



**United States Department of Education
Office for Civil Rights**

DISCRIMINATION COMPLAINT FORM

You do not have to use this form to file a complaint with the U.S. Department of Education's Office for Civil Rights (OCR). You may send OCR a letter or email instead of this form, but the letter or email must include the information in items 1-15 of this form. If you decide to use this form, please type or print all information and use additional pages if more space is needed. An online, fillable version of this form, which can be submitted electronically, can be found at:
<http://www.ed.gov/about/offices/list/ocr/complaintintro.html>

Before completing this form, please read all information contained in the enclosed packet including: Information About OCR's Complaint Resolution Procedures, Notice of Uses of Personal Information and the Consent Form.

If you have questions about civil rights or how to file a complaint, you may contact OCR at 800-421-3481, 800-877-8339 (TTY), OCR@ed.gov, or by calling the enforcement office that serves your state or territory. Contact information for enforcement offices can be found at: <https://ocrcas.ed.gov/contact-ocr>.

If you have difficulty understanding English, you may, free of charge, request language assistance services for this Department information by calling 1-800- USA-LEARN (1- 800-872-5327) (TTY: 1-800-877-8339), or email us at: Ed.Language.Assistance@ed.gov. If you are a person with a disability, you may request disability-related assistance by contacting OCR at 800-421-3481, 800-877-8339 (TTY), OCR@ed.gov, or by calling the enforcement office that serves your state or territory. Contact information for enforcement offices can be found at: <https://ocrcas.ed.gov/contact-ocr>. To request this document in an alternate format such as Braille or large print please contact the Department at 202-260-0852 or om_eeos@ed.gov.

Page 2 of 11 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

1. Name of person filing this complaint:

Last Name: (b)(6); (b)(7)(A); (b)(7)(C) First Name: (b)(6); (b)(7)(A) Address: (b)(6); (b)(7)(A); (b)(7)(C)
City: (b)(6); (b)(7)(A); (b)(7)(C) State: (b)(6); (b)(7)(A) Zip Code: (b)(6); (b)(7)(A); (b)(7)(C)
Primary number: (b)(6); (b)(7)(A); (b)(7)(C) Alternate number: _____
Email Address: (b)(6); (b)(7)(A); (b)(7)(C)

2. Name of person discriminated against (if other than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent, guardian, or other authorized legal representative is required.

Last Name: _____ First Name: _____ Address: _____
City: _____ State: _____ Zip Code: _____
Primary Phone: _____ Alternative Phone: _____
Email Address: _____

3. OCR investigates discrimination complaints against schools, colleges and universities, institutions, and agencies which receive funds or other forms of financial assistance from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution: Central Bucks School District
Address: 20 Weldon Drive
City: Doylestown State: PA Zip Code: 18901
Department/School: (b)(6); (b)(7)(A); (b)(7)(C)

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, or age. The regulations also ban retaliation against persons who assert the right to be free from discrimination. Please note the following:

- Discrimination based on race, color, and national origin includes failure to provide meaningful access to English learners and limited English proficient parents and guardians, as well as discrimination based on shared ancestry or ethnic characteristics or based on citizenship in a country with a dominant religion.

Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Page 3 of 11 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

Discrimination based on race, color, and national origin also includes discrimination, including harassment, because you and/or another individual are, for example, Jewish, Muslim, Arab, Hindu, or Sikh; or based on other ethnic and religious characteristics. For example, individuals who have been subjected to ethnic slurs (such as antisemitic or anti-Muslim harassment); harassed for how they look, dress, or speak in ways related to their ethnic background (such as skin color, religious attire, or language spoken); or stereotyped based on their perceived ethnic characteristics.

