

1 Willie W. Williams, Bar No. 233902
2 The Law Offices of Willie W. Williams
3 10621 Church Street, Suite 110
4 Rancho Cucamonga, CA 91730
5 (909) 581-8341 (phone)
6 (909) 586-9380 (facsimile)
7 www@williewilliamsllaw.com

8 Attorney for PLAINTIFFS
9 JOHN DOE 1, a minor by and through his Guardian *Ad Litem*,
10 DAPHNE HAWKINS, JOHN DOE 2, a minor by and through
11 his Guardian *Ad Litem*, DAPHNE HAWKINS and
12 DAPHNE HAWKINS, individually

13 **SUPERIOR COURT OF CALIFORNIA**
14 **CIVIL UNLIMITED - SAN BERNARDINO COUNTY**

15 JOHN DOE 1, a minor by and through his 16 Guardian <i>Ad Litem</i> , DAPHNE HAWKINS; 17 JOHN DOE 2, a minor by and through his 18 Guardian <i>Ad Litem</i> , DAPHNE HAWKINS; and 19 DAPHNE HAWKINS, an individual, 20 21 PLAINTIFFS, 22 23 vs. 24 25 REDLANDS UNIFIED SCHOOL DISTRICT, 26 a governmental entity; and DOES 1-25, 27 inclusive, 28 29 DEFENDANTS.) Case No.: CIVSB2607420)) COMPLAINT FOR DAMAGES AND) INJUNCTIVE RELIEF:)) 1. TITLE VI, CIVIL RIGHTS ACT OF) 1964) 2. EQUAL PROTECTION 42 U.S.C.) §1983) 3. CALIFORNIA EDUCATION CODE) §220) 4. CALIFORNIA EDUCATION CODE) §262.3) 5. GOVERNMENT CODE §11135) (STATE FUNDED PROGRAMS)) 6. VIOLATION OF THE UNRUH ACT) 7. VIOLATION OF THE BANE ACT) 8. INTENTIONAL INFLICTION OF) EMOTIONAL DISTRESS) 9. NEGLIGENT SUPERVISION) 10. NEGLIGENCE)) DEMAND FOR JURY TRIAL
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1 PLAINIFFS JOHN DOES 1 and 2, minors, by and through their Guardian *Ad*
2 *Litem*, DAPHNE HAWKINS; and DAPHNE HAWKINS, an individual (collectively,
3 “PLAINIFFS”), sue REDLANDS UNIFIED SCHOOL DISTRICT, a governmental entity; and
4 DOES 1-25, inclusive (“DEFENDANTS”), and in support thereof states as follows:

5 **INTRODUCTION**

6 This action arises from multiple race-based harassment incidents directed at two
7 Black elementary school students at Mariposa Elementary School within Redlands Unified
8 School District (“RUSD”). The harassment included racist curriculum, written racial
9 degradation, dehumanizing racial slurs, and racialized insults. The parents lodged multiple
10 allegations under RUSD’s Uniform Complaint Procedures yet RUSD failed to implement
11 adequate corrective and protective measures. As a direct result, both minor Plaintiffs were
12 diagnosed with Post-Traumatic Stress Disorder (PTSD) in April 2025.

13 **PARTIES**

14 1. PLAINTIFF JOHN DOE 1 (“JOHN DOE 1”) was at all times relevant, a
15 student attending Mariposa Elementary School, a School within Redlands Unified School
16 District.

17 2. PLAINTIFF JOHN DOE 2 (“JOHN DOE 2”) was at all times relevant, a
18 student attending Mariposa Elementary School, a school within Redlands Unified School
19 District.

20 3. Defendant REDLANDS UNIFIED SCHOOL DISTRICT (“RUSD”) is a
21 governmental entity providing educational services and is located in San Bernardino County.

22 4. At all times relevant, DAPHNE HAWKINS was the mother to JOHN
23 DOES 1 and 2, (collectively, the “Hawkins Children”) minors and residents of the County of San
24 Bernardino, California. PLAINTIFF DAPHNE HAWKINS (“MRS. HAWKINS”) is a resident
25 of the County of San Bernardino, California.

