ReedSmith

ADL

October 16, 2026

VIA EMAIL

Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1100
Email: OCR@ed.gov

Office for Civil Rights, Denver Office
U.S. Department of Education
1244 Speer Blvd., Suite 310
Denver, CO 80204-3582
Email: OCR.Denver@ed.gov

Re: Title VI Civil Rights Violations at Paradise Valley Unified School District, Scottsdale, AZ

I. INTRODUCTION

The Anti-Defamation League ("ADL") and Reed Smith LLP ("Reed Smith") submit this Complaint to the U.S. Department of Education, Office for Civil Rights ("OCR") on behalf of a Jewish student ("Student A") and her family concerning antisemitic harassment occurring at the Desert Shadows Middle School ("Desert Shadows" or the "School"), a public school operated by the Paradise Valley Unified School District ("PVUSD" or the "District") in Scottsdale, Arizona.[1] PVUSD receives federal financial assistance and is subject to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.* ("Title VI").

Between approximately April 20 and May 21, 2026, Student A, a fourteen-year-old Jewish student who visibly identifies as Jewish by wearing a Magen David (Star of David) necklace, was subjected to a relentless and escalating campaign of antisemitic harassment by multiple students at Desert Shadows. The harassment Student A endured is grotesque and shocks the conscience.

Student A was called a "dirty filthy Jew" and an "ugly Jew."

A classmate threatened to "steal her pennies," invoking an antisemitic trope.

She was told that her parents should send her to a concentration camp to be "gassed."

She was subjected to a Heil Hitler salute accompanied by shouts of "Jew, Jew, Jew."

[1] To protect the privacy and safety of the student and her family, this Complaint refers to the student as "Student A" and her parents as "Student A's father" and "Student A's mother" (collectively, "Complainants"). Complainants' identities, names, and contact information are available to OCR personnel upon request, and Complainants remain ready to make themselves available for interviews and the potential mediation process.

She received a retaliatory threat of physical violence.

And ultimately, Student A was physically assaulted by a student who threw her into a cabinet, causing bruises and prompting evaluation for a concussion.

These incidents were not isolated. They were severe, persistent, and pervasive, and they occurred during school hours on school property. And this harassment involved at least five perpetrators. Critically, the facts of this case demonstrate that antisemitism, like other forms of hate, operates as a social contagion. It spreads when institutions fail to contain it. And every aspect of the District's response (its dismissiveness, its delay, its victim-blaming) created the conditions for that contagion to spread.

Despite repeated complaints from Student A's parents, the District's response was utterly inadequate. It was characterized throughout by dismissiveness, delay, and ineffective half-baked solutions to ostensibly protect Student A's safety and well-being. In reality, the District's response was de minimis and inconsistent. Upon information and belief, only two of the five perpetrators received suspensions and the student who performed a Heil Hitler salute was not suspended at all. The School cited his Individualized Education Program ("IEP"), as though a disability accommodation absolved the District from protecting a Jewish student from antisemitic harassment. The District invoked IEP protections across multiple perpetrators as a blanket justification for inaction, rather than implementing alternative protective measures. The student who directed a retaliatory physical threat to Student A received no known discipline at all. And the student who physically assaulted Student A on the last day of school was apparently saved by the bell. Because it was the last day, the School opted to do nothing. There was no discipline whatsoever, and upon information and belief, the School never filed an incident report.

When Student A's classroom teacher was told about the slurs, he dismissed them as not being his "problem." When Student A asked the School to call her parents after being told she should be "gassed," the School refused because staff were "too busy." Assistant Principal Bell attempted to minimize the Heil Hitler salute by suggesting the perpetrator "probably had a crush on" Student A. The School would later offer the same explanation for a physical assault by a different student. The assistant principal was observed rolling her eyes during communications with Student A's parents, muting the phone, and saying, "I don't know what to do with them." Principal Leah Knaeble excused one perpetrator, claiming he was "very religious" and "just defending himself." Each of these failures sent the same message to Student A and to the student body: targeting a Jewish classmate carries no real consequence. The District's "protective" measures placed the burden entirely on Student A. She was moved to a new classroom where one of her harassers was already assigned, given a personal escort that broadcast her victim status to the entire school while her harassers walked freely and ultimately confined to the principal's office while she fell behind in her classes. By the end of the school year, Student A had accumulated more than 45 missing assignments and her grades dropped significantly. This was the direct and foreseeable result of the District's decision to isolate the victim rather than the perpetrators.

Student A's experience is not an isolated case. In addition to Student A, other Jewish students at Desert Shadows have also been targeted: a swastika was placed in a Jewish student's backpack; proselytizing notes were left in Jewish students' backpacks; a Jewish student was attacked near the end of the school year. These incidents demonstrate that antisemitism at Desert Shadows was not confined to

a single incident or a single perpetrator. It has metastasized throughout the school community. The District's systemic failures—its minimization of each incident, and its treatment of Student A's family as a nuisance—created the environment in which it could spread.

ADL[2] and Reed Smith[3] respectfully request that OCR investigate the District for violations of Title VI and its implementing regulations based on the hostile environment created by pervasive antisemitic harassment targeting Jewish students on the basis of their shared Jewish ancestry and ethnicity. We further request that OCR pursue mediation pursuant to Section 201(a) of OCR's Case Processing Manual, to be followed by a full investigation if mediation is not successful.

II. EXECUTIVE SUMMARY

Between April 20 and May 21, 2026, Student A—a fourteen-year-old Jewish student at Desert Shadows Middle School—was subjected to a consistent campaign of antisemitic harassment culminating in a physical assault. At least five students participated, and the harassment escalated in severity over approximately one month.

Both the School and the District had actual notice and failed to act effectively. Student A's father sent multiple emails to School and District officials beginning on April 20, 2026. District Director of Student Services, Dr. Christopher Asmussen, attended a security meeting at the School on April 23, 2026. Despite this notice at the highest levels, the District delayed and dismissed the allegations, rather than take the situation seriously. The unfortunate result was that the harassment of Student A (and others) did not stop.

The impact on Student A was severe. The District's "protective" measures placed the burden entirely on her, culminating in her confinement to the principal's office for an extended period and the loss of access to the direct instruction [redacted]. By the end of the school year, she had accumulated more than 45 missing assignments and her grades dropped significantly. The resulting academic impact remains ongoing at her new school.

The harassment directed at Student A constitutes a hostile environment in violation of Title VI. The conduct was severe (Holocaust references, Nazi salutes, physical assault), persistent (at least five incidents over one month), and pervasive (multiple harassers from the same peer group, multiple locations on campus). The District had actual notice and failed to take prompt and effective steps reasonably calculated to end the harassment. Indeed, its response was unreasonable in light of the incidents, placed the burden of the harassment onto the student already being targeted, and failed to focus its response on those engaged in the antisemitic harassment in the first place. We respectfully

[2] ADL is a leading anti-hate organization committed to stopping the defamation of the Jewish people and securing justice and fair treatment to all. Since 1913, ADL has been at the forefront of the fight against antisemitism and all forms of hate.

[3] Reed Smith LLP is an international law firm with attorneys throughout the United States, Europe, Asia, and the Middle East.

request that OCR investigate and pursue mediation, followed by a full investigation if mediation is not successful.

III. STATEMENT OF FACTS

A. Student A and Her Family

Student A is a fourteen-year-old Jewish student who attended Desert Shadows Middle School, a public school operated by PVUSD in Scottsdale, Arizona, from August 2024 to May 2026. Student A does not hide her Jewish identity and typically wears a Magen David (Star of David) necklace. Student A's parents reside in Scottsdale, Arizona.

B. Antisemitic Incidents at Desert Shadows Middle School

The antisemitic incidents detailed below did not emerge in a vacuum. Their origins can be traced to Fall 2025, in Student A's seventh-period [redacted] where she, as the only Jewish student, found herself repeatedly challenged about her faith by classmates who would later direct antisemitic slurs at her. Students told Student A that she "didn't believe in God" because she was Jewish rather than Christian.

Upon information and belief, Desert Shadows draws from a predominantly Christian community, with many students attending a neighborhood church. It is not inherently problematic for students unfamiliar with Judaism to have questions about Jewish beliefs and practices. But that unfamiliarity places a responsibility on the School to treat the subject with care (particularly when, as here, the School was simultaneously conducting Holocaust education). In Student A's [redacted], these conversations—in which classmates challenged Student A's faith or told her she "didn't believe in God" because she was Jewish rather than Christian—occurred approximately twice a month. Christianity was treated as the default, and Student A, as the only Jewish student in the class, was regularly expected to explain and defend her faith.