- Discrimination based on sex includes discrimination based on sex stereotypes, pregnancy or related conditions, sexual orientation, and gender identity, as well as rules about parental, family, or marital status that treat people differently based on sex.
- Discrimination based on disability includes discrimination against individuals who have a physical or mental impairment that substantially limits a major life activity, as well as individuals who have a record of or are regarded as having a disability.
- Discrimination based on age does not limit protection against discrimination to a certain age group (e.g., people over 40); however, there are a variety of exceptions to the relevant Federal law that may permit age to be taken into account.
- Retaliation refers to actions taken for the purpose of interfering with any rights under the laws enforced by OCR, or because you made a complaint, testified, or participated in any manner in an OCR proceeding.

Please indicate the basis of your complaint:

Discrimination based on race (specify)

Please see Attachment 1

Discrimination based on color (specify)

Discrimination based on national origin (specify)

Please see Attachment 2

Discrimination based on disability (specify)

Discrimination based on age (specify)

Retaliation because you filed a complaint or otherwise asserted rights under laws enforced by OCR (specify)

Violation of the Boy Scouts of America Equal Access Act (specify)

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Please see attachments provided with this complaint form.

Page 5 of 11 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Please see Attachments provided with this complaint form.

6. Do you have documents or written information that you think will help us to understand your complaint?
- No
 Yes

If yes, please describe the documents or written information you have.

Please see Attachments 1-4

If OCR investigates your complaint, we may ask you to provide us the items you describe above.

7. What is the most recent date you were discriminated against?

Date:

8. If this date is more than 180 days ago, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why did not file your complaint within 180 days.

Page 6 of 11 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

9. Have you complained about the allegations that you raise in this complaint to your school, institution, or another organization or agency?

YES NO

If yes, have you complained about the allegations that you raise in this complaint by:

filing an internal complaint or appeal with your school or institution?

participating in your school or institution's grievance procedures?

participating in a due process hearing either at your school or institution, or through another organization or government agency?

If you answered **yes to any of the above questions**, please describe the allegations that you raised in an internal complaint or appeal, through your school or institution's grievance procedures, or in a due process hearing, identify the date you complained about the allegations and where you made the complaint, and tell us the status of the complaint, appeal, grievance procedures, or due process hearing. If possible, please provide us with a copy of your complaint or grievance or appeal or due process request and, if completed, the decision in the matter.

Please see Attachment 3

10. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: N/A

Date Filed: _____

Case Number or Reference: _____

Results of Investigation/Findings by Agency or Court:

11. You do not need to have a lawyer to file a complaint with OCR; however, if you do have a lawyer, OCR staff are required to communicate directly with your lawyer. If you have a lawyer representing you in this matter, please provide the lawyer's contact information.

Last Name: N/A First Name: _____

Telephone: _____ Email: _____

12. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information is not required, but it will be helpful to us.

Last Name: (b)(6); (b)(7)(A); (b)(7)(C) First Name: (b)(6); (b)(7)(A); (b)(7)(C)

Telephone: (b)(6); (b)(7)(A); (b)(7)(C) Email: (b)(6); (b)(7)(A); (b)(7)(C)

13. **Option to Participate in OCR's Early Mediation Process**

OCR provides an early mediation process as an opportunity for you and the recipient institution to voluntarily resolve your complaint soon after you file it with OCR.

Mediation is a form of complaint resolution that OCR offers as an alternative to its investigative process. Mediation is an informal process in which a staff member from OCR who is trained in mediation assists the parties to reach a negotiated resolution of the complaint. The mediator does not decide who is right or wrong and does not have the authority to impose a settlement on the parties. Instead, the mediator helps the parties to find a mutually acceptable resolution to your complaint. Mediation is a strictly voluntary process. If either party does not want to participate in mediation, OCR will address the complaint through its regular processes.

If you are interested in participating in the early mediation process, you must check the box below. If you indicate your interest in early mediation by checking the box below and OCR determines that your complaint is appropriate for this process, OCR will contact you and the recipient institution and offer this resolution option. If the recipient agrees to participate in early mediation, OCR will work with you and the recipient to achieve a mutually agreeable resolution of your complaint. If the recipient does not wish to participate in early mediation, OCR will proceed with its regular processing of your complaint. ***If you do not indicate your interest in early mediation by checking the box below, early mediation will not be offered to you and OCR will proceed with its regular processing of your complaint.***

I am interested in participating in early mediation (Please check box):

NOTE: You **MUST** submit a signed Consent Form to OCR if you want to participate in early mediation.

