student didn't stand for the prayer, grabbing the boy's shirt and pushing him out the door into the hallway. K.C. came home upset and described the argument to her mother.

35. Christy Cole called Central to inquire about its policy regarding school prayer. The secretary asked why Ms. Cole did not "believe in" prayer and insinuated that Ms. Cole was not "Christian." The secretary informed Ms. Cole that the practice was legal and told her that Principal Marvin Jones was not available to speak with her but would call her back. Although Ms. Cole repeated her attempt to speak with him, Principal Jones did not return her call.

36. In November 2008, K.C. was in the second grade at Central when Ms. Cole learned that students there were being compelled to pray twice every day. In addition to morning prayer broadcast over the school PA, teachers required students to pray, in a group, before lunch each day.

37. In or about November 2008, Ms. Cole wrote a letter to K.C.'s teacher at Central informing her that Defendants' practice of sponsoring school prayer was illegal. In her letter, Ms. Cole asked the teacher to stop, and Ms. Cole made clear that she objected to the official religious practices at school.

38. Principal Jones called Ms. Cole after her letter was received. He implied she was not a Christian and could not understand Christians; she informed him that she is, in fact, a Christian.

39. During the call, Principal Jones asserted that school prayer is legal and informed Ms. Cole that participation by students is voluntary. He claimed to have a "100% volunteer rate," adding, "They all volunteer for it!"

40. Ms. Cole suggested to Principal Jones that she would disapprove school-sponsored prayer regardless of the faith promoted. Principal Jones said that he would remove his own son from school if he were forced to observe Islamic prayer.

41. Shortly after Ms. Cole's telephone call to Principal Jones, school-sponsored prayer at Central stopped temporarily but later resumed in the same manner described above.

42. Ms. Cole repeatedly called the Webster Parish School Board in an effort to complain to the superintendent about school-sponsored prayer, but he did not

return her calls. She considered filing a lawsuit at that time, but she did not want to make her children targets for retaliation or ostracizing.

43. After Principal Jones retired in 2011, Principal Lisa Toland took over and immediately continued the practice of broadcasting Christian prayers in the morning over the PA at Central. Ms. Cole contacted Principal Toland and asked her to stop the practice, but Principal Toland angrily refused.

44. Also in 2011, Ana Lopez-Cole and other students witnessed a heated dispute about the card game “Magic: The Gathering.”

45. Two teachers at Central, Kim Austin and Donna Strickland, said the game was “against the Bible” and “of the Devil.” One of them waved the Bible in the air as she exclaimed, upsetting the students.

46. In or about the 2011-2012 school year, a ministry of Christian bodybuilders was invited to Central to speak to students, and students were excused from classes to attend the event held at the school.

47. The Christian bodybuilders, known as Team Impact,² proselytized to students at Central and invited them to visit a local church after the school event. At the nearby church, the bodybuilders handed out Bibles, which they autographed.

² Team Impact, which calls its events “creative evangelism,” typically partners with local churches “to infuse communities with the gospel of Jesus Christ,” according to its web site. *See* www.team-impact.com.

48. On March 17, 2013, K.C.'s teacher Garth Owens slapped a Bible on K.C.'s desk after implying to students in her class that it should be taken literally. K.C. asked another student how the Bible can be literal when it refers of unicorns in several verses.³ Mr. Owens became furious. He told K.C. the Bible did not mention unicorns, and he humiliated K.C. in front of the entire class at Central. The incident scared and embarrassed her.

49. After Ana Lopez-Cole and K.C. enrolled at Lakeside in 2011 and 2013, respectively, Christy Cole began to notice that her daughters' new school promoted religious activities more frequently than the elementary schools had. Not only did the morning prayers over the PA system continue every day; school events that Ms. Cole attended, such as pep rallies, assemblies, and athletic games, also incorporated school-sponsored Christian prayers.

50. A chapter of the Fellowship of Christian Athletes ("FCA")⁴ meets every Wednesday during school hours in Lakeside's gym, and Lakeside teachers and

³ Scholars have recognized that the King James Bible refers to unicorns in several verses, including Numbers 23:22, Numbers 24:8, Job 39:9, Job 39:10, Psalms 29:6, Psalms 92:10, Deuteronomy 33:17, Psalms 22:21, and Isaiah 34:7. Modern translations refer not to unicorns but to "wild ox" or "buffalo."

