

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

PLAINTIFF TYREKE WILLIAMS, and )  
ALISHA HORNBUCKLE )  
Plaintiffs, )  
v. )  
REPUBLIC R-III SCHOOL DISTRICT )  
Serve: Superintendent Dr. Matt Pearce )  
636 N. Main Ave. )  
Republic, Missouri 65738 )  
Defendant. )

JURY TRIAL DEMANDED

PETITION FOR DAMAGES

COMES NOW, Plaintiff Tyreke Williams and Plaintiff Alisha Hornbuckle, by and through their attorney, Rose C. Briscoe of Law Office of Rose C. Briscoe, LLC, and state and allege as follows for their *Petition for Damages* against Defendant:

PARTIES

1. Plaintiff Tyreke Williams (hereinafter “Plaintiff Williams”) is an African American, black male, now age 19.

2. At all relevant times referenced herein, Plaintiff Williams was a minor child and student attending Republic High School in Greene County, Missouri, and Plaintiff Williams resided in Greene County, Missouri.

3. Plaintiff Williams now resides at [REDACTED].

4. Plaintiff Alisha Hornbuckle (hereinafter “Plaintiff Hornbuckle” or “Plaintiff Williams’s mother”) is the biological mother of Plaintiff Williams and is Caucasian.

5. At all relevant times referenced herein, Plaintiff Hornbuckle resided in Greene County, Missouri.

6. Plaintiff Hornbuckle now resides at [REDACTED].

7. Plaintiffs are citizens of the United States.
8. Defendant Republic R-III School District (hereinafter “Defendant” or “Defendant School District”) is a place of public accommodation within the meaning of the Missouri Human Rights Act, R.S.Mo. § 213.010, *et seq.*
9. Defendant School District is a public school district existing under the laws of the state of Missouri with its administrative offices located at 636 N. Main Ave., Republic, Missouri 65738.
10. Defendant School District operates Republic High School located at 4370 Repmo Dr, Republic, Missouri 65738, as well as several other primary and secondary schools within Greene County, Missouri.
11. The district office and primary and secondary schools, including Republic High School, are public facilities and are supported in whole or in part by public funds.
12. Republic School District, through the district office and its primary and secondary schools, including Republic High School, own, offer to hold out to the general public goods, services, privileges, facilities, advantages or accommodations for the peace, comfort, health, welfare and safety of the general public.
13. At all times relevant herein, administrative personnel, principals, assistant principals, teachers, counselors, 504 Coordinators, school staff, and coaches were employed by Republic R-III School District and acted within the course and scope of their employment and/or as authorized agents of the Republic School District.

**JURISDICTION AND VENUE**

14. At all times alleged herein, Plaintiffs were residents of Greene County, Missouri.

15. At all times alleged herein, Plaintiff Williams was a student at Republic High School in Greene County, Missouri.

16. Defendant is a place of public accommodation within the meaning of the Missouri Human Rights Act, R.S.Mo. § 213.010, *et seq.*

17. Defendant School District is a public school existing under the laws of the state of Missouri with its administrative offices located at 636 N. Main Ave., Republic, Missouri 65738

18. All unlawful acts, omissions, behaviors, policies, and practices set forth below were committed in Greene County, Missouri.

19. This Court has jurisdiction over Defendant School District because the unlawful acts and inactions alleged in this Petition were committed in Republic, Greene County, Missouri.

20. At all times relevant herein, Defendant School District's employees were acting within the course and scope of their employment.

21. Jurisdiction and venue are proper in Greene County, Missouri, pursuant to Mo. Rev. Stat. §§ 508.010 and 213.111(1), (2).

**JURISDICTIONAL PREREQUISITES**

22. Plaintiff Hornbuckle, on behalf of Plaintiff Williams, at a time of his infancy, timely filed a Charge of Discrimination against Defendant on or about February 10, 2025, with the Missouri Commission on Human Rights ("MCHR") alleging discrimination in public accommodation based on Plaintiff William's race and disability (attached as Exhibit 1 and incorporated herein by reference).

23. On or about April 8, 2025, an Amended Charge of Discrimination was filed on behalf of Plaintiff Williams, at a time of his infancy, alleging discrimination and harassment based

on Plaintiff Williams' race, color, disability, and allegations of retaliation. (attached as Exhibit 2 and incorporated herein by reference).

24. On or about April 8, 2025, Plaintiff Hornbuckle filed a Charge with the Missouri Commission on Human Rights alleging retaliation. (attached as Exhibit 3 and incorporated herein by reference).

25. On or about October 27, 2025, the MCHR issued a Notice of Right to Sue to Alisha Hornbuckle on behalf of Plaintiff Williams (attached as Exhibit 4 and incorporated herein by reference).

26. On or about October 27, 2025, the MCHR issued a Notice of Right to Sue to Plaintiff Hornbuckle (attached as Exhibit 5 and incorporated herein by reference).

27. This lawsuit was filed within 90 days of the issuance of the MCHR Notice of Right to Sue letters concerning Plaintiff Williams and Plaintiff Hornbuckle.

28. Plaintiffs have satisfied and exhausted all administrative and judicial prerequisites prior to the filing of this action.

**COMMON FACTUAL ALLEGATIONS**

29. Plaintiff Williams is an African American, black male, and at all relevant times was a student at Republic High School.

30. Throughout Plaintiff Williams' attendance in high school, he endured racist remarks and taunting by other students, which racist comments were overheard by school employees who did nothing to intervene and stop the racial harassment.

31. On multiple occasions throughout Plaintiff Williams' attendance at Republic High School, Plaintiff Williams's mother, Alisha Hornbuckle, reported incidents of racial harassment and discrimination to [REDACTED]

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32. Despite Ms. Hornbuckle’s complaints to District employees, Plaintiff Williams continued to be subjected to racial harassment several times per week.

33. Plaintiff Williams was a member of the Republic High School football team.  
**Freshman Year 2021-2022**

34. During Plaintiff Williams’s Freshman year football season, Plaintiff Williams was subjected to harsher treatment by [REDACTED] than white football players.

35. Beginning August 30, 2021, Plaintiff Williams was spoken to by [REDACTED] more harshly than white football players.

36. During Plaintiff Williams’s Freshman year football season, Plaintiff Williams was subjected to harsher treatment by [REDACTED] than white football players.

37. During Plaintiff Williams’s Freshman year football season, Plaintiff Williams was the subject of racist comments by white football players who would call Plaintiff Williams “Tyrone.”

38. Plaintiff Williams would continue to be called “Tyrone” throughout his high school years by white students [REDACTED], including [REDACTED] and [REDACTED].

39. White students [REDACTED] who called Plaintiff Williams “Tyrone” did so to insult Plaintiff Williams by using the commonly known racial stereotype to insult Plaintiff Williams.

40. During Plaintiff Williams' Freshman year, white football players would harass Plaintiff Williams by telling him that he was only good at football because he was black.

41. On or about September 1, 2021, Plaintiff Williams's mother contacted the school and spoke to [REDACTED] about [REDACTED] not allowing Plaintiff Williams comparable playing time as white students.

42. In September 2021, Plaintiff Williams's mother noticed a difference in Plaintiff Williams's [REDACTED].

43. On or about September 6, 2021, Plaintiff Williams's mother emailed [REDACTED] [REDACTED] requesting to speak with him about concerns that football coaches were not allowing Plaintiff Williams the same opportunities as the white students.

44. On or about September 7, 2021, [REDACTED] called Plaintiff Williams's mother, at which time she reported to [REDACTED] concerns about how Plaintiff Williams was being treated differently from white students.

45. During the call on September 7, 2021, [REDACTED] asked for the names of the white students who always received playing time, and Plaintiff Williams's mother provided the names of those students to [REDACTED].

46. After speaking with [REDACTED], [REDACTED] contacted Ms. Hornbuckle, advising that Plaintiff Williams would get a position on the football team and more opportunities once he got more practice in and described Plaintiff as "a natural talent and wonderful sportsmanship."

47. Despite [REDACTED] praise of Plaintiff Williams to Ms. Hornbuckle, [REDACTED] [REDACTED] treated Plaintiff Williams much differently on the field, at practice, and even in the

weight room, and would often call Plaintiff Williams “chicken legs” and tell Plaintiff Williams that he needed to gain more weight.

48. When Plaintiff Williams’s mother asked [REDACTED] about calling Plaintiff Williams “chicken legs” and telling Plaintiff Williams that he needed to gain more weight to play football, [REDACTED] denied making those comments.

49. Over the next four (4) years, [REDACTED] continued to call Plaintiff Williams “chicken legs,” tell Plaintiff Williams that he needed to gain more weight, and gave Plaintiff Williams significantly less playing time than white football players.

50. On or about October 2021, Plaintiff Williams’s mother reported to [REDACTED] that Plaintiff Williams was subjected to constant racial harassment by white students at lunch, throughout the school day, and at football practice with white students making the following comments to Plaintiff Williams: “You’re only good because you are black;” “How are you black and not starting?” and “It’s probably because you are black.”

51. When reporting the racial harassment to [REDACTED] in October 2021, Plaintiff Williams’s mother provided specific names of white students who were making racially harassing comments to Plaintiff Williams – specifically, [REDACTED], [REDACTED], [REDACTED], and [REDACTED], as well as other random students who would join in on the conversations.

52. [REDACTED] would later physically assault Plaintiff Williams on January 17, 2025, at school.

53. On or about April 6, 2022, Plaintiff Williams’s mother had a meeting with [REDACTED] to report concerns that certain accommodations were not being

provided to Plaintiff Williams according to his 504 Plan, including sections B, C, D, E, and H of the 504 Plan.

54. Specific teachers who did not follow Plaintiff Williams’s 504 Plan included [redacted]; [redacted]; and [redacted].

55. [redacted] bullied and harassed Plaintiff Williams in Plaintiff Williams’s weight class by calling him “chicken legs” during Plaintiff Williams’s regular class time when he attended his weights class.

56. During the April 6, 2022 meeting with [redacted], Plaintiff Williams’s mother reported to [redacted] the racial harassment that had been previously reported to [redacted] concerning the white students referenced above.