Page 8 of 11 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

14. What would you like the institution to do as a result of your complaint
— what remedy are you seeking?

Please see Attachment 4

15. We cannot accept your complaint if it has not been signed. Please
sign and date your complaint below.

(Date)

(Signature)

(Date)

(Signature of person in Item 2)

Please mail or email the completed and signed Discrimination Complaint Form, your signed consent form and copies of any written material or other documents you believe will help OCR understand your complaint to the OCR Enforcement Office responsible for the state where the institution or entity about which you are complaining is located. You can locate the mailing information for the correct enforcement office on OCR's website at <https://ocrcas.ed.gov/contact-ocr>.

**CONSENT FORM - FOR DISCLOSING NAME AND OTHER PERSONAL INFORMATION
CONTAINED IN THE DISCRIMINATION COMPLAINT FORM TO OTHERS**

(Please print or type except for signature line)

Your Name:

(b)(6); (b)(7)(A); (b)(7)(C)

Name of School or Other Institution That You Have Filed This Complaint Against: _____

Central Bucks School District

- The purpose of this consent form is for the Office for Civil Rights (OCR) to request your consent to disclose your name and other personal information when OCR decides that doing so will assist in investigating and resolving your complaint.
- For example, to decide whether a school discriminated against a person, OCR often needs to reveal that person's name and other personal information to employees at that school to verify facts or get additional information. When OCR does that, OCR informs the employees that all forms of retaliation against that person and other individuals associated with the person are prohibited. OCR may also reveal the person's name and personal information during interviews with witnesses and consultations with experts.
- If you do not consent to OCR disclosing your name or other personal information, OCR may decide to close your complaint if OCR determines it is necessary to disclose such information in order to determine whether the school discriminated against you.

NOTE: If you file a complaint with OCR, OCR can release certain information about your complaint to the press or general public, including the name of the school or institution; the date your complaint was filed; the type of discrimination included in your complaint; the date your complaint was resolved, dismissed or closed; the basic reasons for OCR's decision; or other related information. Any information OCR releases to the press or general public will not include your name or the name of the person on whose behalf you filed the complaint.

NOTE: OCR requires you to respond to its requests for information. Failure to cooperate with OCR's investigation and resolution activities could result in the closure of your complaint.

Please sign section A or section B (but not both) and return to OCR:

- If you filed the complaint on behalf of yourself, you should sign this form.
- If you filed the complaint on behalf of another specific person, that other person should sign this form.
EXCEPTION: If the complaint was filed on behalf of a specific person who is younger than 18 years old or a legally incompetent adult, this form must be signed by the parent or legal guardian of that person.
- If you filed the complaint on behalf of a class of people, rather than any specific person, you should sign the form.

A. I give OCR my consent to disclose my name (and that of my minor child/ward on whose behalf the complaint is filed) and other personal information contained in the Discrimination Complaint Form to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint Form.

Signature

Date

OR

B. I do not give OCR my consent to disclose my name (and that of my minor child/ward on whose behalf the complaint is filed) nor other personal information contained in the Discrimination Complaint Form to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint Form. I understand that OCR may have to close my complaint.

B. I do not give OCR my consent to disclose my name (and that of my minor child/ward on whose behalf the complaint is filed) nor other personal information contained in the Discrimination Complaint Form to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint Form. I understand that OCR may have to close my complaint.

Signature (b)(6); (b)(7)(A); (b)(7)(C)

Date 4/8/24

I declare under penalty of perjury that it is true and correct that I am the person named above; and, if the complaint is filed by a parent or legal guardian on behalf of a minor child/individual who has been declared to be incompetent due to physical or mental incapacity or age by a court of competent jurisdiction, that I am that person's parent or legal guardian. This declaration only provides consent for the disclosure of identity of the persons (and other individually identifiable information about them contained in the Discrimination Complaint Form) and does not extend to any of the claims filed in the complaint.

