

VIRGINIA:

IN THE CIRCUIT COURT OF LOUDOUN COUNTY

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

Plaintiffs,

v.

Civil Case No. _____

**THE LOUDOUN COUNTY PUBLIC
SCHOOLS,**

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

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

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

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

Ashburn, Virginia 20148;

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

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

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

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

**THE LOUDOUN COUNTY
SCHOOL BOARD,**

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

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

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

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

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

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

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

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

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

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

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

and

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

Defendants.

Complaint

Plaintiffs state as follows:

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

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

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

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

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

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

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

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

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

The Parties

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Jurisdiction and Venue

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

Background

Virginia Law

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

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

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

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

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

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

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

Defendants' Malfeasance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

46. Plaintiffs repeat paragraphs 1 – 45.

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

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

Plaintiffs ask for relief as requested below.

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

49. Plaintiffs repeat paragraphs 1 – 48.

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

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

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

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

Plaintiffs ask for relief as requested below.

COUNT III
For Tortious Interference with Parental Rights

54. Plaintiffs repeat paragraphs 1 – 53.

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

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

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

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

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

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

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

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

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

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

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

Plaintiffs ask for relief as requested below.

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

65. Plaintiffs repeat paragraphs 1 – 64.

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

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

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

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

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

Plaintiffs ask for relief as requested below.

COUNT V
For Common Law Civil Conspiracy

71. Plaintiffs repeat paragraphs 1 – 70.

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

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

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

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

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

Plaintiffs ask for relief as requested below.

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

76. Plaintiffs repeat paragraphs 1 – 75.

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

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

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

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

Prayer for Relief

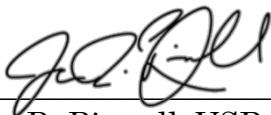
Plaintiffs request that this Court enter judgment on its behalf and as follows:

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

Dated: June 28, 2022

Plaintiffs
By Counsel

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