⁴ The FCA is a nonprofit Christian sports ministry based in Kansas City, Missouri, whose mission is "to present coaches and athletes, and all whom they influence, the challenge and adventure of receiving Jesus Christ as Savior and Lord, serving Him in their relationships and in the fellowship of the church." See <https://www.fca.org/aboutus/who-we-are/vision-mission>.

administrators encourage students to attend the weekly meetings that feature speakers such as coaches, pastors and performers.⁵

51. During K.C.'s eighth-grade year at Lakeside, in 2014, the students were taken to the gym to be "introduced" to the FCA. Because of a security incident at the school, Lakeside was put into "lockdown" during the event, and no student was permitted to leave the gym.

52. During the "lockdown," which occurred when the students normally ate lunch, an adult representing FCA decided to give a sermon to the students. A friend of K.C.'s who is agnostic began to cry because he didn't want to hear the sermon. K.C. was very upset by the sermon because she, too, could not leave.

53. On March 3, 2014, the father of Ana Lopez-Cole and K.C., Michael Simpson, asked Lakeside's then-Principal Johnny Rowland (now Superintendent of Webster Parish Schools) to stop the practice of daily prayers at school, warning him that it was illegal. Mr. Rowland replied, "I will stop when someone makes me stop."

54. During Ana Lopez-Cole's freshman year at Lakeside, in 2013-2014, the school's teachers excused from class early all students who participated in FCA's

⁵ These speakers include Michelle Harris of Brushwood United Methodist Church in Dubberly, who spoke at Lakeside's FCA on Nov. 2, 2016; and Dylan Drumm of First Baptist Church in Minden, who visited Lakeside on October 30, 2016. Lakeside Girls Basketball Coach McConathy spoke at Lakeside FCA's Feb. 1, 2017 event. Mynista, a Christian rapper, performed at Lakeside's FCA meeting on April 19, 2017.

weekly meeting, allowing them to eat lunch earlier than other students. Lakeside students who are late to class because of FCA attendance are automatically excused for their absences.

55. During Ana Lopez-Cole's sophomore year in 2014-2015, her teacher TroyAnn Williamson frequently showed movies with Christian themes to the students in her class. Ms. Williamson, who taught Home Economics and other subjects, played several films for students, including "God's Not Dead," a Christian drama in which a college student's faith is challenged by a philosophy professor who declares God a fiction.

56. In 2014, Ms. Cole attended a powderpuff football game at Lakeside in which her daughter Ana played. Christian prayers delivered by students were broadcast over the school's loudspeakers at the event. As Ana stood on the field with her team, she felt anxious because she knew the prayers would offend her parents.

57. Upon information and belief, every athletic event held at schools in Webster Parish includes prayers delivered by students broadcast over school loudspeakers.

58. During Ana Lopez-Cole's time at Lakeside, at least three different science teachers informed her class, while purporting to teach evolution, that evolution is not real. The teachers told students that they believe in Adam and Eve, not the Big Bang. One science teacher told Ana's class that evolution is a "fairytale."

59. In May 2015, K.C.'s eighth-grade graduation ceremony was held in Lakeside's gym. The event included at least four Christian prayers, during which parents were asked to stand.

60. Michael Simpson refused to stand for prayers at the graduation, and Christy Cole remained sitting with him in solidarity. Other parents hissed and made disapproving noises to shame them.

61. After this ceremony, Michael Simpson refused to attend any more school-sponsored events. Christy Cole resolved not to attend any school-sponsored events unless absolutely necessary.

62. Mr. Rowland left Lakeside in August 2015, and Denny Finley took over as principal. Mr. Finley continued the school-sponsored religious activities described herein, including the practice of selecting students to read a Christian prayer over Lakeside's PA every day.

63. In September of 2015, Mr. Finley—who was Ana's teacher—expressed anti-Muslim sentiments while teaching Ana's American History class.

64. During K.C.'s enrollment at Lakeside and continuing to the present day, two students are selected daily by teachers or administrators, and the students decide which one of them will read the Pledge of Allegiance, and which one will read the prayer. Only Bible verses are permitted, and a copy of The Lord's Prayer is provided

to the student “volunteers.” A copy of The Lord’s Prayer is taped to the secretary’s desk in the main office.

65. K.C. and Ana Lopez-Cole have been chosen as “volunteers,” and both refused to read a prayer. K.C. read the Pledge of Allegiance once during her sophomore year. Ana was recruited 2-3 times by a teacher to “volunteer,” and she also read the Pledge of Allegiance.

66. Upon information and belief, the prayer broadcast daily at Lakeside is always a Christian prayer. Neither K.C. nor Ana Lopez-Cole has ever heard a prayer in school that was from a faith other than Christianity.

67. Upon information and belief, every school in Webster Parish follows the practice of broadcasting a daily prayer delivered by a student in the manner described above.

