

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

SCOTT LANE, on his own behalf and on behalf of his minor children, S.L. and M.L.; AND SHARON LANE, on her own and on behalf of her minor child, C.C.,

Plaintiffs,

– Versus –

SABINE PARISH SCHOOL BOARD; SARA EBARB, in her official capacity as Superintendent of the Sabine Parish School District; GENE WRIGHT, in his official capacity as Principal of Negreet High School; and RITA ROARK, in her official capacity as a teacher at Negreet High School,

Defendants.

NUMBER: 5:14-cv-00100

JUDGE:

MAGISTRATE JUDGE:

VERIFIED COMPLAINT

INTRODUCTION

1. Students of all faiths should feel safe and welcome in our public schools. At Negreet High School (“Negreet” or “NHS”) in Sabine Parish, Louisiana, however, school officials have a longstanding custom, policy, and practice of promoting and inculcating Christian beliefs by sponsoring religious activities, as well as conveying religious messages to students. For example, at Negreet, which serves students in kindergarten through twelfth grade, teachers ask students for professions of faith in class. At least one science teacher treats the Bible as scientific fact, telling students that the Big Bang never happened and that evolution is a “stupid” theory that “stupid people made up because they don’t want to believe in God.” Paintings of Jesus Christ,

Bible verses, and Christian devotional phrases adorn the walls of many classrooms and hallways, including the main hallway leading out to the bus pick-up area. A lighted, electronic marquee placed just outside the building scrolls Bible verses every day. And staff members routinely lead students in Christian prayer. The school district's administration – all the way up to the Superintendent of Schools – not only knows about these activities, but endorses and encourages all of this.

2. So engrained is official promotion of religion at Negreet that when Plaintiff C.C.,¹ a Buddhist of Thai descent, enrolled in the sixth grade this past August, he quickly became the target of proselytizing and harassment by one of his teachers, Defendant Rita Roark, who even ridiculed C.C. in class for his non-Christian beliefs and has told her students that his faith, Buddhism, is “stupid.”

3. After learning of Negreet's unlawful practices and treatment of their son, C.C.'s parents, Scott and Sharon Lane, rose to his defense, taking their concerns to Defendant Sara Ebarb, the Sabine Parish Superintendent of Schools. But she took no corrective action. On the contrary, she told the Lanes that “[t]his is the Bible Belt” and that they would simply have to accept that teachers would proselytize students. She also asked whether C.C. had to be raised as a Buddhist and whether he could “change” his faith, and she suggested that C.C. transfer to another district school – more than 25 miles away where, in her words, “there are more Asians.” The day after meeting with the Lanes, the Superintendent sent a letter to Negreet Principal Gene Wright stating that she approved of Negreet's official religious practices. Wright read the letter to the entire Negreet student body over the school's public-address system.

4. Plaintiffs believe that their children should be able to attend public school without

¹ Per L.R. 5.7.12(b), Plaintiffs who are minors are identified only by their initials in this document and in all other public filings.

unwelcome exposure to government-sponsored religious practices and messages and without harassment for their religious beliefs. Indeed, the Establishment Clause of the First Amendment to the U.S. Constitution guarantees that public-school students have an unequivocal right to attend school free from official imposition or promotion of religion. Defendants' custom, policy and practice of promoting and inculcating Christian religious beliefs, while denigrating students of non-Christian faiths, plainly violates this right. Matters of faith are deeply personal and the decision regarding which religious beliefs, if any, to follow belongs to students and their families, not school officials.

5. 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; nominal and compensatory damages; and other relief as set forth below.

JURISDICTION AND VENUE

6. Plaintiffs bring this matter under 42 U.S.C. §1983 (2014), for violations of civil rights under the First and Fourteenth Amendments to the U.S. Constitution.

7. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (2014) (federal question); Section 1343 (civil rights); and Sections 2201 and 2202 (Declaratory Judgment Act).

