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12/19/2022 9:43 AM
IRIS Y. MARTINEZ
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

ABOLITION COALITION and JASMINE SEBAGGALA,)
)
Plaintiffs,)
)
v.)
)
NILES TOWNSHIP ACCOUNTABILITY COALITION d/b/a)
"NTAC," and HELEN LEVINSON,)
)
Defendants.)

No. **2021L009047**

VERIFIED FIRST AMENDED COMPLAINT AT LAW

Plaintiffs Abolition Coalition and Jasmine Sebaggala hereby respectfully complain and allege against Defendants, NILES TOWNSHIP ACCOUNTABILITY COALITION d/b/a "NTAC," and HELEN LEVINSON, as follows:

Preliminary Statement

Helen Levinson is a white supremacist and alt-right provocateur who fancies herself to be Skokie, Illinois' version of Alex Jones. Like Jones, she uses her platform to spread misleading, false, and inaccurate conspiracy theories about public figures and private citizens alike. Like Jones, she monetizes that misinformation for her own personal gain. And like Jones, she does not limit her conspiracy theories merely to politicians and political leaders. Instead, like Jones, she does not seek only spread her false information and conspiracy theories, but also to silence those who offer truthful information in the public sphere.

Levinson's latest target is Jasmine Sebaggala. Levinson, as a white supremacist, does not want Black teachers in Skokie schools, so she wrote a complaint to Sebaggala's employer filled with false allegations. Sebaggala is not a political leader – she is simply a teacher who happens to be Black. For Levinson, that makes her a legitimate target for conspiracy theories, false and

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defamatory attacks, and demands for termination to Sebagala's employer. Levinson's white supremacist and anti-semitic rhetoric accusing Governor J.B. Pritzker of creating "synthetic sex identities" may be protected speech, but falsely accusing Jasmine Sebagala – a teacher, not a politician – of misconduct and demanding she be fired is not.

The First Amendment's guarantee of freedom of speech in the political arena is among our important freedoms, because "the best test of truth is the power of the thought to get itself accepted in the competition of the market." *Imperial Apparel v. Cosmo's*, 227 Ill. 2d 381, 394 (Ill. 2008). What the First Amendment does not protect, therefore, is the ability of conspiracy theorists to silence the private citizens they target by using false and defamatory information as the basis of a campaign to cost those private citizens their careers. This action is brought to vindicate the rights of Jasmine Sebagala and put an end to Levinson's campaign of defamatory racism.

General Allegations Common to All Counts

1. Plaintiff Jasmine Sebagala ("Jasmine") is a natural person and resident of the State of Illinois.
2. At all times herein relevant, Jasmine is, and identifies as, Black and/or African-American.
3. At all times herein relevant, Jasmine was and is employed as a schoolteacher.
4. Sebagala is not a politician or political activist. She is simply a schoolteacher who happens to be Black.
5. Plaintiff Abolition Coalition ("AC") is a nonpartisan group of parents, teachers, and concerned citizens who support and advocate for diversity and anti-racism in Niles Township, Illinois schools.
6. In support of those goals, AC educates, aids, and organizes parents and community members whose children are facing racism and/or bigotry in schools in Illinois.

7. Plaintiff Sebagala is a member of Abolition Coalition.
8. Defendant Helen Levinson (“Levinson”) is a natural person and resident of the state of Illinois.
9. Levinson is a white Christian.
10. Levinson is Vice President of “Awake Illinois,” an alt-right white supremacist organization which spreads debunked and bigoted conspiracy theories about minority groups.
11. Awake Illinois was founded by Shannon Adcock, who on the Awake Illinois website states she is proud of being called a “white supremacist” and “racist.”
12. Adcock and Levinson are local leaders of “Moms for Liberty,” and refer members of Awake Illinois to Moms for Liberty. Moms for Liberty has been designated a hate group by the GLAAD Accountability Project of the *Gay & Lesbian Alliance Against Defamation* for its racist and homophobic views.
13. “Awake Illinois” is a white supremacist organization which, on its website, *inter alia*:
 - a. “educat[es] parents and schools on the existential threat of [Critical Race Theory](#) which is applied in schools via "Culturally Responsive Teaching", "Social-Emotional", "White Privilege", "Gender Identification", Panorama surveys, "Inherent Bias" training, and several other ever-changing terminologies”;
 - b. refers to LGBTQ+ people as “groomers”;
 - c. calling a Black speaker, Calvin Terrell, an anti-white racist for urging Black people to vote;
 - d. tells parents to oppose “CRT, gender ideology, and bathrooms for ‘furries’”;
 - e. calls the presence of Black students and studying Black History Month a “race-based curricula”;

- f. states that “God ha[s] a plan” for public education, and that public education should be taught according to white and Christian beliefs;
- g. contains links to speeches by racist, antisemitic, and transphobic political commentators James Lindsay and Matt Walsh;
- h. parrots the antisemitic and transphobic myth that the Pritzker administration is making children transgender for profit;
- i. Links to far-right persons and organizations like the Heritage Foundation, Prager University, and Christopher Rufo;
- j. Other racist, sexist, homophobic, antisemitic, and transphobic statements.

14. For example, Awake Illinois’s website contains these pictures:



**EDUCATION
NOT
INDOCTRINATION**

FORM: File a Grievance Against a School District

[Click here to Anonymously Report School-Based Indoctrination Incident](#)

[Click here to print the Illinois OPT-OUT form to add to your student's school file.](#)

[Click here to demand NO CRT in schools with the Policy on Equality and Civil Rights.](#)

[IL Education Association is NOT happy to see children's faces unmasked - click here](#)

[School Choice is a top issue in Illinois for 2022. Enter, G.R.A.C.E. Schools:](#)



PRITZKER financial ties to SSI Industry

Synthetic Sex Identities (SSI)