26 5. Defendants Does 1 through 25, inclusive, are included in the Complaint
27 under fictitious names. The true names and capacities are unknown to Plaintiff. When the true
28 names and capacities are ascertained, Plaintiffs will amend this Complaint by inserting the true

1 names and capacities herein. Plaintiffs are informed and believe and thereupon alleges that each
2 of the fictitiously named Defendants was and is responsible in some manner for the occurrences
3 alleged herein and that Plaintiff's damages as alleged herein were proximately caused by such
4 Defendants.

5 STATEMENT OF FACTS

6 6. Beginning in or about December 2024, the Hawkins Children were
7 subjected to repeated acts of racial harassment by fellow students within the school environment,
8 occurring in classrooms, hallways, and on the playground on a near-weekly basis and frequently
9 in the presence of other students and school staff. These incidents occurred during instructional
10 time and recess periods under the supervision of certificated teachers and yard supervisors,
11 thereby placing RUSD employees on actual or, at minimum, constructive notice of race-based
12 misconduct from its inception.

13 7. In approximately December 2024, during a classroom lesson, students
14 were introduced to the racially offensive and inherently discriminatory caricature commonly
15 known as "Black Pete." The presentation included imagery and discussion portraying
16 exaggerated physical features associated with racist depictions of Black individuals. Following
17 this classroom lesson, the Hawkins Children became the target of escalating racially derogatory
18 comments by other students.

19 8. The classroom lesson normalized and reinforced racial stereotypes and
20 caused the Hawkins Children to feel singled out and demeaned on the basis of race, prompting
21 classmates to stare, laugh, and subsequently reference the imagery in teasing comments directed
22 at Hawkins Children later that same day. The lesson was conducted by a classroom teacher
23 acting within the scope of RUSD employment, thereby providing RUSD with direct, institutional
24 notice that racially charged subject matter had been introduced without adequate safeguards,
25 after which peer harassment measurably increased.

26 9. In or about January 2025, John Doe 2 received a handwritten note from
27 another student during class time, which was passed across desks while the teacher was present
28 in the classroom, stating: "your skin is as black as your future."

1 10. The note was humiliating, racially degrading, and threatening in tone, and
2 caused the John Doe 2 to cry, withdraw from classroom participation for the remainder of the
3 day, and express fear about returning to school. Plaintiffs reported the incident immediately to
4 their classroom teacher, who confiscated the note, and later that day to the school principal.
5 Plaintiffs also followed up with written communication to school administration. Despite this
6 actual notice to both site-level administrators and certificated staff, RUSD failed to implement a
7 written safety plan, separate the offending student, or provide increased supervision, after which
8 additional racial harassment occurred. The school's counselor reported John Doe 2 was having
9 nightly nightmares and fear of group work. His STAR reading score fell from the 68th percentile
10 to the 41st percentile.

11 11. In approximately February 2025, during recess a student directed a racial
12 slur toward one John Doe 2 stating "you should be in a Black African monkey show." The slur
13 was overheard by multiple students and corroborated in peer statements.

14 12. This statement was made on school grounds during school hours within
15 earshot of yard supervisors and other students, and the targeted John Doe 2 immediately reported
16 feeling ashamed and isolated. The incident was reported the same day to supervising staff and
17 subsequently to school administration, thereby providing actual notice to RUSD of escalating
18 racial hostility. RUSD's response consisted only of verbally telling the offending student to "be
19 nice," without documented discipline, parent conference, separation measures, or monitoring.
20 Following this minimal response, the Hawkins Children began avoiding recess and reporting
21 stomachaches and anxiety before school, demonstrating a direct link between RUSD's inaction
22 and escalating emotional harm.

23 13. In March 2025, during a first-grade lunch period, a student confronted
24 John Doe 1 and stated, "your skin is the color of dog food." A playground supervisor overheard
25 the remark. The school's counselor noted John Doe 1 demonstrated withdrawal, appetite
26 suppression, and declining class participation.