**Sophomore Year 2022-2023**

57. On or about August 2022, Plaintiff Williams’s mother contacted [redacted] to discuss the continued disparate treatment concerning playing time in football in comparison to white students.

58. On or about August 2022, Plaintiff Williams was again mentally and emotionally distressed about the racial harassment and disparate treatment concerning football, which was communicated to [redacted] and [redacted].

59. On or about September 2022, Ms. Hornbuckle left a voicemail message for [redacted] to discuss how Plaintiff Williams was struggling in his classes and not receiving the accommodations in accordance with his 504 Plan.

60. [redacted] returned Ms. Hornbuckle’s call, stating that she would reach out to the teachers regarding Ms. Hornbuckle’s concerns.

61. Despite [REDACTED] advising Ms. Hornbuckle that she would reach out to Plaintiff Williams's teachers about accommodations not being followed, nothing changed.

62. After there was no improvement with Plaintiff Williams receiving the necessary accommodations pursuant to his 504 Plan, Ms. Hornbuckle contacted [REDACTED] again, requesting information about the next step of reporting the issue since there had not been any improvement.

63. [REDACTED] advised Ms. Hornbuckle that she was Plaintiff Williams's advocate and that they should report incidents concerning accommodations of the 504 Plan to her when issues arose.

64. [REDACTED] was dismissive of Plaintiff Williams' and Ms. Hornbuckle's 504 Plan accommodation concerns, which resulted in Ms. Hornbuckle reporting the 504 accommodations issue to [REDACTED].

65. After reporting the 504 accommodations issue to [REDACTED], there was no corrective action or change, and Plaintiff Williams still did not receive the accommodations pursuant to his 504 Plan.

66. During September 2022, [REDACTED] continued to show preferential treatment to white students while Plaintiff Williams was mostly kept on the sidelines.

67. In the Fall of 2022, [REDACTED] continued to call Plaintiff Williams "chicken legs" and would tell Plaintiff Williams that he needed gain more weight to play football despite there being white players who were similar in size to Plaintiff Williams and received more playing time than Plaintiff Williams.

68. [REDACTED] continued to call Plaintiff Williams “chicken legs,” and the name-calling and disparate treatment continued over Plaintiff Williams’s remaining years of high school.

69. The racial harassment by white students towards Plaintiff Williams continued throughout Plaintiff Williams’s high school years despite several complaints made to District employees.

70. Republic High School and Republic R-III School District were on notice of racial harassment at Republic High School as reports from other students had been made about racial harassment during the school years between 2021 and 2025, yet Defendant failed to stop the racial harassment.

71. Instead of taking corrective action, Plaintiff Williams and his mother were retaliated against because they complained to District employees concerning racial discrimination and harassment.

72. On or about January 2023, [REDACTED], a white student, made comments concerning the shape and size of Plaintiff Williams’s nose, and [REDACTED] altered pictures with memes and stated the altered picture was Plaintiff Williams, which harassment was reported to [REDACTED] by Plaintiff Williams’s mother.

73. Although [REDACTED] advised that he would “look into it,” [REDACTED] continued to harass Plaintiff Williams about his nose.

74. On or about April 4, 2023, Ms. Hornbuckle had a 504 Meeting with [REDACTED] to discuss Plaintiff Williams still not receiving accommodations pursuant to his 504 Plan, specifically sections B, C, D, E, and H of the 504 Plan, and that Plaintiff

Williams continued not to get the proper resources to be successful with his 504 Plan in order to be able to keep up in class.

75. The following teachers failed to provide accommodations to Plaintiff Williams in accordance to his 504 Plan: [REDACTED]; [REDACTED]; [REDACTED]; and [REDACTED].

76. Ms. Hornbuckle requested that [REDACTED] do a check-in more than once per year, as Plaintiff Williams needed accommodations.

77. During the 2022-2023 school year, [REDACTED] was supposed to check in mid-way through the school year; however, that never happened.

78. On or about April 2023, [REDACTED] was again made aware of the ongoing racial harassment towards Plaintiff Williams by white students, and nothing was done by [REDACTED] to address or correct the racial harassment.

**Junior Year 2023-2024**

79. During the 2023 – 2024 school year, Plaintiff Williams continued to be racially harassed by white students who called him “nigger” throughout the school year and continued to call Plaintiff Williams “Tyrone.”

80. During the 2023 – 2024 school year, Plaintiff Williams, being called “nigger” and “Tyrone” was reported to [REDACTED].

81. [REDACTED], a white student, bullied Plaintiff Williams by telling Plaintiff Williams [REDACTED].

82. Other students reported to Plaintiff Williams that [REDACTED] encouraged them to ask Plaintiff Williams about [REDACTED].

83. Students who asked Plaintiff Williams about [REDACTED] [REDACTED] included [REDACTED], [REDACTED], and [REDACTED].

84. [REDACTED] continued to tell Plaintiff Williams that he needed to gain more weight to play football and continued to call Plaintiff Williams “chicken legs.”

85. During the 2023 - 2024 school year, Ms. Hornbuckle continued to make complaints to [REDACTED], [REDACTED], and [REDACTED] about the racial harassment and discrimination towards Plaintiff Williams.

86. During the 2023 – 2024 school year, [REDACTED] continued to treat Plaintiff Williams less favorably than white students who played football by calling Plaintiff “chicken legs,” telling Plaintiff Williams that he needed to gain weight in order to play, and not allowing Plaintiff Williams to have comparable playing time as white football players, including white players similar in size to Plaintiff Williams.

87. On or about August 30, 2023, Plaintiff Williams’s mother called [REDACTED] to discuss Plaintiff Williams’s mental health, at which time Ms. Hornbuckle told [REDACTED] that student [REDACTED] was bullying Plaintiff Williams by stating [REDACTED].

88. On or about August 28, 2023, [REDACTED] instructed other students, including [REDACTED], [REDACTED], and [REDACTED], to ask Plaintiff Williams about [REDACTED], and those students would say things to Plaintiff Williams, such as [REDACTED].

89. [REDACTED] continued to harass Plaintiff Williams by calling him a “nigger” and continued referring to black people as “niggers” and “slaves.”

90. On or about August 28, 2023, [REDACTED] harassed Plaintiff Williams about the [REDACTED] in front of the other students at football practice.

91. [REDACTED] also asked Plaintiff Williams about [REDACTED] [REDACTED] and advised that [REDACTED] was the one passing this information along to others.

92. [REDACTED] would sit at the lunch table and laugh at Plaintiff Williams when other students would question Plaintiff Williams about [REDACTED].

93. Plaintiff Williams's mother reported the racial harassment and bullying by [REDACTED], [REDACTED], and [REDACTED] to [REDACTED], and [REDACTED] told Plaintiff Williams's mother that he would check in with Plaintiff Williams.

94. [REDACTED] saw Plaintiff Williams in the hall, stopped him in front of other students, and asked Plaintiff Williams about the issues and concerns of racial harassment and bullying – not in a private setting or a place where he could take notes to further conduct an investigation – simply passing Plaintiff Williams in the hall between classes surrounded by other students.

95. Plaintiff Williams did not attend his football team dinner on August 31, 2023, because he had received text messages from other students discussing the [REDACTED] concerning [REDACTED].

96. The students would continue to bully and harass Plaintiff Williams by saying, [REDACTED]

97. [REDACTED] would continue to bully and harass Plaintiff Williams about [REDACTED] during school and football practice.

98. The ongoing harassment by [REDACTED] resulted in a 'No Contact Order' between [REDACTED] and [REDACTED] and [REDACTED].

99. This 'No Contact Order' was implemented by the school after Plaintiff Williams's mother demanded that something be done after she had already made numerous reports to school employees.

100. The 'No Contact Order' was to be enforced by the school, and the school was supposed to act if either Plaintiff Williams or [REDACTED] violated the 'No Contact Order.'

101. [REDACTED] violated the 'No Contact Order' concerning [REDACTED] by encouraging her to deny the [REDACTED] and to lie to [REDACTED], Ms. Hornbuckle.

102. Plaintiff Williams's mother reported the violation of the 'No Contact Order' by [REDACTED] to [REDACTED].

103. On or about August 31, 2023, Plaintiff Williams's mother spoke to [REDACTED] about the declining emotional and mental state of Plaintiff Williams due to the ongoing, persistent racial harassment and bullying by white students and football coaches, including other football players calling Plaintiff Williams "Tyrone," students using the word "nigger," students telling Plaintiff Williams that he was only good at football because he was black, Plaintiff Williams being teased about the [REDACTED], [REDACTED] calling Plaintiff Williams "chicken legs," and telling Plaintiff Williams that he needed to gain more weight to play football.

104. After Plaintiff Williams's mother made the report to [REDACTED] on or about August 31, 2023, the persistent racial harassment and bullying by students [REDACTED] towards Plaintiff Williams continued.

105. On or about September 19, 2023, Plaintiff Williams's mother sent an email to [REDACTED] requesting a return call to discuss the ongoing issues of Plaintiff Williams being bullied about the rumor of [REDACTED].

106. The following day, September 20, 2023, [REDACTED] returned Plaintiff Williams's mother's phone call, at which time Plaintiff Williams's mother reported that [REDACTED] continued to harass and bully Plaintiff Williams regarding the [REDACTED] issue. At this time, Plaintiff Williams's mother requested a meeting with [REDACTED] by communicating that request to [REDACTED].

107. On or about September 21, 2023, Plaintiff Williams's mother spoke to [REDACTED] concerning the ongoing harassment and bullying by white students about [REDACTED] and [REDACTED], and how Plaintiff Williams was being made fun of because of the rumor.

108. On or about September 22, 2023, Plaintiff Williams's mother spoke to [REDACTED] again about Plaintiff Williams, specifically how the school environment is unsafe for Plaintiff Williams, the ongoing racial harassment, bullying, discrimination, disparate treatment, and how Plaintiff Williams was still not receiving accommodations in accordance with his 504 Plan.

109. During the September 22, 2023 conversation with [REDACTED], Ms. Hornbuckle expressed concerns for Plaintiff Williams's safety.