1. Fall 2025: The Environment at Desert Shadows

In the class period immediately preceding [redacted], Student A's history class conducted a unit on the Holocaust. Teaching the Holocaust to middle schoolers, particularly in a predominantly Christian community, demands sensitivity, gravity, and vigilance. The subject matter—the systematic murder of six million Jews—is not merely historical; it remains a source of profound trauma for Jewish families and a flashpoint for contemporary antisemitism. Schools undertaking this education must navigate a complex reality as students who are not properly guided may minimize the genocide, treat it as ancient history, or seize upon Holocaust imagery as a weapon against their Jewish classmates. That is precisely what happened here.

During the Holocaust unit, students began minimizing the Holocaust, treating it as though it were a trivial matter. Student A attempted to explain the significance of the genocide to her classmates, stepping into a role that should have belonged to her teachers. She should not have had to do this. Instead, Student A's teacher sat idly by while her classmates pestered her about her religious background and ostracized her. The School took no action to correct or discipline the students who

showed such dismissiveness. This cavalier treatment of the Holocaust in the period directly before [redacted] should have raised alarm bells but instead was allowed to fester in an environment already plagued by antisemitism. Unchecked by the adults in the room, these loaded conversations emboldened the students who later would invoke gas chambers and perform Nazi salutes in school.

The School's failing to effectively address the singling out of a Jewish student set the stage for the acute antisemitic incidents that began on April 20, 2026. The same classroom, the same students, and the same permissive environment produced months of escalating antisemitic abuse directed at Student A. By failing to treat Holocaust education with the gravity it demands, and by allowing students to openly minimize the genocide without consequence, the School allowed an environment in which antisemitism could take root and escalate.

2. April 20, 2026: Antisemitic Slurs

On or about April 20, 2026, during Student A's [redacted] class [redacted], two students subjected her to virulent antisemitic abuse. A student identified as Perpetrator #1 called Student A a "dirty filthy Jew" and threatened to "steal [Student A's] pennies" because she was Jewish, invoking a well-known antisemitic trope.

Another student identified as Perpetrator #2 told Student A that her parents should send her to a concentration camp so that she could be "gassed," a direct reference to the Nazi genocide that murdered six million Jews during the Holocaust.

Student A immediately reported the slurs to her classroom teacher, [redacted]. Student A did exactly what students are taught to do: tell an adult. Rather than intervene to protect her or discipline the students, [redacted] told Student A that it was not his "problem," refusing to take any action despite having been directly informed of Holocaust-referencing abuse occurring in his own classroom. Every student in that room saw what happened next: nothing. The teacher knew, and the teacher did not care. If targeting the Jewish girl was not a problem, then it was open season.

A teacher in the adjacent classroom, whose room shared a connecting door with [redacted] classroom, intervened. She removed Student A and her belongings, confronted [redacted], arranged for a substitute for her own class, and escorted Student A to the principal's office. This teacher was visibly upset that [redacted] failed to act. *See* Ex. A (email dated Apr. 20, 2026 at 10:55pm).

At the principal's office, Student A filled out an incident report, again doing exactly what was asked of her. Assistant Principal Shawn Bell read the report but treated the matter without urgency. Student A, showing a composure that should not have been required of any young student in her situation, asked the School to call her parents. The School administrators inexplicably refused, responding that they were "too busy." The message was clear to Student A that, despite her reporting, the School did not treat this matter with the seriousness it demanded. She was left sitting alone in the office for approximately one hour. She told her father what happened when he picked her up that afternoon. Her parents wrote to the School that evening, demanding an immediate investigation and action based on the ongoing antisemitism and torment that Student A suffered at the hands of her classmates. *Id.*

Upon information and belief, Perpetrator #2 admitted to making the statements in question. Perpetrator #1 initially denied his involvement but, upon information and belief, subsequently sent text messages to friends stating that he believed he was in trouble "for saying things about Jews"—thereby confirming his participation. The School's reliance on a perpetrator's denial, even in the face of contemporaneous admissions to peers, reflects the pattern of crediting harassers over victims.

3. April 21, 2026: Heil Hitler Salute

The following day, on or about April 21, 2026, a student ("Perpetrator #3") performed a Heil Hitler salute[4] in the hallway between classes and shouted "Jew, Jew, Jew" at Student A. Upon information and belief, Perpetrator #1 directed Perpetrator #3 to perform this salute. *See* Ex. A (email dated Apr. 21, 2026 at 10:33pm). When Student A reported this incident, administrators responded with visible irritation: sighing, exchanging looks, and treating her complaint as an annoyance rather than an escalation of antisemitic abuse.

Perpetrator #3 was a friend of Perpetrator #1 and, upon information and belief, was aware of the April 20 incident and its aftermath when he continued the antisemitic harassment of Student A. This detail is critical: Perpetrator #3 did not act in isolation. He sought out Student A to ask about it, and then performed the Nazi salute as they passed in the hallway. Perpetrator #3 targeted Student A because she was Jewish, believing that such conduct was socially acceptable in his peer group. That harassment was compounded by the dismissiveness displayed by several School teachers and administrators, who appeared more bothered by Student A's complaints than by the harassing, antisemitic behavior of the perpetrators.

4. April 22, 2026: Retaliatory Threat of Physical Violence

On or about April 22, 2026, a student identified as Perpetrator #4, who was friends with Perpetrator #1, confronted Student A while passing her in the hallway on the way to lunch while she was entirely by herself. He told her that she had "messed up" and "should not have snitched," threatening her for reporting what had occurred. Upon information and belief, Perpetrator #1 had been suspended for approximately three days following the April 20 incident. *See* Ex. A (email dated Apr. 22, 2026 at 4:54pm).

He also told her she would "regret what she did for snitching" and would "have to watch out." As a result of this direct physical threat, Student A missed lunch, spent the rest of the day in the School's office, and missed her sixth-, seventh-, and eighth-period classes. Student A's father filed the first police report with the Phoenix Police Department following this incident.

5. May 13–14, 2026: Continued Antisemitic Harassment

On or about May 13, 2026, another student—a friend of Perpetrator #3—directed the chant "Jew! Jew! Jew!" at Student A in [redacted] class. This was the same conduct Perpetrator #3

[4] The Heil Hitler salute is among the most universally recognized symbols of antisemitic hatred and violence, evoking the Nazi regime's systematic extermination of the Jewish people. *See* Anti-Defamation League, *Hitler Salute (Hand Sign*), ADL Hate on Display, https://www.adl.org/resources/hate-symbol/hitler-salute-hand-sign.

had engaged in on or about April 21, 2026. By this point, Student A's father was writing to the School[5] to report what he described as "the FOURTH anti-Semitic incident" targeting his daughter:

[redacted] Sun, May 17, 2026 at 12:22 PM
To: shbell@pvschools.net, "Staff.Leah Knaeble" <lknaeble@pvschools.net>
Cc: [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net, Sarah Kader [redacted], Charlee McDermott <charlee.mcdermott@phoenix.gov>, lorenzo.melvin@phoenix.gov

Principal Knaeble, Principal Bell, and Paradise Valley Unified School District Administration,

We are writing to formally express our outrage and profound disappointment regarding the ongoing anti-Semitic harassment our daughter, [redacted] has endured at Desert Shadows Middle School and the administration's repeated failure to stop it.

This is now the FOURTH anti-Semitic incident involving our daughter, despite prior reports, meetings, and assurances from school leadership that the situation would be addressed appropriately.

Most recently, on Wednesday, May 13, 2026, during [redacted] a student named [redacted] — who is friends with [redacted] the student previously involved in the April 14, 2026 incident where [redacted] was subjected to a Hitler salute accompanied by chants of "Jew! Jew! Jew!" — again directed the phrase "Jew! Jew! Jew!" toward [redacted]

This behavior is not teasing. It is not immature joking. It is targeted anti-Semitic harassment, and it is creating a hostile educational environment for our daughter.

What is equally disturbing is the apparent inability or unwillingness of Desert Shadows Middle School administration to effectively intervene after repeated incidents. The fact that another student felt comfortable engaging in the exact same anti-Semitic conduct after the April incident demonstrates that the school's response has been wholly ineffective and has failed to send any meaningful message that this behavior will not be tolerated.

With classes ending on May 21, we are especially concerned that the administration may attempt to delay meaningful action until the school year concludes. That is unacceptable. The timing of the school calendar does not diminish the seriousness of repeated anti-Semitic harassment or the district's responsibility to address it fully and immediately.

During our April 16th meeting with school & district leadership, we were deeply troubled by what appeared to be a greater emphasis on programs designed to support the perpetrators rather than protecting the student being targeted. The discussion repeatedly focused on how several of the accused students were protected because of their special needs status, while far less attention was given to the ongoing impact these anti-Semitic incidents have had on [redacted]

Our daughter deserves to attend school without fear of harassment, intimidation, humiliation, or religious discrimination. Instead, [redacted] has repeatedly been singled out because she is Jewish, while the adults responsible for maintaining a safe educational environment have failed to stop it.