Excerpt from the Online Interactive Complaint Form

Race / Color / National Origin / Ethnicity / Shared Ancestry

Discrimination based on national origin includes discrimination based on the country, world region, or place where a person or their ancestors come from; a person's limited English proficiency or English learner status; and a person's actual or perceived shared ancestry or ethnic characteristics, including membership in a religion that may be perceived to exhibit such characteristics (e.g., Hindu, Jewish, Muslim, and Sikh students). For more information about race, color, and national origin discrimination, please visit www.ed.gov/ocr/frontpage/pro-students/race-origin-pr.html.

Sex

Discrimination based on sex includes discrimination based on sex stereotypes, pregnancy or related conditions, sexual orientation, and gender identity. Discrimination based on sex also encompasses rules about parental, family, or marital status that treat people differently based on sex. For more information about sex discrimination, please visit <https://www2.ed.gov/policy/rights/guid/ocr/sexoverview.html>.

Disability

A person with a disability is defined as any person who (i) has a physical or mental impairment, which substantially limits one or more major life activities, or (ii) has a record of such impairment, or (iii) is regarded as having such an impairment. Whether a person has a disability is determined without considering mitigating measures. For more information about disability discrimination, please visit www.ed.gov/policy/rights/guid/ocr/disability.html.

ATTACHMENT 2

Because Judaism and Zionism (the belief that Jews have the right to exist on their ancestral land: Israel) are intertwined, please refer to ATTACHMENT 1 in support of the claim of **discrimination based on national origin- Israeli**. In addition to ATTACHMENT 1 please note that (b)(6); (b)(7)(A); (b)(7)(C) has two Instagram accounts which have been shown to and encouraged following by the students at (b)(6); (b)(7)(A); (b)(7)(C) School. They are (b)(6); (b)(7)(A); (b)(7)(C) features students in the (b)(6); (b)(7)(A); (b)(7)(C) with captions reading (b)(6); (b)(7)(A); (b)(7)(C) **"Palestine!!!"** and (b)(6); (b)(7)(A); (b)(7)(C) In these photos students are (b)(6); (b)(7)(A); (b)(7)(C) The individual student Instagram accounts as well as the school account for the club (b)(6); (b)(7)(A); (b)(7)(C) are tagged and featured.

This is in direct violation of school conduct code #8 which prohibits the following: "Friending" or otherwise adding students to their circle of contacts on an online social networking site whose function does not involve enhancing the educational goals of the district.

On other posts (b)(6); (b)(7)(A); (b)(7)(C) features (b)(6); (b)(7)(A); (b)(7)(C) such as (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) On or about (b)(6); (b)(7)(A); (b)(7)(C) reposts from (b)(6); (b)(7)(A); (b)(7)(C) featuring individuals (b)(6); (b)(7)(A); (b)(7)(C)

Furthering the anti-Israel sentiment (b)(6); (b)(7)(A); (b)(7)(C) features the (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C)

On (b)(6); (b)(7)(A); (b)(7)(C) and other (b)(6); (b)(7)(A); (b)(7)(C) tied to the anti-Israel, pro Palestine movement. On (b)(6); (b)(7)(A); (b)(7)(C) he posted a video of (b)(6); (b)(7)(A); (b)(7)(C) with the following caption (b)(6); (b)(7)(A); (b)(7)(C) Further in the post he tags his (b)(6); (b)(7)(A); (b)(7)(C) with an emoji of a (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) Hamas broke a ceasefire with Israel, crossed a border invading Israel and killed, burned, mutilated, raped, and then kidnapped 1,200 and 250 people respectively. Among those were women, elderly, disabled, children (as young as 9 months old), and male citizens.