110. During the September 22, 2023 conversation with [REDACTED], Plaintiff Williams's mother discussed the school's refusal to move [REDACTED] from the class that [REDACTED] had with Plaintiff Williams.

111. Instead, the school only wanted to move Plaintiff Williams out of the class that [REDACTED] was in – even though Plaintiff Williams was not the aggressor.

112. During the September 22, 2023 conversation with [REDACTED], Plaintiff Williams's mother told [REDACTED] that it would be more disruptive for Plaintiff Williams to be moved from the class due to the accommodations that Plaintiff Williams required.

113. During the September 22, 2023 conversation with [REDACTED], Plaintiff Williams's mother advised that [REDACTED] had violated the 'No Contact Order' that was in place because [REDACTED] sent a text message to Plaintiff Williams.

114. During the September 22, 2023 conversation with Mr. Stephens, Plaintiff Williams's mother asked for resources to assist with Plaintiff Williams's mental and emotional well-being due to the ongoing racial harassment, bullying, and discrimination at school and that students were continuing to use the word "nigger," that [REDACTED] continued to refer to black people as "slaves," that students were continuing to call Plaintiff Williams "Tyrone," and that other football players continued telling Plaintiff Williams that he was only good at football because he was black.

115. No school employee communicated with Plaintiff Williams's mother concerning the option for counseling except for [REDACTED] on or about September 25, 2023, after Plaintiff Williams's mother requested resources from [REDACTED].

116. Unbeknownst to Plaintiff Williams's mother, Plaintiff Williams declined counseling at that time because he did not trust school staff.

117. Had Ms. Hornbuckle known that school counseling was discussed with Plaintiff Williams, she would have ensured his participation in school counseling.

118. Because Plaintiff Williams's mother was not made aware of school counseling options, she sought private counselors outside of the school on or about September 25, 2023 with [REDACTED], and Plaintiff Williams was placed on a waiting list at [REDACTED] to address therapy for his mental health related to the racial harassment, discrimination and bullying at school.

119. Due to the high demand for juvenile counseling, Plaintiff Williams did not move up on the waitlist in a timely manner to receive counseling services from [REDACTED]; therefore, Plaintiff Williams's mother requested services/resources from school counselor [REDACTED], and [REDACTED] then offered [REDACTED].

120. On or about September 25, 2023, [REDACTED] violated the 'No Contact Order' again by sending Plaintiff Williams a text message concerning Plaintiff Williams's football injury.

121. Plaintiff Williams's mother reported the violation of the 'No Contact Order' to [REDACTED] on September 26, 2023.

122. On or about September 25, 2023, on the bus en route to a football game, in the presence of Plaintiff Williams and [REDACTED], [REDACTED] called another student a "nigger" and a "slave."

123. [REDACTED] did nothing to correct [REDACTED] use of the words "nigger" and "slave."

124. On or about September 26, 2023, Ms. Hornbuckle went to Republic High School and requested to speak to someone with more authority than [REDACTED], as there had been several reports previously made to [REDACTED], and there had not been reasonable efforts made to correct the ongoing problems of racial harassment, discrimination, and bullying.

125. On or about September 26, 2023, Plaintiff Williams's mother reported to Assistant [REDACTED] and [REDACTED] the racial harassment that had occurred on the bus on September 25, 2023.

126. Plaintiff Williams's mother spoke to [REDACTED] on or about September 26, 2023, at which time Plaintiff Williams's mother advised that she had previously made reports to [REDACTED] when [REDACTED] was the [REDACTED] during the years 2016, 2017, 2018, and 2019 concerning racial harassment and discrimination and that [REDACTED] failed to remedy the concerns reported to him in the past concerning racial harassment and discrimination.

127. Ms. Hornbuckle further advised [REDACTED] that Republic School District had been on notice of racial harassment and discrimination for several years as [REDACTED] had been subjected to racial harassment and discrimination and numerous reports had been made to school officials previously with no corrective action taken by Republic School District to stop the racial harassment and discrimination, which resulted in [REDACTED] leaving Republic School and attending school elsewhere.

128. Ms. Hornbuckle reported the following to [REDACTED]:

- a. [REDACTED] violating the 'No Contact Order' by sending Plaintiff Williams a text message.
- b. [REDACTED] calling another student a "nigger" and a "slave," which felt threatening to Plaintiff Williams.
- c. That Plaintiff Williams no longer wanted to go to school because of the ongoing racial harassment, discrimination, and disparate treatment that Plaintiff Williams's mother had reported to Republic

School District administration and Republic High School employees over a period of several years, as referenced above, and the failure of Republic School District to take corrective action.

129. Republic School District had been aware, at least since 2016, of the ongoing racial harassment and discrimination endured by Plaintiff Williams [REDACTED] while they attended school through Republic School District, yet Republic School District took no reasonable efforts to stop the harassment and discrimination.

130. On or about September 26, 2023, [REDACTED] contacted Ms. Hornbuckle to inform her that Plaintiff Williams's designated [REDACTED] was changing from [REDACTED] to [REDACTED] due to the concerns Plaintiff Williams's mother raised with [REDACTED] about [REDACTED] not taking corrective action based on the numerous reports of racial harassment and discrimination that she had made to him.

131. On or about October 12, 2023, Plaintiff Williams's mother spoke to Republic High School [REDACTED] about Plaintiff Williams' tardiness and attendance at which time Plaintiff Williams's mother explained that Plaintiff Williams had a knee injury that required special attention, recovery, and extensive physical therapy over an eight (8) month time period, which would result in significant time away from school.

132. During the October 12, 2023 conversation with [REDACTED], Plaintiff Williams's mother requested resources as Plaintiff Williams missing schooling affected his grades.

133. Plaintiff Williams never received any extra assistance, nor did Plaintiff Williams receive the requested resources for absences related to his injury.

134. On or about October 19, 2023, Plaintiff Williams's mother spoke with [REDACTED] to report that the 'No Contact Order' that Plaintiff Williams had against [REDACTED] had been violated a second time by [REDACTED] because he contacted Plaintiff Williams via text message.

135. Despite Ms. Hornbuckle reporting to [REDACTED] on October 19, 2023 that the No Contact Order had been violated again by [REDACTED], no action was taken by Republic High School or Republic School District against [REDACTED].

136. On or about October 19, 2023, Plaintiff Williams's mother also reported to [REDACTED] that Plaintiff Williams continued to experience ongoing racial harassment in classes and at football practice; specifically, Plaintiff Williams was still being called "Tyrone" by white students, and the white students continued to tell Plaintiff Williams that he was only good at football because he was black.

137. On or about October 19, 2023, Plaintiff Williams's mother reported to [REDACTED] that [REDACTED], a white student, continued to harass Plaintiff Williams about the size of Plaintiff Williams's nose; that [REDACTED] created memes with pictures of Quasimodo, a character from Hotel Transylvania,' stating that Plaintiff Williams and his nose were big like that character; that [REDACTED] would show the memes to Plaintiff Williams in front of other students; and that [REDACTED] would send the racially harassing memes to a group chat that included Plaintiff Williams and [REDACTED].

138. On or about October 19, 2023, Plaintiff Williams's mother reported to [REDACTED] that [REDACTED] continued to treat Plaintiff Williams less favorably than white football players and that [REDACTED] continued to call Plaintiff Williams "chicken legs" and continued to tell Plaintiff Williams that he needed to gain weight if he wanted to play football.

139. On or about October 19, 2023, Plaintiff Williams's mother reported to [REDACTED] that Plaintiff Williams was still not receiving accommodations according to his 504 Plan and that she had previously made several complaints about Plaintiff Williams not receiving accommodations.

140. On or about October 20, 2023, Plaintiff Williams's mother received a call from [REDACTED] at which time [REDACTED] stated that she "understands" the issues that had been reported by Plaintiff Williams's mother, but that the school could not stop the students from what they learn at home.

141. During the October 20, 2023 call with Plaintiff Williams's mother, [REDACTED] advised Plaintiff Williams's mother to keep reporting incidents as they occurred.

142. During the October 20, 2023 call with [REDACTED], Plaintiff Williams's mother expressed concerns regarding Plaintiff Williams and his sister's mental health, and Plaintiff Williams's mother asked [REDACTED] if the school could provide counseling services, at which time [REDACTED] advised that the school could not do that.

143. During the October 20, 2023 call with [REDACTED], Ms. Hornbuckle reported to [REDACTED] that student [REDACTED] continued to racially harass and bully Plaintiff Williams because of Plaintiff Williams's nose and that [REDACTED] continued to alter pictures with memes on them and show those memes to Plaintiff Williams and other students.

144. On or about October 23, 2023, Ms. Hornbuckle called [REDACTED] to inform her of Plaintiff Williams's surgery date and inquire about accommodations or extra time that Plaintiff Williams could have regarding his assignment.

145. On or about October 23, 2023, Plaintiff Williams called his mother from school and told her that he was having a very hard day, mentally, due to the ongoing racial harassment about

his nose, students calling him “Tyrone,” and [REDACTED] continuing to call him “chicken legs” and telling Plaintiff Williams that he needed to gain more weight, and Plaintiff Williams asked his mother if he could leave school early, which Plaintiff Williams’s mother discussed the ongoing racial harassment and bullying with [REDACTED].

146. During Plaintiff Williams’s sophomore year, he was repeatedly called “Tyrone by [REDACTED] and other students on the football team.

147. On or about November 29, 2023, Plaintiff Williams’s mother spoke to [REDACTED] to report that Plaintiff Williams was still not receiving accommodations pursuant to his 504 Plan.

148. Specific teachers not providing accommodations and failing to comply Sections B, C, D, E, and H of the 504 Accommodations were [REDACTED], [REDACTED], [REDACTED], and [REDACTED].

149. During the November 29, 2023 conversation with [REDACTED], Ms. Hornbuckle expressed concerns about Plaintiff Williams’s academics since he had been absent and/or tardy for over a period of eight (8) weeks after being injured at a school football game on September 25, 2023.