At this point, confidence in the school's and district's handling of these matters has been severely damaged. Repeated anti-Semitic incidents against the same student should never become normalized, minimized, or tolerated in any educational environment.

We are requesting a formal written response from both school and district leadership no later than May 19th, 2026, outlining the specific actions being taken to address these incidents and ensure this behavior stops immediately.

[redacted]

Ex. A (email dated May 17, 2026 at 12:22pm).

When the School purportedly investigated this incident, it concluded that "no other individuals in the classroom observed or heard the gesture or words, resulting in an absence of a preponderance of evidence required for formal consequences." Ex. A (email dated May 18, 2026 at 5:19pm). Once again, the School credited the perpetrator's denial over the victim's report.

The following day, on or about May 14, 2026, a student approached another student in Student A's class and asked whether that student liked Student A. A student identified as "Perpetrator #5," who had recently transferred to the School, responded by calling Student A "an ugly Jew." *See id.* Perpetrator #5 also told other students that he "would never like an ugly Jew." The statement became widely known throughout the School, and Perpetrator #5 admitted to Student A that he said it.

Student A told Perpetrator #5 directly that the statement was not acceptable and reported it to Assistant Principal Bell. Despite the clear antisemitic nature of the slur and the pattern of escalating harassment Student A had already endured, the School waited until the last day of school (approximately one week later) to address it. Even then, Principal Leah Knaeble excused the statement, saying Perpetrator #5 was "very religious," a "big Christian" who "would carry around gospel with him," and

[5] The screenshots reproduced in this Complaint are excerpted from a thread of email correspondence between Student A's parents and School and District officials, a true and correct copy of which, subject to redactions, is enclosed herewith as **Exhibit A**.

was "just defending himself" and "didn't know what else to say." Assistant Principal Bell said she had a "hard time believing he would do this because he's so religious." Assistant Principal Bell attempted to justify and excuse Perpetrator #5's antisemitism.

6. May 21, 2026: Physical Assault on the Last Day of School

On or about May 21, 2026, the last day of school, Perpetrator #5 was removed from seventh period and called to the principal's office. Student A's father sent follow-up correspondence pressing the School to address the "ugly Jew" statement from the previous week. Perpetrator #5 returned to eighth period visibly angry. During yearbook signing, Student A accidentally bumped into him. In response, Perpetrator #5 turned around, grabbed Student A by her chest and back, and shoved her across a desk into a cabinet, causing bruises on her hips and side and a possible concussion.

Moments after being physically attacked, Student A confronted Perpetrator #5 and told him that he could never put his hands on a girl like that. A teacher heard Student A's raised voice and took her, but not Perpetrator #5, to Principal Knaeble. Principal Knaeble's response was that the School "c[ouldn't] really do anything" because it was the last day of school, signaling to a student who was just assaulted that there would be no consequences for the offending student because of timing.

The nurse assessed Student A for a concussion; the assessment was negative, but Student A developed visible bruises on her hip. An aide walked her out, and the nurse called her parents. The following day, police came to the family's home, took Student A's statement, and photographed the bruises.

The School, however, did not file an incident report documenting this assault. Student A's father filed a second police report with the Phoenix Police Department on May 22, 2026.[6]

C. Broader Pattern of Antisemitism at Desert Shadows

Student A's experience at Desert Shadows was not isolated. During the same period, additional incidents of antisemitism occurred:

- A swastika was placed in the backpack of another Jewish student.
- Students left "Jesus loves you" notes in the backpacks of Jewish students.
- Perpetrator #2 posted antisemitic content online; upon information and belief, the School was aware of this content.

[6] While the Phoenix Police Department commenced an investigation into this assault, the investigation was not completed. Rather than fully investigating, identifying, and interviewing the male student who physically assaulted Student A, the police prematurely closed the file. Student A's family has been urging the Phoenix Police Department to reopen the case and complete its investigation. Complainants have obtained a copy of this police report and will make it available to OCR upon request.

- Upon information and belief, another Jewish student was attacked near the end of the school year.

- Student A's father is aware of additional Jewish families who experienced antisemitic incidents at Desert Shadows.[7]

Upon information and belief, Perpetrator #3 performed the Heil Hitler salute at another Jewish student near the end of the school year. That student reported the conduct. Complainants are not aware of any disciplinary measures taken as a result of this incident.

When Student A asked Assistant Principal Bell directly about this other supposed antisemitic incident—taking it upon herself to investigate what the School would not—the assistant principal refused to confirm it, citing privacy restrictions. This re-offense demonstrates that the District's failure to effectively discipline Perpetrator #3 after the original Heil Hitler salute emboldened him, causing him to target another Jewish student with identical antisemitic conduct. This illustrates the broader dynamic: when a school fails to intervene decisively and effectively, antisemitism spreads. It becomes normalized. Students learn, as they did here, that targeting their Jewish classmates carries no real consequence.

D. The District's Notice and Knowledge of Antisemitism and Its Inadequate Response

It is undeniable that the District had notice and knowledge of the antisemitic conduct directed at Student A and other students within the District since at least April 20, 2026. The District's response, however, was inadequate and ineffective. More than that, the District's response was affirmatively harmful. Every aspect of how the District handled these incidents—the delays, the minimization, the eye-rolling, the excuses, the victim-blaming, the refusal to discipline—communicated the same message to students: antisemitism is tolerated here. That message traveled through the peer network. Students saw that their classmates could invoke Holocaust rhetoric, perform Nazi salutes, and physically assault a Jewish girl without consequence.

Delayed Response to Initial Complaints. Student A's father sent emails to the School on April 20, April 21, and April 22, 2026. In his first email, sent at 10:55pm on April 20, 2026 (the same evening his daughter was told she should be sent to a concentration camp to be "gassed"), he demanded a formal investigation, disciplinary action, and a written prevention plan:

[7] Complainants are aware of other Jewish students at different schools within PVUSD who have also suffered antisemitic harassment based upon their Jewish identities.

[redacted] Mon, Apr 20, 2026 at 10:55 PM
To: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, Shawn Bell <shbell@pvschools.net>
Cc: [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

Dear Principal Knaeble, Principal Bell, and PV Administration,

We are writing to formally report a serious and unacceptable anti-Semitic incident involving our daughter, [redacted] that occurred today in her [redacted] class at Desert Shadows Middle School. This was not an isolated incident, and the teacher's response today was deeply concerning.

During class today, two boys directed explicitly anti-Semitic statements at [redacted]. A student named [redacted] told her that she "should be sent back to a concentration camp" and further stated that she "should go where they gassed the Jews." Another student, [redacted] told [redacted] that he was going to "steal her pennies" and called her a "greedy rich Jew." These are not ambiguous comments — they are overtly anti-Semitic and invoke historical violence against Jews.

This is also not the first occurrence. Just last week, again in [redacted] class, [redacted] told [redacted] that "Jews are like atheists" and that they "don't believe in God." [redacted] has now been targeted multiple times in the same class with anti-Semitic language.

Equally troubling was the response when [redacted] sought help. After today's incident, [redacted] went directly to [redacted] to report that two students were being anti-Semitic. He told her that if she felt it was "that big of an issue" she should go tell someone else. This response dismissed her concerns and failed to provide support at a moment when she was being targeted for her identity.

[redacted] then sought out [redacted] who comforted her. [redacted] when notified of the incident by [redacted] immediately went to address the situation directly with the boys involved. We appreciate that prompt action. Despite this, [redacted] did not feel safe returning to [redacted] and did not go back.

This situation is unacceptable. Our daughter was subjected to repeated anti-Semitic harassment, and when she appropriately reported it to her teacher, she was effectively turned away. No student should be told to "go tell someone else" after being told they belong in a concentration camp or gas chambers.

We are requesting the following immediate actions:

- A formal investigation into both incidents and the students involved
- A review of [redacted] response and the handling of [redacted] complaint
- Clear disciplinary action consistent with school policy
- Immediate steps to ensure [redacted] feels safe in [redacted]
- Education and intervention addressing anti-Semitism for the students involved
- A written summary of how the school plans to prevent this from happening again

We expect this matter to be treated with urgency. Comments referencing concentration camps and stereotypes about Jews are not teasing, joking, or typical middle school behavior — they are hateful, targeted, and harmful. This requires a serious and immediate response.

Please contact us as soon as possible. We would like to speak tomorrow and understand what actions are being taken.

[redacted]

Ex. A (email dated Apr. 20, 2026 at 10:55pm).