(b)(6); (b)(7)(A); (b)(7)(C) also features (b)(6); (b)(7)(A); (b)(7)(C) in one of his (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) celebrated Hamas terrorist war crimes against Israeli civilians online and (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) Hamas massacred 1,200 Israeli Jews. At this same rally (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A) referred to Zionists as (b)(6); (b)(7)(A); (b)(7)(C) and said (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) was present at this same anti-Israel rally on (b)(6); (b)(7)(A); (b)(7)(C) held by the Philly Palestine Coalition and other local anti-Israel groups. It was called an "Emergency Solidarity Rally" in Philadelphia, Pennsylvania. The rally was in support of (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) Hamas terrorist war crimes. To be mentioned was (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) who (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

Here is the link to the exact page on (b)(6); (b)(7)(A); (b)(7)(C) with additional information and video:

(b)(6); (b)(7)(A); (b)(7)(C)

Please see the attached as follows:

A) (1-3) Three social media posts on (b)(6); (b)(7)(A); (b)(7)(C) glorifying the October 8th antIsrael rally, showing (b)(6); (b)(7)(A); (b)(7)(C) attendance at that rally, and (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

B) (1-2) (b)(6); (b)(7)(A); (b)(7)(C) used his private account to post photos and the Instagram handles of the students in the (b)(6); (b)(7)(A); (b)(7)(C) (3) A copy of a circulating (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) School originating from (b)(6); (b)(7)(A); (b)(7)(C)

detailing a campaign to (b)(6); (b)(7)(A); (b)(7)(C) to take an anti-Israel stance.

C) (1) (b)(6); (b)(7)(A); (b)(7)(C) features violent pro Palestine sentiments such as (b)(6); (b)(7)(A); (b)(7)(C) with comment: (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) (2-3) On or about (b)(6); (b)(7)(A); (b)(7)(C) reposts from

(b)(6); (b)(7)(A); (b)(7)(C) twice featuring individuals (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

D) (1) Furthering the anti-Israel sentiment (b)(6); (b)(7)(A); (b)(7)(C) features the false claim that

(b)(6); (b)(7)(A); (b)(7)(C)

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

ATTACHMENT 3

Parents and clergy emailed Superintendent Scanlon, Principal (b)(6); (b)(7)(A) and the School Board outlying in detail their concerns about (b)(6); (b)(7)(A); (b)(7)(C). To date no substantive response has been received.

On or about (b)(6); (b)(7)(A); (b)(7)(C) an approximately (b)(6); (b)(7)(A); (b)(7)(C) to same recipients via email and first-class mail was sent outlying in greater detail the parents' clergy, and community members' concerns over (b)(6); (b)(7)(A); (b)(7)(C) activities. Confirmed receipt by the School Board is evidenced in a (b)(6); (b)(7)(A); (b)(7)(C) article in (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) To date no substantive response has been received.

Please see attached as follows:

- (A) Parents and clergy emailed Superintendent Scanlon, Principal (b)(6); (b)(7)(A) and the School Board
- (B) (b)(6); (b)(7)(A) Draft Letter to same recipients via email and first-class mail; confirmed receipt by the School Board
- (C) The Philadelphia Inquirer, (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) Pgs. 3-4 " (b)(6); (b)(7)(A); (b)(7)(C) critics have also circulated (b)(6); (b)(7)(A); (b)(7)(C) addressed to Scanlon that (b)(6); (b)(7)(A); (b)(7)(C) An unsigned copy of the letter was provided to (b)(6); (b)(7)(A); (b)(7)(C) which verified the district had received it."

PRIVILEGED AND CONFIDENTIAL

3a

Dear Dr. Scanlon, Principal (b)(6); (b)(7)(C) and Esteemed Board Members:

We write with urgent concern regarding certain recent activity at (b)(6); (b)(7)(A); (b)(7)(C) There are two matters requiring immediate attention from the School District and the building principal, (b)(6);

(b)(6); Both pertain to the in-school and online conduct of (b)(6); (b)(7)(A); School (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C) and the student organization he sponsors and runs, (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C)

Online Threats

(b)(6); (b)(7)(A); may maintain at least two Instagram accounts. One screenname is (b)(6); (b)(7)(A); (b)(7)(C) the other is (b)(6); (b)(7)(A); where he lists (b)(6); (b)(7)(A); (b)(7)(C) Linking to one page directs a user to the other. (b)(6); (b)(7)(A); shares his Instagram handles with his students—it is written on the whiteboard in his classroom.