150. During the November 29, 2023 conversation with [REDACTED], Ms. Hornbuckle explained that Plaintiff Williams’s physical injury required him to participate in physical therapy three (3) times per week, which resulted in Plaintiff Williams missing school frequently, and again requested accommodations to assist Plaintiff Williams with keeping up with his school work.

151. Despite Ms. Hornbuckle again requesting accommodations for Plaintiff Williams during his eight (8) weeks of recovery and frequently missed school days, no accommodations were provided.

152. On or about November 30, 2023, [REDACTED] informed Plaintiff Williams's mother that she had sent an email to Plaintiff Williams's teachers based on Plaintiff Williams's mother's concerns reported to [REDACTED] on November 29, 2023 about Plaintiff Williams's teachers not providing 504 accommodations.

153. On or about November 30, 2023, [REDACTED] informed Plaintiff Williams's mother that she had told Plaintiff Williams's [REDACTED] to return Plaintiff Williams's mother's telephone call.

154. On or about December 18, 2023, [REDACTED] contacted Plaintiff Williams's mother to discuss Plaintiff Williams's grades and Plaintiff Williams's attendance as well as the attendance of [REDACTED].

155. Plaintiff Williams's mother advised that Plaintiff Williams [REDACTED] continued to be mentally and emotionally distressed because of the ongoing discrimination, racial harassment, and disparate treatment at the Republic High School, and that the District failed to address the many complaints made by them to correct the problems with racism, racial harassment, discrimination, bullying, and disparate treatment.

156. On or about January 24, 2024, Plaintiff Williams's mother spoke to [REDACTED], Plaintiff Williams's [REDACTED] by phone and informed [REDACTED] of both children's current [REDACTED] because of the ongoing racism both children experienced attending school at Republic School District.

157. On or about April 1, 2024, Plaintiff Williams's mother had a 504 meeting with [REDACTED] regarding Plaintiff Williams's current 504 Plan at which time Plaintiff Williams's mother expressed concerns regarding Plaintiff Williams's continued struggle with classes and reported that Plaintiff Williams's 504 Plan accommodations were still not being followed, specifically provisions B, C, D, E, and H.

158. During the meeting with Ms. Williams on or about April 1, 2024, Plaintiff Williams's mother reported concerns about Plaintiff Williams's emotional and mental health due to the racial harassment, discrimination, and disparate treatment that Plaintiff Williams had endured for years as a student in the Republic School District, including the disparate treatment and harassment by [REDACTED].

159. During the meeting held on or about April 1, 2024, Plaintiff Williams's mother questioned [REDACTED] regarding why she had not returned the several telephone calls and voicemail messages that Plaintiff Williams's mother had left for her.

160. On or about April 24, 2024, Plaintiff Williams's mother left a voicemail for [REDACTED] reporting concerns that Plaintiff Williams was still not being afforded accommodations pursuant to his 504 Plan, and the ongoing racial harassment by the same students as previously reported.

161. Plaintiff Williams's mother also reported to [REDACTED] that Plaintiff Williams's sister was still being harassed by [REDACTED].

162. During the week of June 3, 2024 through June 7, 2024, Plaintiff Williams's mother called and left a voicemail message for [REDACTED] in an attempt to get resources for Plaintiff Williams's needs and grades and to address that Plaintiff Williams was still not receiving accommodations pursuant to his 504 Plan.

163. [REDACTED] returned Plaintiff Williams's mother's call and offered to do a weekly check-in with Plaintiff Williams and offered to include [REDACTED] in on those communications to see what other resources were available to Plaintiff Williams other than after-school tutoring.

164. On or about June 13, 2024, Plaintiff Williams's mother called to speak to [REDACTED], [REDACTED], about the ongoing racial harassment, discrimination, disparate treatment, and failure of teachers to provide accommodations to Plaintiff Williams pursuant to his 504 Plan.

165. After making the call on or about June 13, 2024, Plaintiff Williams's mother called again, requesting to speak to [REDACTED] to schedule an in-person meeting to report the ongoing concerns of racial harassment, discrimination, disparate treatment, and Plaintiff Williams teachers failing to provide accommodations pursuant to his 504 Plan.

166. [REDACTED] returned Plaintiff Williams's mother's phone call and left a message as Plaintiff Williams's mother was at work and unavailable.

167. On or about June 13, 2024, [REDACTED] responded to Ms. Hornbuckle via email, stating that he had time for a thirty (30) minute call.

168. On or about June 14, 2024, [REDACTED] contacted Plaintiff Williams's mother by phone at which time Plaintiff Williams's mother reported the ongoing racial harassment, discrimination, disparate treatment, and the failure of Plaintiff Williams teachers to provide accommodations pursuant to Plaintiff Williams 504 Plan, as well as the use of the word "nigger" by students at the school, and [REDACTED] advised that he would "look into it."

169. That same date, June 14, 2024, Plaintiff Williams's mother returned [REDACTED] phone call from the day before and requested an in-person meeting to report the ongoing racial harassment, discrimination, disparate treatment, and Plaintiff Williams teachers not providing

accommodations pursuant to Plaintiff Williams's 504 Plan, and the continued use of the word "nigger" by other students.

170. On or about June 2024, school-based counseling services through [REDACTED] was offered by [REDACTED] to Plaintiff Williams, and he accepted those services.

171. Counseling services offered and accepted in June 2024 were scheduled to start at the end of September 2024 or the beginning of October 2024.

172. Plaintiff Williams attended therapy through [REDACTED] on Thursdays at school, which counseling sessions ended in May 2025 due to Plaintiff Williams graduating from high school.

173. On or about December 30, 2024, [REDACTED] with [REDACTED] [REDACTED].

174. A meeting between Ms. Hornbuckle and [REDACTED] was scheduled for June 25, 2024.

175. Plaintiff Williams's mother requested a copy of all Plaintiff Williams's school records, and Ms. Williams specifically requested that she also receive any and all emails and reports that she had previously made to be made available to her at the scheduled meeting on June 25, 2024.

176. [REDACTED] agreed to have the requested records available at the June 25, 2024 meeting.

177. Plaintiff Williams's mother informed [REDACTED] that she had a meeting with [REDACTED] scheduled, and [REDACTED] suggested that Plaintiff Williams's mother first speak with her, and if there was no resolution, that she would get [REDACTED] involved.

178. [REDACTED] advised that she would be canceling the meeting Plaintiff Williams's mother had scheduled with [REDACTED], which she did.

179. Due to Plaintiff Williams's mother's work schedule, the meeting scheduled with [REDACTED] on June 25, 2024 was rescheduled to July 10, 2024.

180. On or about July 10, 2024, Plaintiff Williams's mother met with [REDACTED] and reported all of the concerns regarding Plaintiff Williams [REDACTED], including [REDACTED] overall well-being and safety concerns while the children are at school. Additional concerns reported to Ms. Dishman were as follows:

- a. Plaintiff Williams not receiving accommodations pursuant to his 504 Plan.
- b. Previous reports made to [REDACTED] about Plaintiff Williams's teachers not providing accommodations pursuant to his 504 Plan.
- c. The ongoing racial harassment, discrimination, disparate treatment, and the history of lack of accommodations provided to Plaintiff Williams pursuant to his 504 Plan, as well as the use of the word "nigger" by students at the school.
- d. Plaintiff Williams's [REDACTED] due to the ongoing harassment, discrimination, disparate treatment, and bullying that he had endured for years at the school.
- e. That the No Contact Order regarding Plaintiff Williams's [REDACTED] had been violated by [REDACTED], which had been reported to the school, and nothing was done to ensure the child's safety.

f. That [REDACTED] had to be removed from the District due to a medical emergency, and Republic School District denying her medical care and failed to reach out to the child's mother.

g. [REDACTED] ongoing racial harassment and bullying towards Plaintiff Williams concerning Plaintiff Williams's weight and physical appearance.

181. On or about August 2, 2024, Plaintiff Williams's mother called [REDACTED] and asked for an update on the referral for counseling with [REDACTED]. This was the referral that was put into [REDACTED] that was discussed with [REDACTED] in the meeting in June 2024.

182. On or about August 26, 2024, Plaintiff Williams's mother called [REDACTED] to report that Plaintiff Williams needed [REDACTED] because of all the harassment, discrimination, and bullying he faced at school daily, which had already been previously reported numerous times.

183. During the call with [REDACTED] on or about August 26, 2024, Plaintiff Williams's mother asked [REDACTED] why she never contacted her again after the meeting on July 10, 2024, and [REDACTED] stated, "I didn't know you wanted me to get back to you. I thought you were just reporting your concerns."

184. On that same date, August 26, 2024, Plaintiff Williams's mother called [REDACTED] to discuss her frustration regarding what Plaintiff Williams had continuously endured at school regarding racial harassment, discrimination, bullying, and lack of accommodations pursuant to his 504 Plan, and that nothing was ever done after repeatedly reporting incidents to staff and administration.

185. On or about August 28, 2024, [REDACTED] contacted Plaintiff Williams's mother, and during this call Plaintiff Williams's mother requested documentation from the end of Plaintiff Williams's 5th grade year, as Plaintiff Williams's mother was concerned about the school's documentation of reports having been made over the years.

186. After the call with [REDACTED] on August 28, 2024, [REDACTED] would not allow Plaintiff Williams's mother to speak to [REDACTED] again.

187. On or about August 29, 2024, Plaintiff Williams's mother spoke to [REDACTED] requesting documentation of the reports that Plaintiff Williams's mother had made to her, and [REDACTED] responded by stating "I do not document every call I have."

188. On that same date, August 29, 2024, [REDACTED] returned Plaintiff Williams's mother's telephone call after Ms. Hornbuckle contacted him regarding the same concerns about Plaintiff Williams's [REDACTED], racial harassment, racial discrimination, bullying, and lack of accommodations pursuant to Plaintiff Williams's 504 Plan.

189. After requesting to speak with the [REDACTED] [REDACTED] agreed to have [REDACTED] contact Plaintiff Williams's mother.

190. [REDACTED] stated to Plaintiff Williams's mother that he would make sure that Plaintiff Williams's mother had a meeting with the coaches to address concerns about Plaintiff Williams not having similar playing time as white students, being called "chicken legs" by [REDACTED], and [REDACTED] telling Plaintiff Williams that he would need to gain weight if he wanted to play football.

