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I. INTRODUCTION

StandWithUs, an international, nonprofit education organization with the mission of combating antisemitism and supporting Israel, respectfully submits this letter of complaint pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. (“Title VI”), along with Co-Complainant, a current student at Hillcrest High School (“Hillcrest” or “HHS”) in the Dallas Independent School District (“DISD”). Co-Complainant has been subjected to severe, pervasive, and persistent harassment based on his national origin (shared Jewish ancestry) over many years at Hillcrest. This harassment has created an increasingly hostile environment, and DISD has repeatedly failed to remedy the situation despite being on actual and constructive notice, in violation of its obligations under Title VI.

As set forth in further detail below, *see infra* Part II, Co-Complainant has been subjected to repeated targeting, harassment, intimidation, marginalization, and discrimination based on his Jewish ancestry since at least 2021. Reported incidents include: physical abuse; verbal taunting; ridiculing with reference to Hitler, Auschwitz gas chambers, and the Holocaust; and highly offensive name-calling (“dirty Jew,” “filthy kike”). Since October 2023—when Palestinian terrorists and armed citizens led by Hamas slaughtered thousands of civilians in Israel and kidnapped over 200 hostages into Gaza—the discriminatory harassment also started to include specific and troubling references to Israel and Palestinians (*e.g.*, “The kikes are just getting what they deserve. Free Palestine!”).

DISD has been on actual and constructive notice of these discriminatory incidents for years as they have occurred. The harassment took place “in plain sight” at HHS, in classrooms and hallways, and often with teachers present. Co-Complainant and his mother repeatedly reported the harassment to Hillcrest teachers and administrators since at least 2021. In September 2023,

StandWithUs sent a letter to Hillcrest and DISD clearly outlining the numerous antisemitic incidents of harassment, describing the violations of school policies, and requesting concrete steps to address the ongoing hostile environment. StandWithUs even offered its support to DISD in partnering on the provision of educational programming and other tools to address antisemitism. In October 2023, Co-Complainant filed a formal grievance pursuant to DISD’s Bullying Policy and state grievance procedure rules. Nevertheless, DISD failed to follow its own policies, failed to conduct proper investigations of the harassment, failed to provide even basic training about antisemitism to its faculty, and failed to protect Co-Complainant from ongoing harassment. **In fact, the evidence demonstrates that, far from eliminating the pervasively hostile environment for Jewish students and protecting them from harassment based on shared ancestry, DISD has essentially sanctioned such harassment and enabled it to fester unhindered. As of the time of this complaint, and as a direct result of DISD’s deliberate indifference, Co-Complainant continues to face harassment from other DISD students based on his shared Jewish ancestry.**

As a result, we urge your office to investigate the hostile environment at DISD that Co-Complainant continues to face due to his Jewish identity. If your investigation concludes that DISD has indeed violated Title VI, we urge your administration to demand swift and concrete remedies, some of which are suggested below.

II. STATEMENT OF FACTS

Co-Complainant has been the target of ongoing bullying and harassment based on his national origin (shared Jewish ancestry) for over three years. Co-Complainant’s “log” of over forty incidents of antisemitic harassment—which was shared in its entirety with DISD and Hillcrest on multiple occasions—demonstrates a school plagued by a hostile environment. It further demonstrates DISD’s repeatedly inadequate—at times nonexistent— responses to overt antisemitic harassment and its deliberate indifference to the plight of DISD’s Jewish students.