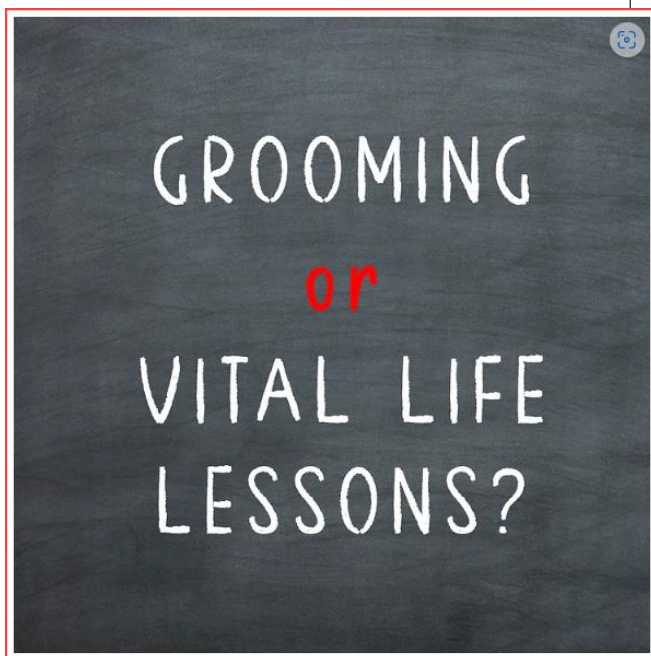
The wealthy, powerful, and sometimes very weird Pritzker cousins have set their sights on a new God-like goal: using gender ideology to remake human biology

BY JENNIFER BILEK

JUNE 14, 2022



Over the past decade, the Pritzkers of Illinois, appear to have used a family philanthropic apparatus to drive an ideology and practice of disembodiment into our medical, legal, cultural, and educational institutions. [READ MORE](#)



GROOMING
or
VITAL LIFE
LESSONS?

15. On the Awake Illinois website, Levinson states that “The innocence of children is being diluted by harmful agendas that only serve one purpose - to make our children illiterate revolutionaries in order to push socialist and communist agendas. Our children are not to be used as political pawns.”
16. Those “harmful agendas” Levinson describes are the existence of Black and LGBTQ+ people.
17. Levinson is also the founder of Defendant NILES TOWNSHIP ACCOUNTABILITY COALITION (“NTAC”).
18. NTAC is a white supremacist group who, according to their website, *inter alia*, oppose the teaching of antiracism and what they deem as “critical race theory” in schools in Niles Township.
19. According to the *Chicago Sun-Times*, one of NTAC’s core initiatives is “preserving the history of the United States,” according to its website, which asks supporters to “contact us if you have encountered radical activity in your school.”
20. Awake Illinois and NTAC merged in or around 2021.
21. Levinson uses the Awake Illinois and NTAC platforms to make bigoted remarks about members of minority groups.
22. For example, she said this about Plaintiff’s undersigned counsel, who is a transgender woman:

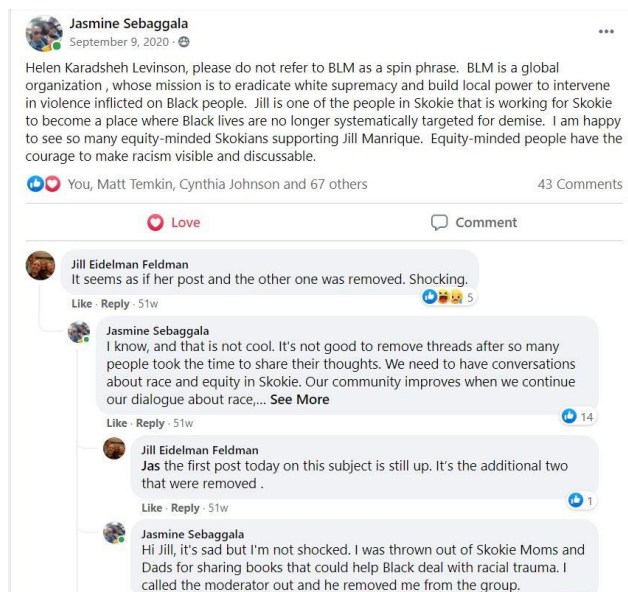


23. On these pages, Levinson repeatedly refers to LGBTQ+ people as “deviant” and advocates for their removal from society.
24. Levinson also repeatedly paraphrases the Fourteen Words – “We must secure the existence of our people and a future for white children” – which the Anti-Defamation League notes is a white supremacist slogan coined by the late racist terrorist David Lane.
25. In short, Levinson, by herself and through Awake Illinois and NTAC, uses her platforms to spread hate, conspiracy theories, and bigotry against minority groups

General Allegations Common to All Counts

26. On or about September 7, 2020, Levinson publicly referred to “Black Lives Matter” as “anti-white” and a “spin phrase.”
27. Levinson made these statements whilst advocating for the “Black Lives Matter” movement to be barred from schools in Niles Township.

28. In response, on or about September 8, 2020, Plaintiff Sebaggala publicly responded to Levinson's posts by advocating for a "dialogue about race" and talking about the need to improve the community.



29. Instead of continuing this First Amendment-protected discussion and dialogue, Levinson and NTAC instead began a protracted and unlawful campaign of harassment towards Plaintiff Sebaggala.

30. On or about November 4, 2020, Sebaggala attended a lawful, permitted protest in support of Black Lives Matter organized by Abolition Coalition.

31. That protest was covered by Nader Issa for the *Chicago Sun Times* on November 8, 2020.

32. Defendants declined comment for Issa's story.

33. However, Defendants did post on social media, including on Twitter and Facebook, that the story was false, and instead falsely said that Sebaggala was protesting in favor of "inappropriate conduct by a D219 Board Member."

34. On or about November 6, 2020, Levinson posted on NTAC's social media that teachers supporting Black Lives Matter was "inappropriate." Levinson made this statement about Sebagala.



35. Links in several of those posts on social media went to Defendants' website, www.ntacnow.org.

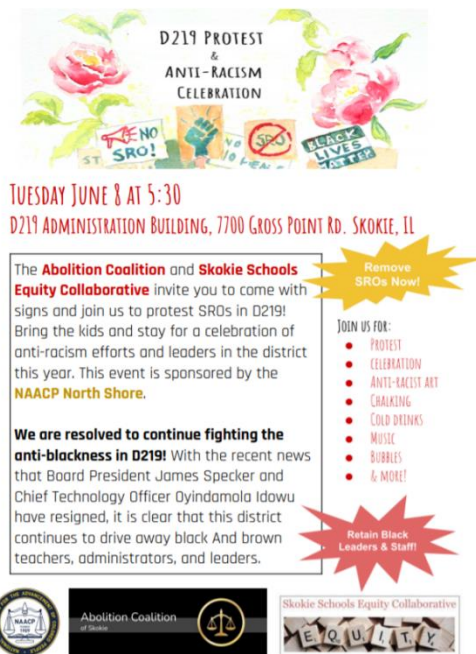
36. On NTAC's website, Levinson solicits donations and fundraising through multiple links.