The School's response the next morning was perfunctory:

Shawn Bell <shbell@pvschools.net> Tue, Apr 21, 2026 at 7:26 AM
Reply-To: shbell@pvschools.net
To: [redacted]
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

I appreciate you bringing this to our attention. I am sorry that [redacted] was faced with this yesterday and previously. I will investigate. I will also follow up with you once I have information to share.

Shawn Bell
Desert Shadows Middle School
Assistant Principal

Ex. A (emails dated Apr. 21, 2026 at 7:26am and 10:51am).

On April 21, 2026, after the Heil Hitler salute, Student A's father wrote again, reporting that one of the perpetrators had not gotten the message, and even appeared to have gotten away with lying to the assistant principal:

[redacted] Tue, Apr 21, 2026 at 10:33 PM

To: shbell@pvschools.net
Cc: "Staff Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

Dear Principal Knaeble, Principal Bell, and PV Administration,

Unfortunately, based on events that occurred after today's meeting, at least one of the involved students—[redacted]—has not learned his lesson. He appears to have misled you into believing he did not make these comments to [redacted]. This afternoon in between classes, he instructed his friend [redacted] to approach [redacted] make a hand gesture, and repeatedly say the word "Jew." In addition, [redacted] other friends continued approaching [redacted] throughout the afternoon, calling her a "snitch." This is intimidation and continued harassment.

When I picked [redacted] up from school today, she was visibly upset and explained what had happened. We immediately came to the office to complete another incident report, but Ms. Bell had already left for the day and Mrs. Knaeble was in a meeting. She will file another report in the morning.

This behavior is escalating, not improving. While we understand the need for fact-finding, the continued harassment after administrative intervention raises serious concerns about the school's ability to control and stop anti-Semitic behavior at Desert Shadows Middle School. We are aware of multiple incidents over the last year, and despite prior intervention, the behavior is continuing.

[redacted] should not have to endure repeated harassment during the school day, nor should she be subjected to retaliation for reporting anti-semitism. Being called a "snitch" and targeted again within hours of administrative involvement is unacceptable and indicates that the current response has not been effective.

[redacted] and I are aware of our rights to involve law enforcement. We have also notified the Anti-Defamation League of this incident. If this behavior continues, we will pursue all available to ensure our daughter's safety and to hold those responsible accountable.

We expect immediate and concrete action tomorrow to:

- Ensure [redacted] is protected from further contact with these students
- Address the retaliatory harassment that occurred today
- Communicate consequences for continued behavior
- Provide a clear plan to prevent additional incidents

We expect a response tomorrow with the steps being taken to ensure [redacted] safety.

Respectfully,
[redacted]

Ex. A (email dated Apr. 21, 2026 at 10:33pm). On April 22, 2026, Student A's father, copying the Anti-Defamation League, informed the School that his daughter had been threatened by yet another student:

[redacted] Wed, Apr 22, 2026 at 4:54 PM

To: "Staff Leah Knaeble" <lknaeble@pvschools.net>, "shbell@pvschools.net" <shbell@pvschools.net>
Cc: [redacted] "Casmussen@pvschools.net" <Casmussen@pvschools.net>, "Gcolonna@pvschools.net" <Gcolonna@pvschools.net>, "Psweeney@pvschools.net" <Psweeney@pvschools.net>, "Hlindsay@pvschools.net" <Hlindsay@pvschools.net>, "Dcourson@pvschools.net" <Dcourson@pvschools.net>, "skalter@pvschools.net" <skalter@pvschools.net>, "smoushey@pvschools.net" <smoushey@pvschools.net>, "kjoiner@pvlearners.net" <kjoiner@pvlearners.net>, "kkodawenger@pvschools.net" <kkodawenger@pvschools.net>, [redacted]

Dear Principal Knaeble, Principal Bell, and PV Administration,

[redacted]

Additionally, our understanding is that student [redacted] who was found to have made antisemitic statements, flatly denied his actions to Principal Bell. This misrepresentation appears to have influenced how the situation was handled and contributed to the environment that allowed retaliation to occur. We understand that [redacted] has now been suspended, which should have occurred a day earlier. The delay in taking action allowed the situation to escalate. As a direct result, our daughter was targeted today by another student, [redacted] who threatened her personal safety because she reported [redacted] antisemitic behavior. We are also aware that [redacted]

[redacted] should not be placed in an environment where she is targeted, retaliated against, and made to feel unsafe for reporting discrimination. At this point, this is no longer a single incident. This is a pattern of antisemitic harassment followed by retaliation and now threats to our daughter's personal safety.

We are scheduled for a safety meeting tomorrow at 9:30 AM. We expect that meeting to include:

- A concrete safety plan ensuring [redacted] has no contact with any involved students
- Immediate disciplinary action for retaliatory behavior and threats
- Clear consequences for repeated antisemitic conduct
- [redacted]
- A district-level response to prevent further incidents

We also reiterate that we are aware of our rights to involve law enforcement and have already copied the Anti-Defamation League. Given today's escalation to threats, we are actively evaluating additional steps to ensure our daughter's safety.

We expect immediate action and a definitive plan at tomorrow morning's meeting.

[redacted]

Ex. A (emails dated Apr. 22, 2026 at 10:47am and 4:54pm).

Despite this continuing and escalating correspondence, the School did not respond substantively for days. On or about April 23, 2026, Student A's father contacted the Phoenix Police Department, which attended a security meeting at the School.[8]

Critically, the District itself had actual notice from the outset: Student A's father's April 20, 2026 email was sent to District officials (Ex. A (email dated Apr. 20, 2026 at 10:55pm)), and District Director of Student Services, Dr. Christopher Asmussen, attended the April 23 security meeting in person where the School scheduled trainings for 7th and 8th grade classes on harassment and general respectful citizenship procedures from April 28 to April 30, 2026.

As noted above, on April 20, 2026, immediately after being subjected to Holocaust rhetoric and antisemitic harassment, Student A asked the School to call her parents. The School refused, claiming staff were "too busy." Student A was left sitting alone in the principal's office for approximately one hour. No one from the School called her parents that day.

Minimization of the Harassment. Assistant Principal Bell, who was in charge of student conduct, consistently attempted to minimize the harassment. In her initial substantive response on April 21, 2026, Assistant Principal Bell blamed the victim's own curriculum for the harassment, writing: "Yesterday, in 8th grade Social Studies, students did have a lesson in [redacted] about concentration camps. I believe this is how/why the subject arose in [redacted]." Ex. A (email dated Apr. 21, 2026 at 10:51am). Assistant Principal Bell's demeanor reinforced this dismissiveness. She was observed rolling her eyes during calls with parents and administrators, muting the phone mid-conversation, and saying (within earshot of Student A) "I don't know what to do with them." In a conversation conducted in front of Student A, Assistant Principal Bell suggested that Perpetrator #3 "probably had a crush on" Student A, trivializing a Heil Hitler salute as adolescent flirtation.

The School used the same "he likes you" excuse for two separate incidents involving two different perpetrators: the Heil Hitler salute and the physical assault.

E. Inadequate Protective Measures[9]

The protective measures implemented by the District placed an inappropriate and outsized burden on Student A rather than on her harassers, which re-victimizes the student already targeted with the harassment:

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[8] Complainants have obtained the Phoenix Police Department's report concerning the April 2026 incidents (together with the report described in n.6, *supra*), as well as its body camera footage of the April 23, 2026 security meeting. Complainants will make the reports available to OCR upon request and, due to the size of the file, will provide the body camera footage to OCR under separate cover. Despite Student A's family's repeated requests and payment for that footage, the Phoenix Police Department failed to provide the police report concerning the April 2026 incidents and body camera footage until October 9, 2026 (almost six months later), only ***after*** the undersigned counsel demanded same.

[9] No apparent preventative measures have been taken by the District to prevent further antisemitism. The Phoenix Police Department, not the District, classified the April 2026 harassment as a bias crime and submitted charges to juvenile court. Complainants are not aware of any comparable steps by the District, before or after the conclusion of the 2025-2026 academic year, to prevent antisemitic harassment of its students.

- The School switched Student A's classroom, but one of the perpetrators was already in the new classroom; thus, Student A was still forced to be in the same room as one of her harassers. None of the harassers were forced to move classes.

- A day or two following the April 23 meeting, the School assigned an adult personal escort to accompany Student A between classes. *See* Ex. A (email dated May 18, 2026 at 5:19pm). While a school has latitude to determine appropriate safety measures in light of harassment of students, in this particular matter, such a decision was unreasonable. By spotlighting Student A as a victim, the School further isolated Student A, which, coupled with its inaction in disciplining the offending students, created more of an atmosphere for peers to continue harassing Student A for her Jewish identity. In short, the escort did not protect Student A; it marked her.