191. On or about September 2, 2024, [REDACTED] refused to allow Plaintiff Williams's mother to speak to [REDACTED], and Plaintiff Williams's [REDACTED] was changed to [REDACTED].

192. Ms. Hornbuckle's previous request for all of Plaintiff Williams's school records, including any and all emails and reports previously made, which was supposed to be made available to Ms. Hornbuckle at the meeting on June 25, 2024, was never provided to Plaintiff Williams's mother by [REDACTED], [REDACTED], or anyone else from the district.

193. On or about August 30, 2024, Plaintiff Williams's mother emailed [REDACTED] [REDACTED] stating she had not heard back from [REDACTED] after a message was left for her on August 26, 2024.

194. [REDACTED] emailed Plaintiff Williams's mother back, stating that [REDACTED] had left a voicemail for Ms. Hornbuckle, which was false.

195. On or about August 30, 2024, Plaintiff Williams's mother sent [REDACTED] an email advising that she still had not heard back from [REDACTED].

196. After Ms. Hornbuckle's email to [REDACTED] on August 30, 2024, [REDACTED] returned Plaintiff Williams's mother's telephone call, at which time Plaintiff Williams's mother discussed her continued concerns about Plaintiff Williams not receiving accommodations pursuant to his 504 Plan and how Plaintiff Williams's mother continued to report ongoing racial harassment, discrimination, and bullying occurring at the school.

197. [REDACTED] admitted to Ms. Hornbuckle that she does not document all calls.

198. Plaintiff Williams's mother requested that [REDACTED] put in writing that they had had the telephone conversation on or about August 30, 2024, and Plaintiff Williams's mother requested that [REDACTED] send that documentation to Ms. Hornbuckle via email.

199. On or about September 2, 2024, Plaintiff Williams's mother sent an email to [REDACTED] advising of the ongoing issue concerning:

- a. [REDACTED] and other football players calling Plaintiff Williams "Tyrone"
- b. [REDACTED] telling Plaintiff Williams that he needed to gain more weight to play football.
- c. [REDACTED] calling Plaintiff Williams "chicken legs."
- d. Student [REDACTED] harassing Plaintiff Williams about the size of his nose and creating memes and adding pictures of Quasimodo to further insult and racially harass Plaintiff Williams.
- e. Student [REDACTED] continuing to use the word "nigger" and referring to black people as "slaves."
- f. Teachers continued not to provide accommodations to Plaintiff Williams as required by his 504 Plan.

200. On or about September 2, 2024, Plaintiff Williams's mother sent an email to [REDACTED] requesting prior documentation of past reports of racism, discrimination, and bullying reported to [REDACTED] by Plaintiff's mother concerning Plaintiff Williams and his siblings.

**Senior Year 2024-2025**

201. During the first semester of Plaintiff Williams's Senior year, between August 2024 through December 2024, Plaintiff Williams continued to endure the following:

- a. On a routine basis during football practice, lunch, and throughout the school day Plaintiff Williams would be subject to racial harassment from numerous

white students who referenced Plaintiff Williams's status as a football player and stated "It's probably because you are black," "You're only good because you are black," and "How are you black and not starting?"

b. [REDACTED] White students [REDACTED], [REDACTED], [REDACTED], [REDACTED], along with random students that Plaintiff Williams did not know, joined in on the racial harassment towards Plaintiff Williams, including using the word "nigger" and referring to African Americans as slaves.

c. Student athletes on the football team would call Plaintiff Williams "Tyrone."

d. The word "nigger" was used daily by students at school and at football practice.

e. [REDACTED] continued to harass Plaintiff Williams about his nose, mocked how big it was, created memes about Plaintiff Williams's nose and added pictures of Quasimodo, and would tell Plaintiff Williams his nose was as big as the Quasimodo character.

f. [REDACTED] continued to call Plaintiff Williams "chicken legs" and continued to tell Plaintiff Williams that he needed to gain weight to play football.

g. Plaintiff Williams teachers continued to fail to provide accommodations to Plaintiff Williams in accordance with his 504 Plan, and Plaintiff Williams was expected to perform the same as all other students who did not need accommodations.

202. Plaintiff Williams's mother spoke to [REDACTED] in August 2024 about the continued racial harassment Plaintiff Williams faced by white students and advised [REDACTED] that white students were still calling Plaintiff Williams "Tyrone," that white students were still using the word "nigger" throughout the school day and at practice on a daily basis, and that white students continued making comments to Plaintiff Williams by saying: "It's probably because you are black," "You're only good because you are black," and "How are you black and not starting?"

203. [REDACTED] advised that Plaintiff Williams still had a shot at football his Senior year and agreed to address the racial harassment concerns.

204. Despite [REDACTED] advising that he would address the racial harassment by white students, nothing changed and the racial harassment continued.

205. [REDACTED] did not allow Plaintiff Williams to play during most football games despite Plaintiff Williams being physically cleared to play.

206. Despite the football coaches knowing about Plaintiff Williams's remarkable speed and athleticism, [REDACTED] refused to allow Plaintiff Williams similar amounts of playing time in comparison to white students.

207. Plaintiff Williams's mother told [REDACTED] that Plaintiff Williams wanted to change schools because of the ongoing racial harassment and bullying, failure of the school to comply with required accommodations, and lack of playing time in football that inhibited Plaintiff Williams from standing out amongst college football scouts and inhibiting the potential for college scholarships.

208. [REDACTED] was dismissive of the complaints by Plaintiff Williams's mother.

209. [REDACTED] was a new specialty coach for the football team during Plaintiff Williams's Senior Year.

210. [REDACTED] made comments to Plaintiff Williams that he didn't know Plaintiff Williams was that fast.

211. [REDACTED] tried getting Plaintiff Williams on the field more and in more plays, but [REDACTED] would deny those attempts.

212. All the other football coaches had been there since at least Plaintiff Williams's Freshman year and knew that Plaintiff Williams was fast and that he was a good athlete.

213. [REDACTED] invited Plaintiff Williams to join a football league outside of school because of Plaintiff Williams's talent.

214. On or about August 2, 2024, Plaintiff Williams's mother called [REDACTED] and asked for an update on the referral for [REDACTED].

215. The referral for [REDACTED] was put into [REDACTED], which was discussed between [REDACTED] and Ms. Hornbuckle in the meeting on or about June 2024.

216. On or about August 26, 2024, Plaintiff Williams's mother called [REDACTED] expressing her frustration about how the school had failed Plaintiff Williams regarding the numerous complaints that they had made regarding numerous incidents of race discrimination and racial harassment, and Ms. Hornbuckle's numerous attempts at contacting the school for help concerning Plaintiff Williams.

217. On or about August 28, 2024, Plaintiff Williams's mother spoke to [REDACTED] and reported the ongoing discrimination and racial harassment.

218. On or about August 28, 2024, Plaintiff Williams's mother made a request to [REDACTED] that she wanted a meeting scheduled with [REDACTED] and [REDACTED], and [REDACTED] stated that she would reach out to them and get a meeting scheduled.

219. On or about August 29, 2024, Plaintiff Williams's mother emailed [REDACTED] requesting updated documentation on the reported bullying, racial harassment, and discrimination.

220. In the email to [REDACTED] on or about August 29, 2024, Ms. Hornbuckle addressed the [REDACTED] that affected Plaintiff Williams from all the incidents, which had been reported to the district for years.

221. On this same date, August 29, 2024, Plaintiff Williams's mother sent an email to [REDACTED] attempting to address Plaintiff Williams not receiving accommodations required by his 504 Plan and requested specific information from [REDACTED] regarding how many trainings are completed each year on harassment, discrimination, documentation concerning meetings held between her and the district about the reports and complaints made concerning Plaintiff Williams, and information to determine how Plaintiff Williams was treated in comparison to white football players on the football team.

222. Defendant failed to properly document reports of discrimination, racial harassment, and bullying previously reported by Plaintiff Williams's mother over the four (4) year period that Plaintiff Williams was at Republic High School.

223. Between August 29, 2024 through September 3, 2024, Plaintiff Williams's mother corresponded via email with [REDACTED] at which time Plaintiff Williams's mother requested a meeting to discuss how Plaintiff Williams was being

treated by [REDACTED], other team members, and how Plaintiff Williams was not being provided the same opportunities as the other white students.

224. In September 2024, [REDACTED] continued to repeatedly degraded Plaintiff Williams in front of the other football players, including making comments to Plaintiff Williams by stating “Stop pouting or you will never get to play.”

225. [REDACTED] was aware that Plaintiff Williams’s mother had reported him to the district office, [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED].

226. After Ms. Hornbuckle reported [REDACTED] disparate treatment towards Plaintiff Williams to the District office, [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED], [REDACTED] treatment towards Plaintiff Williams got worse.

227. On or about September 4, 2024, Plaintiff Williams’s mother sent an email to [REDACTED] stating that she still did not have the requested records/documentation that she had requested from [REDACTED] and [REDACTED].

228. [REDACTED] stated in an email to Plaintiff Williams’s mother on September 5, 2024, that the team is too busy to meet her request for records and documentation.

229. On or about September 5, 2024, Plaintiff Williams’s mother met with [REDACTED], [REDACTED], [REDACTED], and [REDACTED] at which time Plaintiff Williams’s mother addressed concerns of the lack of playing time that Plaintiff Williams had during football games in comparison to white students and the inappropriate ways in which [REDACTED] spoke to Plaintiff Williams, which was disparate in comparison the way that he spoke to the other football players.

230. On or about September 6, 2024, [REDACTED] contacted Plaintiff Williams's mother by phone following the meeting on September 5, 2024.

231. During the call on or about September 6, 2024, it was clear that [REDACTED] was still oblivious to Plaintiff Williams's diagnosis and the details of Plaintiff Williams's 504 Plan.

232. Plaintiff Williams's mother was under the belief that the purpose of [REDACTED] phone call on or about September 6, 2024 was to come up with a corrective plan of action on how to interact with Plaintiff Williams.