8. Venue is proper in this district under 28 U.S.C. § 1391(b)(1) and (2) (2014), 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

9. Plaintiffs Scott and Sharon Lane are married and reside within the Sabine Parish School District. Scott Lane is the natural parent of minor Plaintiffs S.L. and M.L. and step-parent to C.C. Sharon Lane is the legal parent of minor Plaintiff C.C. and step-parent to S.L. and M.L.

10. Plaintiff C.C. is a student currently enrolled in the Sabine Parish School District. His mother, Plaintiff Sharon Lane, sues on his behalf, as well as on her own behalf. From August 8, 2013, through approximately September 3, 2013, C.C. was a student at Negreet, where he was subject to the customs, policies, and practices of all Defendants.

11. C.C. is of Thai descent and is a Buddhist. Sharon Lane became a practicing Tibetan Buddhist approximately fourteen years ago. Both C.C. and Sharon deeply value their Buddhist religious beliefs. They object to and are offended by Defendants' conduct because it denigrates their faith and promotes religious beliefs to which they do not subscribe. Defendants' unlawful practices have made C.C. and Sharon feel marginalized and unwelcome within the School District simply because they do not share the same religious beliefs as many school officials.

12. Specifically, as a sixth-grade student at Negreet, C.C. felt extremely uncomfortable because he was routinely subjected to unwelcome religious messages by school officials. He felt coerced, both directly and indirectly, into participating in religious activities and expression that did not comport with his personal religious beliefs. C.C. was distraught when schools officials mocked and disparaged his Buddhist faith. Defendants' unyielding imposition of Christian beliefs and shocking treatment of C.C. caused him to become physically ill and to dread attending school.

13. Instead of ceasing these unlawful practices, Defendants vowed to continue them.

Defendant Ebarb told C.C.'s parents that he could either continue suffering the official proselytizing and harassment at Negreet or transfer to another District school where "there are more Asians." She also asked if C.C. "has to be raised a Buddhist," or whether he could "change" his faith. C.C.'s parents were incredulous and dismayed by Ebarb's suggestion. However, unwilling to subject C.C. to further emotional and physical distress, the Lanes agreed to transfer him to another school.

14. C.C. is currently enrolled as a sixth-grader at Many Junior High School ("Many" or "MJHS"), where he remains subject to the customs, policies, and practices of Defendants Sabine Parish School Board and Superintendent Ebarb. To attend MJHS, C.C. must be driven to school by a parent every day, more than 30 minutes each way from his home. During the day, he is separated from his siblings, who remain at Negreet. And, even at MJHS, District officials continue to promote Christianity and impose religious exercise on students.

15. Like C.C., his mother Sharon Lane is also extremely uncomfortable with and offended by Defendants' disparagement of Buddhism and pervasive promotion of Christianity, to which both she and her son have been exposed. Lane is committed to raising C.C. as a Buddhist and believes that Defendants are interfering with her right to direct her son's religious education. Defendants' refusal to cease this unlawful conduct has not only caused C.C. to suffer substantial anguish, but also has caused the family to take on additional financial and administrative burdens in order to transport C.C. each day more than 25 miles to a different school than his siblings.

16. Plaintiffs S.L. and M.L. are minor children and brothers to C.C. They are both enrolled at Negreet High School, where they are subject to the customs, policies, and practices of Defendants Sabine Parish School Board, Superintendent Ebarb, and Principal Wright. Although M.L. attends church, he believes that faith is a personal matter. He believes that he should be able

to decide, with the guidance of his parents and religious leaders, which beliefs he will follow and when, as well as how to express those beliefs, without pressure from his teachers and school officials. S.L. is a non-believer who does not subscribe to the religious beliefs promoted by schools officials.

17. S.L. and M.L. feel very uncomfortable and coerced, both directly and indirectly, by school officials' repeated efforts to impose their religious beliefs on students in the form of official prayer, displays of religious iconography, and other religious activities. They are also upset and offended by school officials' disparagement of their brother, C.C., and his faith. S.L. and M.L. feel like outsiders in their school because of Defendants' conduct.

18. Plaintiff Scott Lane sues on behalf of his minor children, S.L. and M.L., and on his own behalf. Lane objects to and is offended by Defendants' policies and practices alleged herein because they promote religious beliefs to which he does not subscribe and impede his right to control his children's religious education and upbringing free from governmental intrusion or interference.