- When the escort was finally discontinued, the School's next solution was even worse: confine Student A to the principal's office with no instruction for seventh and eighth periods. She could not leave for the bathroom without an aide. This was especially harmful [redacted], meaning the School's response to antisemitic harassment was to deprive the victim [redacted] while citing the harassers' IEPs as reasons not to discipline them.

- The School held a single one-period class on "hate speech," substituting it for an English class. It is unclear whether antisemitism was specifically addressed. The session was, however, ineffective. A school that had just witnessed students invoke concentration camps, gas chambers, and Nazi salutes against Jewish classmates responded with a single classroom period that may not have mentioned antisemitism at all. It is unclear whether administrators even notified the School community that any of the antisemitic incidents occurred.

- The School then denied a request from Student A's father to invite a Holocaust survivor to speak to the student body. *See* Ex. A (email dated May 19, 2026 at 8:37am). A school that had just demonstrated its inability to teach the Holocaust responsibly, and that was now confronting the consequences of that failure, refused an offer to bring in someone who could speak to the subject with the gravity and moral authority it demands.

- Requests from Student A's father for expulsions were denied, with the School repeatedly citing the perpetrators' IEP accommodations as justification. *See* Ex. A (email dated May 17, 2026 at 12:22pm).

- The District's Director of Student Services, Dr. Asmussen, in response to the family's concerns, pointed to the District's care for protecting students by noting that it provides free drug tests to parents of suspected drug addicts. This was an irrelevant and dismissive response to complaints of antisemitic harassment that captured the District's broader posture: this family and their complaints about antisemitism were a nuisance to be deflected, not a crisis to be addressed.

The District chose to isolate the victim from the School community rather than isolate the perpetrators. The School's response was to make Student A's world smaller: she was removed from [redacted] lost her [redacted] class, ate lunch in the office, and spent her final weeks of middle school confined away from her peers while her harassers continued attending classes without meaningful consequence. By the end of the school year, she had accumulated more than 45 missing assignments and her grades dropped significantly. The District's approach was not to protect Student A; it was to make her invisible.

F. Impact on Student A

The persistent antisemitic harassment and the District's inadequate response have had a profound impact on Student A's educational development and emotional well-being. Throughout this ordeal, Student A showed maturity beyond her years: reporting incidents, filling out paperwork, confronting her harassers, advocating for herself, and attempting to educate her classmates about the Holocaust and her own faith. The adults within the District, who should have protected her and prevented additional antisemitic harassment, failed to do so. The toll of the District's utter disregard for the repeated, overtly antisemitic harassment of Student A is reflected by:

- Student A missing approximately two to three full days of school due to the incidents, and losing substantially more instructional time when the District removed her from her classes and confined her to the principal's office.
- Incidents negatively impacting Student A's academic performance. Student A accumulated more than 45 missing assignments. Her grades dropped significantly, and she began to fail tests and classes. The academic impact remains ongoing even at her new school.
- Student A struggled to concentrate in class when she was allowed to attend, knowing that her harassers faced minimal or no consequences while she bore the burden of the School's inadequate response.
- Student A developed a reluctance to attend school. She did not want to go to classes where she might encounter her harassers. When the School's protective measures made her a spectacle, her reluctance deepened. By the end of the school year, she was confined to the principal's office for seventh and eighth periods (approximately two hours each day) with no peers and no instruction. She could not even leave for the bathroom without an aide. She described the experience as unbearable.
- [redacted]
- The academic and emotional impact has been ongoing. Student A now attends a high school in a different district, where she has been enrolled since the start of the 2026-2027 school year. She continues to struggle academically as a result of the instruction she missed. During class reviews of eighth-grade material, she has found herself unable to

participate because the District deprived her of that foundational learning during the final weeks of middle school.

- Student A stopped wearing her Star of David necklace out of fear for her safety.
- Student A is now in counseling, in which she had not participated prior to these incidents. PVUSD has not contacted the family since the end of the school year and has not checked in on Student A's well-being.[10]

IV. CONTEXTUAL AND LEGAL ANALYSIS

The antisemitic harassment directed at Student A was not mere schoolyard bullying. It drew upon deeply rooted antisemitic tropes with specific historical significance: the epithet "dirty filthy Jew" and the threat to "steal her pennies" invoke longstanding stereotypes characterizing Jews as unclean and associating Jews with greed; the statement that Student A should be sent to a concentration camp to be "gassed" is an explicit invocation of the Holocaust; and the Heil Hitler salute is among the most universally recognized symbols of antisemitic hatred, evoking the Nazi regime's systematic extermination of the Jewish people. *See* ADL, *Antisemitism Uncovered: A Guide to Old Myths in a New Era* (2022); ADL, *Hate on Display: Nazi Salute*.

Taken together, these incidents reflect the full spectrum of contemporary antisemitic harassment: from age-old stereotypes, to direct invocations of the Holocaust and Nazi genocide, to physical violence motivated by antisemitic hatred. Each incident, standing alone, would constitute severe antisemitic harassment. Together, they created a hostile environment that no student should ever be forced to endure. At each stage, the School had the opportunity to de-escalate through meaningful discipline, separation of perpetrators, or education. It chose none of these options.

A. Title VI Covers Antisemitic Harassment Based on Shared Jewish Ancestry and Ethnicity

Title VI provides that "[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. § 2000d. "[D]iscrimination against Jews may give rise to a Title VI violation when the discrimination is based on an individual's race, color, or national origin."[11]

Executive Order 13899 directs all federal agencies to "enforce Title VI against prohibited forms of discrimination rooted in antisemitism as vigorously as against all other forms of discrimination

[10] Documentation can be provided should OCR request further information.

[11] *See* Exec. Order No. 13899, Combating Anti-Semitism, 84 Fed. Reg. 68,779 (Dec. 11, 2019) ("EO 13899").

prohibited by Title VI."[12] Executive Order 14188, signed on January 29, 2025, reaffirmed EO 13899 and declared it to be the "policy of the United States to combat anti-Semitism vigorously."[13]

"Title VI also covers discrimination that groups face on the basis of actual or perceived shared ancestry or ethnic characteristics" and therefore "provides protection to students from any discrete religious group that shares, or is perceived to share, ancestry or ethnic characteristics, such as Jews, Muslims or Sikhs."[14] The harassment experienced by Student A was directed at her because of her shared Jewish ancestry and ethnicity, and therefore falls squarely within the scope of Title VI.

Executive Orders 13899 and 14188 direct federal agencies (including OCR) to consider the International Holocaust Remembrance Alliance ("IHRA") Working Definition of Antisemitism when investigating complaints of antisemitic discrimination. The IHRA Definition defines antisemitism as "a certain perception of Jews, which may be expressed as hatred toward Jews" and includes among its contemporary examples: "calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion"; "making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective"; and "accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group." Here, the harassment of Student A (and others) included direct references to Nazi genocide (concentration camps, gas chambers, the Heil Hitler salute), stereotypical allegations about Jewish people (*i.e.*, mentions of the "pennies" trope, the "dirty filthy Jew" epithet), and dehumanizing characterizations of Jewish identity ("ugly Jew"). This conduct maps directly onto the IHRA Definition's core examples of antisemitism and reinforces that the harassment was motivated by antisemitic animus targeting Student A's shared Jewish ancestry and ethnicity.

B. The District Permitted a Hostile Environment to Exist

To establish a hostile environment in violation of Title VI, OCR must find: (1) a hostile environment based on national origin, shared ancestry or ethnicity—*i.e.*, unwelcome conduct that is subjectively and objectively offensive and sufficiently severe, pervasive, or persistent so as to interfere with a student's ability to participate in or benefit from educational programs; (2) the recipient of federal funds (here, the District) 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

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[12] *Id*.

[13] Exec. Order No. 14188, Additional Measures to Combat Anti-Semitism, 90 Fed. Reg. 8847 (Jan. 29, 2025).

[14] *See* U.S. Dep't of Educ., Office for Civil Rights, Dear Colleague Letter: Protecting Students from Discrimination, such as Harassment, Based on Race, Color, or National Origin, Including Shared Ancestry or Ethnic Characteristics (May 7, 2024); U.S. Dep't of Educ., Office for Civil Rights, Dear Colleague Letter: Discrimination, including Harassment, Based on Shared Ancestry or Ethnic Characteristics (Nov. 7, 2023); U.S. Dep't of Educ., Office for Civil Rights, Dear Colleague Letter: Addressing Discrimination Against Jewish Students (May 25, 2023); U.S. Dep't of Educ., Office for Civil Rights, Fact Sheet: Protecting Students from Discrimination Based on Shared Ancestry or Ethnic Characteristics (Jan. 4, 2023); U.S. Dep't of Educ., Office for Civil Rights, Questions and Answers on Executive Order 13899 (Combating Anti-Semitism) and OCR's Enforcement of Title VI of the Civil Rights Act of 1964 (Jan. 19, 2021); U.S. Dep't of Educ., Office for Civil Rights, Know Your Rights: Title VI and Religion (Jan. 17, 2017); Russlyn Ali, Dear Colleague Letter: Harassment and Bullying (Oct. 26, 2010); Kenneth L. Marcus, Dear Colleague Letter on Title VI and Title IX and Religious Discrimination (Sept. 13, 2004, reissued Jan. 17, 2017).

any hostile environment and its effects, and prevent the harassment from recurring.[15] All of these elements are satisfied.