27 14. The March 2025 statement further reinforced a pattern of dehumanizing
28 racial harassment and occurred after administrators had already been notified of, and had

1 investigated, prior incidents. By this time, RUSD possessed actual knowledge through prior
2 complaints, meetings, and sustained findings that Hawkins Children were targets of race-based
3 harassment. Nevertheless, RUSD failed to escalate corrective action or revise protective
4 measures. The recurrence of racial insults after formal notice and sustained findings
5 demonstrates deliberate indifference and a causal nexus between the RUSD's inadequate
6 remedial measures and the continuation of harassment.

7 15. DAPHNE HAWKINS sent e-mails to RUSD dating back to October 2024
8 with complaints of classmates calling the children "mud" and "tar ball."

9 16. Plaintiffs reported multiple incidents to school administrators and staff
10 through in-person meetings, email communications, and written complaints under the Uniform
11 Complaint Procedures, creating actual knowledge at the site level and district level of the
12 ongoing racial hostility.

13 17. RUSD conducted internal investigations and sustained multiple allegations
14 of racial harassment. By four separate letters dated April 14, 2025 and April 21, 2025, RUSD
15 provided results of the investigation and substantiated all of the events. RUSD failed to protect
16 the Hawkins Children and other children of color. RUSD delayed proper parental notification,
17 failed to provide culturally competent counseling despite the availability of Title I and LCAP
18 funds designated for that purpose, failed to provide adequate training for yard-duty aides and
19 teachers, failed to adequately supervise children at recess and lunch, and failed to compile data
20 tracking or a uniform log of bias incidents. These failures have created a hostile environment for
21 the Hawkins Children based on their race.

22 18. Despite sustaining the allegations, RUSD imposed minimal discipline,
23 consisting primarily of counseling and informal corrective measures, rather than meaningful
24 disciplinary consequences, and failed to separate the offending students from the Hawkins
25 Children or monitor future interactions. RUSD did not conduct follow-up assessments to
26 determine whether the harassment had ceased, nor did it implement systemic interventions
27 within the classroom environment. As a result, the hostile conditions persisted, reinforcing to
28 offending students that race-based misconduct would not result in significant consequences.

1 19. RUSD's response failed to deter further harassment and allowed the
2 hostile environment to continue.

3 20. Mrs. Hawkins was not promptly notified of the earliest incidents involving
4 her children.

5 21. On information and belief, school officials questioned the Hawkins
6 Children regarding racial harassment allegations before notifying their parents, depriving Mrs.
7 Hawkins of the opportunity to protect and advocate for their children.

8 22. RUSD failed to implement timely safety plans, classroom interventions, or
9 meaningful corrective measures to protect the Hawkins Children, and did not offer classroom
10 transfers, check-in/check-out supports, increased yard supervision, or restorative measures
11 designed to stop the harassment.

12 23. RUSD failed to adequately supervise students and failed to intervene
13 effectively despite actual knowledge of repeated racial harassment.

14 24. RUSD failed to train staff adequately to recognize and address racial
15 harassment and discriminatory conduct.

16 25. RUSD knew or should have known that racial harassment was occurring
17 and posed a foreseeable risk of emotional and psychological harm.

18 26. As a direct and proximate result of Defendant's acts and omissions,
19 including its failure to take prompt and effective remedial action after receiving actual
20 knowledge of repeated racial harassment, the Hawkins Children were subjected to severe,
21 pervasive, and objectively offensive race-based harassment that was so severe, pervasive, and
22 objectively offensive that it effectively barred the victims' access to an educational opportunity
23 or benefit.

24 27. RUSD exercised substantial control over both the harassers and the
25 context in which the harassment occurred, as the conduct took place during school hours, on
26 school grounds, and under the supervision of RUSD employees. Despite having actual
27 knowledge, appropriate persons within the RUSD responded with deliberate indifference—that
28 is, with a response that was clearly unreasonable in light of the known circumstances. RUSD's

1 deliberate indifference subjected the Hawkins Children to further harassment and made them
2 vulnerable to additional race-based misconduct, and was a substantial factor in causing their
3 psychological injuries, loss of educational access, and ultimate diagnosis of Post-Traumatic
4 Stress Disorder (PTSD).

