



June 11, 2026

VIA EMAIL

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Re: Title VI Civil Rights Violations at Boulder Valley Public School District

I. INTRODUCTION

The Anti-Defamation League (“ADL”)¹, submits this Complaint on behalf of Student A, along with his parents, all of whom are Jewish. Student A, who will soon complete 8th grade at Southern Hills Middle School (“SHMS” or “the school”), has been subjected to continued antisemitic harassment on the basis of his Jewish ethnicity, shared ancestry, and national origin while attending the Boulder Valley School District (referred to herein as “BVSD” or “the District”). SHMS is a public school operated by BVSD, located in Boulder, Colorado. The District is a recipient of federal financial assistance and is therefore subject to the requirements of Title VI of the Civil Rights Act of 1964 (“Title VI”).² BVSD has knowingly allowed its schools to become a hostile environment for Jewish students, has failed to take prompt and effective steps to address and remediate that hostile environment, and has thereby violated its legal obligations under Title VI and its implementing regulations.

Accordingly, for the reasons set forth below, ADL respectfully requests that the Office for Civil Rights (“OCR”) initiate an investigation of Boulder Valley School District, a recipient of federal financial assistance, for violations of Title VI of the Civil Rights Act of 1964 and its implementing regulations, based on Jewish shared ancestry discrimination.

¹ ADL is a leading anti-hate organization dedicated to stopping the defamation of the Jewish people and securing justice and fair treatment to all.

² See 42 U.S.C. § 2000d *et seq.*; see also 34 C.F.R. § 100.3.



ADL further requests mediation pursuant to Section 201(a) of OCR’s Case Processing Manual, to be followed by an investigation if mediation is not successful.

Student A³ has been subjected to persistent, escalating, and severe antisemitic harassment at SHMS spanning two consecutive school years — 7th grade (2024–2025) and 8th grade (2025–2026) — by multiple fellow students. The harassment began with antisemitic remarks directed at Student A on the soccer field by classmates. As described further below, it escalated rapidly to include verbal slurs (including repeated use of the word “kike” directed at Student A), threats (including of gun violence), and Nazi salutes in 2024, and progressed to repeated physical assaults (including strangulation), antisemitic taunting in the lunch line, after school and in class (including organization of a game called “Jew touch tag” in PE, in which Jews are chased), and Holocaust-related mockery (including a student telling Student A in math class, “at least my grandma didn’t spend 8 years in hiding,” and asking Student A, “do you get scared when someone raises their hand?” and “do you get scared when someone counts to nine?”). On one occasion, a group of students, none of whom Student A believed were Jewish, threw a dollar bill into the air in front of Student A, and when Student A picked it up, one of the students said “well, well, well” while another recorded the interaction on video — conduct invoking the common antisemitic trope associating Jewish people with money and greed.

The most violent incident occurred on December 15, 2025, when a classmate fashioned a Chromebook charging cord into a lasso, threw it around Student A’s neck without warning or provocation, and dragged Student A backward from a chair while calling Student A a “stupid kike” — conduct so severe it resulted in a police report, a formal founded bullying determination by SHMS, and a Juvenile Court Referral for third-degree assault. That incident was followed by a February 26, 2026 incident in which a former friend of Student A threatened to bring his father’s gun to school to shoot people and then stated in Student A’s Spanish class that “Hitler should have killed all the Jews when he had the chance”; a March 2026 assault in which a fellow student punched and kicked Student A multiple times; and an April 2026 incident in which a fellow student approached Student A while Student A was playing basketball alone at recess and spat in Student A’s face. During the spring 2026 semester, a swastika was found drawn in marker on the wall of the boys’ bathroom directly behind the main office at SHMS, accompanied by a racial slur targeting Black students.

Student A’s parents put SHMS and BVSD on actual notice of antisemitic harassment in November 2024 and have continued to provide them with written, documented, and urgent notice through the present. SHMS itself produced a founded determination of antisemitic bullying in April 2025. The Boulder Police Department has opened two cases and has issued a juvenile criminal referral for third-degree assault. Formal written demands for protective supervision were submitted in January 2026. Despite all of this, the District failed to put into place systemic changes to address the continued antisemitic harassment Student A has been facing and has consistently placed the burden of avoiding the hostile environment on Student A — not on those responsible for creating it. Student A has been relocated from study hall to the principal’s office, no longer changes in the locker room for

³ While we refer to Complainants anonymously herein out of concerns for safety and confidentiality, ADL remains ready to provide names and contact information for OCR personnel, and to make Complainants available for interviews and the potential mediation process, upon OCR’s request.



gym class out of fear of further harassment, and was forced to miss an off-campus school field trip that the students responsible for targeting Student A attended without restriction. Student A [REDACTED] is currently on [REDACTED] medication as a direct and documented result of the hostile environment at SHMS. As of the end of April, 2026, Student A's parents were forced to pull him out of school for the remainder of the year based upon [REDACTED] concerns for his physical safety and well-being.

II. STATEMENT OF FACTS

A. Background: Student A and Southern Hills Middle School

Student A is a Jewish minor currently enrolled in 8th grade at Southern Hills Middle School in Boulder, Colorado. Student A is Jewish by both heritage and practice. Prior to the onset of the harassment described herein, Student A openly wore a Star of David necklace at school, displayed visibly over Student A's shirt and tucked in only during athletic activities. Student A's Jewish identity was thus known to the school community, including to the fellow students who have targeted Student A for harassment. [REDACTED]

[REDACTED] Student A is currently prescribed medication to help address [REDACTED] conditions he is now experiencing. As a direct consequence of the hostile environment at SHMS, Student A no longer wears the Star of David necklace. Because of the ongoing antisemitic harassment, Student A does not want to tell anyone he is Jewish unless he feels he can trust the person asking about his religious identity.

Southern Hills Middle School is a public middle school operated by the Boulder Valley School District. BVSD holds itself out as a district committed to "Excellence and Equity." The District's Board Policies include Policy JDHB (Bullying Prevention), which defines bullying as "any written text or image, or verbal expression, or physical or electronic act or gesture, or a pattern thereof, that is intended to coerce, intimidate, or cause any physical, mental, or emotional harm to any student," and requires written documentation and reporting of bullying investigations within sixty days of a formal complaint.⁴ The District's Board Policy AC (Non-Discrimination and Equal Opportunity) applies where conduct is directed toward students on the basis of a protected characteristic, including shared ancestry and national origin.⁵ Despite these policies, the District has failed, repeatedly and systematically, to enforce them on Student A's behalf.

A. 7th Grade (2024–2025): Escalating Targeting, Antisemitic Harassment, and Founded Bullying Determination⁶

1. Fall 2024: Threats and Intimidation

⁴ See, Bullying, <https://www.bvdsd.org/about/board-of-education/policies/policy/~board/j-policies/post/jdjb>

⁵ See, Notice of Nondiscrimination/Equal Opportunity, <https://www.bvdsd.org/nondiscrimination-equal-opportunity>

⁶ Though these prior antisemitic incidents occurred outside the statutorily required 180-day time period required for OCR Title VI complaint submissions, we believe it is necessary and critical to ensure OCR has the most complete context and background for Student A's experience while attending the District.



The harassment of Student A at SHMS did not begin with a single dramatic incident. It built gradually and relentlessly over the course of Student A’s 7th-grade year. In the fall of 2024, Student A’s father initiated communications with SHMS Principal Melinda Murphy concerning a persistent pattern of targeting directed at Student A by fellow students following multiple incidents of bullying during PE class. Principal Murphy acknowledged the concerns and invited Student A’s father to reach out if specific names were heard repeatedly so that the school could address behaviors and trends before they advanced further. That invitation established actual notice from the outset of the communications, and Student A’s family took it seriously.

In early November 2024, Student A’s father reported to Principal Murphy that two students — referred to herein as Student 1 and Student 2 — had been “really going at [Student A] quite a bit.” In the weeks preceding that communication, Student 1 had attempted to provoke Student A into a physical fight on more than one occasion, had told Student A that he would “kill” Student A if it did not mean going to jail, and had been engaging in aggressive retaliation following Student A’s reporting of the previous bullying (Student A had reported at least one incident through Colorado’s anonymous “Safe to Tell” reporting system).

Student A’s father advised Principal Murphy that the language was “escalating in a very dark and negative direction.” Principal Murphy acknowledged receipt of the report and indicated she or Assistant Principal Sarah DiGiacomo would speak with Student A.⁷ No further documented follow-up or corrective action by the District appears in the record from this period.

2. April 2025: Antisemitic Hate Speech, Nazi Salutes, and Physical Assault

By April 2025, the harassment had crossed definitively into antisemitic hate speech and physical violence. On or around April 11, 2025, Student A’s father wrote to Principal Murphy to report that Student A had “shared some very troubling experiences with ongoing bullying at school over the last few weeks.” This bullying had “recently escalated to include antisemitic hate speech, seemingly coming from a group of boys who have been a persistent issue for both the school and [Student A].” Student A “had been physically assaulted twice this year (that we know of) and has now been subjected to Nazi salutes on the playground and today in Social Studies.”

Student A’s father further noted that Student A had not shared the full extent of the harassment for most of the school year out of fear of retaliation — Student A was “afraid of further repercussions” from fellow students — and had been hesitant to tell even Student A’s parents. Student A’s father formally requested that the school provide a plan to address this behavior, including “a significant increase in supervision and greater engagement with parents regarding the rise of this behavior in the school,” and stated that “transferring [Student A] has to also be on the table” if the situation could not be remediated.

⁷ Complainants are prepared to provide copies to OCR of email communications sent to school officials and/or district administrators to notify them of these incidents each time they learned of them from Student A.



These communications gave the District actual and documented notice, no later than April 2025, that Student A was being subjected to antisemitic harassment — including Nazi salutes and physical assault — by multiple students at SHMS.

3. April 14, 2025: Formal Bullying Investigation — Founded Determination

The school’s own investigation corroborated and confirmed what Student A’s family had reported. Following a formal bullying complaint, SHMS conducted an investigation into the conduct of a fellow student referred to herein as Student 3. Witnesses interviewed by the school reported hearing Student 3 say that Jews were “dirty” and “contaminated.” Student 3 had attempted to organize fellow students during PE class into a game Student 3 called “Jew touch tag,” in which being Jewish would make one the student to be chased. Student 3 had been making jokes about the Holocaust during class periods. Nazi salutes had been directed at Student A.

Based on information gathered during the investigation, SHMS formally determined that its bullying policy (JDHB) had been violated, finding that Student 3 “had made anti-Semitic statements which created emotional harm and an unsafe environment for Jewish students.” These findings were documented in the school’s Infinite Campus records system, with a formal founded determination. The school further found that Board Policy AC (Non-Discrimination and Equal Opportunity) applied, “as the conduct of [Student 3] was directed toward a protected class.”

The District’s own formal investigation produced a founded determination of bias-motivated bullying against Student A on the basis of Jewish identity as early as April 2025 — more than a year before this complaint is filed. It is against this backdrop of actual, confirmed, founded antisemitic harassment that all subsequent failures of the District must be assessed.

4. May 2025: The Family’s Plea for the Following School Year

Student A’s family concluded the 2024–2025 school year with documented and unresolved concerns about Student A’s safety and well-being. In May 2025, Student A’s father wrote to Principal Murphy to report that issues had “emerged again this week” and that “clearly some of the kids are just not getting it.” He formally requested that the school ensure that specific students — including Student 1 and Student 4 — not be assigned to Student A’s classes the following year, so that Student A could begin 8th grade with the best possible chance at a safe and productive school year.

He stated: “If you can’t facilitate this then I am going to formally request that the district immediately assist us in a transfer of [Student A] to another BVSD school to make sure [Student A’s] mental wellbeing and academic success are protected. It has become clear that BVSD priorities are geared more to protecting students that can’t seem to follow the rules and conduct required of them over the rights of others.”