Importantly, OCR's standard applies the disjunctive "severe, persistent, or pervasive," meaning any one of these factors is sufficient. Here, the District allowed severe, persistent, and pervasive antisemitic harassment to occur and continue, creating a hostile environment.

1. The Harassment Was Severe, Persistent, and Pervasive

The harassment in this case satisfies all three prongs of the OCR standard.

*It was **severe.*** Student A was told her parents should send her to a concentration camp to be "gassed." She was subjected to a Heil Hitler salute. She was physically assaulted and thrown into a cabinet. Each of these incidents, standing alone, constitutes severe harassment. *See T.E. v. Pine Bush Cent. Sch. Dist.,* 58 F. Supp. 3d 332, 349 (S.D.N.Y. 2014) (finding viable hostile environment claim where Jewish students "had anti-Semitic slurs directed at them, witnessed swastika graffiti, and were subjected to anti-Semitic 'jokes'").

*It was **persistent.*** The harassment occurred repeatedly over the course of approximately one month, from April 20 through May 21, 2026 (the last day of school), involving at least five separate incidents perpetrated by at least five different students. Upon information and belief, harassment of Jewish students continues to this day.

*It was **pervasive.*** The harassment pervaded Student A's school environment. It occurred in her study hall, in the hallways, on the way to lunch, in her [redacted] class, and elsewhere on campus. Multiple perpetrators participated, and some coordinated with one another. The School's failure to respond effectively signaled to the broader student body that targeting a Jewish classmate was permissible. Other Jewish students at Desert Shadows were also targeted, reflecting a school-wide climate of antisemitism that was allowed to continue.

The harassment deprived Student A of her ability to participate in and benefit from her education. As detailed in the Statement of Facts, Student A missed substantial instructional time, accumulated more than 45 missing assignments, and saw her grades drop significantly. These effects have been ongoing at her new school. *See Zeno v. Pine Plains Cent. Sch. Dist.,* 702 F.3d 655, 667 (2d Cir. 2012) (affirming jury verdict where plaintiff was subjected to ongoing racially motivated harassment that affected his academic performance).

2. The District Had Actual Notice

The District had actual notice of the hostile environment. As documented in Section III.D above, Student A's father sent emails to the School and District officials on April 20, April 21, and April 22, 2026, each time documenting incidents and demanding action. District Director of Student Services, Dr.

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[15] *See* U.S. Dep't of Educ., Office for Civil Rights, Revised Sexual Harassment Guidance (2001) (setting forth the hostile environment framework that OCR applies to Title VI harassment claims); *see also T.E. v. Pine Bush Cent. Sch. Dist.*, 58 F. Supp. 3d 332 (S.D.N.Y. 2014).

Asmussen, attended the April 23, 2026 security meeting in person. The family subsequently sought help from the Phoenix Police Department, filed multiple police reports, and escalated these incidents to the Arizona Superintendent of Public Instruction. *See Monteiro v. Tempe Union High Sch. Dist.,* 158 F.3d 1022, 1034 (9th Cir. 1998) (actual notice established when a student or parent makes a complaint to educational authorities).

In his April 21, 2026 email, after the Heil Hitler salute, Student A's father wrote to the School to advise them of the ongoing antisemitic incidents. Ex. A (email dated Apr. 21, 2026 at 10:33pm).

Moreover, the District had constructive notice of the broader pattern of antisemitism at Desert Shadows through the incidents involving other Jewish students. Under these circumstances, the District knew or should have known of the hostile environment.

3. The District Failed to Respond Promptly and Effectively

Despite actual and constructive notice, the District failed to take prompt and effective steps reasonably calculated to end the harassment, eliminate the hostile environment and its effects, and prevent its recurrence. At each stage, its response was clearly ineffective, because the harassment continued.

(a) ***Delayed Response.*** Despite the urgency of Student A's father's emails (the first sent the same evening that his daughter was told she should be sent to a concentration camp) the School's responses were perfunctory and it was not until he engaged the Phoenix Police Department that the School convened a security meeting.

(b) ***Minimization.*** Assistant Principal Bell blamed the harassment on the School's own Holocaust curriculum, suggested the Heil Hitler salute meant Perpetrator #3 "probably had a crush on" Student A, and was observed rolling her eyes and expressing frustration with the family's complaints. This pattern of rationalizing antisemitic conduct rather than condemning it sent a clear message that the School did not take the harassment seriously.

(c) ***Inadequate Discipline.*** The discipline imposed was grossly disproportionate to the severity of the conduct. Upon information and belief, students who invoked concentration camps and gas chambers received only three-day suspensions. Upon information and belief, a student who performed a Heil Hitler salute received no suspension at all. A retaliatory threat apparently went undisciplined. And a physical assault resulted in no discipline and no incident report. This pattern of non-discipline signaled to the student body that targeting Jewish classmates carries no real consequence.

(d) ***Penalizing the Victim.*** As detailed in Section III.E, the District's protective measures placed the burden entirely on Student A: she was moved to a classroom with one of her harassers, assigned an escort that broadcast her victim status, and ultimately confined to the principal's office while losing access to her classes and disability accommodations.

(e) ***Refusing Appropriate Educational Measures.*** The District refused to permit a Holocaust survivor to speak and offered only a single ineffective "hate speech" class that may not have addressed antisemitism at all, declining the very educational interventions that might have begun to repair the

damage. The administrators' conduct throughout demonstrates that District personnel are in dire need of training on the nature and gravity of antisemitism.

(f) ***Misuse of IEP Protections as a Shield Against Accountability.*** The District invoked IEP protections across multiple perpetrators and multiple incidents as a categorical bar to any accountability, rather than as one factor in a disciplinary calculus that must also weigh the safety of other students. IDEA places certain limits on a school's ability to impose disciplinary sanctions on students whose conduct is a manifestation of their disability. *See* 20 U.S.C. § 1415(k)(1). However, those limitations do not relieve the District of its independent obligation under Title VI to protect other students from a hostile environment. IDEA expressly permits school personnel to remove a child with a disability for up to ten school days, to the extent such alternatives are applied to children without disabilities. IDEA, therefore, did not prevent the District from imposing a short suspension on a student with an IEP. A district that excuses or minimizes harassment because the perpetrators have IEPs, rather than implementing alternative protective measures such as separating students, reassigning classes, or increasing supervision, has not taken prompt and effective steps to address the hostile environment. The District likely knew these students may have required additional support and oversight, yet failed to channel that knowledge into protective action for Jewish students who were being targeted. The District's blanket invocation of IEP protections—without any evidence that manifestation determinations were conducted, that alternative measures were considered, or that the District weighed its Title VI obligations alongside its IDEA obligations—demonstrates a failure to respond promptly and effectively to the hostile environment. *See id*.

Courts have held that a district's failure to effectively respond to known harassment—particularly where that failure leads to escalating conduct—supports a finding that the response was not prompt and effective, and may even constitute deliberate indifference under the stricter federal court standard. *See Zeno*, 702 F.3d at 669 (affirming jury verdict where district "took more than one year . . . to take steps to provide nondisciplinary remedies"). Here, the District's response was clearly unreasonable in light of the circumstances. The eye-rolling, the phone-muting, the sighs, the dismissive comments in front of Student A—these were not merely unprofessional; they were evidence of a systemic mindset that viewed antisemitic harassment as an annoyance rather than a violation of a student's civil rights and a violation of school district policies. The District did not merely fail to effectively respond to the antisemitism; its dismissiveness and treatment of Student A with contempt allowed the hostile environment to persist and worsen.

V. SUGGESTED REMEDIES

ADL and Reed Smith respectfully request that OCR require PVUSD to implement the following remedial measures:

1. **IHRA Definition of Antisemitism**. Ensure that the District 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. The District 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. Zero-tolerance policy. Communicate and enforce a zero-tolerance policy for antisemitic conduct. Said communication should be disseminated to all District educational stakeholders, including administrators, teachers, faculty, employees, students, and families.

3. Statement Denouncing Antisemitism. Issue a standalone statement denouncing antisemitism in all its forms. We recommend the District use the following language: "We condemn antisemitism in all its forms. The District 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 the District's institutional values and nondiscrimination and conduct codes, and will not be tolerated."