5 28. As a direct result of the racial harassment and hostile educational
6 environment, the Hawkins Children suffered severe emotional distress and psychological trauma.

7 29. In or about April 2025, the Hawkins Children were diagnosed and treated
8 for PTSD by a licensed mental health professional. The treatment is ongoing and Plaintiffs have
9 incurred expenses relating to this ongoing treatment.

10 30. The treating therapist has attributed the PTSD diagnoses directly to the
11 racial harassment and hostile school environment experienced by the Hawkins Children.

12 31. The Hawkins Children have experienced many symptoms related to their
13 mental conditions: (a) anxiety; (b) fear of attending school; (c) nightmares; (d) emotional
14 withdrawal; (e) depression; (f) hypervigilance; (g) difficulty concentrating; and (h) loss of
15 enjoyment from school activities.

16 32. Plaintiffs will incur substantial future medical and therapy expenses.

17 33. The Hawkins Children have suffered humiliation, embarrassment, and
18 emotional distress.

19 34. Plaintiffs have suffered economic damages including: (a) therapy costs;
20 (b) medical expenses; and (c) other costs related to treatment. Plaintiffs will continue to incur
21 damages in the future.

22 **COMPLIANCE WITH THE TORT CLAIMS ACT**

23 35. PLAINTIFFS served their claim on DEFENDANT REDLANDS
24 UNIFIED SCHOOL DISTRICT on July 24, 2025, which is attached as Exhibit 1. By letter dated
25 September 10, 2025, PLAINTIFFS learned that DEFENDANTS rejected the claim, which is
26 attached as Exhibit 2.

1 **FIRST CAUSE OF ACTION**

2 **(Title VI, Civil Rights Act of 1964 – Violation of 42 U.S.C. §2000(d))**

3 **(John Does 1 and 2 Against All DEFENDANTS)**

4 36. PLAINTIFFS re-allege and incorporates by reference as if they fully set
5 forth herein paragraphs 1 through 35 above.

6 37. At all times mentioned in the Complaint, Title VI, Civil Rights Act of
7 1964 42 U.S.C. §2000(d), was in full force and effect and was binding on DEFENDANTS. This
8 statute requires RUSD to refrain from harassing or discriminating students based on race.

9 38. As outlined in paragraphs 6 through 27 above, the Hawkins Children been
10 subjected to a continuing pattern of discrimination and harassment based on race by RUSD.

11 39. RUSD, through persons with authority to institute corrective measures on
12 its behalf, had actual knowledge of racial harassment directed at the Hawkins Children.

13 40. RUSD responded with deliberate indifference and its response to known
14 acts of race-based harassment was clearly unreasonable in light of the known circumstances and
15 not reasonably calculated to end the harassment.

16 41. The harassment was so severe, pervasive, and objectively offensive that it
17 effectively denied the Hawkins Children equal access to RUSD's educational programs and
18 activities.

19 42. Defendant's conduct deprived the Hawkins Children of equal access to
20 educational opportunities.

21 43. As a proximate result of the wrongful conduct of RUSD, the Hawkins
22 Children have been subjected to the emotional and monetary damages outlined in paragraphs 28
23 through 34.

24 44. PLAINTIFFS have incurred and continues to incur legal expenses and
25 attorney fees. PLAINTIFFS is presently unaware of the precise amount of these expenses and
26 fees. At the proper time, PLAINTIFFS will provide support for the precise amount sought.

1 **SECOND CAUSE OF ACTION**

2 **(Equal Protection – Violation 42 U.S.C. §1983)**

3 **(John Does 1 and 2 Against All DEFENDANTS)**

4 45. PLAINTIFFS re-allege and incorporates by reference as if fully set forth
5 herein paragraphs 1 through 35 above.

6 46. At all times mentioned in this complaint, 42 U.S.C. §1983 was in full
7 force and effect and was binding on DEFENDANTS. This provides that it is unlawful to
8 intentionally discriminate against a person in a way that denies them the equal protection of the
9 laws guaranteed by the Fourteenth Amendment. As alleged above, DEFENDANTS violated this
10 protection by failing to protect the Hawkins Children against discrimination and harassment.