Principal Murphy’s response was to note the request and commit to doing the school’s “best” to avoid scheduling conflicts, while declining to make any guarantee. She offered that if the family felt they would like an administrative transfer, she could “work through



that process.” No transfer was facilitated. No formal scheduling commitment was made or honored. When the 2025–2026 school year began, the harassment continued — and intensified.

A. 8th Grade (2025–2026): Escalation to Repeated Physical Assault and BVSD Continued Failure to Act

1. October 2025: Ongoing Distress; No Effective Intervention

By early October 2025, Principal Murphy contacted Student A’s mother directly, expressing concern that Student A had “had a rough week so far” and noting her concern about Student A’s “emotional wellbeing.” Student A’s parents responded by requesting a meeting with school leadership to discuss the academic and emotional impact of the hostile school environment. A meeting was eventually scheduled. No meaningful change in Student A’s safety conditions resulted.

2. December 15, 2025: The Cord Assault — Founded Bullying Determination and Boulder Police Department Involvement

The most extensively documented incident in this complaint occurred on December 15, 2025, in a third-period Transitions (study hall) class at SHMS. The Boulder Police Department [REDACTED] documented the incident as a third-degree assault. The teacher assigned to the classroom had stepped out into the hallway to assist another student when, in her absence, a classmate referred to herein as Student 5 targeted Student A.

Based on Student A’s account and multiple corroborating witness statements, Student A was seated at a desk playing a game on a school-issued Chromebook and was not interacting with Student 5. A second student, who was friends with Student 5, first approached Student A claiming to have something important to say, in a deliberate effort to distract Student A and redirect Student A’s attention. While Student A was thus distracted, Student 5 moved behind Student A’s chair and fashioned a Chromebook charging cord into a lasso. Without warning or provocation, Student 5 threw the cord around Student A’s neck and immediately began pulling it backward. Student A was pulled from the chair and fell backward onto the floor, striking both elbows. Student A sustained a rug burn on the right elbow — visible and bleeding — and redness was subsequently observed on the side of Student A’s neck by school counseling staff. A photograph of the elbow injury was taken and preserved.

During the course of the assault, Student 5 called Student A a “stupid kike” and stated, “all Jews are snitches.” When the bell rang, Student 5 fled the classroom. The teacher, who had been outside the classroom during the entire incident, returned to find Student A on the floor. Student A’s father subsequently confirmed to investigators that the teacher heard Student 5 direct the statement “all Jews are snitches” at Student A. It is unclear to



Complainants whether the teacher ever reported this antisemitic assault to administrators after it occurred.⁸

Student A untied the cord from around Student A’s own neck. Three witnesses confirmed to investigators that Student 5 had placed the cord around Student A’s neck. Student 5 himself admitted to investigators that he had done so, acknowledging only that it had been “a bad decision.” Following the incident, SHMS required Student A to remain behind and describe what had occurred, causing Student A to miss Student A’s Humanities class — a combined English and Social Studies period — with no documented effort by the school to assist Student A in making up the missed academic instruction.

SHMS conducted a formal bullying investigation and issued a founded determination: Student 5’s conduct violated Policy JDHB, caused Student A emotional harm, and created an unsafe environment.⁹

Due to the severity of the incident, the Boulder Police Department were involved and an investigation was opened into the matter.¹⁰ A Detective assigned to the case informed Student A’s parents that Student 5 would receive a juvenile summons for third degree assault.

During the police investigation, Student A’s father emphasized to investigators that there had been ongoing antisemitic behavior at SHMS for approximately two years, including incidents the prior year in which students performed Hitler salutes directed at Student A, which incidents had been reported to the school but not effectively addressed.

3. The District’s Response to the December 2025 Assault: Inadequate and Ineffective

The District’s response to the December 15, 2025, assault, though documented, was wholly inadequate and ineffective to remediate the hostile environment or prevent its recurrence. Student 5 was suspended for the remainder of the week. Student A was to be reassigned to a different study hall section the following semester. That constituted the initial response: a one-week suspension of the aggressor¹¹, and a class reassignment of the victim.

In response to this incident, upon information and belief, BVSD failed to:

- Speak with the student body at large about this incident.
- Notify the larger BVSD community, including parents and students, that an antisemitic incident occurred.

⁸ Based upon review of the Boulder Valley Police Department report associated with this incident, there is reference to an interview with the teacher, who indicated to a Detective that she did not report the assault to administrators. *See*, Boulder Police Department report, [REDACTED], attached hereto as Exhibit 1.

⁹ *See* Bullying Investigation Report — December 15, 2025, attached hereto as Exhibit 2.

¹⁰ *See* BVPD Police Report (Exhibit 1).

¹¹ Upon information and belief, complainants are unsure whether Student 5 served the full week of their purported suspension.



- Release a public statement denouncing and condemning antisemitism and antisemitic conduct, harassment or bullying.
- Implement programming or training or provide educational information about antisemitism for students, faculty, or staff in response to the incident.

On January 4, 2026, as Student A was preparing to return to school following the winter break, Student A’s parents had to proactively reach out to the principal to get further clarification on how the school would keep Student A safe when school started again. They submitted an urgent written email to Principal Murphy, copied to BVSD administration, stating that “the last two years have been met with significant bullying by multiple students and in multiple locations” and that their concern was “further heightened by the assault that took place during the final week of the semester in transitions.” They stated they were working with the Boulder Police Department and required “immediate adjustments confirmed by Monday afternoon before we believe [Student A] can safely return to school Tuesday morning.” Their specific requests were:

1. A no-contact order between Student A and Student 5, immediately and strictly enforced, with any violation added to the police case file;
2. Line-of-sight supervision of Student A at all times while at school, without exception;
3. That Student A be excused from changing for gym class, with no grade penalty; and
4. That Student A not attend Transitions and instead report directly to the office during that block.

The District’s response was a support plan providing: weekly check-ins with Student A’s counselor; a break space in the office/counseling area; a provision that Student A leave class one or two minutes early to transition between classes while the hallways were clear; and a no-contact agreement between Student A and Student 5, effective January 6, 2026. The District did not provide line-of-sight supervision, despite the family’s request for that oversight and protective mechanism.

In light of his concerns for the potential of Student A being further victimized or singled out in response to the incident, Student A’s father responded to the school about the early-departure accommodation, explaining: “I don’t want [Student A] to leave early and draw more attention to [Student A] in this which will just lead to more bullying.” He asked the school to “get creative on how [Student A] can be best supervised when changing classes without calling attention to [Student A]. It isn’t fair to make [Student A] the center of attention when [Student A] didn’t do anything.”

The no-contact order was violated the very first day it took effect and continued to be violated by Student 5 repeatedly and through multiple channels. On the very first day the order took effect, Student 5 approached Student A’s friends and began spreading false information about Student A. Student 5 subsequently told another student — referred to



herein as Student 6 — that Student A had “lied to the police” about what had happened, in direct violation of the order’s prohibition on sharing information about the incident.

Student 5 also enlisted friends to approach Student A and relay messages on Student 5’s behalf within the school. When Student A encountered Student 5 in the hallways, Student A would comply with the no-contact order by turning around and walking away; Student 5 did not reciprocate this compliance. Student A reported these violations as instructed. Student 5 was suspended for several days as a result of the initial violation. But the violations did not stop, and the hostile environment continued to intensify.

4. January 2026: Retaliation and Fear; New Incident Involving Student 6

In January 2026, as SHMS began investigating a new incident involving another student — referred to herein as Student 6 — Student A’s father wrote to Principal Murphy: “[Student A] is very concerned that if you speak to [Student 6], [Student A] will lose another friend. I know it’s impossible to investigate these things without talking to the kids but you can see how this is taking its toll on [Student A]. This is just becoming an impossible situation that is victimizing our child over and over.”

This communication reflects the deeply harmful secondary consequence of the District’s pattern of inadequate response: to report harassment was to risk retaliation and the loss of friendships. The District’s failure to adequately address earlier incidents had created a school environment in which Student A, as the victim, bore the cost of every report.

5. February 26, 2026: Harassment and Threats of Violence — Second Boulder Police Department Involvement

On February 26, 2026, Student A was subjected to a new antisemitic incident at SHMS involving a classmate — referred to herein as Student 7 — which, upon information and belief, resulted in the opening of another Boulder Police Department case.¹² The incident unfolded across multiple locations during the school day. Earlier that day, Student 7 stated that he was going to bring his father’s gun to school to shoot people. Subsequently, in Student A’s [REDACTED] Spanish class [REDACTED], Student 7 stated aloud that “Hitler should have killed all the Jews when he had the chance.” Upon information and belief, at the time the comment was made, [REDACTED] was present in the classroom. Student A reported the incident to Principal Murphy, who pulled Student A out of class to discuss what had occurred and indicated she wanted to determine what the school could do to help. However, no disciplinary action against Student 7 was communicated to Student A or Student A’s family, and no documented corrective measures resulted from the report. Student 7 was observed back in school the *following day* without apparent consequence. Following the incident, a friend of Student A filed a Safe To Tell report, to document and report what had taken place. The combination of Student 7’s explicit threat of gun violence invoking his father’s firearm and Student 7’s statement that he wished more Jewish people were killed by Hitler — on the same school day —

¹² Complainants believe the information about this incident is contained in Boulder Police Department Report, [REDACTED]. As of the date hereof, Complainants have requested the report, but they have not received a copy.



significantly increased the climate of fear and intimidation experienced by Student A at SHMS.

What makes this incident particularly significant is Student 7's prior relationship with Student A. In May 2025, Student A's father had explicitly identified Student 7 to Principal Murphy as one of Student A's friends — a student whose presence in Student A's classes would provide Student A with “more support to be successful next year.” Student 7 had been listed among Student A's friend group at the end of 7th grade. By February 26, 2026, that friendship had deteriorated, or so poisoned by the broader antisemitic climate at SHMS, that Student 7 had now become a perpetrator of antisemitic harassment and conduct targeting Student A.

Upon information and belief, a Boulder Police Department investigation was opened with Student 7 as the named perpetrator.¹³ These incidents represent the continuation of a pattern of antisemitic harassment and targeting of Student A that the District has consistently failed to prevent or effectively remediate.

6. March 24, 2026: Physical Assault — Student A Punched and Kicked by Student 1

Then on March 24, 2026, Student A was physically assaulted at SHMS by Student 1 — the same student who, as far back as November 2024, had threatened to kill Student A and had repeatedly attempted to provoke fights.

Student A's father wrote to Principal Murphy and Assistant Principal DiGiacomo that evening: “[T]here appears to be a clear violation of the school's JDHB policy and Colorado law SB23-296. Specifically, the incident involved physical contact intended to intimidate [Student A], a clear power differential, and a repeated pattern of behavior over an extended period. [T]here is no justification for physical assault.” He further reported that upon picking Student A up from school, another student yelled across the parking lot: “Hey [Student A] I heard you got bitch slapped today” — demonstrating that the assault was known to, and treated as entertainment by, the wider student community.

Student A's father directly and explicitly connected this assault to the District's earlier failure to honor the family's request for line-of-sight supervision: “I also want to reference our request for hallway supervision from December; the denial of that request has contributed to this ongoing behavior. This repeated targeting has significantly impacted [Student A's] mental health, [Student A's] academic performance, and [Student A's] legal right to an education.” He requested the written report mandated by Policy JDHB within the sixty-day timeframe required by that policy.

Although the events described in this paragraph did not involve specifically antisemitic harassment, they speak to the generally hostile environment Student A has faced at BVSD, and BVSD's repeated failure to appropriately address serious incidents.