4. Mandatory Antisemitism Training. Implement mandatory training on antisemitism to all District 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 District 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[16] 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. Student Training & No Place For Hate. Implement mandatory training on antisemitism and the Holocaust for all District students. The training for students should also include the No Place For Hate program facilitated by the ADL.

6. Policy & Procedure Review. Review the District's 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 School Board Policy AC to include explicit guidance on the application of Title VI to antisemitism, as it relates to the prohibition on discrimination based upon actual or perceived Jewish shared ancestry and/or ethnicity.

[16] *See* Working Definition of Antisemitism, International Holocaust Remembrance Alliance, https://holocaustremembrance.com/resources/working-definition-antisemitism; *see also* EO 13899 § 1 (directing agencies to consider the IHRA Definition when investigating antisemitism complaints); Exec. Order No. 14188 § 2 (reaffirming EO 13899 and directing additional measures to combat antisemitism).

7. Title VI Coordinator. Appoint a Title VI Coordinator to oversee the District's compliance with Title VI, including ensuring that the District adequately and consistently responds to allegations of discrimination and harassment based on all protected traits, including allegations of antisemitism; ensure Title VI and District policies regarding bullying and harassment are enforced equally, applying the same standards for all students, including Jewish ones; review and implement OCR Guidance and applicable law; recommend policy updates relating to Title VI; coordinate the investigation of Title VI allegations as outlined in the District policies; and ensure complainants are appropriately supported. Said Title VI Coordinator should be a separate and distinct role from any Title IX Coordinator.

8. Independent Monitor. Appoint an independent monitor to: evaluate the District's response to complaints of discrimination and harassment based on Jewish shared ancestry and/or ethnicity; review the District's implementation of Title VI guidelines; produce an annual public report concerning the District's response to allegations of discrimination and harassment on the basis of Jewish shared ancestry and/or ethnicity; and undertake an audit of all bullying and bias-incidents reported to Desert Shadows Middle School for the last three school years, to be reviewed by OCR, with findings provided to OCR within ninety (90) days.

9. Impact Assessment. Ensure that the District's policies clarify that when students report incidents of harassment or bullying, any potential supportive measures should consider the impact of such measures on students. When necessary while schools are investigating and/or working to remediate bullying or harassment incidents with appropriate interventions, supportive measures may include working to minimize the potentially negative consequences a targeted student may face from missing required or voluntary educational programs or activities.

10. Anti-retaliation Policies & Procedures. 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 the District 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.

11. Disciplinary Review. Undertake a disciplinary review of all Desert Shadows Middle School staff or faculty members who failed to report, respond to, or appropriately address antisemitic incidents involving Student A, and appropriately enforce School Policies and Procedures which indicate that an employee who fails to report a case of suspected bullying may be subject to disciplinary action.

12. Confidential Reporting Mechanism. Develop and implement a confidential and accessible reporting mechanism for students to report antisemitic incidents without fear of retaliation.

13. Confidential Reporting Requirements for Staff and Faculty. 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 the District. 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. Should said process currently not exist, once created, train all teachers, faculty, and staff to understand their obligations around these reporting mechanisms and the importance of their roles as educators in stopping harassment, and reiterate the District's commitment to a harassment-free and welcoming school environment.

14. Annual Audit. 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, the District will apply the IHRA Definition and its examples when evaluating such complaints.

15. District-wide Antisemitic Incident Reporting. Implement mandatory annual District-wide reporting to OCR on the number and disposition of antisemitic incident reports at all District schools, for a period of no less than three years.

16. Apology. Provide a formal written apology to Student A and her family.

17. Harm Remediation. 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 compensatory education or academic remediation addressing the instruction Student A lost and the work she was unable to complete, and reimbursement by the District for past and future out-of-pocket costs directly incurred for academic support, counseling costs, mental health services, and any medication costs.

18. Policies & Procedures. Enact policies and procedures to ensure that responses to harassment do not penalize the targeted student, including by reviewing policies regarding classroom reassignment to ensure that victims are not burdened by the consequences of reporting harassment.

19. School Climate Survey. Implement a school climate survey to assess the prevalence of antisemitism and other forms of discrimination at Desert Shadows and other schools within the District.

VI. CONCLUSION

This Complaint demonstrates a clear and sustained pattern of antisemitic harassment at Desert Shadows Middle School, targeting Student A and other Jewish students on the basis of their shared Jewish ancestry and ethnicity. The District had actual knowledge of this hostile environment and failed to take prompt and effective steps reasonably calculated to end the harassment, eliminate the hostile environment and its effects, and prevent its recurrence. This conduct constitutes a clear violation of Title VI of the Civil Rights Act of 1964.

We respectfully request that OCR initiate an investigation of the Paradise Valley Unified School District and pursue the remedial measures outlined above. We further request mediation pursuant to

Section 201(a) of OCR's Case Processing Manual, to be followed by a full investigation if mediation is not successful.

We welcome the opportunity to discuss this matter with OCR at its earliest convenience and to provide any additional information needed to support this complaint.

Dated: October 16, 2026

REED SMITH LLP

By: /s/ *Gregory D. Speier*

Gregory D. Speier
Telephone: (973) 879-8156
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Andrew L. Buck
599 Lexington Avenue, 22nd Floor
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Alexander W. Raap
Telephone: (609) 524-2089
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ANTI-DEFAMATION LEAGUE



James Pasch
VP, National Litigation
Anti-Defamation League
Email: jpasch@adl.org

Rachel Grinspan
Rachel Grinspan
Director, Litigation Counsel
Anti-Defamation League
Email: rgrinspan@adl.org

Attorneys for Complainants

Enclosure

EXHIBIT A

Gmail [redacted]

Immediate Action Required: Anti-Semitic Harassment of Our Daughter in [redacted] Class

26 messages

[redacted] Mon, Apr 20, 2026 at 10 55 PM
To Staff Leah Knaeble lknaeble@pvschools net , Shawn Bell shbell@pvschools net
Cc [redacted] Casmussen@pvschools net, Gcolonna@pvschools net, Psweeney@pvschools net, Selse@pvschools net, Hlindsay@pvschools net, Dcourson@pvschools net, skalter@pvschools net, smoushey@pvschools net, kjoiner@pvlearners net, kkodawenger@pvschools net

Dear Principal Knaeble, Principal Bell, and PV Administration,

We are writing to formally report a serious and unacceptable anti Semitic incident involving our daughter, [redacted] that occurred today in her [redacted] class at Desert Shadows Middle School This was not an isolated incident, and the teacher's response today was deeply concerning

During class today, two boys directed explicitly anti Semitic statements at [redacted] A student named [redacted] told her that she "should be sent back to a concentration camp" and further stated that she "should go where they gassed the Jews " Another student, [redacted] told [redacted] that he was going to "steal her pennies" and called her a "greedy rich Jew " These are not ambiguous comments they are overtly anti Semitic and invoke historical violence against Jews

This is also not the first occurrence Just last week, again in [redacted] class, [redacted] told [redacted] that "Jews are like atheists" and that they "don't believe in God " [redacted] has now been targeted multiple times in the same class with anti Semitic language

Equally troubling was the response when [redacted] sought help After today's incident, [redacted] went directly to [redacted] to report that two students were being anti Semitic He told her that if she felt it was "that big of an issue" she should go tell someone else This response dismissed her concerns and failed to provide support at a moment when she was being targeted for her identity

[redacted] then sought out [redacted] who comforted her [redacted] when notified of the incident by [redacted] immediately went to address the situation directly with the boys involved We appreciate that prompt action Despite this, [redacted] did not feel safe returning to [redacted] class and did not go back

This situation is unacceptable Our daughter was subjected to repeated anti Semitic harassment, and when she appropriately reported it to her teacher, she was effectively turned away No student should be told to "go tell someone else" after being told they belong in a concentration camp or gas chambers

We are requesting the following immediate actions

A formal investigation into both incidents and the students involved
A review of [redacted] response and the handling of [redacted] complaint
Clear disciplinary action consistent with school policy
Immediate steps to ensure [redacted] feels safe in [redacted]
Education and intervention addressing anti Semitism for the students involved
A written summary of how the school plans to prevent this from happening again

We expect this matter to be treated with urgency Comments referencing concentration camps and stereotypes about Jews are not teasing, joking, or typical middle school behavior they are hateful, targeted, and harmful This requires a serious and immediate response

Please contact us as soon as possible We would like to speak tomorrow and understand what actions are being taken

[redacted]

Mail Delivery Subsystem mailer daemon@googlemail com Mon, Apr 20, 2026 at 10 55 PM
To [redacted]

Address not found

Your message wasn't delivered to **Selse@pvschools.net** because the address couldn't be found, or is unable to receive ail

LEARN MORE

The response was

```
550 5.1.1 The email account that you tried to reach does not exist. Please try double checking the recipient's email address for typos or unnecessary spaces. For more information, go to https //support google com/mail/?p NoSuchUser 5a478bee46e88 2e53a1b9eebsor3064710eec.12 gsmtp
```

Final Recipient rfc822; Selse@pvschools net
Action failed
Status 5 1 1
Diagnostic Code smtp; 550 5 1 1 The email account that you tried to reach does not exist Please try
550 5 1 1 double checking the recipient's email address for typos or
550 5 1 1 unnecessary spaces For more information, go to
550 5 1 1 https //support google com/mail/?p NoSuchUser 5a478bee46e88 2e53a1b9eebsor3064710eec 12 gsmtp
Last Attempt Date Mon, 20 Apr 2026 22 55 23 0700 (PDT)

noname
4K

Shawn Bell <shbell@pvschools.net> Tue, Apr 21, 2026 at 7:26 AM
Reply-To: shbell@pvschools.net
To: [redacted]
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

I appreciate you bringing this to our attention. I am sorry that [redacted] was faced with this yesterday and previously. I will investigate. I will also follow up with you once I have information to share.