19. Plaintiffs have been rendered outsiders at Negreet and within the School District because of Defendants' longstanding custom, policy, and practice of promoting and inculcating Christian beliefs by sponsoring and encouraging prayer, proselytizing students, and imposing other religious messages and iconography on them. If this custom, policy, and practice remains in place, Plaintiffs will continue to suffer these harms through this school year and beyond.

20. Defendant Sabine Parish School Board is a Sabine Parish governmental organization with the power to sue and be sued. The Board controls, operates, and supervises all District schools, including Negreet High School and Many Junior High School. The Board is responsible for prescribing and enforcing rules and regulations at all District schools.

21. Defendant Sara Ebarb is a resident of Sabine Parish and Superintendent of the Sabine Parish School Board. She is responsible for, among other things, implementing and enforcing Board rules, regulations, and policies. She is sued in her official capacity.

22. Defendant Gene Wright is a resident of Sabine Parish and the Principal of Negreet High School. He is the decision-maker on day-to-day operational issues at Negreet and is responsible for enforcing school rules, regulations, and policies. He is sued in his official capacity.

23. Defendant Rita Roark is a resident of Sabine Parish and a sixth-grade teacher at Negreet. She is in charge of the education of children in her classroom. She is sued in her official capacity.

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

ADDITIONAL FACTUAL ALLEGATIONS

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

26. Defendants have a longstanding custom, policy, and practice of promoting and inculcating Christian beliefs by coercing and encouraging prayer and religious exercise, proselytizing students, and subjecting students to religious iconography and other religious messages. Among other unlawful activities, Defendants routinely incorporate official prayer and proselytization into class and school events, teach Biblical doctrine as fact, display religious messages and iconography in classrooms and hallways, and degrade minority faiths.

33. C.C. felt sick and humiliated after the incident.

34. When C.C. later showed the exam to his mother, she instructed him that he need not answer such inappropriate questions. However, when C.C. expressed his concern that he would lose points on his tests, Sharon told her son he could write “Buddha,” consistent with their religious beliefs, if the question were posed again.

35. C.C. did just that on a subsequent science test featuring the same question. In the blank, he wrote “Lord Boda [sic].” Roark marked the answer incorrect by placing a large, red question mark near it. *See Ex. B*, a copy of the test. As Roark was returning the tests to students, one student declared again, for the whole class to hear, that “people are stupid if they think God is not real.” Roark agreed, responding, “Yes! That is right! I had a student miss that on his test.” Most of the students, who were present when Roark had previously ridiculed C.C. for failing to write “Lord” as the correct answer, broke out in laughter.

36. As a result of Roark’s conduct, C.C. became anxious and nauseated every morning before school. When his mother asked why he was sick, he told her in more detail what Roark had been doing in science class.

B. Defendants’ Refusal to Stop Roark’s Unlawful Activities

37. Outraged over Roark’s treatment of C.C., Scott and Sharon Lane contacted Superintendent Ebarb and explained what had happened. Although Ebarb indicated that she would look into the matter, she also told them that “this is the Bible Belt,” and recommended that they simply tolerate Roark’s proselytization and harassment.

38. Unsatisfied, the Lanes met with Ebarb to follow up. They discussed Roark’s treatment of C.C., as well as the general promotion of Christianity by faculty and administrators at Negreet. During the meeting, Ebarb was unreceptive to Plaintiffs’ concerns and repeated her

earlier admonition that they were “in the Bible Belt” and should simply accept the pervasiveness of official Christianity in Sabine Parish public schools.

39. Ebarb defended Roark specifically, declaring that “[t]eachers have religious freedom.” She further stated that “if they were in a different country,” Plaintiffs would see “that country’s religion everywhere,” and that, therefore, they “shouldn’t be offended” to “see God here.” Purporting to illustrate her point further, she noted that, because she did not find it offensive that “the lady who cuts [her] toenails has a statue of Buddha,” Plaintiffs should not be bothered by Roark’s in-class proselytization. She then wondered whether C.C. “has to be raised Buddhist” and even asked whether he could “change” his faith. The Lanes were floored by Ebarb’s implication that C.C. should change his faith to fit in.