37. On or about May 18, 2021, Plaintiffs attended a school board meeting in District 72. AC organized a racially diverse group of community members and parents whose children attended District 72 schools to attend the meeting.

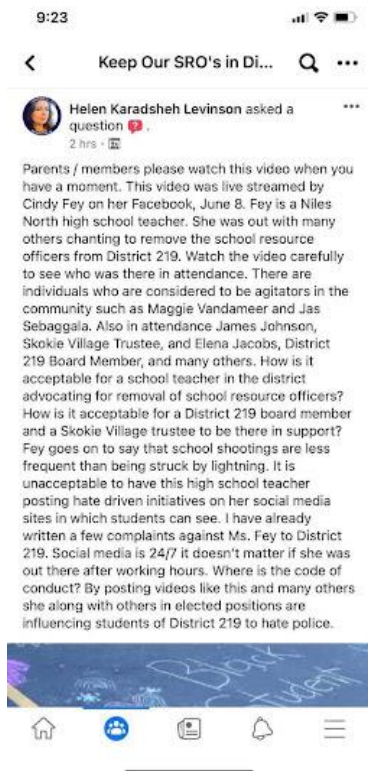
38. Whilst those parents of color were speaking about the need to combat white nationalism and white supremacy, Levinson led NTAC members in laughing and pumping their fists.

39. Levinson and NTAC also said “That’s us!” in response to the mention of white supremacy and white nationalism.

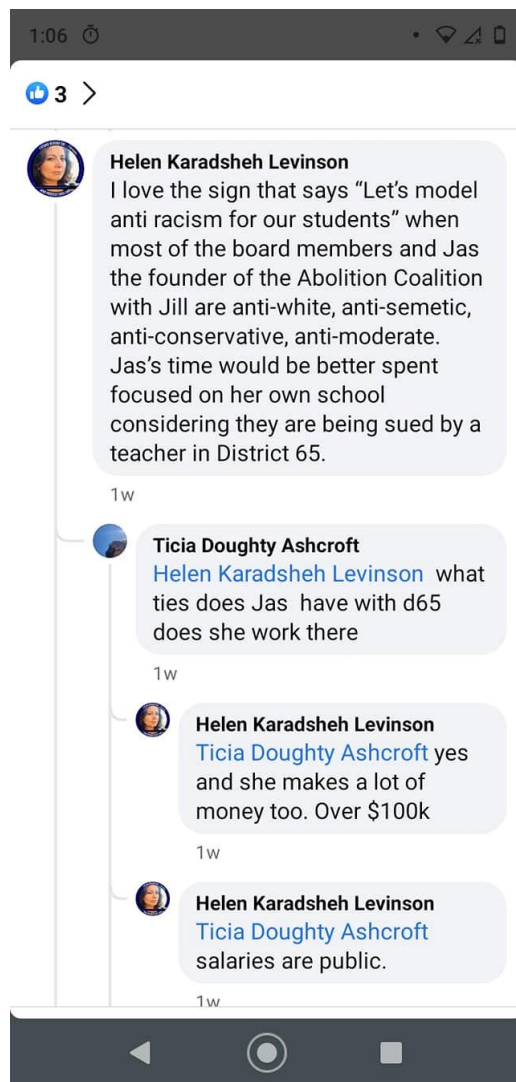
40. On or about June 8, 2021, Sebaggala attended a protest and anti-racism celebration with the NAACP. The purpose of the protest was to oppose police officers, known as “school resource officers,” in schools.



41. Levinson posted video of the event with this caption:



42. Levinson again included links to the NTAC website and solicited donations for NTAC using the video of Plaintiffs.
43. Levinson also posted similar statements, including photographs of Plaintiffs, to NTAC's Twitter feed.
44. Levinson's statements in Facebook and Twitter included numerous false statements, including that Sebaggala is considered to be "agitators in the community."
45. On or about August 8, 2021, Levinson issued a series of false statements regarding Plaintiff on the Facebook page of a District 219 School Board Member.



46. Plaintiffs are not “anti-white.”

47. Plaintiffs are not being sued by a teacher in District 65.

48. In fact, both as of the date of Levinson’s post and the date this action was filed, Plaintiffs were not being sued by anyone.

49. Levinson continued to make these posts on social media on behalf of herself and NTAC, publishing false statements about Plaintiff Sebagala including without limitation the following:

- a. That Plaintiffs advocate for racial segregation;
- b. That Plaintiffs are Marxists and/or Communists;

- c. That Plaintiffs are committing “child abuse” and Plaintiff Sebagala is a “child abuser”;
 - d. That Plaintiffs are being sued by a person exposing their “child abuse”;
 - e. That Plaintiff Sebagala abuses white children in her class;
 - f. Other untrue and defamatory statements.
50. Levinson did so because Sebagala is a Black teacher who attended Black Lives Matter protests.
51. Levinson learned that bragging on her platforms about attacking Sebagala led to donations and increased engagement with her posts.
52. As such, Levinson escalated her campaign against Sebagala further.
53. On or about August 31, 2021, Levinson wrote a fourteen-page letter to Plaintiff Sebagala’s employer.
54. In that letter, Levinson demanded that the letter be included in Sebagala’s employee file and that the letter be sent to the Human Resources Department of Sebagala’s employer.
55. Levinson also demanded “confirmation” that these were done.
56. That letter included several untrue and defamatory statements regarding Plaintiff, including without limitation the following false statements:
- a. Accusing Plaintiff of falsifying racist events;
 - b. Saying that Plaintiff is lying because no racist events occurred or were reported, when in fact racist events *did* occur and *were* reported;
 - c. Stating that Plaintiff was falsely accusing children of vandalism and other crimes, when Plaintiff made no such accusations;
 - d. Falsely stating that a “riot nearly broke out” because of Plaintiff;
 - e. Falsely stating that Plaintiff abused white children;