233. During the call on or about September 6, 2024, [REDACTED] did not provide any insight regarding how to appropriately interact with Plaintiff Williams considering Plaintiff Williams's disability in order to set Plaintiff Williams up for success.

234. After Ms. Hornbuckle's call with [REDACTED] on or about September 6, 2024, [REDACTED] would no longer allow Plaintiff Williams's mother to communicate directly with [REDACTED].

235. On or about September 9, 2024, [REDACTED] emailed Plaintiff Williams's mother to inform her that he could not support the staff digging for paperwork and therefore there would be a cost for the records request.

236. On or about September 9, 2024, [REDACTED] informed Plaintiff Williams's mother that he would share her email with the Board since she had previously asked for information on how she could speak to the Board.

237. By September 10, 2024, Plaintiff Williams was having regular check-ins with [REDACTED], and Plaintiff Williams had disclosed to her feeling self-conscious about his nose and hair due to the racial harassment he had endured for so long at school.



245. Plaintiff Williams's mother sent [REDACTED] a copy of Plaintiff Williams's football photo via email and expressed concerns about how unhappy Plaintiff Williams looked in the photo in comparison to the white football players and how Plaintiff Williams did not look as proud as the white players.

246. On or about October 6, 2024, Plaintiff Williams's mother contacted [REDACTED] again via telephone with concerns about Plaintiff Williams still not receiving accommodations pursuant to the 504 Plan and how Plaintiff Williams was [REDACTED] because of all the emotional and verbal abuse from [REDACTED] and the ongoing racial harassment from other students.

247. [REDACTED] sent an email to Plaintiff Williams's mother on or about October 9, 2024, advising that she would not be able to speak directly to [REDACTED].

248. On or about October 10, 2024, [REDACTED] informed Plaintiff Williams's mother that she would need to address her concerns about [REDACTED] to [REDACTED].

249. On or about October 9, 2024, Plaintiff Williams's mother made several calls and sent emails to [REDACTED], who repeatedly dismissed Plaintiff Williams's concerns by stating to Plaintiff Williams's mother that school staff and administration could not confirm whether the claims that Plaintiff Williams and his mother had made to him and school staff were true or false.

250. On or about October 10, 2024, [REDACTED] sent an email to Plaintiff Williams's mother advising that he would have [REDACTED] call her to address her concerns and further informed Plaintiff Williams's mother that any concerns that she had

regarding Plaintiff Williams's 504 Plan Accommodations would also need to be addressed with [REDACTED].

251. On or about October 10, 2024, [REDACTED] advised Plaintiff Williams's mother that any concerns not related to Plaintiff Williams's 504 Plan Accommodations should be communicated to [REDACTED].

252. On or about October 25, 2024, [REDACTED] continued to treat Plaintiff Williams differently than white football players and told Plaintiff Williams in front of the white players "Stop pouting or you will never play."

253. After the game on October 25, 2024, Plaintiff Williams and his mother wanted to speak to [REDACTED] because of the way [REDACTED] continued to treat Plaintiff Williams differently from white players.

254. After the game on October 25, 2024, outside of the locker room, Plaintiff Williams and his mother advised [REDACTED] and [REDACTED] that they were there to speak to [REDACTED], and the coaches advised that they would let [REDACTED] know of their request to speak to him.

255. Plaintiff Williams and his mother waited for thirty (30) minutes to speak to [REDACTED] and did not get the opportunity as [REDACTED] did not come out of the locker room.

256. When Plaintiff Williams's mother reported this to [REDACTED], he stated in an email to Plaintiff Williams's mother that [REDACTED] had been advised that all communication with Plaintiff Williams's mother was to go through [REDACTED].

257. On or about October 27, 2024, [REDACTED] pulled Plaintiff Williams to the side during practice and asked him why he was so upset and asked Plaintiff Williams why he and

his mother wanted to talk to him after the football game two (2) days prior at which time Plaintiff Williams tried to express his feelings regarding the discrimination that he continued to endure.

258. In response to Plaintiff Williams expressing himself to [REDACTED] on or about October 27, 2024, [REDACTED] stated to Plaintiff Williams, "You should be proud that you are playing for a team that is going to state. You just need to be happy for the team."

259. On or about November 7, 2024, Plaintiff Williams's mother sent an email to [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED] to inform them of Plaintiff Williams's [REDACTED] because of the ongoing issues that had previously been reported.

260. Plaintiff Williams's mother contacted [REDACTED] by telephone, and [REDACTED] agreed to speak to [REDACTED] and have [REDACTED] contact Plaintiff Williams's mother.

261. On or about November 7, 2024, [REDACTED] contacted Plaintiff Williams's mother by phone at which time Plaintiff Williams's mother questioned why nothing had changed regarding the ongoing discrimination, racial harassment, and bullying Plaintiff Williams faced at school and why nothing had changed regarding Plaintiff Williams not receiving accommodations required by his 504 Plan, and why [REDACTED] had failed to follow up with her on the previous complaints that she had made.

262. In response to Plaintiff Williams's mother's concerns, [REDACTED] stated that [REDACTED] had been hired to investigate Ms. Hornbuckle's previous complaints.

263. In or about October 2024, [REDACTED] contacted Plaintiff Williams's mother by phone, stating that he was a third-party investigator.

264. Approximately one week after receiving the call from [REDACTED], Plaintiff Williams's mother met with [REDACTED] at the public library to discuss the concerns that she had raised regarding the discrimination, racial harassment, and bullying Plaintiff Williams faced at school regularly, the disparate treatment by [REDACTED], and how Plaintiff Williams was not receiving the accommodations required by his 504 Plan.

265. Plaintiff Williams's mother brought supporting documentation with her to the meeting with [REDACTED].

266. [REDACTED] was very dismissive towards Ms. Hornbuckle at their meeting and told Plaintiff Williams's mother that he would collect her documentation after he spoke to all of the individuals involved and that he would have a follow-up meeting with Plaintiff Williams's mother.

267. It was not until sometime later that Plaintiff Williams's mother made a comment about escalating things higher that [REDACTED] requested the documentation from Plaintiff Williams's mother that she had already offered to provide to him at their first meeting, which he initially refused to accept.

268. Plaintiff Williams's mother also advised [REDACTED] that Plaintiff Williams was willing to speak directly with [REDACTED]; however, it was football playoffs at that time, and Plaintiff Williams was not doing well mentally.

269. After the football playoffs, Plaintiff Williams was available and willing to meet with [REDACTED]; however, [REDACTED] never met with Plaintiff Williams and never reviewed the documentation that Plaintiff Williams's mother had offered him, which he initially refused to accept.

270. Instead, after months had passed, █████ closed the investigation, concluding no discrimination had occurred.

271. On or about November 9, 2024, █████ was teaching a lesson with stick figure people on the board, with different words on the board as well, including the words “Nigger Lover” written next to one of the stick figures.

272. On or about November 9, 2024, Plaintiff Williams’s mother attempted to contact █████ to report the incident concerning █████ using the words “Nigger Lover” on the board that she was teaching from, and Plaintiff Williams’s mother requested a call back.

273. █████ informed Ms. Hornbuckle that he contacted █████ about the words “Nigger Lover” written on █████ board and advised that it was part of her lesson.

274. Plaintiff Williams’s mother would continue to send emails to █████, █████, █████, █████, and █████ about Plaintiff Williams’s teachers not providing accommodations required by Plaintiff Williams’s 504 Plan.

275. Between November 2024 and December 2024, Plaintiff Williams’s mother had a meeting with █████ in an effort to get him to understand the ongoing issues of discrimination, racial harassment, and bullying that Plaintiff Williams faced on a regular basis at school.

276. During Plaintiff Williams’s mother’s meeting with █████, █████ wanted to know what Plaintiff Williams wanted for his future instead of addressing the issues concerning discrimination, racial harassment, bullying, and Plaintiff Williams’s not receiving accommodations pursuant to his 504 Plan.

277. During Plaintiff Williams's mother's meeting with [REDACTED], she expressed concerns about prior complaints that she had made regarding [REDACTED], and that she felt that she was being ignored and retaliated against.

278. Instead of [REDACTED] being responsive to Plaintiff Williams's mother, he became upset and said, "I'm ending this now. We are done here."

279. On or about December 10, 2024, Plaintiff Williams's mother sent an email to [REDACTED] requesting that resources and accommodations be provided to Plaintiff Williams pursuant to his 504 Plan and for records to be provided to Plaintiff Williams's mother concerning her prior complaints reported.

280. On or about December 19, 2024, Plaintiff Williams's mother had a 504 meeting with [REDACTED] at which time Plaintiff Williams's mother brought the original documents from elementary school showing Plaintiff Williams's [REDACTED]

281. Plaintiff Williams's 504 Plan on file at Republic School District did not accurately reflect his diagnoses and only indicated the [REDACTED].

282. During the meeting with Ms. Trogdon on or about December 19, 2024, [REDACTED] admitted to Plaintiff Williams's mother that the district had failed Plaintiff Williams in the past, but that moving forward, the concerns about Plaintiff Williams would be addressed.

283. During the meeting with [REDACTED] or on about December 19, 2024, Plaintiff Williams's mother again brought up [REDACTED] because of the ongoing racial harassment and bullying at school that had continuously been reported to the school for years, with nothing ever being done about it.

284. [REDACTED] sent an email to Ms. Hornbuckle in January 2025 advising that her entry onto school property would result in trespassing charges.

285. In December 2024, during the football banquet, parents and family members of the football team were invited to come forward and congratulate the team.

286. At the banquet, when Plaintiff Williams was in line with the white players, he noticed that when white parents approached the white student athletes, they would give them a hug, but when they got to Plaintiff Williams, they would shake his hand and walk away very fast.

287. At the banquet, [REDACTED] did not even speak to Plaintiff Williams or shake his hand, nor did she take any pictures of him, the way that she did for the white student athletes.

288. When Plaintiff Williams's mother started making complaints to the school about how Plaintiff Williams was being treated, [REDACTED] attitude and behavior towards Plaintiff Williams and his mother changed.