40. In the end, the only recourse Ebarb offered Plaintiffs was to transfer C.C. to a different school 25 miles away where, in her words, “there are more Asians.” She did not, however, offer to provide school bus transportation or, alternatively, funds to cover Plaintiffs’ private expense of transporting C.C. to the new school.

41. Ebarb’s dismissive and offensive response to Plaintiffs’ concerns did not end there. The day after her meeting with Ebarb, Principal Wright read a letter from Ebarb over Negreet’s public-address system. The letter stated that Ebarb approved of Wright’s practices in general and that she approved of the fact that the teachers at Negreet acted consistent with their strong religious beliefs.

42. Concerned about the increasingly hostile environment Defendants were creating for C.C., and hoping to save him from suffering additional psychological harm, his parents decided to remove him from Negreet and enroll him at Many Junior High School. At great personal expense of both cost and time, the Lanes now drive C.C. daily 25 miles each way to

school.

C. Roark's Continued Promotion of Religious Beliefs

43. Despite Plaintiffs' objections, Defendant Roark continues to promote religious beliefs to students during science class and at other times.

44. In recent months, she has repeatedly instructed students that evolution is not valid as a scientific theory and that God made the world 6,000 years ago.

45. She demands that students write a Bible verse or "Isn't it amazing what the Lord has made" at the bottom of exams and assignments if they want extra credit. Roark writes "Yes!" next to the verse or religious affirmation and awards students five additional points when they comply with this mandate.

46. In social studies class, which Roark also teaches, she presents Biblical accounts of persons, places, and events as fact. For example, on a handout asking, "What mountain did Moses supposedly get the Ten Commandments from," Roark crossed out the word "supposedly." She also has told students that the Bible is "100% true" and that "scientists are slowly finding out that everything in the Bible is accurate."

47. Further, she continues to ridicule non-Christians for their beliefs. Last month, during a social studies lesson about Hinduism and Buddhism, after asking a student to read aloud from the textbook, Roark would make derogatory comments about the discussed minority faith. For instance, she told the class during a discussion of Siddhartha that Buddhism is "stupid," and that "no one can stay alive that long without eating."

D. Displays of Religious Iconography and Messages at Negreet

48. Roark's conduct is part of a pervasive custom, policy, and practice of official promotion and inculcation of religion generally, and Christianity, specifically, by District

officials.

49. For example, the District's belief statement, posted on its website until this school year, declares first that, "We believe that: God exists." *See Ex. C*, a screenshot of the page.

50. A large painting of Jesus Christ hangs in the main hallway and other depictions of Christ have been displayed in classrooms and hallways at other times during the year. *See Ex. D*, a photograph of the painting that hangs in the main hall.

51. A large, outdoor, variable-message electronic marquee on Negreet premises regularly displays Bible verses. By way of example, *see Exhibit E*, a video of the marquee displaying the message, "In all ways acknowledge God, and he will direct thy path. Prov. 3, v6."

52. Bible verses are also prominently displayed in many school hallways and classrooms. For example, posters displayed in the hallways of the junior-high wing of Negreet present the following Bible verses to students:

- 2 SAMUEL 22:31: AS FOR GOD, HIS WAY IS PERFECT . . . HE SHIELDS ALL WHO TAKE REFUGE IN HIM;
- PHILLIPIANS 4:6-7: DON'T WORRY ABOUT ANYTHING: INSTEAD, PRAY ABOUT EVERYTHING;
- PSALM 137:8: THOUGH I WALK IN THE MIDST OF TROUBLE, YOU PRESERVE MY LIFE;
- PSALM 51:10: CREATE IN ME A PURE HEART, O GOD, AND RENEW A STEADFAST SPIRIT WITHIN ME; and
- JEREMIAH 29:13: YOU WILL SEEK ME AND FIND ME WHEN YOU SEEK ME WITH ALL YOUR HEART . . . DECLARES THE LORD.