- f. Falsely stating that Plaintiff was violating Title VII of the Civil Rights Act in and outside of her classroom;
 - g. Falsely stating that Plaintiff discriminated on the basis of race in and out of her classroom;
 - h. Falsely stating that Plaintiff had attempted to start a “riot” in multiple school board meetings;
 - i. Falsely stating that Levinson and/or other persons required security escorts because of Plaintiff;
 - j. Falsely and repeatedly accusing Plaintiff of publicly lying;
 - k. Other untrue and defamatory statements.
57. The letter demands that disciplinary action be taken against Sebagala for this purported conduct.
58. The letter also contains multiple screenshots of Sebagala’s personal Facebook page.
59. Many of those screenshots are taken out of context or deliberately altered by Levinson.
60. In reality, the factual allegations against Sebagala in Levinson’s letter were entirely false.
61. Levinson knew that all of the factual allegations in her letter were false when she made them.
62. However, Levinson wanted to damage Sebagala’s career for the sole reason that Sebagala is a Black teacher who supports Black Lives Matter.
63. Levinson then bragged on Facebook about sending the letter, and referenced that this was laying the groundwork for a lawsuit against Sebagala based on the false accusations in the letter.



64. Levinson wrote the letter with false accusations to lay the groundwork for a suit against Sebaggala’s employer for employing her based on those false allegations.
65. Levinson then solicited donations based on this letter she sent to Sebaggala’s employer.
66. Upon receipt of the letter, Sebaggala received notice from her union representative about the letter, and that the letter was causing harm to her career.

----- Forwarded Message -----

From: Maria Barroso <mariabarroso618@gmail.com>
To: "sebaggalajasmine@yahoo.com" <sebaggalajasmine@yahoo.com>
Sent: Thursday, September 9, 2021, 06:47:19 AM CDT
Subject: Letter

Good morning Ms. Sebaggala,

I am writing to you in regards to a letter that was sent to the Superintendent, Human Resources and myself. This letter was sent to District 65 Administration and to me as your union president. Helen Levinson mentions that you have been doing work surrounding equity, and she is trying to ruin your reputation as an educator. This is defamatory and can impact your profession. Such actions by this person can cause harm to your livelihood, and this should be addressed.

Sincerely,
Maria Barroso
DEC President

67. In response to the letter, Sebaggala's employer assigned a principal to observe her classroom and teaching.
68. As a result of the letter, Sebaggala suffered a loss of reputation in her community and among her coworkers.
69. Sebaggala has also received repeated threats from Levinson's followers as a result of the letter.
70. Sebaggala has suffered extreme emotional distress as a result of Defendants' conduct, including without limitation depression, anxiety, loss of function, and humiliation.

COUNT I – DEFAMATION

71. Plaintiff restates and re-alleges paragraphs 1-69 of this First Amended Complaint as if fully set forth herein.
72. Defendants made statements regarding Plaintiffs knowingly, maliciously, and with actual knowledge of their falsity.
73. Those false statements included, without limitation, the following:
 - a. Falsely stating that Sebaggala falsified racist events and that no racist events occurred, when in fact Sebaggala had personally experienced such racist events;
 - b. Accusing Sebaggala of being a "child abuser" and committing "child abuse";

- c. Accusing Sebagala of threatening bodily injury to Defendants;
- d. Accusing Sebagala of violating the Civil Rights Act;
- e. Accusing Sebagala of threatening harm against police officers;
- f. Falsely stating Sebagala is segregating students on the basis of race;
- g. Falsely accusing Sebagala of being a segregationist;
- h. Falsely accusing Sebagala of attempting to start a riot;
- i. Other false and defamatory statements as set forth herein.

74. Those statements were published both via social media and via a letter sent to Plaintiff Sebagala's employer.

75. In Illinois, falsely accusing a person of an unlawful act is *per se* defamatory and damages are presumed.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter judgment in her favor and against Defendants in an amount to be proven at trial but not less than \$50,000, plus costs, punitive damages and whatever additional relief this Court deems appropriate and just under the circumstances.

COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

76. Plaintiff restates and re-alleges paragraphs 1-74 of this First Amended Complaint as if fully set forth herein.

77. Defendants' conduct is extreme, outrageous, and beyond the bounds of human decency.

78. Defendants have accused Plaintiff, a Black woman, of inventing racist incidents when they have actual knowledge that those incidents are real and Plaintiff has experienced them.

79. Levinson did so purely to improve her standing in the eyes of her followers and to continue to spread her message of white supremacy.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter judgment in her favor and against Defendants in an amount to be proven at trial but not less than \$50,000, plus costs, punitive damages and whatever additional relief this Court deems appropriate and just under the circumstances.

COUNT III – APPROPRIATION OF RIGHT OF PUBLICITY

80. Plaintiffs restate and reallege paragraphs 1-78 of this Complaint as if fully set forth herein.

81. The people of the State of Illinois, by and through their popularly elected legislature, enacted a statute codified at 765 ILCS 1075/1 and popularly known as the “Illinois Right of Publicity Act” (IROPA”).

82. IROPA was in force and effective at all times herein relevant.

83. Pursuant to Section 1075/30 of IROPA,

A person may not use an individual's identity for commercial purposes during the individual's lifetime without having obtained previous written consent from the appropriate person or persons specified in Section 20 of this Act or their authorized representative.

84. Pursuant to Section 1075/5 of IROPA (emphasis supplied),

"Commercial purpose" means the public use or holding out of an individual's identity (i) on or in connection with the offering for sale or sale of a product, merchandise, goods, or services; (ii) for purposes of advertising or promoting products, merchandise, goods, or services; or (iii) ***for the purpose of fundraising.***

85. Pursuant to *Gabiola v. Sarid*, No. 16-cv-02076, at *14 (N.D. Ill. Sep. 26, 2017), the use of a person’s likeness and name for fundraising purposes need not imply an endorsement to violate the IROPA.

86. Defendants have repeatedly and continuously violated this statute by making false statements about Plaintiff Sebagala for the purpose of creating outrage among their followers, and thus causing their followers to donate to their cause.

87. In other words, Levinson, like Alex Jones, makes false statements about a person as the product she is selling to her consumers.