11 47. As outlined in paragraphs 6 through 27 above, the Hawkins Children been
12 subjected to a continuing pattern of discrimination and harassment based on race by RUSD.

13 48. DEFENDANTS acted under color of state law.

14 49. DEFENDANTS denied the Hawkins Children equal protection of the laws
15 by failing to protect them from known racial discrimination and harassment.

16 50. DEFENDANTS maintained customs, policies, or practices that permitted
17 racial discrimination and harassment to persist.

18 51. DEFENDANTS' actions and omissions constituted deliberate indifference
19 to constitutional rights.


20 52. As a proximate result of DEFENDANTS' misconduct, PLAINTIFFS have
21 sustained and continue to experience substantial decline in the children's education and mental
22 health.

23 53. As a proximate result of DEFENDANTS' misconduct, the Hawkins
24 Children have been subjected to the emotional and monetary damages outlined in paragraphs 28
25 through 34.

26 54. PLAINTIFFS have incurred and continues to incur legal expenses and
27 attorney fees. PLAINTIFFS are presently unaware of precise amount of these expenses and fees.
28 At the proper time, PLAINTIFFS will provide support for the precise amount sought.

1 Dated: March 6, 2026

The Law Offices of Willie W. Williams

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3 By: 

4 Willie W. Williams
5 Attorney for PLAINTIFFS
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Exhibit 1



July 24, 2025

NOTICE UNDER THE CA GOVERNMENTAL TORT CLAIMS ACT

VIA E-MAIL AND HAND DELIVERY

Juan Cabral
Superintendent
Redlands Unified School District
20 West Lugonia Avenue
Redlands, CA 92374-2234

Carianne Mackamul-Covey
Risk & Benefits Manager
Redlands Unified School District
20 West Lugonia Avenue
Redlands, CA 92374-2234

Michele Rendler
President
Redlands Unified School District
20 West Lugonia Avenue
Redlands, CA 92374-2234

Jeannette Wilson
Board Clerk
Redlands Unified School District
20 West Lugonia Avenue
Redlands, CA 92374-2234

Re: Claim by Channing and Daphne Hawkins Against Redlands Unified School District

Dear Representatives of the Redlands Unified School District:

This firm represents Channing and Daphne Hawkins (the "Hawkins"), with respect to their tort and statutory claims against Redlands Unified School District ("RUSD" or "District"). This letter serves as notice of legal claims against RUSD by the Hawkins on behalf of their minor children ("Hawkins Child 1" and "Hawkins Child 2," respectively, and "Hawkins Children," collectively). This letter satisfies any obligation under the California Governmental Tort Claims Act to present the claim to RUSD prior to filing a lawsuit. Please direct any future correspondence related to this claim to me.

I. BACKGROUND OF THE TRAMATIC INCIDENTS

Unfortunately, the Hawkins Children, who were minors at the time, suffered from persistent, race-based discrimination, harassment, retaliation, and curriculum-based racial trauma experienced at Mariposa Elementary School ("Mariposa"), a school within RUSD. The details of the specific incidents are chilling and are provided below. Importantly, RUSD has investigated these incidents and has substantiated them. The incidents have left the Hawkins Children emotionally scarred and distressed.

The facts summarized below are taken from District investigative reports, witness statements, and contemporaneous documentation.

A. March 7, 2025 – “Dog-Food Skin” Slur (Claim 1)

During a first-grade lunch period, Student T.E. confronted Hawkins Child 1 and stated, “Your skin is the color of dog food.” A playground supervisor overheard the remark.

B. January 24, 2025 – “Black as Your Future” Note (Claim 2)

Hawkins Child 2 received a handwritten note from peer K.C. stating, “Your skin is as black as your future.” The note was preserved as physical evidence and photographed in the District’s Notice of Determination (“NOD”) issued April 21, 2025.

C. February 20, 2025 – “Black African Monkey Show” Insult (Claim 3)

During recess, student R.H. taunted Hawkins Child 2 with the phrase, “You should be in a Black African monkey show.” The slur was overheard by multiple students and corroborated in peer statements.