See Ex. F, a set of photographs of the above posters.

53. Another display in the main foyer of the school informs students that "ACTIONS SPEAK LOUDER THAN WORDS." It features several posters, including one of a child praying

that instructs students to “Pray,” another that urges them to “Worship,” and another that encourages them to “Believe.” *See Ex. F.*

54. Meanwhile, a poster displayed in the waiting area of the main office announces that “[i]t’s okay to pray.”

55. Principal Wright approved, or at least is aware of, these items. Superintendent Ebarb is also aware of their presence, and neither she nor Wright has made any effort to have them removed.

E. School-Sponsored Prayer & Distribution of Religious Literature in Class and at School Events.

56. School officials also routinely incorporate Christian prayer into school functions or class. Principal Wright encourages, condones, and tolerates such prayers. Superintendent Ebarb is also aware of and approves the practice and has made no effort to curtail it.

57. For example, C.C.’s fifth grade math teacher, Stacy Bray, asked her students to bow their heads and pray aloud before lunch every day. Bray selected a different student each time to lead the class in prayer and participated in the prayers herself. Another teacher, Angela Knight, leads her class in daily lunchtime prayer.

58. Nearly all student assemblies begin with prayer. For example, this past spring, Negreet held a mandatory Drug Abuse Resistance Education (D.A.R.E.) assembly at which Principal Wright led the entire faculty and student body in prayer. Wright frequently leads the faculty and student body in prayer at other assemblies as well, including the school’s annual Class Ring Ceremony, held in the springtime. *See Ex. G*, a photo of students being led in prayer at the Class Ring Ceremony. Student attendance at the Class Ring Ceremony is compulsory.

59. Mandatory pep rallies held before LEAP standardized testing also feature official prayer led by a student over the public-address system.

60. Every Veterans Day, including the most recent, school officials invite a local Christian preacher to hold a group prayer at a mandatory faculty/student assembly honoring the Nation's veterans. See **Ex. H**, a video of this year's clergy-led prayer at the Veterans Day assembly. This assembly also features video presentations set to Christian pop music.

61. Once a year, Negreet administrators and faculty organize a "See You at the Pole" event, at which students and faculty gather at the school's flagpole before class to pray. Attendance is compulsory for all students.

62. Almost every athletic event at Negreet opens with an official prayer. The prayers are often led by faculty, administration, or local religious leaders.

63. The day Negreet was dismissed for the most recent holiday break, Principal Wright prayed to all of the students over the public-address system.

64. Negreet faculty members also sometimes distribute religious literature to students. For example, on one occasion earlier this school year, a faculty member gave M.L. and the rest of his class copies of a book from the "Truth for Youth" program. Published by Revival Fires International ministry of West Monroe, Louisiana, the "Truth for Youth" Bibles consist of the entire New Testament, along with cartoon tracts that promote Christian beliefs, denounce evolution, spread scientifically inaccurate information about birth control and sex, and warn students about the evils of rock music, drunkenness, pornography, premarital sex, homosexuality, sorcery, witchcraft, and other subjects.²

F. Official Promotion of Religion at Many Junior High School

65. At Many Junior High School, which C.C. currently attends, school officials also

² A detailed summary of the Truth for Youth program can be found at Truth for Youth Bible, Revival Fires International, <http://timtodd.org/truthforyouth.html> (last visited Jan. 18, 2014).

incorporate official prayer into school events. For example, most, if not every, football game begins with an official student-led prayer over the public-address system. Prior to each prayer, an announcer asks the entire audience to stand and bow their heads. *See Ex. I*, a video portraying such prayer at a recent Many football game.

66. School-day assemblies, including the Veterans Day celebration, also include official prayer.

67. This past Christmas, Many Junior High School organized and held on school premises a “living nativity” scene depicting the birth of Jesus Christ.

68. And before the holiday, C.C.’s teacher read his class a story about the birth of Christ. The story stated that candy canes are shaped like a “J” to symbolize Jesus.