¹³ *Id.*

7. April 14, 2026: Student A Spat Upon and Subjected to More Harassment at Recess

Less than three weeks after the March 24, 2026 assault, Student A was targeted yet again. On April 14, 2026, during recess, while Student A was playing basketball alone, a student referred to herein as Student 8 approached Student A and spat directly in Student A's face. Student 8 had a documented pattern of initiating unwanted physical contact with Student A — conduct that had previously been reported to the school and addressed only with lunch detention before eventually escalating to spitting in Student A's face. Following the April 14, 2026, incident, Student 8 was suspended for one day. The school's response to Student A was to advise Student A to "let us know if it happens again." When a school staff member asked Student A why Student A believed Student 8 had engaged in the conduct, Student A responded: "because the school doesn't have consequences." The staff member did not respond.

Student A's parents submitted a formal report to SHMS, characterizing the incident as "an unprovoked physical assault" and requesting that the school initiate a formal investigation. In that report, Student A's parents noted: "We have raised this concern multiple times and are still awaiting a follow-up response. Since our initial request in December for line-of-sight supervision and escorts in the hall [Student A] has been physically assaulted multiple times." They further noted that they were still awaiting the written report from the March 24, 2026, Student 1 assault, and described the District's repeated failure to produce timely documentation as "yet another example of the school's inability or unwillingness to enforce its own policies."

8. April 2026: Student A Excluded from Off-Campus School Field Trip

By April 2026, the hostile environment at SHMS had so thoroughly compromised Student A's ability to participate in school activities that Student A's parents were forced to make the heartbreaking decision to keep Student A from attending an off-campus school field trip to a Topgolf facility. Student A informed [REDACTED], the [REDACTED] teacher who was the lead faculty member for the trip, that Student A could not be placed in a group with certain students. The school's response was that groups could not be changed, and that the only students who would be separated from Student A were those subject to existing no-contact orders — not the broader group of students who had been harassing and assaulting Student A throughout the year.

Student A's mother wrote to the school: "Given the ongoing and repeated bullying [Student A] has endured, we are not confident that [Student A's] safety and wellbeing can be adequately ensured in an off-campus setting. This is a difficult decision, as I know [Student A] would otherwise benefit from and enjoy the experience." She added: "It is deeply concerning that [Student A] must miss out while students involved in repeated bullying and physical assault can still participate. All students are entitled to feel safe and included in school activities and this is clearly an epic failure for Southern Hills." The students who had harassed and physically assaulted Student A participated in the Topgolf field trip. Student A stayed home.



B. The District's Pattern Of Systemic Failure

Across two school years, BVSD and SHMS have demonstrated a consistent pattern of inadequate and ineffective response to the antisemitic hostile environment targeting Student A. The following summarizes the District's specific, documented failures:

Failure to remediate and effectively address an antisemitic incident following a founded bullying determination. Despite SHMS's own April 2025 founded determination that Student 3 had made antisemitic statements creating emotional harm and an unsafe environment for Jewish students, the District failed to issue any school-wide statement, failed to speak directly with the larger student body about what had occurred, and failed to implement educational programming for students, faculty and staff about antisemitism. The founded determination produced no measurable change in the school environment and no systemic changes were made to ensure this type of antisemitic harassment would not happen again.

Failure to enforce the no-contact order. The no-contact agreement between Student A and Student 5 was violated by Student 5 on the very first day it was in effect. Student A, placed in the position of monitoring and reporting the violation, was again made to bear the burden of protecting Student A's own safety.

Denial of line-of-sight supervision. Despite an urgent, written, formal request submitted on January 4, 2026 — following a physical assault that resulted in a criminal referral — the District denied the family's request for line-of-sight supervision of Student A in the school hallways. Student A's father directly and explicitly attributed the subsequent March 2026 assault to that denial. The District's own records contain this attribution in writing.

Failure to produce required written reports. Policy JDHB requires a written report following a bullying investigation within sixty days of a formal complaint.¹⁴ SHMS failed to follow District policy as it relates to the April 2025 antisemitic harassment incident. Complainants did not receive any written report of the purported investigation until eight months later and only at Complainants request.¹⁵

No school-wide or District response to antisemitism. Despite a founded finding of antisemitic bullying, two police cases, one criminal referral, multiple formal written complaints from Student A's parents over two years, a swastika drawn on the wall of the boys' bathroom adjacent to the main office, a student's threat to bring his father's gun to school to shoot people, and that same student's statement in a classroom — in the purported presence of [REDACTED] — that "Hitler should have killed all the Jews when he had the chance," the District has never: spoken with the student body at large about the pattern of antisemitic incidents; issued any public statement denouncing antisemitism; or implemented any form of educational programming, training, or curriculum on antisemitism directed at students, faculty, or staff. No response by the school or District was aimed at remedying the antisemitic environment.

¹⁴ See, District policy JDHB: , <https://www.bvsd.org/about/board-of-education/policies/policy/~board/j-policies/post/jdhb>

¹⁵ See, Bullying Investigation report, attached hereto as Exhibit 3.

Burden placed consistently on the victim. Rather than eliminating the hostile environment by appropriately sanctioning perpetrators, and taking corrective and effective measures to address antisemitism at BVSD, the District consistently placed the burden of navigating the hostile environment on Student A: reassigning Student A’s study hall class rather than restricting the aggressor; requiring Student A to leave class early to avoid crowded hallways; relocating Student A to the principal’s office; and excusing Student A from the gym locker room. Based upon information and belief, Student A’s aggressors suffered no comparable restrictions on their school participation and were able to attend the Topgolf field trip that Student A was forced to miss because the teacher refused to help accommodate group changes for Student A’s safety. These disparities reinforced Student A’s perception — and the reality — that the school’s rules were being applied more strictly to the victim of antisemitic harassment than to the students responsible for creating the hostile environment.

Failure to engage District leadership. Despite the Superintendent being copied on urgent family communications, Student A’s family received responses only from the school principal — never from the Superintendent or any other District-level administrator. The absence of District-level engagement with a matter involving two police cases, a criminal referral, multiple physical assaults, and founded antisemitic bullying determinations constitutes its own form failure to effectively address the hostile environment. The sole contact from District level administrators prior to the June 9th report detailed below appears to be in early May, 2026, once Complainants contacted them to explain Student A needed to be removed from SHMS for the remainder of the school year due to medical necessity as a result of [REDACTED] persistent harassment at school.

Failure to evaluate reported incidents under Title VI federal law obligations. The District findings, as detailed below, fail to evaluate whether the reported incidents of harassment individually or in the aggregate created a hostile environment based upon Student A’s Jewish national origin and shared ancestry, as the report only speaks to an evaluation of whether SHMS followed District policy JDHB.

1. BVSD Investigative Findings Report – June 9, 2026

On June 9, 2026, Complainants received via email a “KE-R Formal Complaint” report from BVSD investigator Katie Romero.¹⁶ Investigator Romero determined that “the school followed District Policy JDHB and expectations” in each evaluated instance of reported harassment that is referenced in the report. Yet, despite that finding, which Complainants strongly contest, Investigator Romero then goes on to indicate multiple instances in which the school failed to take multiple steps to effectively remediate the harm, including restorative practices and interventions.¹⁷

¹⁶ See, BVSD KE-R Formal Complaint Report, dated June 9, 2026, attached hereto as Exhibit 4. [REDACTED]

¹⁷ *Id.*



With respect to the April 14th, 2025 antisemitic incident, the report notes, “[h]owever, admittedly, the Principal had not written and shared an outcome report with the Complainant and did not implement a support plan...” and “[a]n investigation outcome report was given to the Complainant in January of 2026 upon the Complainant’s request.”¹⁸ The report continues that a “... support plan was not put in place with supportive measures in addition to the schedule change.”¹⁹ Complainants did not receive a report about this incident until nine months later, far exceeding the JDHB policy required 60 day timeline for a report to be issued.

In reference to the December 2025 physical assault on Student A and violation of the no-contact order by Student 5, Investigator Romero stated “...however, there is no evidence of additional supports or interventions to prevent the student from violating the no contact order in the future.” Missing in this report is any mention that Student A was called a “stupid kike” while he was being assaulted, a clear antisemitic reference to Student A’s Jewish heritage, in addition to being told “all Jews are snitches.”

2. Report Recommendations

The report recognized the emotional toll these incidents had on Student A. The report identifies where SHMS should have been implementing additional supportive measures for Student A. It recommends the school utilize “District Restorative Practices” and that staff receive training, so they are equipped to intervene with students “as a means to address behaviors prior to them escalating into more serious incidents.” The report further recommends school wide training for staff and students to “create a more inclusive culture and community...”²⁰

However, this report wholly fails to address any evaluation of BVSD’s and SHMS’ required legal obligations under Title VI of the Civil Rights Act of 1964 as described below in Section III, which further demonstrates BVSD’s failure to promptly and effectively address the continued hostile environment Student A was facing on the basis of his Jewish ethnicity and shared ancestry.

3. Report Deficiencies and Failures To Address A Hostile Environment

The report was not completed until June 9th, 2026. BVSD has known since at least April of 2025 that Student A was being harassed on multiple occasions and that Student A’s parents were contacting SHMS to report the continued antisemitic harassment and bullying. Despite this continued notice, despite the purported remedial measures, no systemic changes were implemented to stop the antisemitic harassment from continuing. This report fails to effectively evaluate the underlying acts of harassment in relation to the targeting of Student A based upon his Jewish ethnicity and shared ancestry. The report provides little to no discussion on the potential for other systemic changes, programming,

¹⁸ *Id* at page 1.

¹⁹ *Id* at page 2.

²⁰ *See*, BVSD KE-R Complaint Report, page 4.



and educational efforts SHMS and BVSD could institute to address antisemitism in the District.

Lastly, and of critical importance, there is a complete failure on the part of BVSD to address and evaluate the hostile environment Student A was facing as a result of his Jewish ethnicity and shared ancestry. There is no discussion or evaluation regarding the District's responsibility of ensuring the schools they operate take effective steps to promptly and effectively address and remediate hostile environments in relation to Title VI federal legal obligations. These findings fail to evaluate whether the reported incidents of harassment individually or in the aggregate created a hostile environment based upon Student A's Jewish national origin and shared ancestry, as the report only speaks to whether SHMS followed District policy JDHB.

The report itself makes clear that SHMS did not implement additional measures to address the incidents reported. BVSD is responsible for SHMS and all schools within their district. BVSD failed to adequately and effectively address the antisemitic hostile environment Student A has been facing for nearly two years.

C. Impact on Student A

The impact of two years of sustained, escalating antisemitic harassment on Student A has been severe, pervasive, and lasting. Student A is currently prescribed [REDACTED] medication [REDACTED] as a direct result of the hostile environment at BVSD. Student A no longer changes in the locker room for gym class. Student A's study hall period is spent in the principal's office rather than with peers. Student A's parents describe Student A as existing in a constant state of fight or flight, with learning comprehensively compromised. Student A stopped playing basketball — a sport Student A had actively participated in and enjoyed — for the remainder of the school year as a direct result of the harassment, and feels uncomfortable participating on the same team on a go-forward basis because the same students who have harassed and intimidated Student A at school also participate in that basketball league.

Student A, who previously wore a Star of David necklace openly and with pride, no longer does so. Student A does not want to tell anyone he is Jewish, denying his own religious and ethnic identity — a profound and deeply troubling consequence of the hostile environment. This reflects the degree to which the District's failure to protect Student A has forced Student A to conceal a core aspect of their identity in order to avoid further targeting. Student A should never have to even consider hiding their religious identity.