See attached picture labeled Instagram Post 1

(b)(6); (b)(7)(A); posts what we see as (b)(6); (b)(7)(A); (b)(7)(C) CBSD students follow (b)(6); (b)(7)(A); (b)(7)(C) Instagram accounts. (b)(6); (b)(7)(A); (b)(7)(C) is bringing through the proverbial back door content he knows may not enter from the front, through prescribed, approved channels. He has posted and shared vitriolic and incendiary content since at least (b)(6); (b)(7)(A); (b)(7)(C) Israeli Jews, Christians and Muslims alike were slaughtered at a peace festival and in their homes.

However, the most troubling and worrisome of (b)(6); (b)(7)(A); (b)(7)(C) content is a post made on (b)(6); (b)(7)(A); (b)(7)(C) sharing (b)(6); (b)(7)(A); (b)(7)(C) On social media, this is oftentimes called promoting others' posts.

See attached picture labeled Instagram Post 2

Two accounts were tagged, in order to promote them as well. Going into these accounts, the hatred and violence are self-evident to anyone.

See attached picture labeled Instagram Posts 3,4 and 5

This implied threat of violence is simply a bridge too far: School violence is a real danger. Antisemitic violence is at an all-time high in the United States. As a teacher, (b)(6); (b)(7)(A); (b)(7)(C) occupies an extraordinary position of trust with respect to his students. It would take only one misguided student to create an unthinkable tragedy for the entire community. (b)(6); (b)(7)(A); has promoted and glorified unspeakable violence in the name of "resistance."

Encouragement to (b)(6); (b)(7)(A); (b)(7)(C)

As you may be aware, on Sunday, February 25, a 25-year old serviceman of the United States Air Force, Aaron Bushnell, lit himself on fire outside of the Israeli Embassy in Washington, D.C. Mr. Bushnell ostensibly did so in protest of the current war between Israel and Hamas, though independent records reveal that Mr. Bushnell was suffering from mental illness leading up to the events in question. Mr. Bushnell died of his self-inflicted injuries the next day.

To normal, mentally healthy people, this horrifying act is unthinkable and should be condemned. (b)(6); (b)(7)(A); (b)(7)(C) however, (b)(6); (b)(7)(A); (b)(7)(C)

PRIVILEGED AND CONFIDENTIAL

as (b)(6); (b)(7)(A); (b)(7)(C) The images shared by (b)(6); (b)(7)(A) shock the conscience.

Our students are young and impressionable. The actions of Bushnell must be roundly condemned, not promoted, and certainly not (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); The thought that a teacher with unfettered access to young, suggestible minds would do anything but (b)(6); (b)(7)(A); is unconscionable. For this act alone, he should be (b)(6); (b)(6); (b)(7)(A); (b)(7)(C)

Though these are the most urgent concerns there are other activities in which (b)(6); has **possibly** engaged in, perhaps violating both Central Bucks School District Policy and federal law, including:

- Exploiting CBSD students for his personal political agenda, in violation of School District Policies 321 and 319;
- Exploiting CBSD students by using their images and tagging them in his social media posts without consent or permission;
- Brainwashing impressionable students with propaganda in an area outside of his instructional directive (he is a (b)(6); (b)(7)(A) teacher purporting to teach (b)(6); (b)(7)(A);
- Creating a hostile and unwelcoming environment for students on the basis of religion, ethnic and national background;
- Utilizing school district materials for personal gain;
- (b)(6); (b)(7)(A); (b)(7)(C)
- Using instructional time to engage in prohibited conduct;
- Leading and organizing (b)(6); (b)(7)(A); (b)(7)(C)

This list, it seems to us, is merely representative of the litany of bases for (b)(6); (b)(7)(A); (b)(6); (b)(7)(C); (b)(6); (b)(7)(A);

We hereby demand that the Central Bucks School District (b)(6); (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(6); (b)(7)(A); (b)(7)(C) pending a comprehensive investigation of his conduct with respect to the School District and his students.