D. March 6, 2025 – “Black Pete” Curriculum (Claim 4)

First-grade teacher T. Peyton presented a “Christmas Around the World” lesson featuring Zwarte Piet (Black Pete). Students were instructed to color a worksheet depicting Black Pete with oversized red lips. Hawkins Child 1, the sole Black student, was singled out to “model the costume” in class.

E. Prior Notice & Pattern of Tolerance (Claim 5)

Parent e-mails dating back to October 2024 complained of classmates calling the children “mud” and “tar ball.” The District’s failure to implement remedial instruction or climate assessments despite at least five written notices shows a persistent pattern of deliberate indifference.

II. THE DISTRICT HAS FAILED IN ITS DUTY TO PROTECT THE HAWKINS CHILDREN.

As outlined above, RUSD failed to protect the Hawkins children and other children of color. In particular, RUSD (1) delayed proper parental notification; (2) failed to provide culturally competent counseling despite the availability of Title I and LCAP funds designated for that purpose; (3) failed to provide adequate training for yard-duty aides and teachers; (4) failed to adequately supervise children at recess and lunch; and (5) failed to compile data tracking or a uniform log of bias incidents. Collectively, these failures created a hostile environment for the Hawkins Children based on their race.

More specifically, RUSD is in violation of numerous statutory provisions and is liable for numerous legal claims, in part, as follows: (1) Title VI, Civil Rights Act of 1964 (42 U.S.C. §2000d) (discrimination, harassment and failure to prevent discrimination); (2) Equal Protection, 42 U.S.C. §1983; (3) California Education Code §§200, 220, 262.3; (4) Government Code §11135 (State-Funded Programs); (5) Civil Code §51 (Unruh Civil Rights Act); (6) Civil Code §52.1 (Bane Act); (7) Intentional Infliction of Emotional Distress; (8) Negligent Hiring, Supervision and Retention; (9) Negligence; and (10) Injunctive Relief.

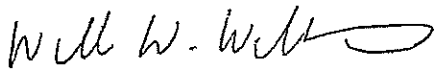
As for injunctive relief, the Hawkins will seek orders compelling curriculum overhaul, mandatory reporting, and court-supervised training.

III. CLOSING

If not resolved, the case would be filed in the Superior Court of San Bernardino County in the Unlimited Civil Division with a monetary demand above the jurisdiction minimum. The damages include (1) compensatory damages for medical expenses for the Hawkins Children and lost wages for the Hawkins; (2) emotional distress damages; (3) statutory damages; (4) attorneys' fees and costs; and (4) other damages consistent with the causes of action.

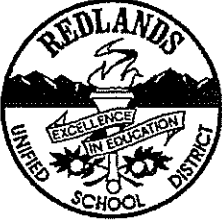
I look forward to your prompt response to this letter.

Sincerely,

A handwritten signature in black ink that reads "Willie W. Williams". The signature is written in a cursive style with a large, sweeping flourish at the end.

Willie W. Williams

Exhibit 2



REDLANDS UNIFIED SCHOOL DISTRICT

September 10, 2025

Willie W. Williams
The Law Office of Willie W. Williams
10621 Church Street, Suite 110
Rancho Cucamonga, CA 91730

Re: Channing and Daphne Hawkins

To Whom it May Concern:

NOTICE OF ACTION TAKEN ON CLAIM Government Code Section 913

The claim you presented, against Redlands Unified School District on or about July 24, 2025, has been considered. Notice is hereby given that the claim was rejected at the regular School Board meeting on September 9, 2025, pursuant to the California Government Code.

WARNING

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action in a municipal or superior court of the State of California on this claim. See Government Code, Section 945.6.

This time limitation applies only to causes of action arising under California law for which a claim is mandated by the California Government Tort Claims Act, Government Code sections 900 et. seq. Other causes of action, including those arising under federal law, may have a shorter time limitation for filing.

You may seek the advice of an attorney in connection with this matter. If you desire to consult an attorney, you should do so immediately.

Sincerely,

Carianne Mackamul-Covey

Carianne Mackamul-Covey
Risk and Benefits Manager

Cc: File
Keenan & Associates/PLCA