Student A was forced to miss the April 2026 off-campus school field trip because Student A's parents could not be confident their child would be physically safe in an off-campus setting. Student A's family has concluded that the environment at SHMS is so unsafe that they have begun planning to leave the school district entirely. Student A has been removed from the school out of concerns for his mental health and well-being, [REDACTED]



or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.”²⁵

The conduct Student A experienced at Southern Hills Middle School — including explicit antisemitic slurs, Nazi salutes directed at Student A, Holocaust jokes used to demean and exclude, and physical assaults accompanied by statements like “stupid kike” and “all Jews are snitches” — falls squarely and unambiguously within Title VI’s coverage as antisemitic discrimination based on Jewish shared ancestry and national origin.

C. The District Has Permitted and Failed to Effectively Remediate a Hostile Environment in Violation of Title VI

OCR has long recognized that a school district violates Title VI when peer harassment creates a hostile environment and “the harassment is encouraged, tolerated, not adequately addressed, or ignored by school employees.”²⁶ To establish a hostile environment violation, OCR must find that: (1) a hostile environment based on national origin existed; (2) the recipient had actual or constructive notice of the hostile environment; and (3) the recipient failed to take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring.²⁷ All three elements are clearly satisfied here.

1. A Hostile Environment Based on Jewish Shared Ancestry Exists at Southern Hills Middle School

A hostile environment exists where harassing conduct is “sufficiently serious that it adversely affects a student’s ability to participate in or benefit from the school’s program.”²⁸ OCR looks to “the totality of the circumstances” and considers, among other factors: the type, frequency, and duration of the conduct; the relationship between the parties; the number of individuals involved; whether the conduct was directed at more than one person; the location of the incidents; the age and grade of those involved; and the effects of the conduct on the complainant’s education.²⁹

The conduct to which Student A has been subjected is both individually severe and collectively overwhelming. It includes:

- Repeated use of the epithet “kike” — a virulent antisemitic slur— including during and immediately following a physical assault;

²⁵ Exec. Order No. 14188, Additional Measures to Combat Anti-Semitism, 90 Fed. Reg. 8847 (Jan. 29, 2025), <https://www.federalregister.gov/documents/2025/02/03/2025-02230/additional-measures-to-combat-anti-semitism>

²⁶ See U.S. Dep’t of Educ., Office for Civil Rights, Dear Colleague Letter on Harassment and Bullying (Oct. 26, 2010), at 2.

²⁷ *Id.* at 3–4.

²⁸ *Id.* at 2.

²⁹ *Id.* at 3.

- The statement “all Jews are snitches,” directed at Student A in connection with reporting of assault.
- Student 3 and others performing Nazi salutes directed at Student A on the playground and in Social Studies class.
- Statements to the effect that “Hitler should have finished the job.”
- Being called a “stupid kike” during a physical altercation.
- Exclusion and change in PE activities out of concern of fear of being bullied and harassed.
- Student 3 attempting to organize fellow students into a game called “Jew touch tag” — in which being Jewish made one the target to be chased.
- Holocaust jokes directed at Student A and made in Student A’s presence during class time.
- Three separate, documented physical assaults: (a) a Chromebook charging cord fashioned into a lasso, thrown around Student A’s neck, and pulled until Student A fell from a chair; (b) Student A being punched and kicked multiple times; and (c) Student A being spat upon in the face.
- A student threatening to shoot others at the school, and on the same day stating that more Jews should have been killed in the Holocaust.
- A juvenile criminal referral issued for third-degree assault.

This pattern of conduct is clear. It is not borderline. It is pervasive, sustained over two full school years, inflicted by multiple perpetrators in various locations throughout the school, and documented in the District’s own records, in two Boulder Police Department files, and in extensive written communications from Student A’s family to BVSD and the school. It has subjected Student A to conditions so severe that Student A is now on [REDACTED] medication, cannot participate in PE class or change in the school locker room, has been removed from the normal study hall environment, was forced to miss a school field trip attended by the very students responsible for the harassment, and finally, Student A’s parents were forced to remove him from the school entirely [REDACTED] as a result of the sustained harassment.

The harassment is “subjectively and objectively offensive” and is “so severe or pervasive that it limits or denies” Student A’s “ability to participate in or benefit from” the educational program at SHMS.³⁰ A hostile environment plainly exists.

2. The District Had Actual Notice of the Hostile Environment

Actual notice exists where school officials responsible for taking corrective action received notice of the harassment.³¹ There is no question as to actual notice here. The District received:

³⁰ *Id.* at 2.

³¹ *Id.* at 4.

- Direct, detailed written communications from Student A’s father beginning in November 2024, reporting escalating threats, harassment, and intimidation by identifiable students.
- A formal written report in April 2025 documenting Nazi salutes, antisemitic slurs, and two separate physical assaults of Student A during the school year.
- SHMS’s own April 2025 founded determination of antisemitic bullying, confirmed in Infinite Campus.
- An urgent formal communication in January 2026 following a physical assault that had resulted in a police report, specifying the need for a no-contact order and line-of-sight supervision.
- A police investigation [REDACTED] resulting in a Juvenile Court Referral for third-degree assault against Student 5.
- A no-contact order violated on its first day, duly reported to the school and resulting in a further suspension.
- Upon information and belief, a formal report in February 2026 resulting in the opening of Boulder Police Department [REDACTED].
- A formal written report of a physical assault on March 24, 2026, explicitly connecting the assault to the District’s denial of the earlier supervision request; and
- A formal written report of an assault on April 14, 2026, along with the family’s documented complaint that prior required written reports had not been produced.

The District’s actual notice is indisputable. SHMS’s own Principal initiated communications with Student A’s mother in October 2025 to express concern about Student A’s emotional wellbeing, confirming that school administration was directly aware that the situation was causing significant harm. The Superintendent was copied on urgent family communications. There is ample documentation to establish that BVSD and SHMS had long-term notice of the ongoing harassment of Student A.

3. The District Failed to Take Prompt and Effective Steps to End the Harassment

Having actual notice of a hostile environment, a school district must take “prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring.”³² Those steps must be tailored to the circumstances; a school that takes superficial action that fails to actually stop the harassment has not met its Title VI obligation.³³ The District’s responses, considered individually and collectively, were not prompt, not effective, and not reasonably calculated to end the harassment, eliminate its effects, or prevent recurrence.

In April 2025, following a founded determination of antisemitic bullying, the District took no school-wide action to address the antisemitism. Complainants are unaware as to whether administrators even identified the students who violated BVSD or SHMS policies or whether any disciplinary action was taken against them. There were no systemic changes at either the school or district level; no statements were issued condemning antisemitism;

³² *Id.*

³³ *Id.* at 5.



no programming was implemented to train students and faculty. The founded determination was entered into a computer system — and the hostile environment continued. No meaningful action was taken to address the antisemitic harassment.

In December 2025, following a physical assault accompanied by antisemitic slurs, a police report, and a request for specific protective measures, the District suspended Student 5 for one-week, reassigned Student A's study hall class, and declined to provide line-of-sight supervision. The no-contact order it did provide was violated on day one, with inadequate follow-through.

The subsequent physical assault in March 2026 — by a student whose threatening conduct had been reported since November 2024 — directly followed the District's denial of the supervision request Student A's parents had submitted two months earlier. Student A's father told the District precisely this in writing. The April 14, 2026, spitting incident followed within weeks.

Throughout this two-year period, the District does not appear to have:

- Issued any public or school-community statement denouncing antisemitism;
- Held any assembly or school-wide discussion of antisemitism;
- Implemented any educational programming, curriculum, or training on antisemitism for students, faculty, or staff;
- Took any effective documented District-level action in response to any of the family's formal written reports before June, 2026;
- Ensured the enforcement of its own policies (including by producing required written investigation reports within the sixty-day period mandated by Policy JDHB); or
- Provided adequate supervision to protect Student A despite an explicit, documented, and reasonable request for such supervision.

Instead, the District consistently placed the burden of navigating the hostile environment on Student A: moving Student A out of classes, excusing Student A from the locker room, relocating Student A to the principal's office during study hall, and ultimately allowing Student A to be excluded from a school field trip that Student A's aggressors attended without consequence.

The District's failure to take prompt and effective action was not the result of ignorance. It was the result of a blatant failure to protect the safety and civil rights of a Jewish student in its care. In the face of repeated, documented, urgent, and specific notice that Student A was being targeted with antisemitic harassment, bullying and assault, BVSD failed to remedy a hostile environment, which constitutes a violation of Title VI of the Civil Rights Act of 1964.



IV. SUGGESTED REMEDIES

For the foregoing reasons, Complainants urge OCR to require Boulder Valley School District to take, at a minimum, the following steps to come into compliance with Title VI and ensure that Student A and all Jewish students are safe and welcome:

1. Ensure that the BVSD community understands and recognizes antisemitic discrimination by incorporating the IHRA Definition, including its guiding examples, in the District's policy manuals and documents related to discrimination, consistent with Executive Orders 13899 and 14188 and the values of free speech and academic freedom. BVSD should also announce its commitment to utilize the IHRA Definition when investigating and responding to incidents of harassment and discrimination to determine whether they are motivated by antisemitic animus; and amend its codes, policies, and procedures concerning discrimination, retaliation, intimidation, harassment, bullying, and violence to clarify that conduct falling within the IHRA Definition and examples will be considered discriminatory and retaliatory treatment in violation of those codes, policies, and procedures.
2. Communicate and enforce a zero-tolerance policy for antisemitic conduct. Said communication should be disseminated to all BVSD educational stakeholders, including administrators, teachers, faculty, employees, students, and families.
3. Issue a standalone statement denouncing antisemitism in all its forms. We recommend BVSD use the following language:

We condemn antisemitism in all its forms. BVSD is committed to taking all necessary actions, including discipline where appropriate, to address and ameliorate discrimination and harassment based on actual or perceived Jewish shared ancestry or ethnicity. Antisemitic bullying, harassment and targeting of Jewish students because of their Jewish ancestral and ethnic identity, is contrary to BVSD's institutional values and nondiscrimination and conduct codes and unacceptable.

4. Implement mandatory training on antisemitism to all BVSD administrators, teachers, faculty, and staff who interact with students. The training should familiarize all members of the community with traditional as well as contemporary antisemitic stereotypes and conspiracy theories and their social and political functions, so that the BVSD community will be able to better identify and respond to antisemitic incidents in the future. Such training should incorporate the IHRA working definition of antisemitism with its guiding examples, along with information on how to respond to and report antisemitic incidents and the District's legal obligations under Title VI.
5. Implement mandatory curriculum on antisemitism and the Holocaust for all BVSD students including the student body at SHMS. The training for students should also include the No Place For Hate program facilitated by the ADL.



6. Review BVSD policies and procedures to ensure that they adequately address the Title VI prohibition on discrimination based on race, color, and national origin, including discrimination based on a student's actual or perceived shared ancestry or ethnic characteristics (e.g., antisemitism); revise its policies and procedures accordingly; and submit the revised policies and procedures for OCR's approval. This includes:
 - Amending BVSD Board Policy JDHB to include explicit provisions addressing bias-motivated bullying based on Jewish shared ancestry, and establishing clear, consistent, and enforceable disciplinary consequences for violations.
 - Amending BVSD Board Policy AC to adopt the IHRA definition and provide explicit guidance to school administrators on the application of Title VI to antisemitism.
7. Adopt new policies and procedures for administrators and other employees regarding Title VI's prohibition against retaliation. The revised policies and procedures should ensure that BVSD will protect students who report civil rights violations, and that it will take prompt and effective action to stop retaliatory harassment that occurs as a result of a student's report of discriminatory conduct.
8. Undertake a disciplinary review of all SHMS staff or faculty members who failed to report, respond to, or appropriately address antisemitic incidents involving Student A, including the teacher present during the December 15, 2025 incident.
9. Development and implementation of a confidential and accessible reporting mechanism for students to report antisemitic incidents without fear of retaliation outside of a Safe To Tell Reporting System.
10. Create a confidential reporting process for teachers, faculty, and staff to require reporting of antisemitic harassment and bullying to appropriate administrators if they observe, witness or are notified of said antisemitic conduct occurring as it relates to students at BVSD.
 - a. In the alternative, if said process already exists, renew training to ensure teachers, faculty and staff are properly trained on recognizing antisemitism so that they are able to effectively report incidents when they occur.
 - b. Should said process currently not exist, once created, train all teachers, faculty, and staff to understand their obligations around these reporting mechanisms, the importance of their roles as educators in stopping harassment, and reiterating BVSD's commitment to a harassment-free and welcoming school environment.