A. Pervasive Harassment at DISD Targeting Jewish Students

1. Co-Complainant Has Been Subjected to Harassment Within DISD Classrooms.

Since 2021, within DISD classrooms, Co-Complainant has been repeatedly subjected to offensive taunting, verbal harassment, and physical harassment based on his national origin. Hillcrest classmates use horrific antisemitic slurs—particularly references to the Holocaust—to harass Co-Complainant. For example, classmates have called Co-Complainant a “kike¹” a “lying kike,” a “fucking kike,” a “snitching Jew,” and “a snitching filthy kike” while in the classroom. They use these derogatory terms to Co-Complainant’s face while passing his desk or loudly enough to be heard throughout the classroom. One student said to Co-Complainant: “You’re such a kike, like if I were you, I’d kill myself.” Another told Co-Complainant: “Go bathe in Auschwitz where you belong. Wish you died with your great aunt, that sorry ass lame story you

¹ “Kike” is an offensive, derogatory term for a Jewish person. It is widely considered to be a form of hate speech. <https://www.ajc.org/translatehate/kike>; see also <https://forward.com/culture/465557/we-need-to-talk-about-kike-etymology-ethnic-slur-antisemitic/>.

told me.” In another incident in the classroom, a classmate forcefully slapped Co-Complainant and exclaimed: “Go home to Auschwitz.”

Classmates have also made loud statements to one another in front of Co-Complainant, including: “Kikes suck, Jews suck and are disgusting” and “Kikes suck, fuck kikes.” Another student said: “Send the kikes to the crematorium,” which was met with a round of laughter in the classroom. Yet another student circulated pictures of Adolf Hitler with offensive captions to classmates’ phones during class. In another incident, one student drew a swastika on Co-Complainant’s paper on his desk. One classmate playing a game on his phone exclaimed loudly: “I just beat the shit out of this guy, I feel like Hitler killing all of those filthy kikes, hell yeah!” The same classmate later said: “Hitler is like Star Wars, he’s a god and he kills people.”

The harm is compounded by the fact that Co-Complainant is often subjected to harassment based on national origin *by other Jewish students*. For example, a Jewish student made a Heil Hitler salute to Co-Complainant, laughing and saying, “We are all Jews, it’s okay for us to make Hitler jokes.” Another student, who came to school wearing a Jewish skullcap for the first time, told other classmates, “I’m wearing my ‘kike’pah to be a better Jew.”

Despite the fact that all of these incidents took place in DISD classrooms, and though Co-Complainant is aware that at least some of these horrific comments were heard by faculty members present at the time, there is no evidence of any appropriate response consistent with DISD policy or federal regulation and guidance. Furthermore, and as discussed in more detail below, even when a teacher or administrator was a witness to, or notified of, the harassment, there is no evidence of any meaningful disciplinary action or investigation.

2. Co-Complainant Has Been Subjected to Harassment in DISD’s Common Spaces.

The harassment follows Co-Complainant outside of the classroom, creating a hostile environment for him in spaces throughout the Hillcrest campus. While walking through school, Co-Complainant has been taunted by classmates with antisemitic slurs and statements, including: “Filthy Jew,” “Dirty Jew,” “Sup kike,” “Bye kike, hope the Nazis grab you tonight,” “Sup kike, Heil Hitler, wish he was still here,” and “Fucking kike, useless piece of shit, all of you guys should be dead, RIP Hitler.” One classmate approached Co-Complainant and stated, “Fuck you Jew,” while doing a Heil Hitler salute. Another classmate told Co-Complainant that his favorite Jewish food “is hamantaschen² and “I like to kill Jews and then put their remains for the filling.”

Co-Complainant has faced particularly cruel harassment in the school bathroom over many years, even after reporting these incidents to school administrators. For instance, one classmate said to him, “Heil Hitler, the amazing ruler of the world. Rest in peace, his amazing soul. Six million is my favorite number.” Another told him the bathroom stall “isn’t for Jews,” and weeks later, told him: “Go back to Auschwitz” and “You don’t belong here you filthy kike.” Another student said: “Kike, I’ve told you before you *can’t* use this bathroom.”

Co-Complainant reported at least two swastikas that were drawn in bathroom stalls in 2023, one of which (below) was accompanied by the words “Burn the Jews.”

² A *hamantaschen* is a three-cornered pastry traditionally eaten during the Jewish holiday of Purim.