CLAIM FOR RELIEF: ESTABLISHMENT CLAUSE VIOLATION

69. Plaintiffs re-allege and incorporate by reference all of the preceding paragraphs in this Complaint.

70. The conduct alleged above constitutes the official policy and practice of Defendants, or is so persistent, widespread, and pervasive as to constitute an official custom regarding which Defendants have actual or constructive knowledge.

71. By Defendants’ conduct alleged above, they have violated, and continue to violate, Plaintiffs’ rights under the Establishment Clause of the First Amendment to the U.S. Constitution and the Fourteenth Amendment to the U.S. Constitution. Defendants’ custom, policy, and practice of promoting and inculcating Christian beliefs by sponsoring and encouraging prayer, proselytizing students, and imposing other religious messages and iconography on them is the cause-in-fact of the constitutional violations.

72. Defendants’ conduct coercively exposes Plaintiffs to unwanted religious exercises,

instruction, and messages.

73. Defendants' conduct also improperly endorses 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 by sending the message that Christians are officially favored, and non-Christians disfavored, by school officials.

74. Defendants' conduct, in addition, has the primary purpose and effect of promoting and advancing religion and excessively entangles the School Board with religion.

75. Unless restrained by this Court, Defendants will continue to subject Plaintiffs to this unlawful conduct, causing Plaintiffs irreparable harm by denying their fundamental constitutional rights to be free from governmental promotion of religious beliefs and messages, governmental coercion of religious practices, and governmental denigration of their faith.

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

RELIEF REQUESTED

77. Plaintiffs respectfully request the following relief in the form of a judgment against the Defendants Sabine Parish School Board, Sara Ebarb, Gene Wright, and Rita Roark, 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 U.S. 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 Negreet High School, Many Junior High School, and all schools within the Sabine 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. 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;
3. Encouraging students to participate in religious events and activities, or otherwise promoting religious events and activities;
4. Displaying religious iconography or 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;
5. Permitting the unlawful distribution of religious literature on campus during the school day;
6. Conveying messages endorsing religion or denigrating any individual faiths;
7. Retaliating against Plaintiffs or their family members for objecting to Defendants' unlawful practices and bringing this action; and
8. Otherwise unconstitutionally endorsing religion or religiously

coercing students.

- C. An order directing Defendants to provide a copy of the written injunction to all School Board officials, employees, and agents;
- D. Entry of judgment for Plaintiffs against named Defendants for nominal damages; and for compensatory damages to recover money Plaintiffs have spent on (1) transporting C.C. to a different school, and (2) any other necessary activities related to this matter;
- 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 permitting this Court to retain jurisdiction over this matter to enforce the terms of the Court's orders; and
- G. Such further and different relief as is just and proper or that is necessary to make Plaintiffs whole.

Respectfully submitted,

/s/ Justin Harrison

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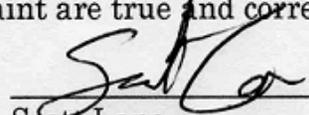
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Dated: January 22, 2014

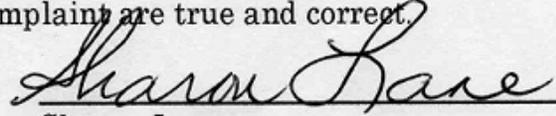
VERIFICATIONS

I, Scott Lane, hereby verify to the best of my knowledge and under penalty of perjury that the facts set forth in this complaint are true and correct.



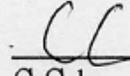
Scott Lane

I, Sharon Lane, hereby verify to the best of my knowledge and under penalty of perjury that the facts set forth in this complaint are true and correct.



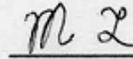
Sharon Lane

I, C.C., hereby verify to the best of my knowledge and under penalty of perjury that the facts set forth in this complaint are true and correct.



C.C.¹

I, M.L., hereby verify to the best of my knowledge and under penalty of perjury that the facts set forth in this complaint are true and correct.



M.L.

I, S.L., hereby verify to the best of my knowledge and under penalty of perjury that the facts set forth in this complaint are true and correct.



S.L.

¹ Signed verifications bearing the full names of all minor Plaintiffs are on file with Plaintiffs' counsel.