11. Conduct an annual audit for the next five academic years of all complaints of national origin discrimination, including shared Jewish ancestry discrimination, to ensure they are addressed by the District in a timely and effective manner. Consistent with OCR guidance, BVSD will apply the IHRA definition of antisemitism and examples when evaluating such complaints.
12. Implement an audit of all bullying and bias-incident reported to Southern Hills Middle School for the 2024–2025 and 2025–2026 school years, to be reviewed by OCR, with findings provided to OCR within ninety (90) days.
13. Implement mandatory annual District-wide reporting to OCR on the number and disposition of antisemitic incident reports at all BVSD schools, for a period of no less than three (3) years.
14. Facilitation of a voluntary administrative transfer of Student A to another school within BVSD — or support for enrollment in another school of the family’s choosing — should Student A’s family determine that the environment at SHMS cannot be made safe.
15. A formal written apology to Student A and Student A’s family from BVSD.
16. Take immediate steps to remediate the individual harm to Student A as a direct result of the antisemitic harassment and hostile environment endured while in the District. This should include reimbursement by BVSD for past and future out-of-pocket costs directly incurred for academic support, counseling costs, mental health services, and medication costs.

CONCLUSION

For the foregoing reasons, Complainants urge OCR to (1) initiate an investigation of BVSD, a recipient of federal funding, for violations of Title VI and the statute’s implementing regulations, and (2) require BVSD to undertake, at a minimum, the remedial measures outlined above to ensure that Jewish students and all students in the district are safe and welcome. Complainants request mediation pursuant to Section 201(a) of OCR’s Case Processing Manual, to be followed by an investigation if the mediation is not successful.

Respectfully submitted,

Rachel Grinspan

Rachel Grinspan
Director, Litigation Counsel
Anti-Defamation League (ADL)

A handwritten signature in black ink, appearing to read "James Pasch". The signature is written in a cursive style with a large, looped initial "J".

James Pasch
VP, National Litigation
Anti-Defamation League (ADL)

EXHIBIT 1



Incident Report [REDACTED]

Primary Officer: Hill, Andrew (B16877) Assisting Officer: Frasier, Gabriele (B9448)

Shift/Unit: Detectives

Overview

Incident Overview

Report Date: 07/01/2025 Report Time: 13:21 Incident From Date: 12/15/2025 Incident From Time: 10:30

Incident To Date: 12/15/2025 Incident To Time: 10:45 Location: [REDACTED], BOULDER CO [REDACTED]

Location Category: School-College/University Is Reported date, different from incident date?: No

Incident/Case Management

Requested Disposition: Open

Synopsis

Synopsis- No Personal Info

This report will document a Third-Degree Assault of one student at another student on 12/15/2025 between 1030 and 1045 hours at [REDACTED] School, [REDACTED], City and County of boulder, State of Colorado.

This case is open

Offenses

18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS Author: Frasier, Gabriele

Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS NIBRS UCR Code: Simple Assault Severity: Misdemeanor

Completion: Completed NCIC Offense Code: SIMPLE ASSAULT

Additional Details

Is the offender suspected of using alcohol, computer equipment or drugs/narcotics?: No

Was Criminal or Gang Activity Involved?: No Was Weapon/Force Involved?: Yes Was Bias Motivation Involved?: No

Type of Weapon/Force Involved: 40 - Personal Weapons

Names

Reporting Party - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Reporting Party Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Height: [REDACTED] Weight: [REDACTED] Eye Color: [REDACTED]
Hair Color: [REDACTED] Employer: [REDACTED] Occupation: [REDACTED]

Contact

Address Type: Work Location: [REDACTED]

Address Type: Work Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile Phone Number: [REDACTED]

Phone Number Type: Work Phone Number: [REDACTED]

Arrestee/Cited - [REDACTED] Author: Frasier, Gabriele • Edited by Hill, Andrew

Involvement

Role: Arrestee/Cited Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Height: [REDACTED] Weight: [REDACTED] Eye Color: [REDACTED]
Hair Color: [REDACTED] Resident Status: [REDACTED] School: [REDACTED] Occupation: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home

Relationships

- Name: [REDACTED] Is: Parent
- Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known
- Name: [REDACTED] [REDACTED] Is: Otherwise Known
- Name: [REDACTED] [REDACTED] Is: Otherwise Known
- Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known
- Name: [REDACTED] Is: Parent
- Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known

Arrest

Arrest Date: 03/04/2026 Arrest Time: 17:00 Arrest Type: Summoned/Cited (Not Taken Into Custody)
Does this Arrest Clear Multiple BPD Incidents: No Multiple Arrestee Segments Indicator: Count Arrestee
Location: [REDACTED] Arresting Officer / Employee Number: Hill, Andrew (B16877)

Arrestee Details

Juvenile Arrestee Disposition: Referred to Other Authorities Primary Offense For Arrest: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS
Armed With: Unarmed

Arrest Charges

Charge: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS Severity: Misdemeanor Disposition/Status: Cited
Date Issued: 03/04/2026

Involved Other - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Sex: [REDACTED] Race: Unknown

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Child

Victim - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Victim Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Victim Details

Victim Type: Individual Victim Was Injured: Yes Type of Injury: Minor Injury

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Hair Color: [REDACTED] Resident Status: [REDACTED]

School: [REDACTED] Occupation: student

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Parent

Involved Other - [REDACTED] [REDACTED] **Author:** Frasier, Gabriele

Involvement

Role: Involved Other **Offense:** 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known **Last Name:** [REDACTED] **First Name:** [REDACTED] **DOB:** [REDACTED]

Identifying Documents

ID Type: Driver's License

ID Number: [REDACTED]

Description

Age: [REDACTED] **Race:** [REDACTED] **Ethnicity:** [REDACTED] **Height:** [REDACTED] **Weight:** [REDACTED] **Eye Color:** [REDACTED]

Hair Color: [REDACTED]

Contact

Address Type: Home **Location:** [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile **Phone Number:** [REDACTED]

Relationships

Name: [REDACTED] [REDACTED] **Is:** Child

Witness - [REDACTED] [REDACTED] **Author:** Frasier, Gabriele

Involvement

Role: Witness **Offense:** 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known **Last Name:** [REDACTED] **First Name:** [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Sex: [REDACTED] **School:** [REDACTED] **Employer:** [REDACTED] **Occupation:** [REDACTED]

Contact

Address Type: Work Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile Phone Number: [REDACTED]

Involved Other - [REDACTED] [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Sex: [REDACTED] Race: [REDACTED] Height: [REDACTED] Eye Color: [REDACTED] Hair Color: [REDACTED] Employer: [REDACTED] [REDACTED] [REDACTED]

Occupation: [REDACTED]

Contact

Address Type: Work Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Work Phone Number: [REDACTED]

Involved Other - [REDACTED] [REDACTED] [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Alias: [REDACTED] [REDACTED] [REDACTED]

Identifying Documents

ID Type: Social Security Card

Social Security Number: [REDACTED]

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Height: [REDACTED] Weight: [REDACTED] Eye Color: [REDACTED]
Hair Color: [REDACTED] Resident Status: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Address Type: Work Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile Phone Number: [REDACTED]

Phone Number Type: Home Phone Number: [REDACTED]

Phone Number Type: Work Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Otherwise Known

Witness - [REDACTED] **Author:** Frasier, Gabriele

Involvement

Role: Witness Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Eye Color: [REDACTED]
Hair Color: [REDACTED]

Contact

Address Type: [REDACTED] Location: [REDACTED]

Unhoused: [REDACTED]

Contact

Phone Number Type: [REDACTED] Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Parent

Involved Other - [REDACTED] [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Sex: [REDACTED] Race: Unknown

Contact

Address Type: Home

Unhoused: No

Contact

Phone Number Type: Mobile Phone Number: [REDACTED]

Relationships

Name: [REDACTED] [REDACTED] Is: Child

Witness - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Witness Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile Phone Number: [REDACTED]

Relationships

Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Parent

Involved Other - [REDACTED] [REDACTED] [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Issuing State: [REDACTED] ID Number: [REDACTED]

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Height Type: [REDACTED] Height: [REDACTED]

Weight Type: [REDACTED] Weight: [REDACTED] Eye Color: [REDACTED] Hair Color: [REDACTED] Resident Status: [REDACTED]

Primary Language: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Address Type: Home

Unhoused: No

Contact

Phone Number Notes: [REDACTED]

Phone Number Type: Home Phone Number: [REDACTED]

Phone Number Type: Mobile

E-Mail: [REDACTED]

Relationships

Name: [REDACTED] [REDACTED] [REDACTED] Is: Child

Witness - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Witness Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home Phone Number: [REDACTED]

Relationships

Name: [REDACTED] [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Parent

Name: [REDACTED] [REDACTED] [REDACTED] Is: Otherwise Known

Involved Other - [REDACTED] [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Sex: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Child

Witness - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Witness Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] Middle Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home Phone Number: [REDACTED]

Relationships

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Otherwise Known

Name: [REDACTED] Is: Parent

Involved Other - [REDACTED] Author: Frasier, Gabriele

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED]

Identifying Documents

ID Type: Driver's License

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Home

Relationships

Name: [REDACTED] Is: Child

Involved Other - [REDACTED] [REDACTED] Author: Hill, Andrew

Involvement

Role: Involved Other Offense: 18-3-204 - ASSAULT-THIRD DEGREE - MIS - MIS

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Identifying Documents

ID Type: Driver's License

Description

Age: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Ethnicity: [REDACTED] Height: [REDACTED] Weight: [REDACTED] Eye Color: [REDACTED]

Hair Color: [REDACTED]

Contact

Address Type: Home Location: [REDACTED]

Unhoused: No

Contact

Phone Number Type: Mobile

Relationships

Name: [REDACTED] [REDACTED] [REDACTED] Is: Child

Vehicles

None reported.

Property

None reported.

Narrative by Frasier, Gabriele

On December 15th, 2025, at approximately 18:17 hours, I, Officer Gabriele Frasier, received a mandatory report regarding an incident that occurred earlier in the day at [REDACTED] School. The incident involved two students, identified as [REDACTED] and [REDACTED] (suspect), during a study hall class. The report was initiated by [REDACTED] with Boulder Valley School District, who provided the details of the incident.

At approximately 10:30 to 10:45 hours, during a study hall class, [REDACTED] and [REDACTED] were reportedly arguing over a Chromebook charging cord. Witnesses stated that [REDACTED] placed the cord around [REDACTED] neck and tied it loosely. The teacher, [REDACTED] was not present in the classroom at the time, as she had stepped out to speak with a student in the hallway. There were four other students who witnessed that the cord was tied around [REDACTED] neck, but there was no indication of tightness or restriction of breathing.

[REDACTED] was pulled back in his chair when [REDACTED] placed the cord around his neck. [REDACTED] reportedly made a comment, "You're coming to me," and pulled the cord, causing [REDACTED] to lose balance. Another student attempted to hold [REDACTED] chair to prevent him from falling, but [REDACTED] ultimately fell to the floor. As a result, [REDACTED] sustained minor injuries, including a rug burn on his right elbow and a small scratch on the back of his right hand. These injuries did not require medical attention.