289. In January 2025, Plaintiff Williams and his mother met with [REDACTED] via a Zoom call to discuss Plaintiff Williams still not receiving accommodations pursuant to his 504 Plan.

290. In January 2025, Plaintiff Williams was still not receiving written copies of instructions pursuant to his 504 Plan Accommodations.

291. On or about January 6, 2025, Plaintiff Williams was no longer allowed to have his mother appear at school functions or be on school property, as she had been threatened with a charge of trespass by [REDACTED] if she did so.

292. In January 2025, Plaintiff Williams's mother spoke to [REDACTED] for over an hour, at which time she asked why she was never questioned before [REDACTED] made a decision to keep her off school property.

293. [REDACTED] solely relied on the two staff members discussions with him before he made the decision to restrict Plaintiff Williams's mother from being on school property.

294. [REDACTED] did not speak to Plaintiff Williams's mother to get any information from her before deciding to keep her off school property.

295. Plaintiff Williams's mother informed [REDACTED] that it would be detrimental for Plaintiff Williams not to have her support at track meets and school functions.

296. [REDACTED] advised Plaintiff Williams's mother that at that time, for now, he was denying her request to be on school property for school functions.

297. On or about January 17, 2025, Plaintiff Williams was assaulted at school by [REDACTED], the same white student who had been racially harassing Plaintiff Williams throughout the school year about Plaintiff Williams's physical appearance and his nose.

298. The school failed to contact Plaintiff Williams's mother about the physical assault.

299. Plaintiff Williams Facetimed his mother after the assault, asking her to come to the school and that he was with the nurse.

300. When Plaintiff Williams's mother arrived at the school, she was directed to [REDACTED] and the school officers/security who work with the school.

301. [REDACTED] informed Plaintiff Williams's mother that he had time to review the camera and confirmed that [REDACTED] had come up to Plaintiff Williams while Plaintiff Williams had his face down with his headphones on and hit Plaintiff Williams.

302. During the confrontation, [REDACTED] asked Plaintiff Williams “Why are you ducking me?” and Plaintiff Williams told [REDACTED] to go away and that he wasn’t going to fight, and Plaintiff Williams put his headphones back on.

303. As [REDACTED] began to walk away, he sucker punched Plaintiff Williams, causing physical harm to Plaintiff Williams’s face and eye.

304. [REDACTED] walked with Plaintiff Williams’s mother, along with two school officers, to where Plaintiff Williams was located.

305. [REDACTED] began to ask about the details of the incident and what led up to it.

306. Plaintiff Williams’s mother was told that [REDACTED] was eighteen (18) years of age and that because it was a Felony, he would be going to jail.

307. Plaintiff Williams told the officers that he did want to press criminal charges.

308. Plaintiff Williams informed the officers that [REDACTED] had been threatening him for over a week and that he went to Plaintiff Williams’s job a week prior in an attempt to fight him, but Plaintiff Williams was not at work when [REDACTED] got there.

309. [REDACTED] asked Plaintiff Williams why he didn’t inform anyone at the school about the threat [REDACTED] made to Plaintiff Williams over the past week, and Plaintiff Williams told [REDACTED] that the school had not done anything regarding the other numerous complaints that had been made regarding discrimination, racial harassment, and bullying in the past.

310. Plaintiff Williams began receiving text messages from [REDACTED] asking that Plaintiff Williams not press criminal charges.

311. [REDACTED] advised that he would have the Republic Police Department call Plaintiff Williams and his mother regarding the matter.

312. [REDACTED] told Plaintiff Williams that, per district policy, when something like this occurs, they must hand it over to the school officer, as they are employed by the district.

313. On January 17, 2025, the same date of the physical assault, Plaintiff Williams's mother sent an email to [REDACTED] asking how the school was going to keep Plaintiff Williams safe.

314. When [REDACTED] did not respond to Plaintiff Williams's mother's email dated January 17, 2025, Plaintiff Williams's mother called him, expressing further concerns about the mistreatment of Plaintiff Williams at the school, and [REDACTED] hung up on Plaintiff Williams's mother and never followed up with her regarding her concerns for Plaintiff Williams's safety.

315. Plaintiff Williams was deeply embarrassed, depressed, and distressed by the actions of the white students, football coaches, and the inactions of the Republic School District's administrative staff and Republic High School employees, who made no reasonable effort to stop the racial harassment, discrimination, and bullying that went on for years despite the numerous complaints made by his mother.

316. Defendant acquiesced in the racial harassment, discrimination, and bullying against Plaintiff Williams based on his race, color, and disability.

317. Defendant acquiesced in failing to provide Plaintiff Williams with accommodations required by his 504 Plan.

318. Defendant acquiesced in the disability discrimination towards Plaintiff Williams by continuously refusing to accommodate Plaintiff Williams's learning disabilities.

319. Defendant acquiesced in retaliating against Plaintiff Williams and his mother by being dismissive of their repetitive complaints made about the same racial harassment, discrimination, disparate treatment, and bullying towards Plaintiff Williams, and the repeated complaints made by them about Plaintiff Williams continuously not receiving accommodations required by his 504 Plan.

320. As a result of the ongoing complaints made by Plaintiff Hornbuckle concerning the ongoing racial harassment, racial discrimination, disability discrimination, and bullying towards Plaintiff Williams, Plaintiff Williams's mother was prohibited by [REDACTED] from being on school property, effective on or about January 6, 2025.

**COUNT I**

**Violation under Mo. Rev. Stat. § 213.010, et seq. Race and Color  
Discrimination and Harassment  
(Plaintiff Williams)**

321. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

322. Plaintiff Williams is an African American, black male, and is a member of a protected class.

323. Plaintiff Williams was subjected to racial harassment and racial discrimination based on his race and color.

324. Plaintiff Williams' race was a motivating factor in the harassment and discrimination.

325. Plaintiff Williams' skin color was a motivating factor in the harassment and discrimination.

326. The harassment and discrimination were substantial and denied and attempted to deny Plaintiff Williams meaningful use of the services, privileges, facilities, advantages, and accommodations made available at a school district in the state of Missouri.

327. The harassment was terrifying at times.

328. The harassment and discrimination were sustained, interconnected, linked, and of similar nature and pattern, such that they exhibited a constant hostile learning environment for Plaintiff Williams.

329. The harassment further discriminated against Plaintiff Williams in that his use of the district grounds was available only under conditions of racial harassment and discrimination, and conditions that non-African American, non-black students did not have to experience while attending school.

330. At all times mentioned herein, the [REDACTED] [REDACTED] were employees of the Defendant and were at all such times acting within the scope and course of their employment.

331. Defendant possessed actual knowledge, or it should have known of the racial harassment and racial discrimination permeating within the school that Plaintiff Williams attended.

332. Defendant possessed actual knowledge, or it should have known of the racial harassment and racial discrimination against Plaintiff Williams.

333. Defendant possessed actual knowledge, or it should have known of the substantial threat of continuing, serious, and substantial racial harassment incited against Plaintiff Williams.

334. Defendant possessed actual knowledge, or it should have known of the substantial threat of continuing, serious, and substantial racial discrimination against Plaintiff Williams.

335. Employees of Defendant knew or should have known of the problems of racial harassment at Republic High School and within the district.

336. Employees of Defendant knew or should have known that writing “nigger lover” on the board from which they were teaching would incite racial harassment towards African American and black students.

337. Employees of Defendant knew or should have known that writing “nigger lover” on the board from which they were teaching would create fear, anxiety, mental anguish, and feelings of threat for African American and black students.

338. Employees of Defendant knew or should have known that writing “nigger lover” on the board from which they were teaching was racial harassment.

339. Despite such knowledge, Defendant:

- a. Deliberately refused to take reasonable action to protect Plaintiff Williams.
- b. Deliberately refused to take reasonable corrective action to stop the racial harassment and racial discrimination towards Plaintiff Williams.
- b. Tactically condoned and tolerated the racial harassment and racial discrimination.

340. Defendant’s acts and omissions as alleged violate the Missouri Human Rights Act.

341. Republic School, operated by Defendant, is a public place of accommodation covered by the Missouri Human Rights Act.

342. Defendant failed to properly train its employees on discrimination, harassment, and retaliation laws under the Missouri Human Rights Act (MHRA).

343. Plaintiff Williams was subjected to racial harassment by fellow students and coaches while attending school, during school hours, and on school premises.





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355. Throughout all four years of high school, Plaintiff Williams’s teachers and testing coordinators failed to accommodate his disability pursuant to Plaintiff Williams’s 504 Plan.

356. On several occasions, Plaintiff Williams’s mother complained to teachers, 504 Coordinators, administrative staff at the high school, and administrative staff at the district office that Plaintiff Williams’s 504 Plan was not being followed.

357. Despite complaints by Plaintiff Williams’s mother, Plaintiff Williams’s 504 plan continued not to be followed by teachers and testing coordinators.

358. Plaintiff Williams’s teachers and testing coordinators were required to follow Plaintiff Williams’s 504 plan and accommodate his disabilities.

359. Plaintiff Williams’ race was a motivating factor in Defendant not accommodating his disability.

360. Plaintiff Williams’ skin color was a motivating factor in Defendant not accommodating his disability.

361. Defendant failed to properly train its employees on discrimination, harassment, and retaliation laws under the Missouri Human Rights Act.

362. Defendant’s employees retaliated against Plaintiff Williams and continued to fail to provide accommodations to Plaintiff Williams despite his 504 Plan Accommodation requirements after Plaintiff Williams’s mother complained about the 504 Plan not being followed.

363. As a direct result of the Defendant’s failure to accommodate Plaintiff’s disability and the unlawful conduct of the Defendant, as set forth herein, [REDACTED]

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364. Plaintiffs have incurred and will continue to incur attorneys' fees, costs and expenses of suit.

365. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray for judgment against Defendant for actual and compensatory damages, all costs of expenses and attorneys' fees incurred herein, for appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

**COUNT III**

**Violation of Anti-Bullying Policy Pursuant to RSMo 160.775  
(Plaintiff Williams)**

366. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

367. Plaintiff Williams was bullied by students and [REDACTED].

368. The conduct of students [REDACTED] towards Plaintiff Williams was intimidating, unwanted, aggressive behavior, or harassment that was repetitive and caused Plaintiff Williams to fear for his safety, substantially interfered with his educational performance, opportunities, or benefits.