68. In May 2016, Lakeside’s graduation ceremony was held at First Baptist Church in Minden. The ceremony featured several Christian prayers throughout the event, including a minister who mentioned God several times during the ceremony.

69. In May 2017, Lakeside’s graduation ceremony was held at City on a Hill, a Pentecostal church in Minden.

70. The May 2017 graduation ceremony included several Bible verses, Biblical stories and Christian prayers, beginning with an invocation and ending with a benediction; a minister with a microphone told Biblical stories during the event.

Everyone in attendance was expected to stand for the prayers, as indicated by the event's written program.

71. Although Christy Cole and other family members attended, several of them were offended by the overtly religious nature of the event. Present among Ana's family members were Christian, agnostic and atheist relatives, and all were shaken by the overtly religious nature of the graduation ceremony.

72. On September 27, 2017, Lakeside and other Webster Parish schools participated in See You At The Pole, an event described as "a day committed to global unity in Christ and prayer for your generation," according to its Web site, www.syatp.com. Lakeside teachers and administrators promoted See You At The Pole and provided sound-amplification equipment for students to use. Teachers and administrators at Lakeside attended and participated.

73. On the night of October 11, 2017, Lakeside hosted "Fields of Faith" at its football stadium. "Fields of Faith" was promoted as a student-led event in which students "invite, pray for, share with, and challenge their peers to read the Bible and follow Jesus Christ," according to its Web site, www.fieldsofffaith.com/what-is-fields-of-faith.

74. Although "Fields of Faith" was ostensibly student-led, Lakeside administrators and teachers—including Principal Finley—promoted the event in their official capacities at school, and attended and participated, along with local

pastors such as Tony Salas of First Assembly of God in Minden. The event was promoted over Lakeside's PA system.

75. During three of the past four years, Lakeside has invited Mynista, the Christian rapper, to perform for students during a school assembly or pep rally. For these events, student attendance was compulsory. Students were excused from class and sent to watch Mynista perform in the gym. In addition to giving a rap performance with Christian lyrics, Mynista typically described how God helped him overcome his struggles with drugs and lead a sober life. He encouraged students to turn to God as their inspiration.

76. On the morning of November 7, 2017, Lakeside held a mandatory assembly featuring You Are Worth It ("YAWI"), a religious nonprofit corporation in Monroe, Louisiana.

77. Although YAWI's promoted purpose is to caution teens and young adults against drunken driving, YAWI's president, Bill Baldrige, also proselytizes and urges audiences that "faith in God" will help them overcome obstacles and achieve success.

78. Mr. Baldrige promoted the November 7, 2017 event on YAWI's Facebook page, noting that students from Minden High School and Doyline High School would be bussed to Lakeside to hear him speak.

79. During the November 7, 2017, event, which was attended by Webster Parish School Board members, Mr. Baldrige, several youth pastors, and others proselytized to more than 500 students.

80. After the event, Mr. Baldrige wrote a blog post in which he stated, “It was an awesome feeling when the students clapped and cheered when Chief Matecki Nelson from the Ouachita Parish Fire Department explained their value by quoting John 3:16, ‘For God so loved the world, that he gave his only begotten Son, that whosoever believeth in him shall not perish, but have everlasting life.’”⁶

81. On November 8, 2017, Lakeside held another mandatory, school-day assembly that involved proselytizing during the school day’s second block, or period. Although it was supposed to be an event memorializing veterans and their service in advance of Veterans Day on Nov. 11, a local Christian minister was invited to speak to the students, and he proselytized during the event. The minister introduced veterans to the students, and he frequently mentioned God as having a role in the lives of veterans. The minister mentioned Christian figures and read a Bible verse, then explained its meaning. Students were instructed to leave class for the event, which was attended by Principal Finley.

82. Every day of the present school year, from August until the present, Lakeside has sponsored a student-read Christian prayer over its PA system.

⁶ See <https://www.youareworthitinc.com/content/lakeside-high-school>

83. On every day of this school year, The Lord's Prayer has been read over the Lakeside PA by a student.

84. Although K.C. stopped reciting prayer while in school during her eighth-grade year, she recently began to remain seated during the morning prayer. This act caused one of her classmates to call out her name, and another mocked her by saying, "Devil be rid of me!" K.C.'s teacher did not intervene or stop this harassment.

85. On the wall of a classroom at Lakeside, Mechelle Hall, a teacher, put up religious messages at the start of the current school year, including psalms and Bible verses. Students serving in-school suspension are sent to Mrs. Hall's classroom.