88. Levinson creates false statements about Plaintiffs to generate outrage and, therefore, more donations.

89. Defendants did not grant permission or consent at any time for their use in Defendants' fundraising.

90. This is a purely commercial, money-making purpose which violates the Illinois Right of Publicity Act and is not protected by the First Amendment.

91. Pursuant to Section 40 of the IROPA,

A person who violates Section 30 of this Act may be liable for either of the following, whichever is greater:

(1) actual damages, profits derived from the unauthorized use, or both; or

(2) \$1,000.

(b) Punitive damages may be awarded against a person found to have willfully violated Section 30 of this Act.

92. Pursuant to Section 55 of IROPA,

The court may award to the prevailing party reasonable attorney's fees, costs, and expenses relating to an action under this Act.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter judgment in her favor and against Defendants in an amount to be proven at trial but not less than \$50,000, plus costs, attorney fees, punitive damages and whatever additional relief this Court deems appropriate and just under the circumstances.

Respectfully Submitted,
JASMINE SEBAGGALA
And ABOLITION
COALITION

/s/ Sheryl Ring Weikal, Esq.
By their Attorneys

Sheryl Ring Weikal Esq. #6311043/62447
518 South Route 31, Suite 113
McHenry, Illinois 60050
(847) 975-2643
sheryl@sherylringlaw.com

I, Jasmine Sebaggala, hereby state and affirm under penalty of perjury pursuant to Section 1-109 of the Illinois Code of Civil Procedure that the facts set forth herein are true, correct, and complete to the best of my knowledge and belief.

Dated: 12 / 17 / 2022

Jasmine Sebaggala

August 31, 2021

Re: Complaint against Jasmine Sebagala

Dear Dr. Horton, Ms. McCoy, Ms. Bonastia, and Ms. Barroso

I am a parent in Fairview District 72 and Niles Township High School District 219. I would like to file a complaint against one of your teachers at Willard Elementary School, Ms. Jasmine Sebagala. I ask that this complaint be given to Human Resources to add to her employee file.

This year, Ms. Sebagala has made several appearances at the Fairview South District 72 board meetings. She has also made several appearances at the District 219 board meetings. Ms. Sebagala typically attends these meetings with many other members of her Abolition Coalition and some call themselves "fellow travelers." These individuals travel together from board meeting to board meeting with the sole intent to intimidate school board members and residents within the community.

On July 27, 2021, some of the District 219 board members, who were not part of the Abolition Coalition, required security to escort them to their cars. This was needed after a riot nearly broke out when the board did not vote in favor of Ms. Sebagala to fill the vacancy created by the resignation of James Specker. The members of the Abolition Coalition and Ms. Sebagala called the board members racist for not appointing her.

This past year, Ms. Sebagala has attended several of the District 72 board meetings. She is not a resident of District 72, nor does she have children that attend Fairview South. What personal interest does she have with the school or the community?

On August 18, 2021, using the same heavy-handed tactics, Ms. Sebagala's group tried to bully me in an attempt to stop my public comments during the board meeting.

Ms. Sebagala and the members of her coalition's intimidation tactics include berating parents online via social media platforms, posting anti-white rhetoric, posting anti-police rhetoric, holding signs in the faces of board members, holding fists in the air during board meetings, calling parents and board members racists, white supremacists, white nationalists, bigots, and misogynists.

I understand Ms. Sebagala's passion, and as mothers, we are passionate about protecting our children. However, her behavior is doing more harm than good. She and her Abolition Coalition members are creating a divide within the community. It is creating a mindset of segregation and anti-white rhetoric, hate, and a narrative of racism that does not exist in our community. To be clear, many of the families in the Fairview district and surrounding areas are immigrants who have fled communism, genocide, and religious persecution. I am a daughter of immigrant parents from Jordan and a minority as a Christian Arab. My husband is Jewish, grew up in Evanston, and had family members who lived and died during the holocaust.

I can assure you that I am not a "white supremacist" or a "racist." I can assure you that the immigrant families with light-colored skin, are not white supremacists or racists either.

Despite immigrant families, Ms. Sebagala and her members have continued to criticize many other parents and me with condescending and unflattering comments. Many members within the community, including myself, feel unsafe with the anti-white hate speech that she and her members incite, who are part of her Abolition Coalition.

To support the complaint, I have listed Ms. Sebagala and her member activity below.

1. May 18, 2021, board meeting recording: https://www.youtube.com/watch?v=mO_E3UjQuB0

Ms. Sebagala attends the District 72 board meeting and speaks during public comments. She begins her comments on how to confront white nationalism and white supremacy. She goes on to say that white nationalists are recruiting children in our community. She asks the Fairview District 72 board to hire a racial equity leader, black, Hispanic, and Asian teachers, which is fine, yet she knows nothing about our school nor the district. Further, there is no evidence to support her statements.

It is insulting that Ms. Sebagala segregates District 72 by skin color with complete disregard of the demographics within our community.

You may listen to hear her public comments at mark 2:06 of the recording in the link above. If you listen further, at mark 2:36, the members of the Abolition Coalition, in attendance with Ms. Sebagala, begin to boo me when I speak in public comments.

To add to the bullying, a member of Ms. Sebagala's Abolition Coalition, Ms. Cindy Fey, who is a Niles North High School teacher live-streamed a video during public comments and at 44:31 mark called me an anti-anti-racist and continues with verbal abuse.

Cindy Fey's Facebook video can be viewed here:
<https://www.facebook.com/cindyfey/videos/10224511704160788>

These individuals are bombastic with the sole intent to bully the parents of District 72.

2. August 18, 2021, board meeting recording: <https://www.youtube.com/watch?v=H8-tEmtQEel>

During the District 72 board meeting, the board president Mary Ann Brown asks that individuals from out of district allow D72 residents to speak first. Since I am a resident, I stood in line ahead of others. Ms. Sebagala, along with a Niles West teacher, Ms. Nicole Reynolds, began to criticize me, accusing me of cutting the line. This activity takes place at mark 1:38 of the video. As a reminder, neither Ms. Sebagala nor Ms. Reynolds lives in District 72 nor have children at Fairview. As a courtesy, I let them speak first and moved to the end of the line.