Sincerely Yours,

(b)(6); (b)(7)(A); (b)(7)(C)

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(6); (b)(7)(A); (b)(7)(C)

of the Freedom of Information and Privacy Act

Dr. James Scanlon
20 Weldon Drive
Doylestown, PA 18901

VIA E-MAIL AND FIRST-CLASS MAIL

CONFIDENTIAL COMMUNICATION

(b)(6); (b)(7)(A); (b)(7)(C)

Dear Dr. Scanlon, Principal (b)(6); (b)(7)(A) and Esteemed Board Members:

We write with **urgent concern** regarding certain recent activity at (b)(6); (b)(7)(A); (b)(7)(C). There are two matters requiring immediate attention from the School District and the building principal, (b)(6); (b)(7)(A); (b)(7)(C). Both pertain to the in-school and online conduct of (b)(6); (b)(7)(A); (b)(7)(C) School (b)(6); (b)(7)(A); (b)(7)(C) teacher, (b)(6); (b)(7)(A); (b)(7)(C) and the student organization (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C).

Online Threats

(b)(6); (b)(7)(A); (b)(7)(C) maintains at least two Instagram accounts. One screenname is (b)(6); (b)(7)(A); (b)(7)(C) the other is (b)(6); (b)(7)(A); (b)(7)(C). Linking to one page directs a user to the other. On both pages, (b)(6); (b)(7)(A); (b)(7)(C) He also posts (b)(6); (b)(7)(A); (b)(7)(C) At least (b)(6); (b)(7)(A); (b)(7)(C) current CBSD students follow his Instagram accounts.

(b)(6); (b)(7)(A); (b)(7)(C) has posted and shared vitriolic and incendiary content since at least (b)(6); (b)(7)(A); (b)(7)(C) Israeli Jews and Arabs alike were slaughtered at a peace festival and in their homes. Over 200 Israeli and other nationality people were kidnapped to Gaza.

This letter is not to debate (b)(6); (b)(7)(A); (b)(7)(C) right to post vitriolic and incendiary content to Instagram; that is for Meta, Inc. to determine. This letter is to express deep concern that (b)(6); (b)(7)(A); (b)(7)(C) is using these pages, as well as his platform and a (b)(6); (b)(7)(A); (b)(7)(C) teacher to (b)(6); (b)(7)(A); (b)(7)(C) CBSD students. (b)(6); (b)(7)(A); (b)(7)(C) shares his Instagram handles with his students—it is written on the whiteboard in his classroom (See Exhibit H).

Some of the content of his page includes such incendiary falsehoods as (b)(6); (b)(7)(A); (b)(7)(C) (see Exhibit __), proclaiming (b)(6); (b)(7)(A); (b)(7)(C) and making outrageous claims about the (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C)

¹ A fuller discussion of this claim is below.
(b)(6); (b)(7)(A); (b)(7)(C)

But MOST troubling and worrisome is a post made on (b)(6); (b)(7)(A); (b)(7)(C) sharing a (b)(6); (b)(7)(A); (b)(7)(C) This is terrifying for CBSD's Jewish families. **It is a call for violence. It is an imminent threat of violence.** It is real and it must not be tolerated.

(b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) **must be** (b)(6); (b)(7)(A); (b)(7)(C)
(b)(6); (b)(7)(A); (b)(7)(C)

Encouragement to (b)(6); (b)(7)(A); (b)(7)(C)

As you may be aware, on Sunday, February 25, a 25-year old serviceman of the United States Air Force, Aaron Bushnell, lit himself on fire outside of the Israeli Embassy in Washington, D.C.. Mr. Bushnell ostensibly did so in protest of the current war between Israel and Hamas, though Mr. Bushnell's mother, Danielle, released a subsequent statement saying that her son had been struggling with mental health and was a "victim of propaganda."³ Mr. Bushnell died of his self-inflicted injuries the next day.