369. Plaintiff Williams's mother made several complaints to the school staff and administration concerning the bullying and harassing conduct of students [REDACTED] towards Plaintiff Williams.

370. Despite the complaints made by Plaintiff Williams's mother, the bullying by students [REDACTED] continued.

371. The bullying by students occurred in the presence of [REDACTED].

372. Pursuant to RSMo 160.775, district employees who witness an incident of bullying are required to report the incident to the district's designated individual at the school within two days of the employee witnessing the incident.

373. Plaintiff Williams's [REDACTED] failed to comply with RSMo 160.775 as they did not report the incidents of bullying witnessed by them to the district's designated individual within two days of witnessing each incident.

374. Instead, the [REDACTED] were complicit in the bullying of Plaintiff Williams.

375. The anti-bullying policy under RSMo 160.775.4 requires a procedure for prompt investigation of reports of violations and complaints identifying one or more employees responsible for the investigation, including, at a minimum, the following requirements:

- a. Within two school days of a report of an incident of bullying being received, the school principal, or his or her designee, shall initiate an investigation of the incident;
- b. The school principal may appoint other school staff to assist with the investigation; and
- c. The investigation shall be completed within ten school days from the date of the written report unless good cause exists to extend the investigation.

376. Defendant failed to comply with RSMo 160.775 by failing to investigate the complaints made by Plaintiff Williams's mother concerning the students and [REDACTED] bullying towards Plaintiff Williams.

377. Defendant failed to appropriately train school district staff regarding the anti-bullying policy pursuant to RSMo 160.775.

378. As a direct result of the bullying and unlawful conduct of the Defendant, as set forth herein, Plaintiff Williams [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

379. Plaintiffs have incurred and will continue to incur attorneys' fees, costs, and expenses of suit.

380. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray for judgment against Defendant for actual and compensatory damages, all costs of expenses and attorneys' fees incurred herein, for appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

**COUNT IV**

**Violation of Mandated Reporting Statute – R.S.M.o. 210.115  
(Plaintiff Williams)**

381. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

382. Plaintiff Williams was [REDACTED]

383. Defendant is a mandated reporter pursuant to RSMo 210.115.

384. Pursuant to RSMo 210.115, Defendant was required to immediately report to the state of Missouri the conduct of Plaintiff Williams's [REDACTED] who participated in inciting

emotional abuse on Plaintiff Williams by calling him "Tyrone," making fun of his body weight, calling him "ugly," and making fun of Plaintiff Williams's physical appearance.

385. Plaintiff Williams's mother made several reports to school staff and administration concerning how the [REDACTED] name-calling and mockery of Plaintiff Williams's physical features affected Plaintiff Williams's [REDACTED].

386. Despite complaints made by Plaintiff Williams's mother to District employees, no district employee ever reported those complaints to the state of Missouri's division as required by RSMo 210.115.1.

387. Defendant failed to appropriately train school district staff regarding mandated reporting laws and RSMo 210.115.

388. As a direct result of the Defendant's failure to comply with RSMo 210.115 and the unlawful conduct alleged herein, [REDACTED]

[REDACTED]

389. Plaintiffs have incurred and will continue to incur attorneys' fees, costs and expenses of suit.

390. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray for judgment against Defendant for actual and compensatory damages, all costs of expenses and attorneys' fees incurred herein, for appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

**COUNT V**

**Violation of MHRA (§ 213.070(2), RSMo) – Unlawful Discriminatory Practice - Retaliation  
(Plaintiff Williams and Plaintiff Hornbuckle)**

391. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

392. Plaintiffs opposed the unlawful discriminatory practices of Defendant on several occasions by making complaints to several district employees and administrative staff.

393. As a result of Plaintiffs' opposition to Defendant's unlawful discriminatory practices and Plaintiffs' complaints, Defendant retaliated against Plaintiffs by being dismissive of the complaints, not investigating Plaintiffs' complaints, and allowing the unlawful discriminatory practices to continue and worsen.

394. As a result of Plaintiffs' opposition to Defendant's unlawful discriminatory practices and Plaintiffs' complaints, Plaintiff Hornbuckle was prohibited from being on school property and prohibited from speaking to employees of Defendant concerning her son, Plaintiff Williams.

395. As a result of Plaintiff Hornbuckle being prohibited from being on school property, Plaintiff Williams was denied the support and advocacy that he needed at school and extra-curricular events.

396. As a result of Plaintiff Hornbuckle being prohibited from speaking to employees of Defendant concerning her son, Plaintiff Williams was denied the support and advocacy that he needed at school and extra-curricular events.

397. As a result of Plaintiff Hornbuckle being prohibited from being on school property during Plaintiff Williams's last semester of high school, she missed activities in which Plaintiff Williams participated.

398. As a result of Plaintiff Hornbuckle being prohibited from speaking to employees of Defendant concerning her son and prohibited from being on school property during Plaintiff Williams's last semester of high school, those prohibitions resulted in her not being able to perform her parental duties on behalf of Plaintiff Williams.

399. As a direct and proximate cause of the foregoing, Plaintiffs were retaliated against for complaining of the harassment, discrimination, and bullying that occurred at school and on school premises in violation of § 213.070(2), RSMo – at the hands of Defendant.

400. As a direct result of the retaliation and unlawful conduct of the Defendant, as set forth herein, [REDACTED]

[REDACTED]

[REDACTED]

401. Plaintiffs have incurred and will continue to incur attorneys' fees, costs and expenses of suit.

402. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray for judgment against Defendant for actual and compensatory damages, all costs of expenses and attorneys' fees incurred herein, for appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

[REDACTED]

COUNT VI

**Intentional Infliction of Emotional Distress**

**(Plaintiff Williams and Plaintiff Hornbuckle)**

403. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

404. [REDACTED] as a result of all allegations set forth herein.

405. [REDACTED] as a result of Defendant's unlawful discriminatory acts prohibited under the MHRA.

406. [REDACTED]

[REDACTED]

[REDACTED]

407. As a result of the emotional distress Plaintiff Williams suffered as a result of Defendant's unlawful discriminatory acts prohibited under the MHRA, [REDACTED]

[REDACTED]

408. The conduct complained of in this Petition was outside the conduct expected to exist in a place of public accommodations, was intentional and malicious, and done for the

purpose of causing Plaintiffs to suffer [REDACTED]

[REDACTED]

409. Defendant's conduct, in confirming and ratifying the wrongful conduct of its employees and/or agents of Defendant, was done with the knowledge that [REDACTED]

[REDACTED] would thereby increase and was done with a wanton and reckless disregard

of the consequences to Plaintiffs.

410. As a proximate result of Defendant's conduct and by its intentional infliction of emotional distress as alleged herein, Plaintiffs have been harmed in that

[REDACTED]

As a result of said distress and consequent harm, Plaintiffs have suffered such damages in an amount to be proven at time of trial.

411. Defendant's conduct was outrageous because of its evil motive or reckless indifference to the rights of Plaintiffs.

412. Plaintiffs have incurred and will continue to incur attorneys' fees, costs, and expenses of suit.

413. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray that this Court will, after trial by jury, enter judgment against Defendant and in his favor of Plaintiffs and for a finding that Plaintiffs have been subjected to intentional infliction of emotional distress; award Plaintiffs damages in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; prejudgment interest, as allowed by law; for reasonable attorneys' fees and costs of suit; and for such other relief as this Court deems just, proper and as justice requires.

**COUNT VII**

**Negligent Infliction of Emotional Distress  
(Plaintiff Williams and Hornbuckle)**

414. Plaintiffs restate and incorporate by reference, as if fully set forth herein, all prior allegations and paragraphs within this Petition.

415. In the alternative, if said conduct of Defendant, and of its agents and employees, was not intentional, it was negligent, and Plaintiffs are thereby entitled to general damages for the negligent infliction of emotional distress.

416. [REDACTED] as a result of Defendant's unlawful discriminatory acts prohibited under the MHRA.

417. Defendant's actions towards Plaintiffs were reckless.

418. [REDACTED] as a result of Defendant's unlawful discriminatory acts prohibited under the MHRA.

419. [REDACTED]

420. [REDACTED]

[REDACTED]

421. The conduct complained of in this Petition was outside the conduct expected to exist in a place of public accommodations, was intentional and malicious, and done for the purpose of causing Plaintiffs to suffer [REDACTED]

[REDACTED]

422. Defendant's conduct, in confirming and ratifying the wrongful conduct of its employees and/or agents of Defendant, was done with the knowledge that Plaintiffs' emotional and physical distress would thereby increase and was done with a wanton and reckless disregard of the consequences to Plaintiffs.

423. As a proximate result of Defendant's conduct and by its intentional infliction of emotional distress as alleged herein, Plaintiffs have been harmed in that Plaintiffs have suffered

[Redacted]

As a result of said distress and consequent harm, Plaintiffs have suffered such damages in an amount to be proven at time of trial.

424. Defendant's conduct was outrageous because of its evil motive or reckless indifference to the rights of Plaintiffs.

425. Plaintiffs have incurred and will continue to incur attorneys' fees, costs, and expenses of suit.

426. Plaintiffs are entitled to recover reasonable attorney fees and costs from the Defendants, as provided in § 213.111.2, RSMo.

WHEREFORE, Plaintiffs pray that this Court will, after trial by jury, enter judgment against Defendant and in his favor of Plaintiffs and for a finding that Plaintiffs have been subjected to intentional infliction of emotional distress; award Plaintiffs damages in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; prejudgment interest, as allowed by law; for reasonable attorneys' fees and costs of suit; and for such other relief as this Court deems just, proper and as justice requires.

**DEMAND FOR JURY TRIAL**

Plaintiffs request a trial by jury in the Circuit Court of Greene County, Missouri, on all issues in this case which are so triable.

Dated: January 12, 2026

Respectfully Submitted,

LAW OFFICE OF ROSE C. BRISCOE, LLC

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*Attorney for Plaintiffs*

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