During this meeting, Ms. Sebyggala begins public comments at 1:44:27 to urge the board to create a response to racist incidents, yet we have no racist school incidents reported. Further, her members continue to berate and falsely accuse innocent children in our community of egging and vandalism by kids outside of our district just to fit their narrative.

Once I begin my public comments at mark 1:50, Ms. Sebyggala and her Abolition Coalition members yell out statements in the background, one going as far to threaten me to "step outside."

I would like to know is this acceptable behavior of a teacher for parents and students to witness who reside within District 72 and beyond? Are there rules in place, or is this acceptable behavior outside of the school building by an employee of yours? Isn't there a code of conduct in being a good role model to students as a teacher?

Ms. Sebyggala's behavior outside of school makes me question her behavior in the classroom. As a 4th grade teacher, how are white children in her classroom being treated? What type of classroom instruction is being given? I would think that District 65 has enough problems with a lawsuit filed by another teacher, i.e., Deemar v. Evanston/Skokie School District 65; which states that it is forcing its teachers to participate in, teach their students, and observe programming that discriminates against individuals based on race. I must ask, does Ms. Sebyggala's in-person and online activity violate Title VI of the Civil Rights Act as well?

Attached to this letter, are additional screen captures to support my complaint. Please take the time to address this complaint with Ms. Sebyggala. I would like this shared with the Board of Education members, administration, and teachers of District 65. I would also like a response from you on how this complaint will be handled and the action taken as the outcome.

Last, I would like confirmation that this complaint was reported to Human Resources and added to her employee file.

Sincerely,

Helen Levinson

Ms. Sebaggala is quite active online and in the community. Below are just a few posts I am providing you. I have not included the entire thread of those conversations to avoid submitting a complaint of over 300 pages, so I'm providing the most relevant posts to the complaint. There are many more posts of Ms. Sebaggala on Facebook within her Abolition Coalition group. Ms. Sebaggala's activity perpetuates an anti-white sentiment that is ethically and morally wrong.

August 28, 2021 – Public Facebook Post: <https://www.facebook.com/jasmine.harrissebaggala>
A post is made by Ms. Sebaggala on her personal Facebook. She begins her post that she is oppressed, which is misleading. Based on the D65 public information of teacher salaries, Ms. Sebaggala makes over \$100k which is far more than many (White, Black, Brown, Hispanic, Asian) people in the community earn. Where is the evidence that she is oppressed or that there is an oppression movement in Skokie?



August 27, 2021 – Public Facebook Post: A post is made by Ms. Sebagala on her personal Facebook. She states that District 219 board members worked together to make sure the black community of D69 remains unrepresented. Where is the evidence to support this statement? She further makes false statements that black staff members do not stay in D219. One black staff member left D219 for a job offer with a large tech company, so where is the evidence to support her statements? Last, she makes a statement asking how many black school board members are there in Skokie. It misleads others to believe there are none, when in fact there ARE black school board members in our districts. District 73.5, District 69, District 68, District 67 have black school board members, and three out of the four happen to be women. Up until July 2021, James Specker, a black school board member, resigned from D219 due to rumors that he was berated by the Abolition Coalition and called racist names. Names so foul that I will not include here. Where is the evidence that there is an oppression movement in Skokie? It seems the only voices being silenced are the conservative to moderate ones.



Jasmine Sebagala

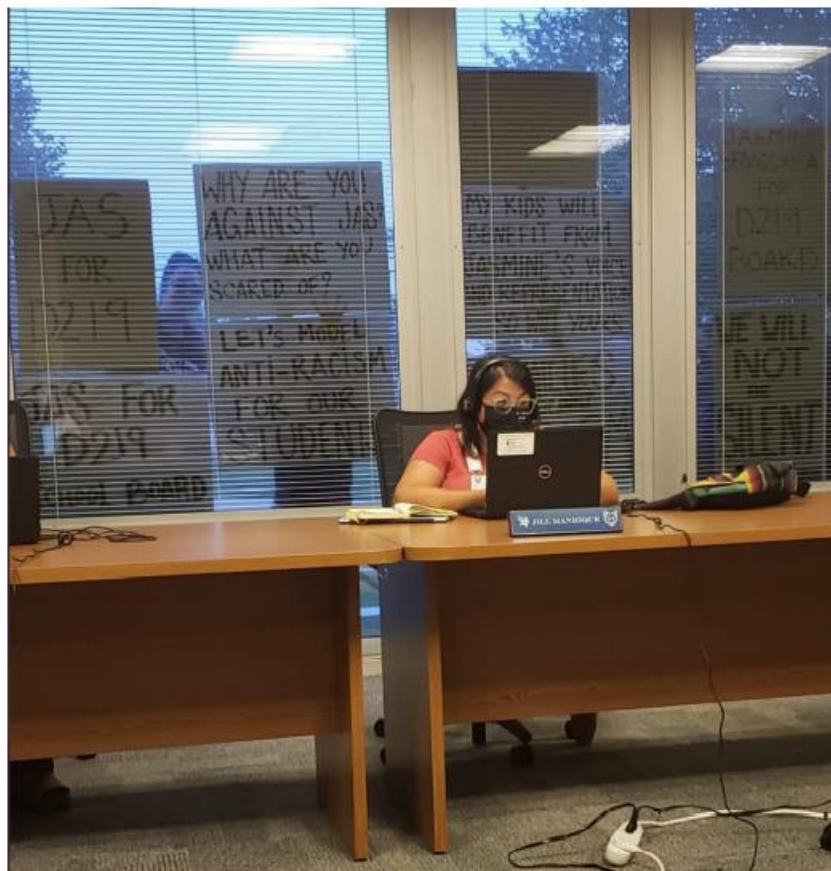
August 27 at 7:38 AM · 🌐

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The anti- blackness and oppression of women that speak against racism and oppression and stand up for the historically excluded students is tearing the fabric of the D219 Board and community. The men on the D219 Board and Naema worked together to make sure that the Black community and D69 remains unrepresented. The data shows that Black children are underrepresented, undereducated, isolated in honors classes, and overdisciplined. Black Staff members do not remain in D219 for long because they are mistreated and disrespected. The data indicates a need for Black leadership! My heart goes out to every Black child, Black parent, Black staff member and, ACTIVE CO-CONSPIRATOR(white silence is violence). It's time to include and respect Black leaders! I will continue to stand for the students and against oppression. Pay attention Skokians! I received over 50 letters of support for the vacant position, I have attended every board meeting for over a year, I've been teaching for almost 20 years, I am a Beyond Diversity facilitator, I am an advocate for all children, and I worked with SSEC and AC to advocate for the Black and Brown children that have not received the same educational opportunities as their white peers. Black Women have been excluded from leadership positions in Skokie for too long. How many Black school board members do you know in Skokie? Black women face racism and sexism on a regular basis. This has to change. For those of you that wrote letters on my behalf, please don't be sad. Let's continue to work together! Have a great day!