To normal, mentally healthy people, this horrifying act is unthinkable and should be condemned. (b)(6); (b)(7)(A); (b)(7)(C) however, have (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) (See Exhibit A).⁴ The images are truly shocking.

Your students are young and impressionable. The actions of Bushnell must be roundly condemned (b)(6); (b)(7)(A); (b)(7)(C) by persons operating under the auspices of the School District. The thought that a teacher with unfettered access to young, suggestible minds would do anything but (b)(6); (b)(7)(A); (b)(7)(C) is unconscionable.

It is incumbent on CBSD leadership to let the leadership and members of (b)(6); (b)(7)(A); (b)(7)(C) know that (b)(6); (b)(7)(A); (b)(7)(C) but, *even more important*, that it **may not be** (b)(6); (b)(7)(A); (b)(7)(C) under the auspices of Central Bucks School District. (b)(6); (b)(7)(A); (b)(7)(C) bears the name of the school and the school district in its Instagram handle. It is therefore *more* imperative that the School District and (b)(6); (b)(7)(A); (b)(7)(C) distance themselves from this organization.

The students who are responsible for (b)(6); (b)(7)(A); (b)(7)(C) should be compelled immediately to (b)(6); (b)(7)(A); (b)(7)(C) as they post an (b)(6); (b)(7)(A); (b)(7)(C) They should not be permitted to (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C)

If it is true of your students, it is even more true of your faculty. (b)(6); (b)(7)(A); (b)(7)(C) must (b)(6); (b)(7)(A); (b)(7)(C) For this act alone, he should be (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C)

(continued on the next page)

³ See <https://www.newsweek.com/aaron-bushnell-death-report-reveals-police-call-about-mental-distress-1873386>.

⁴ The exhibits attached herein are merely representative—not exhaustive. An exhaustive compendium of screenshots of evidence, including videos, are available upon request.

I. (b)(6); (b)(7)(A); (b)(7)(C) **Is In Violation of the Law, School District Policy and Is a Danger to CBSD**

Regrettably, the (b)(6); (b)(7)(A); (b)(7)(C) and the encouragement of (b)(6); (b)(7)(A); (b)(7)(C) comprises only *the most urgent* part of our collective concerns. It is not the entirety of them. Both concerns are symptoms of the larger issue. (b)(6); (b)(7)(A); (b)(7)(C) is using his classroom, his students and his online platform to disseminate (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) Some students have fallen prey to his efforts towards indoctrination. This is not speculative—it is real.

A. Hate Speech

(b)(6); (b)(7)(A); (b)(7)(C) is a (b)(6); (b)(7)(A); (b)(7)(C) at (b)(6); (b)(7)(A); (b)(7)(C) that was approved by the administration (b)(6); (b)(7)(A); (b)(7)(C) is the (b)(6); (b)(7)(A); (b)(7)(C) of (b)(6); (b)(7)(A); (b)(7)(C) According to the District's website, (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) The mission seems benign, except that (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) is actually acting in a divisive and hurtful fashion.

At the outset, October 7, 2023—a new day which will live in infamy—did not only impact Jewish or Israeli people. In fact, 21 Israeli Muslim Arabs were slaughtered on that day by Hamas and 6 were kidnapped to Gaza.⁶ The suffering and plight of these Israelis is heartbreaking and urgent. Yes (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) has not mentioned this horrific tragedy. Instead, it has focused its efforts on condemning Israel for seeking and, to some extent, succeeding in having these citizens returned from captivity.

This (b)(6); (b)(7)(A); (b)(7)(C) is deeply problematic. It is antithetical to the School District's stated mission of creating a "safe and supportive environment in which to learn," and "promoting tolerance and respect for diversity."⁷

(b)(6); (b)(7)(A); (b)(7)(C)

⁶ <https://www.timesofisrael.com/in-rahata-bedouin-community-mourns-its-october-7-losses-away-from-the-public-eye/>

(b)(6); (b)(7)(A); (b)(7)(C)