86. Under the heading, "Daily Objectives," four out of five listed "objectives" in Mrs. Hall's classroom involve religion: "Pray Daily!," "Love God!" "Study His Word," "Love Others," and "Worship God." On another wall in the classroom, a paper cutout of praying hands accompanies the words, "WANT A CHANGE? PRAY!" Mrs. Hall continually plays Christian music in her classroom.

87. The school-sponsored activities described herein continue to the present day, including school-sponsored prayer, religious messages and proselytizing from school officials.

88. The divisive impact of the District's customs, policies, and practices have had in the community is further evinced by the backlash that K.C., Ana Lopez-Cole, Christy Cole, and Michael Simpson have experienced after making their objections known.

89. The Coles have been hissed at, shunned, and had their religious beliefs questioned by school officials. K.C. has been called out by name and made to feel unwelcome in her own school classroom. The family has been made to feel like outsiders and second-class citizens within the school community because they object to the schools' religious activities. The District's and community's reaction to these issues illustrates a key reason why the Establishment Clause mandates that government must stay neutral regarding religion in the first place: to prevent such sectarian strife and civic divisiveness.

CLAIM FOR RELIEF: ESTABLISHMENT CLAUSE VIOLATION

90. Plaintiffs re-allege and incorporate by reference all of the preceding paragraphs in this Complaint as if fully set out herein.

91. By Defendants' customs, practices, and policies alleged above, Defendants have violated, and are continuing to violate, Plaintiffs' rights under the Establishment Clause of the First Amendment to the United States Constitution and Fourteenth Amendment to the United States Constitution. The customs, practices,

and policies established by Defendants are the cause in fact of the constitutional violations.

92. Defendants' customs, practices, and policies coercively expose Plaintiffs to unwanted religious exercise and messages sponsored by school officials.

93. Defendants' customs, practices, and policies also improperly endorse religion. A reasonable, objective student, parent, or other observer aware of the conduct alleged above would conclude that the Defendants have endorsed and continue to endorse religion at Central, Lakeside, and other District schools.

94. Defendants' customs, practices, and policies, in addition, have the primary purpose and effect of promoting and advancing religion and excessively entangle the District with religion.

95. Defendants' customs, practices, and policies also usurp the role of parents in controlling the religious upbringing of their children.

96. Unless restrained by this Court, Defendants will continue to subject Plaintiffs to these unconstitutional customs, policies, and practices, causing Plaintiffs irreparable harm by denying their fundamental constitutional rights to be free from governmental promotion of religious beliefs and messages and governmental coercion of religious practices.

97. Plaintiffs have no adequate remedy at law for the denial of their fundamental constitutional rights.

RELIEF REQUESTED

Plaintiffs respectfully request the following relief in the form of a judgment against the Defendants Webster Parish School Board, Johnny Rowland, and Denny Finley, jointly and severally:

- A. An order declaring Defendants' customs, policies, and practices alleged above to be in violation of the Establishment Clause of the First Amendment to the United States Constitution;
- B. An order preliminarily and, thereafter, permanently enjoining Defendants and their officers, agents, affiliates, subsidiaries, servants, employees, successors, and all other persons or entities in active concert or privity or participation with them, from continuing their unlawful conduct at Central Elementary School, Lakeside Junior/Senior High School, and all schools within the Webster Parish School District, and specifically prohibiting Defendants from:
 - 1. Participating in, organizing, promoting, advancing, aiding, endorsing, or causing prayer, religious devotionals, or proselytizing during class and school-sponsored events;
 - 2. Encouraging students to participate in religious events and activities, or otherwise promoting religious events and activities;

3. Displaying religious messages in a manner that (a) does not have a non-religious, educational, curriculum-related purpose, or (b) conveys official approval of its religious message or content;
 4. Teaching Biblical doctrine as fact or otherwise endorsing, promoting, or seeking to bolster as true creationism or other religious beliefs about the origin of life;
 5. Conveying messages endorsing religion;
 6. Otherwise unconstitutionally endorsing religion or religiously coercing students or parents; and
 7. Retaliating against Plaintiffs or their family members for objecting to Defendants' unlawful practices and bringing this action;
- C. An order directing Defendants to provide a copy of the written injunction to all Webster Parish School District officials, employees, and agents;
- D. Entry of judgment for Plaintiffs against Defendants for compensatory damages in an amount to be determined according to proof, as a remedy for the mental and emotional distress and discomfort that Plaintiffs have suffered;
- E. An award, from Defendants to Plaintiffs, of reasonable attorneys' fees and costs incurred in connection with this action, pursuant to 42 U.S.C. § 1988;

- F. An order retaining this Court's jurisdiction of this matter to enforce the terms of the Court's orders; and
- G. Such further and different relief as is just and proper.

Respectfully submitted,

/s/ Bruce Hamilton

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