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August 3, 2021 – District 219 School Board Meeting: After the July 27 incident, the district decides to have a closed session for safety reasons. As mentioned earlier in my letter, some of the District 219 board members, who were not part of the Abolition Coalition, required security to escort them to their cars. This was needed after a riot nearly broke out when the board did not vote in favor of Ms. Sebagala to fill the vacancy created by the resignation of James Specker. Below is a picture of the members of the Abolition Coalition intimidating school board members on August 3, 2021. This was the activity outside the district office during the meeting. Why is this bullying tactic acceptable? When has professional expertise and character not been the primary focus of appointing school board members?



May 20, 2021 – Skokie Parent Group: A post made by Ms. Sebagala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. Ms. Sebagala shares a book about whiteness. It solicits 41 comments creating tension and reactions from both sides. What is the purpose of this post? What is Ms. Sebagala's interest in the Fairview community considering she does not live in the district, nor has children in Fairview South?

Jasmine Sebagala shared a link.
May 20

There was a conversation about adding a gender neutral washroom to Fairview School. One of the parents shouted out, "Why?" Others laughed in agreement. Yes, I said parents. Fairview needs a gender neutral washroom because there is a gender spectrum. A person's gender identity may differ from the gender they were assigned at birth. Skokie Public Library has some amazing books. Our family chose this book last night! Let's learn about each other! Every kid at Fairview needs a sense of belonging. The Fairview administrators need to add a gender neutral! Every child is important!

WHEN AIDAN BECAME A BROTHER

YOUTUBE.COM
When Aidan Became a Brother-Read Aloud Book
When Aidan Became a Brother is an insightful story of a young tran...

73 73 Comments

Like Comment

All Comments

Maury Elizabeth Parent of Multiple Kids
People are so ignorant and heartless. Of course they need a gender neutral bathroom.
Jas, do you know if we can contact admin/the board even if we aren't Fairview residents?

Like Reply 13w

Friday, May 14 - Skokie Parent Group: A post made by Ms. Sebagala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. Ms. Sebagala targets Glenbrook South High School and makes false statements that there are white nationalists in the area recruiting kids. Her views may not align with those that are more moderate and conservative, but she neglects to share that Glenbrook does have progressive clubs as well. Should conservative students not be allowed to have their club? Does it make them white nationalists? No, it does not. There is no evidence supporting her statements, yet she defames the group of conservative students and the person who approved use of the image.

Jasmine Sebagala shared a link.
May 14

<https://www.dailyherald.com/.../student-club-poster-at...>
This post contains sensitive information.

I just saw this image posted on the news. Please warn your kids that this image is considered racist. These posters were found at Glenbrook South High School. White nationalist are in our area and they are trying to recruit our kids. We have to protect our children and each other. Hate has no home here. Have a great day everyone.

DAILYHERALD.COM
Student club poster at Glenbrook South draws accusations of racism

13 Reactions 75 Comments

Like Comment

All Comments

Matt Laufenberg
Thank you! Hopefully these students can find a way to protest the exceptionally horrric behavior of China towards their citizens and the world in an anti-racist way. There's plenty to critique but TPUSA isn't known for having adult conversations

Nicole Reynolds
Thanks for sharing and letting us know!!

Cindis Anderson
This is so harmful. What happen to the no tolerance rule.

April 5, 2021 – Skokie Parent Group: A post is made by Ms. Sebaggala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. She shares a post and references Niles Township Accountability Coalition (NTAC) and other candidates running for District 219 school board who took a picture with Skokie Police officers. After several complaints from parents the administrators of the FB group asked her to update her post, which is what you see below. It solicits 161 comments creating tension and reactions from both sides. What is the purpose of the post? What evidence does she have to support her statements that white supremacy and patriarchy exists in Skokie?

Jasmine Sebaggala shared a link.
April 5 · 🌐

<https://dailynorthwestern.com/.../district-65-parents-of-.../>

Stand up Evanston! I am proud of our neighbors in Evanston for holding board candidates accountable. There are too many people in Skokie that are playing political games, ignoring racism, and leading for power. What happened to being a leader to serve the people?

We have to lead the charge to create a more equitable Skokie. The D219 incumbents have decided to misappropriate the word equity in order to gain votes. Please don't be fooled!

I noticed that the same board members that shunned the Black and Brown parents for advocating for their children were featured in a picture with a Skokie based group leader that is running for a K-8 school board.

This group leader and members of her group shunned the data based concerns of D219 Black and Brown parents, educators, and students. The document they created was shared by Nowik.

A trustee candidate that has shunned women was also featured with Evonitz and Nowik.


Actions speak louder than words! It's no coincidence that they were all at the same place at the same time.

We need a multi-racial group to stand against racism, white supremacy, and patriarchy.

Where do you stand? Silence equals violence. It's time to be bold and shake off complacency! The election results will tell our children where we stand!

All of our children are watching everything we do and say! Will you vote for candidates that have shunned marginalized community members and women or will you vote for the candidates that pledge to serve every member of our community. The choice is yours!

One Skokie! We must elect leaders that embody trust, compassion, stability, and hope.



DAILYNORTHWESTERN.COM

District 65 parents of color lead march to cast ballots for equity-focused school board amid contentious election...

52 161 Comments

Like Comment

All Comments ▾

Maggie Vandermeer
We have so much to learn from Evanston. When I see how their awesome, anti-racist, equity-focused Black and Brown leaders have faced intense backlash, including death threats, it is clear that white pseudo-supremacy will not go down without a big, horrible, well-funded fight and that is what we can expect to see here in Skokie too as we continue to push for justice.