After the fall, [REDACTED] reported that [REDACTED] stood over him and made a derogatory comment, calling him a "kike." [REDACTED] who is Jewish, stated that this comment was made as the class was ending and students were gathering their belongings to leave. However, none of the other four students interviewed reported hearing this comment.

When [REDACTED] returned to the classroom, she observed [REDACTED] on the floor and removed the cord from around his neck. She asked [REDACTED] if he was okay, and he responded that he was fine. Later, [REDACTED] approached school counselor [REDACTED] in the hallway and reported that [REDACTED] had "choked him out" during the class. [REDACTED] clarified that he was not unconscious at any point during the incident.

Four other students who were present during the incident were interviewed. All confirmed that [REDACTED] placed the cord around [REDACTED] neck and tied it, but none corroborated the use of the derogatory term. [REDACTED] has a history of disciplinary issues at the school, according to [REDACTED].

The parents of both students were informed of the incident. [REDACTED] father, who currently has custody of him, picked him up from school and expressed understanding of the seriousness of the situation. [REDACTED] parents were also informed by Principal [REDACTED]. [REDACTED] was suspended for the remainder of the week, and the school plans to reassign [REDACTED] to a different study hall class next semester to avoid further interactions between the two students.

[REDACTED] did not know the names of the other four students who witnessed this incident.

I provided [REDACTED] with my name and the case number.

Further follow-up may be required to determine if additional actions, including criminal charges, are necessary. This case is open and referred back to Officer Frasier.

This report is a synopsis of this investigation and is not meant to be a transcript or complete accounting of every detail or circumstance contained within any body-camera footage collected. Although I am the author of this report and have verified its content for accuracy, this report may have been completed with the assistance of an Artificial Intelligence which had access to body camera footage or other digital evidence. Furthermore, this report may include additional information regarding what the officer is actually seeing or perceiving during the event that may not be captured in the video footage. Similarly, if this report includes information regarding recorded interviews or actions by an officer(s), it should be treated as a summary of those interviews or actions, and not a transcript. Based on my interpretation of interviews, inferences of time, and an attempt to logically prepare this report, this report may not be in chronological order as reported by the victim(s), witness(es) and/or suspect(s). The written report is based on my reasonable determination of what is relevant at the time.

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Narrative by Frasier, Gabriele

On December 18th, 2025, at approximately 16:07 hours, I followed up on this case by talking to [REDACTED] father of [REDACTED]

[REDACTED] stated he and his wife had met with an attorney that morning regarding the incident. [REDACTED] sustained injuries during the assault. [REDACTED] indicated he had photographs of the injuries. I explained the difference between school disciplinary action and criminal liability, noting that [REDACTED] had been suspended for one week by the school. [REDACTED] requested time to consult with his wife before deciding whether to pursue criminal charges. I provided him with the non-emergency dispatch number, 303-441-3333, and the case number. [REDACTED] expressed frustration that the school had not communicated information about the case or provided a case number to the family.

[REDACTED] provided the following account: [REDACTED] reported that [REDACTED] caused him to fall from a chair that was balanced on two legs backwards with a cable around [REDACTED] neck. After [REDACTED] fell, [REDACTED] allegedly stood over him and called him a "kike." [REDACTED] stated there had been ongoing anti-Semitic behavior at the school for approximately two years, including an incident the previous year where students performed Hitler salutes toward [REDACTED]. [REDACTED] also reported that when the teacher, [REDACTED], entered the room and asked what happened, [REDACTED] allegedly said to [REDACTED] "all Jews are snitches" after [REDACTED] explained the incident to the teacher.

I explained that if criminal charges were pursued, [REDACTED] would receive a juvenile referral requiring him to appear in court. Potential outcomes could include restitution for monetary damages, a letter of apology, and community service. I noted that if bias motivation was established, it would serve as an enhancer for the assault charge.

At approximately 16:21 hours, I contacted [REDACTED] [REDACTED] by telephone. [REDACTED] stated four students witnessed the chair incident, but none reported hearing the "kike" comment. She agreed to provide the names of the four witnesses and contact information for teacher [REDACTED]. [REDACTED] indicated she would email the witness information around 19:00 or 20:00 hours. [REDACTED] stated she was unaware of the "all Jews are snitches" comment and had not been informed of any Hitler salute incident from the previous year.

At approximately 16:51 hours, I contacted [REDACTED] [REDACTED] [REDACTED] father, by telephone. [REDACTED] confirmed he was aware of the case and stated he had impressed upon [REDACTED] the seriousness of the situation. I informed [REDACTED] that an assault case was open and that I was reaching out to both families. [REDACTED] stated he was aware there was "some assertion" of a derogatory term being used but had not discussed that particular aspect with [REDACTED]. I informed [REDACTED] of the allegation that [REDACTED] said "all Jews are snitches" when the teacher entered the room. I explained that if bias was involved, it would serve as an enhancer this case.

At approximately 17:21 hours, [REDACTED] called back and stated he and his wife decided to pursue criminal charges. [REDACTED] indicated he planned to speak with [REDACTED] again that evening about the bias component, noting the term "kike" was unusual and uncommon. [REDACTED] confirmed he had consulted an attorney primarily regarding school matters and repeated bullying issues, and the attorney had encouraged filing a police report. [REDACTED] wanted me to mention that the school filed a mandatory report on this. I explained that the decision to pursue criminal charges was the parents' decision, not the school's, and that I would inform [REDACTED] accordingly.

At approximately 17:25 hours, I contacted [REDACTED] and informed him that [REDACTED] parents decided to pursue criminal charges. I explained the next steps would involve issuing a juvenile referral that would require signatures from both [REDACTED] and a parent. [REDACTED] and I agreed to schedule the referral process for the following Monday, avoiding the [REDACTED] holiday.

[REDACTED] [REDACTED] provided me with the phone number for the teacher, [REDACTED] [REDACTED] at 19:37 hours. I attempted to call her but was only able to leave her a voicemail with the request to call me back.

[REDACTED] [REDACTED] also advised that she wanted to provide me with the four witness students information.

I did not hear back from [REDACTED] [REDACTED] that day.

This case is open and referred back to Officer Frasier.

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Narrative by Frasier, Gabriele

On December 22nd, 2025, at approximately 14:41 hours, I, Officer Gabriele Frasier, contacted [REDACTED] [REDACTED] regarding an incident that occurred at [REDACTED] between [REDACTED] [REDACTED] and [REDACTED] [REDACTED]. [REDACTED] [REDACTED] is a teacher at the school and was identified as a potential witness to the events. The purpose of the call was to gather her account of the incident.

[REDACTED] [REDACTED] provided the following account: She is the teacher for the [REDACTED] class that includes [REDACTED] [REDACTED] and [REDACTED] [REDACTED], who is also referred to as [REDACTED] [REDACTED]. On the day of the incident, she stepped out of her classroom briefly into the hallway, where some students were working. When she returned to the classroom near the end of the period, she observed [REDACTED] [REDACTED] lying on the ground with his chair flipped over. She noted that a cord was wrapped around his neck and tied in a knot at the back. She immediately approached [REDACTED] [REDACTED] and asked if he was okay. She then untied the cord from his neck.

[REDACTED] stated that she asked [REDACTED] if someone had harmed him or caused the incident. [REDACTED] responded that he was fine and specifically stated, "[REDACTED] didn't do it." [REDACTED] emphasized that [REDACTED] did not identify anyone else as being involved. She also noted that [REDACTED] had been behaving unusually throughout the day, describing his behavior as "silly" and "disruptive." She explained that this behavior was not uncommon for him on certain days. Based on his response and demeanor, she did not report the incident to the principal at that time.

[REDACTED] further explained that later in the day, during her planning period, she was called into the office by the principal, assistant principal, and the school safety officer, [REDACTED] [REDACTED]. She was informed that other students had reported the incident and that [REDACTED] [REDACTED] had admitted to being involved. [REDACTED] stated that she was not present during the incident itself and could not provide additional details about what occurred before she entered the room.

When asked about the cord, [REDACTED] described it as either a Chromebook charging cord or a headphone cord, as she keeps a box of such cords in her classroom for student use. She could not confirm the exact type of cord but stated it was wrapped around [REDACTED] neck in a single loop with a knot at the back. She estimated that the cord was tight enough to prevent a fist from fitting between the cord and the neck but loose enough that a finger could fit through. She did not believe the cord was tight enough to cause choking.

[REDACTED] was unable to provide the names of specific students who may have witnessed the incident. She stated that there were approximately 20 students in the classroom at the time, with a few students in the hallway and some attending a band activity. She suggested that the principal or [REDACTED] [REDACTED] would have more information about which students were interviewed.

[REDACTED] concluded by reiterating that she was not present during the incident and could only speak to what she observed upon re-entering the classroom. She stated that she had no additional information to provide and referred further questions to the school administration.

On 12/22/2025, I also received an email from [REDACTED] [REDACTED]. She provided me with face sheets of four more students who allegedly witnessed what happened between [REDACTED] and [REDACTED] those students were:

- [REDACTED] [REDACTED] [REDACTED]
- [REDACTED] [REDACTED] [REDACTED]
- [REDACTED] [REDACTED] [REDACTED]
- [REDACTED] [REDACTED] [REDACTED]

There statement as witnesses, provided to the school, were not included.

This is a contributing report only, no change to case status.

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Narrative by Hill, Andrew

On 01/15/2026 I, Detective Hill, was assigned this case for review.

On 01/16/2026 I called the victim's father, [REDACTED] to advise I would be reviewing the case and conducting follow-up. I was unable to reach him so left a voicemail.

On 01/20/2026 I called [REDACTED] again and was able to reach him. We set an appointment for me to interview his son at their home on 01/29/2026 at 1600 hours.

No change in case status.

Narrative by Hill, Andrew

On January 29th, 2026, at approximately 15:59 hours, I, Detective Hill, conducted an interview with [REDACTED] regarding the assault that took place at his school. The interview took place at [REDACTED] home, [REDACTED] with his mother and father present.

[REDACTED] stated that the assault occurred around 1000 hours on a day he does not recollect. He was seated at a table in his classroom, playing a game called "Drive Mad" on a computer with his friends [REDACTED] and [REDACTED]. [REDACTED] was seated on the far left, with [REDACTED] in the middle and [REDACTED] on the right. [REDACTED] (DOB [REDACTED]) approached [REDACTED] and stated, "I need to talk to you about something really important." [REDACTED] then moved behind [REDACTED] chair. [REDACTED] reported that he felt something around his neck and turned to see [REDACTED] attempting to tie a charging cord around his neck. [REDACTED] stated that he tried to remove the cord, but [REDACTED] pulled it backward, causing [REDACTED] to fall out of his chair and hit the ground. [REDACTED] reported feeling pain in his elbow and described it as similar to a rug burn, rating the pain as a six on a scale of one to ten.

Prior to [REDACTED] approaching [REDACTED] [REDACTED] told me he observed [REDACTED] speaking with another classmate named [REDACTED]. [REDACTED] was not sure what the conversation between those two entailed.

[REDACTED] stated that his teacher, [REDACTED] was out of the room at the time of the incident, as she was checking on students working in the hallway. When [REDACTED] returned, she saw [REDACTED] on the ground with the charging cord around his neck. She immediately unwrapped the cord and asked what had happened. [REDACTED] informed her of what occurred. [REDACTED] then reported the incident to school leadership. [REDACTED] also reported that [REDACTED] said something under his breath before leaving the classroom. [REDACTED] stated that [REDACTED] said, "Stupid kike, all Jews are snitches." [REDACTED] described this statement as hurtful and upsetting. He noted that [REDACTED] said it quietly, and the classroom was noisy at the time and he did not believe anyone else heard the statement.

[REDACTED] was later called out of his next class by a hall pass delivered by a student aide. He met with a counselor, who asked him to recount the incident. [REDACTED] did so and then he returned to class but was called out again approximately 15-20 minutes later to speak with a school safety advocate who also asked him to explain what had happened.

[REDACTED] reported that the school implemented a no-contact order between him and [REDACTED] which prohibited them from being within 20 feet of each other. [REDACTED] was also moved out of the only class he shared with [REDACTED]. However, [REDACTED] stated that [REDACTED] violated the no-contact order on the first day it was issued by speaking to [REDACTED] friends and spreading false information about him. [REDACTED] reported this violation as instructed and [REDACTED] was suspended for a few days after that.

[REDACTED] described his relationship with [REDACTED] as neutral prior to the incident. He stated that they were acquaintances in sixth and seventh grade and had no significant positive or negative interactions. [REDACTED] also stated that he is good friends with [REDACTED] and [REDACTED] who were seated at the table during the incident, and is friendly with [REDACTED]. [REDACTED] noted that he does not interact much with [REDACTED] or his friend group.

[REDACTED] stated that after the incident, a counselor observed redness on the side of his neck. He also mentioned that he has a photo of his injuries, which his father, [REDACTED] uploaded to evidence.com.

[REDACTED] parents expressed concerns about retaliation and safety at school. They reported that other students have approached [REDACTED] asking what he did to cause [REDACTED] to be suspended. [REDACTED] stated that he has not experienced any direct intimidation or retaliation from [REDACTED] since the incident.

[REDACTED] parents also mentioned that antisemitic behavior has been an ongoing issue at the school, involving multiple students over the past year. They referenced a prior incident involving antisemitic remarks during a football game, which was reported to the school but not adequately addressed.

I informed [REDACTED] and his parents that the investigation is ongoing and that I will be conducting interviews with other involved parties, including [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. I explained that, at minimum, [REDACTED] will receive a juvenile summons for third-degree assault based on the evidence provided. I also noted that additional charges, such as a bias-motivated crime enhancer, may be considered if corroborating evidence of the antisemitic remarks is obtained.

I then concluded the interview and provided [REDACTED] and his parents with my contact information and advised them to reach out with any further questions or concerns.

On 01/30/2026 at approximately 1714 hours, I interviewed [REDACTED] [REDACTED] (DOB [REDACTED]) via phone call with permission from his family. [REDACTED] informed me of the following.

While in [REDACTED] Class [REDACTED] was sitting with [REDACTED] at a table doing homework. [REDACTED] referred to [REDACTED] as [REDACTED] throughout the interview. [REDACTED] said he thought [REDACTED] and [REDACTED] were arguing a bit with each other but it appeared it was in a playful manner. [REDACTED] did not remember the nature of the conversation or what they were saying back and forth to each other. Soon after they exchanged words, [REDACTED] approached [REDACTED] and placed a computer charger around [REDACTED] neck and pulled him to the ground. [REDACTED] said [REDACTED] was flustered and had what appeared to be a carpet burn on his elbow.

[REDACTED] told me he did not believe [REDACTED] or [REDACTED] were friends and described their relationship to be that of classmates. [REDACTED] also told me he was not good friends with [REDACTED] or [REDACTED]

[REDACTED] did not remember any portion of the conversation between [REDACTED] and [REDACTED]

No change in case status at this time.

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Narrative by Hill, Andrew

On 01/30/2026 at approximately 1714 hours, I, Detective Hill, contacted a witness, [REDACTED] regarding an incident that occurred in December 2025 involving [REDACTED] [REDACTED] and [REDACTED]

The incident reportedly took place in a classroom at [REDACTED] while the teacher, [REDACTED] [REDACTED] was out of the room.

[REDACTED] [REDACTED] provided the following account: [REDACTED] could not recall the exact date or time but estimated it happened between the start and middle of the class period. [REDACTED] stated that [REDACTED] was seated at his table, and [REDACTED] [REDACTED] used a computer charger to wrap it around [REDACTED] neck and pull him off his chair. [REDACTED] did not recall how the interaction began but mentioned that [REDACTED] and [REDACTED] were either arguing or playing around before the incident. [REDACTED] described their initial interaction as "kind of friendly, just taken too far."

[REDACTED] stated that after [REDACTED] was pulled down, he appeared flustered and may have had a carpet burn on his elbow. [REDACTED] did not observe any further physical altercation between the two. [REDACTED] stated that [REDACTED] returned to his seat, and his teacher entered the room shortly after the incident. [REDACTED] did not hear [REDACTED] say anything during or after the incident and did not recall any antisemitic or other inappropriate remarks being made by [REDACTED] toward [REDACTED]

When asked about the relationship between [REDACTED] [REDACTED] and [REDACTED] [REDACTED] stated that they were not friends and were only classmates. [REDACTED] did not recall the nature or contents of the conversation between [REDACTED] and [REDACTED] before the incident and could not provide further details about what led up to the altercation. [REDACTED] confirmed that the individuals involved were [REDACTED] [REDACTED] and [REDACTED]

At the conclusion of the interview, [REDACTED] stated that they did not have any additional information to provide. [REDACTED] parent, who was present during the call, confirmed that they did not have any questions. The call ended at approximately 1724 hours.

No change in case status.

This report is a synopsis of this investigation and is not meant to be a transcript or complete accounting of every detail or circumstance contained within any body-camera footage collected. Although I am the author of this report and have verified its content for accuracy, this report may have been completed with the assistance of an Artificial Intelligence which had access to body camera footage or other digital evidence. Furthermore, this report may include additional information regarding what the officer is actually seeing or perceiving during the event that may not be captured in the video footage. Similarly, if this report includes information regarding recorded interviews or actions by an officer(s), it should be treated as a summary of those interviews or actions, and not a transcript. Based on my interpretation of interviews, inferences of time, and an attempt to logically prepare this report, this report may not be in chronological order as reported by the victim(s), witness(es) and/or suspect(s). The written report is based on my reasonable determination of what is relevant at the time.

Please remember, video and other technologies only give a reviewer a small snapshot of events. It does not capture the entire scene or show the officer(s) thought process or show an officer's investigative efforts. This technology shouldn't replace an officer's testimony.

Narrative by Hill, Andrew

On 02/17/2026 at approximately 1359 hours, I (Detective Hill) conducted a phone interview with witness [REDACTED] (DOB [REDACTED]) regarding an incident that occurred in December 2025 involving classmates [REDACTED] and [REDACTED] at [REDACTED] School.

[REDACTED] provided the following account: The incident occurred during third period study hall. [REDACTED] was seated at a table with friends [REDACTED] and [REDACTED] with [REDACTED] positioned at the end of the table. [REDACTED] was seated on the other side of the room. [REDACTED] had been goofing around throughout the class period and was not doing his assigned work. [REDACTED] walked around the classroom and approached [REDACTED] where he began calling [REDACTED] names and annoying him. [REDACTED] stated [REDACTED] was "just generally mean" and told [REDACTED] things like "you're so annoying." [REDACTED] explained that [REDACTED] had been acting as a class clown and making jokes, and when [REDACTED] tried to join in, [REDACTED] told him he was not the same and that nobody found him funny.

[REDACTED] described how [REDACTED] took a Chromebook charger and fashioned a lasso out of it. [REDACTED] threw the lasso around [REDACTED] neck. At first, [REDACTED] appeared to be playing along with what seemed like a joke, kicking himself backward in his chair while [REDACTED] reeled him in using the charger cord. However, at some point [REDACTED] stopped moving himself with his legs and stopped going along with the interaction. [REDACTED] continued pulling on the charger.

[REDACTED] stood up from his seat and went over to hold [REDACTED] up to prevent him from falling. [REDACTED] continued pulling on the charger cord while [REDACTED] tried to hold [REDACTED] upright. [REDACTED] remained seated and did not intervene during the incident. [REDACTED] pulled [REDACTED] backward, causing him to tip over in his chair and fall to the floor despite [REDACTED] efforts to hold him up.

[REDACTED] the teacher, entered the classroom and observed the situation. [REDACTED] recalled [REDACTED] saying "Whoa, whoa, whoa, what's going on?" at which point [REDACTED] had tipped back in his chair and [REDACTED] was standing nearby. [REDACTED] stated he stepped aside when [REDACTED] arrived because he did not want to be involved or get in trouble, noting that [REDACTED] did not seem too upset at that point. [REDACTED] observed a light scuff mark on what he believed was [REDACTED] right elbow area, which appeared to have occurred when [REDACTED] tipped over in his chair.

When asked about antisemitic remarks, [REDACTED] stated he did not hear [REDACTED] make any antisemitic comments toward [REDACTED]. [REDACTED] clarified he was still seated at his table when [REDACTED] first approached [REDACTED] and did not hear everything that was said between them. [REDACTED] described [REDACTED] as "definitely the antagonist the whole time" and stated [REDACTED] and [REDACTED] were "definitely not" friends. [REDACTED] confirmed that [REDACTED] nickname at school is [REDACTED].

[REDACTED] stated that [REDACTED] reported the incident to administration. [REDACTED] was subsequently called to the office where he provided a witness report. Following the incident, [REDACTED] and [REDACTED] were separated.

I ended the conversation with [REDACTED]

On 02/19/2026 at approximately 1210 hours, I called [REDACTED] [REDACTED] [REDACTED] father, to schedule an interview with [REDACTED] I left a voicemail.

No change in case status.

This report is a synopsis of this investigation and is not meant to be a transcript or complete accounting of every detail or circumstance contained within any body-camera footage collected. Although I am the author of this report and have verified its content for accuracy, this report may have been completed with the assistance of an Artificial Intelligence which had access to body camera footage or other digital evidence. Furthermore, this report may include additional information regarding what the officer is actually seeing or perceiving during the event that may not be captured in the video footage. Similarly, if this report includes information regarding recorded interviews or actions by an officer(s), it should be treated as a summary of those interviews or actions, and not a transcript. Based on my interpretation of interviews, inferences of time, and an attempt to logically prepare this report, this report may not be in chronological order as reported by the victim(s), witness(es) and/or suspect(s). The written report is based on my reasonable determination of what is relevant at the time.

Please remember, video and other technologies only give a reviewer a small snapshot of events. It does not capture the entire scene or show the officer(s) thought process or show an officer's investigative efforts. This technology shouldn't replace an officer's testimony.

Narrative by Hill, Andrew

On 02/19/2026 I received a return phone call from [REDACTED] [REDACTED] at approximately 1326 hours. [REDACTED] is [REDACTED] father.

I advised [REDACTED] I was investigating this case and would like to speak with [REDACTED] to hear his side. I told [REDACTED] at this time I had probable cause to charge [REDACTED] with third degree assault. [REDACTED] told me he wished to consult with counsel prior to consenting to an interview with [REDACTED] I told him I would follow-up in a few days to see what he wished to do. [REDACTED] asked if there was a bias motivated enhancer that would be charged. I told him I did not have probable cause to charge that as an enhancer at the moment.

I will follow-up with [REDACTED] on my next working day to see if they wish to have [REDACTED] speak with me.

No change in case status.

Narrative by Hill, Andrew

On 02/24/2026, I (Det. Hill) spoke with [REDACTED] [REDACTED] father of [REDACTED] [REDACTED] about this case. [REDACTED] advised [REDACTED] would not be consenting to an interview in reference to this case. I told [REDACTED] I had probable cause to issue a summons to [REDACTED] for third degree assault. [REDACTED] requested we meet on 03/03/2026 at approximately 1600 hours at his home for the summons. I agreed and will follow-up with them at that time.

No change in case status.