Like · Reply · 19w 8

Jasmine Sebaggala *Author*
We have to work together. Current leaders need to stop being scared of what they might lose. We gain so much by focusing on the common good.

Like · Reply · 19w 16

Cynthia Johnson
Jas Sebaggala Yes! Yes! Yes!

Like · Reply · 19w 2

Helen Karadsheh Levinson
Jas Your post is misleading. Please don't make assumptions or make statements based on knowledge that you do not have. Those who attended a gathering was nothing more than to show support to our local Skokie Police. They didn't go to the event together and the picture taken was to show support for our local police. There were many of us there to show support for our police. Please don't use that event as a way to tarnish individuals in creating misinformation that would mislead others.

Like · Reply · 19w · Edited 3

February 2, 2021 – Skokie Parent Group: Skokie Parent Group: A racist post made by Ms. Sebaggala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. She shares a book about whiteness. It solicits 41 comments creating tension and reactions from both sides. These types of anti-white posts are insulting to many immigrant families who are light colored in skin, let alone white families. What purpose does this post serve?

Jasmine Sebaggala shared a link. February 2 · 🌐

Happy Black History Month! I will try to share a few resources each week. Have a great day!

NOT MY IDEA
Written and illustrated by Anastasia Higginbotham
Read by Jenna Giles-Turner

YOUTUBE.COM
Not My Idea : a book about whiteness
Searching for resources to talk about race and racism with kids? Thi...

40 Likes · 41 Comments

Like · Comment

Jasmine Sebaggala · Author
I am trying to figure out why I have to wait for my posts to be approved. I haven't broken any rules.
Like · Reply · 28w · Edited

Jasmine Sebaggala · Author
I received a message about waiting for my post to be approved. Why is that?
Like · Reply · 28w

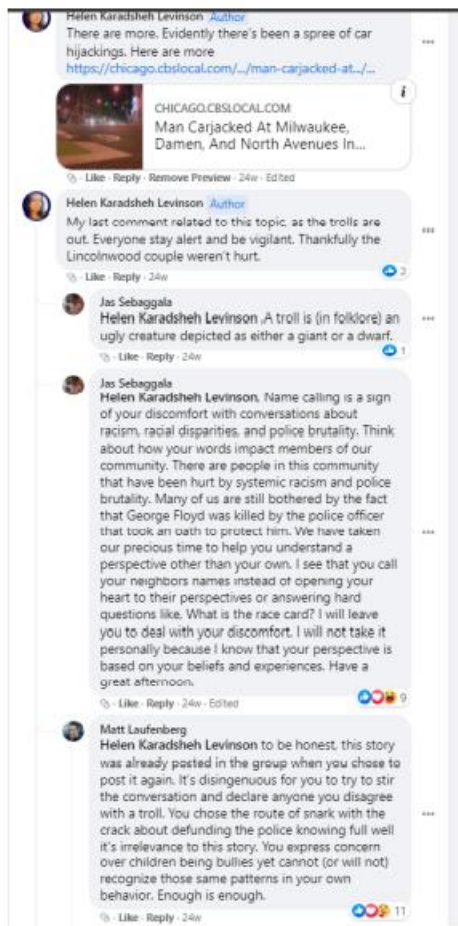
Jasmine Sebaggala · Author
I haven't broken any rules.
Like · Reply · 28w

Jasmine Sebaggala · Author
Brie Zdravkovic and Jon Clemons, please explain. I don't understand why my posts have to be approved.
Like · Reply · 28w

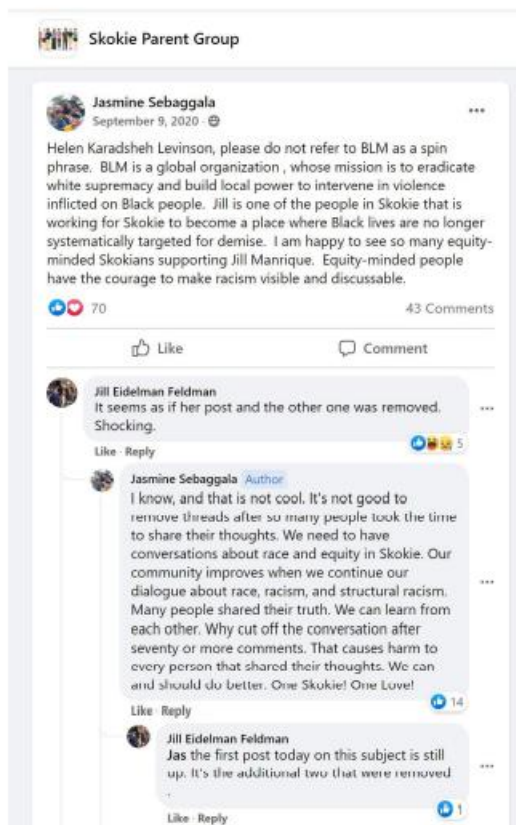
January 7, 2021 – Skokie Parent Group: A post is made by Ms. Sebaggala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. Ms. Sebaggala begins the post with "Dear White Parents...", many of her Abolition Coalition members chime in. This goes on with 98 comments creating tension and reactions from both sides. What purpose does this serve? Had the post been made by a white person with the title, "Dear Black Parents..." it would have been equally offensive. Why does Ms. Sebaggala tie the Capitol riot with only white people? Does Ms. Sebaggala know that there were many different races of people, including Black, Indian, Hispanic, Asian, Arab, at the Capitol Building? Why is anti-white hate speech acceptable?



November 29, 2020 - Skokie Parent Group: I made a post on Facebook to notify others that there were carjackings in our community. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. Someone zero's in on my response and begins to misconstrue my defund police statements online. He joins in on the banter with Ms. Sebaggala and the others, who are causing disruption in the Fairview community and board meetings. They continue to berate me and other parents throughout the night and into the next day.



September 9, 2020 – Skokie Parent Group: A post made by Ms. Sebaggala on Facebook. Skokie Parent Group is a private FB group. Therefore I cannot provide a direct link. Ms. Sebaggala tags me to purposely target me for her and others to bully me, all because I created a petition to remove Jill Manrique from the D219 school board. She and her members continue to berate me online about racism and the mission of the BLM organization. What purpose does this serve? Is this acceptable behavior of a teacher who should be a positive role model in the community?



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