Narrative by Hill, Andrew

On 03/04/2026 at approximately 1600 hours, I (Det. Hill) met with [REDACTED] [REDACTED] at [REDACTED], Colorado and served him a Juvenile Court Referral. This was in the presence of his father, [REDACTED] [REDACTED] and his mother, [REDACTED] [REDACTED] (DOB [REDACTED]).

[REDACTED] parents declined an interview request with [REDACTED] [REDACTED] signed the Juvenile Court Referral.

The case status is cleared with a summons for 18-3-204 Assault-Third Degree.

EXHIBIT 2

Bullying Investigation
Re: 12/15/2025 incident

Student #1 [REDACTED]

Student #2

Investigation summary:

12/15/2025 Student 1 reported to [REDACTED] that a charging cord had been placed around his neck during his third period transition class. [REDACTED] asked Student #1 to report to the Counseling office. Student #1 said he did not want to report initially so [REDACTED] sent for him to come down. When speaking with [REDACTED] and [REDACTED] student #1 stated that he and Student #2 were arguing over who needed a charging cord more (based on how much charge their devices had). Student #1 was tipping back on his chair and Student #2 had put a charging cord around his neck and pulled him out of his chair. Student #1 stated to [REDACTED] that he wasn't going to do anything about it but that Student #2 had called him a "kike."

[REDACTED] [REDACTED] reported that she had repeatedly asked Student #1 to stay in his seat and that she had been in the hallway helping other students and entered the room and saw Student #1 on the ground. She untied the cord and checked that Student #1 was okay. [REDACTED] reported that it was not unusual to find Student #1 on the ground because she routinely redirects him to stay in his seat and to focus on his work.

Three witnesses were interviewed: [REDACTED] [REDACTED] confirmed that Student #2 had put a cord around Student #1 neck. [REDACTED] was holding the chair while Student #1 tipped back and let go as it was near the ground. [REDACTED] saw Student #1 on the ground. None of the witnesses heard Student #2 call Student #1 a "kike" or use derogatory statements.

[REDACTED] interviewed Student #2. He confirmed that he had put a charging cord around Student #1 neck but denied that he called him a "kike" or used any other slurs. He stated that this was a "bad decision."

Summary of investigative findings:

Applicable policy: Board Policy JDHB Bullying establishes the School District's commitment to a school climate conducive to teaching and learning that is free from any type of bullying behavior. The Policy defines bullying as "any written text or

image, or verbal expression, or physical or electronic act or gesture, or a pattern thereof, that is intended to coerce, intimidate, or cause any physical, mental, or emotional harm to any student.”

Board Policy JDC Student Conduct establishes the School District’s commitment to the expectation that students conduct themselves in a manner compatible with the school’s function as an educational facility. Conduct by students or others that disrupts or threatens to disrupt the operation of a school; interferes in any manner with the public or private rights of other students or members of the community; threatens or endangers the health or safety of any person will be addressed.

Board Policy KE provides for additional District review if parents/guardians/students are not satisfied with the outcome of this investigation.

Determination of whether the investigation substantiated that bullying occurred:

Based on the information gathered, the school has determined that policy JDHB was violated by Student #2 as it was confirmed that he placed a charging cord around Student #1 neck as the incident caused him emotional harm and created an unsafe environment. These findings are documented in Infinite Campus.

EXHIBIT 3

Bullying Investigation
Re: 4/14/2025 incident

Student #1 [REDACTED]

Student #2 [REDACTED]

Incident:

On 4/14/25 it was reported that Student #2 had used anti Semitic language directed toward Student #1 on the playground, cafeteria, and during class on multiple occasions. Witnesses reported that they had heard Student #2 say that Jews were "dirty," and "contaminated," was trying to get kids to play "Jew touch tag" during PE, and had made jokes about the holocaust during class periods.

Summary of investigative findings:

Applicable policy: Board Policy JDHB Bullying establishes the School District's commitment to a school climate conducive to teaching and learning that is free from any type of bullying behavior. The Policy defines bullying as "any written text or image, or verbal expression, or physical or electronic act or gesture, or a pattern thereof, that is intended to coerce, intimidate, or cause any physical, mental, or emotional harm to any student."

Board Policy JDC Student Conduct establishes the School District's commitment to the expectation that students conduct themselves in a manner compatible with the school's function as an educational facility. Conduct by students or others that disrupts or threatens to disrupt the operation of a school; interferes in any manner with the public or private rights of other students or members of the community; threatens or endangers the health or safety of any person will be addressed.

Board Policy AC Non Discrimination and Equal Opportunity applies as the conduct of Student #2 was directed toward a protected class.

Board Policy KE provides for additional District review if parents/guardians/students are not satisfied with the outcome of this investigation.

Determination of whether the investigation substantiated that bullying occurred:

Based on the information gathered, the school has determined that policy JDHB was violated by Student #1 as it was confirmed that he had made anti Semitic statements which created emotional harm and an unsafe environment for Jewish

students. These findings were recorded in IC with a finding that bullying allegations were founded.

EXHIBIT 4



6500 Arapahoe, P.O. Box 9011
Boulder, CO 80303

To: [REDACTED]
Subject: KE-R Formal Complaint
Conducted by: Katie Romero, Investigator
Date of Report: June 9, 2026

The following outcome report fairly summarizes the relevant evidence obtained in an investigation of a formal complaint into violations of School District policy or expectations, specific to Southern Hills Middle School and the Boulder Valley School District.

Through the course of the investigation I interviewed the Principal of Southern Hills Middle School. In addition I reviewed the following:

- Original KE-R Complaint
- Written statement (timeline of events) from the Southern Hills Principal in response to the Complaint
- Documentation of supports and interventions
- Emails to and from Complainant and Principal
- School records through Infinite Campus and Frontline
- District Policy [JDHB](#)
- District Policy [JDSE](#)
- District Discipline Framework
- C.R.S. 22-33-106

Relevant Policies

This investigation report attempts to address these allegations in detail pursuant to District Policy [KE-R](#), District Policy KE and its corresponding regulation, Policy KE-R, govern nondiscriminatory complaints.

Summary of Allegations

The Complainant alleges that Southern Hills Middle School and the District failed to uphold established policies and expectations. Specifically, the Complainant contends that there were consistent failures to enforce protective measures for [REDACTED] regarding the persistent bullying he experienced over the preceding two-year period.

Investigative Findings

Contextual Information:

On April 14, 2025, the Complainant's [REDACTED] was on the receiving end of anti-semitic comments from a classmate including; "jews are dirty", "contaminated". In addition, the student attempted to organize "jew tag" in PE class.

Findings:

Based on my investigation, the school followed District policy [JDHB](#) and followed the District investigation protocol. There was an investigation and bullying/harassment based on religion was determined to be founded. The offending student was appropriately disciplined, a no contact was put in place, and the student received a restorative intervention including anti-semitic education. However, admittedly, the Principal had not written and shared an outcome report with the Complainant and did not implement a support plan for [REDACTED]. An investigation outcome report was given to the Complainant in January of 2026 upon the Complainant's request.

Contextual Information:

In October and November 2025, there were several emails between the Principal and the Complainant. Starting on October 2, 2025, the Principal emailed the Complainant about some concerns with [REDACTED] emotional well being and peer issues. On November 13, 2026, the Complainant sent an email reporting [REDACTED] [REDACTED] [REDACTED] physical contact by way of "body checking".

Findings:

Based on my investigation, the school followed District expectations and protocol to investigate and sort out the convoluted peer issues surrounding the Complainant's initial report. Initially, [REDACTED] was reluctant to give names, but eventually the Complainant was able to provide names to the Principal. In addition, the Complainant asked that while investigating, the Principal not use [REDACTED] name. The outcome of the investigation concluded bullying/harassment was unfounded and it was determined to be peer conflict. However, one student was found to have physical contact with [REDACTED] as evident from video footage and was appropriately disciplined. A schedule change was discussed, requested, and implemented, however, a support plan was not put in place with supportive measures in addition to the schedule change.

Contextual Information:

On December 15, 2025, [REDACTED] was physically assaulted by a classmate during class. The offending student put a computer charging cord around his neck and pulled him out of his chair. [REDACTED] reported it to the Counselor.

Findings:

Based on my investigation, the school followed District policy [JDHB](#) and expectations. An investigation was conducted followed by an outcome report. Bullying and harassment was founded and the offending student was appropriately disciplined according to District expectations and policy and in compliance with the law (C.R.S. 22-33-106). In addition a support plan was developed collaboratively with the Complainant as well as a no contact agreement issued. The Complainant made three requests in addition to the support plan; one of which was that [REDACTED] have line of sight

supervision. Although that request was denied, an alternative measure was offered which the Complainant rejected. The requested schedule change and PE exception were granted.

It's important to note that the day after the no contact agreement was put in place, the offending student violated the agreement. The school took immediate action and appropriate discipline was issued, however, there is no evidence of additional supports or interventions to prevent the student from violating the no contact in the future.

Contextual Information:

On March 24, 2026, ■ reported to the Counselor that he had been shoved and kicked in the hallway. The Counselor immediately took ■ to the Assistant Principal who proceeded to investigate the incident. The video footage showed ■ walking out of class, stopping, and then push/poke the other student. The other student pushed ■ and as ■ walked away, slapped him in the back of the head. Through the investigation, the Assistant Principal discovered that there was an interaction between the two during class. The teacher had to intervene and tell ■ to stop bothering and making fun of the other student.

Findings:

Based on my investigation, the school followed District policy [JDHB](#) and expectations. An investigation was conducted followed by an outcome report with a determination that bullying/harassment was unfounded. The investigation concluded the incident was a peer conflict, as both students engaged and had inappropriate contact with one another. Per the District Discipline Framework, both students could have been given Level 3 consequences. However, the Assistant Principal chose to conference with both students and issue a no contact agreement. This is appropriate considering this investigator did not find any subsequent pattern of behavior between these two students like the Complainant claimed.

Contextual Information:

On April 14, 2026, ■ reported that a student called him a homophobic slur and spit in his face. This was unsolicited as ■ was playing basketball, minding his own business. The Principal proceeded to conduct an investigation.

Findings:

Based on my investigation, the school followed District policy [JDHB](#) and expectations. An investigation took place and included interviews with each student as well as checking video footage of the incident. The video footage showed the offending student with two other students, walk by ■ on the basketball court, stop, and say something, then spit on the ground before walking away. The investigation outcome report determined that bullying/harassment was founded and the offending student was issued appropriate discipline and a no contact agreement.

Conclusion

Based on my investigation I conclude that the school followed District Policy and expectation in the handling of incidents that took place with the Complainant's ■. However, there is a question as to why there weren't more restorative practices and interventions implemented. The District has a Restorative Practices Coordinator and there are many types of restorative practices resources for

schools to utilize. For the past two years, the Complainant communicated the peer conflicts and bullying and harassment ■ was enduring as well as the emotional toll it was taking on ■. In each incident, there could have been an attempt to repair harm through restorative justice in addition to disciplinary measures and appropriate supportive measures.

Recommendation

Based on my investigation I recommend the school utilize the District Restorative Practices Coordinator and resources when there is ongoing conflict between students. This includes a proactive approach to prevent an escalation of behavior as well as when there are serious incidents that have been investigated and founded. There are many ways to implement restorative practice in the form of restorative conversations, student mediations, and restorative circles for groups of students or classrooms.

Furthermore, I recommend the staff receive training presented by the District Restorative Practices Coordinator and be given the resources necessary to intervene with students as a means to address behaviors prior to them escalating into more serious incidents. School wide training with the Bullying Prevention Coordinator and Director of Equity should also be considered not only for staff, but for students as well in order to create a more inclusive culture and community, with shared norms and expectations with how students interact with one another.

Respectfully,

A handwritten signature in black ink that reads "Katie Romero". The signature is written in a cursive, flowing style.

Katie Romero
Complaints Investigator