Shawn Bell
Desert Shadows Middle School
Assistant Principal
[redacted]

[Quoted text hidden]

Emails and other correspondence to and from Paradise Valley School District are subject to public disclosure, upon request, according to Arizona Public Records Law (A.R.S. §39-121, et seq.) and corresponding State records retention requirements, unless the content is specifically exempt from disclosure by a state or federal law.

Shawn Bell <shbell@pvschools.net> Tue, Apr 21, 2026 at 10:51 AM
Reply-To: shbell@pvschools.net
To: [redacted]
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

Good morning....

I have interviewed the staff and students involved in this incident.

Our district and school policy in regards to hate speech is in compliance with Arizona Revised Statute 15-341 regarding victim rights. Students have the right to attend school without the fear of being harassed, intimidated, or bullied. [redacted] filled out her incident report and her Victim's Rights Reporting Form.

I have shared this form with [redacted] and I will attach our Victim Rights Policy in regards to Harassment, Intimidation, and Bullying. I have reviewed these policies and have shared them with each of the students involved. We remain consistent with our message to students that any form of hate speech will not be tolerated and appropriate consequences were given.

We will be placing [redacted] in [redacted] class to ensure she feels safe and so she is able to receive services she is entitled to. [redacted] stated that he did not hear the comments, but told her to report it to the office. [redacted] did go to [redacted] room and reported to her yesterday. [redacted] then came to my office this morning and wrote up her incident report.

Here are my findings: Yesterday, in 8th grade Social Studies, students did have a lesson in [redacted] about concentration camps. I believe this is how/why the subject arose in [redacted] As always, we have alerted the community about this subject as we want the community to be alert and aware of this sensitive subject matter.

I have alerted families/students involved. With that said, we also understand that this is a significant learning opportunity for everyone involved, and education is at the very root of this incident. We have reminded our teachers to follow our [redacted] curriculum (social studies) in the classroom. I can assure you that this is being done appropriately. We also ask that our teachers remind students when having conversations with others that include sensitive issues, that we use academic language when facilitating those conversations with one another. Leah and I continue to remind students of positive behavioral choices and expectations by giving daily reminders in regards to our PRIDE matrix. Here are some of those reminders:

R- Respectful
Respect the rights and privacy of others
Communicate with kind words and images

I - Inviting
Work with everyone

E - Excellence
Do your personal best each day
Allow others the opportunity to learn

I will call you shortly, so we can review the incidents, and so I can answer any further questions. I would like to share with you an apology from one of our parents.

Sincerely,

Shawn Bell
Desert Shadows Middle School
Assistant Principal
[redacted]

On Mon, Apr 20, 2026 at 10:55 PM [redacted] wrote:
[Quoted text hidden]

[Quoted text hidden]

Victim's Rights.pdf
194K

[redacted] Tue, Apr 21, 2026 at 10:33 PM

To: shbell@pvschools.net
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

Dear Principal Knaeble, Principal Bell, and PV Administration,

Unfortunately, based on events that occurred after today's meeting, at least one of the involved students—[redacted]—has not learned his lesson. He appears to have misled you into believing he did not make these comments to [redacted] This afternoon in between classes, he instructed his friend [redacted] to approach [redacted] make a hand gesture, and repeatedly say the word "Jew." In addition, [redacted] other friends continued approaching [redacted] throughout the afternoon, calling her a "snitch." This is intimidation and continued harassment.

When I picked [redacted] up from school today, she was visibly upset and explained what had happened. We immediately came to the office to complete another incident report, but Ms. Bell had already left for the day and Mrs. Knaeble was in a meeting. She will file another report in the morning.

This behavior is escalating, not improving. While we understand the need for fact-finding, the continued harassment after administrative intervention raises serious concerns about the school's ability to control and stop anti-Semitic behavior at Desert Shadows Middle School. We are aware of multiple incidents over the last year, and despite prior intervention, the behavior is continuing.

[redacted] should not have to endure repeated harassment during the school day, nor should she be subjected to retaliation for reporting anti-semitism. Being called a "snitch" and targeted again within hours of administrative involvement is unacceptable and indicates that the current response has not been effective.

[redacted] and I are aware of our rights to involve law enforcement. We have also notified the Anti-Defamation League of this incident. If this behavior continues, we will pursue all available [redacted] to ensure our daughter's safety and to hold those responsible accountable.

We expect immediate and concrete action tomorrow to:

- Ensure [redacted] is protected from further contact with these students
- Address the retaliatory harassment that occurred today
- Communicate consequences for continued behavior
- Provide a clear plan to prevent additional incidents

We expect a response tomorrow with the steps being taken to ensure [redacted] safety.

Respectfully,
[redacted]

On Apr 21, 2026, at 10:51AM, Shawn Bell <shbell@pvschools.net> wrote:

[Quoted text hidden]
<Victim's Rights.pdf>

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Tue, Apr 21, 2026 at 10:33 PM
To: [redacted]

Address not found

Your message wasn't delivered to **Selse@pvschools.net** because the address couldn't be found, or is unable to receive mail.

LEARN MORE

The response was:

```
550 5.1.1 The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos
or unnecessary spaces. For more information, go to https://support.google.com/mail/?p=NoSuchUser a92af1059eb24-12db2adcd1bsor533913c88.7 -
gsmtp
```

Final-Recipient: rfc822; Selse@pvschools.net
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try
550-5.1.1 double-checking the recipient's email address for typos or
550-5.1.1 unnecessary spaces. For more information, go to
550 5.1.1 https://support.google.com/mail/?p=NoSuchUser a92af1059eb24-12db2adcd1bsor533913c88.7 - gsmtp
Last-Attempt-Date: Tue, 21 Apr 2026 22:33:29 -0700 (PDT)

---

noname
4K

[redacted] Wed, Apr 22, 2026 at 10:47 AM
To: shbell@pvschools.net, "Kader, Sarah" [redacted]
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net

Dear Principal Knaeble, Principal Bell, and PV Administration,

I am looping Sarah Kader, from the ADL in on this thread. She is a great resource. The school clearly does not have a handle on this issue; she can help.

[redacted]

[Quoted text hidden]

Kader, Sarah <[redacted]> Wed, Apr 22, 2026 at 4:03 PM
To: [redacted], "shbell@pvschools.net" <shbell@pvschools.net>
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, [redacted] "Casmussen@pvschools.net" <Casmussen@pvschools.net>, "Gcolonna@pvschools.net" <Gcolonna@pvschools.net>, "Psweeney@pvschools.net" <Psweeney@pvschools.net>, "Hlindsay@pvschools.net" <Hlindsay@pvschools.net>, "Dcourson@pvschools.net" <Dcourson@pvschools.net>, "skalter@pvschools.net" <skalter@pvschools.net>, "smoushey@pvschools.net" <smoushey@pvschools.net>, "kjoiner@pvlearners.net" <kjoiner@pvlearners.net>, "kkodawenger@pvschools.net" <kkodawenger@pvschools.net>

Thanks, [redacted]

Hi everyone,

My name is Sarah Kader and I am the Deputy Director for ADL Desert. ADL is the leading anti-hate organization in the world, combatting antisemitism through protection, education and advocacy. The [redacted] family reached out to ADL for assistance. I will be sending a separate message to connect Principals Bell and Knaeble with [redacted] our ADL Program Director, who can offer education resources directly. In the meantime, I am available to hop on the phone or come to the school to talk through what is going on and how ADL can help.

Please let me know how I can assist.

Thank you,

Sarah Kader

Deputy Regional Director

ADL Desert Region - Serving Arizona and Nevada

ADL Desert

[redacted]

www.adl.org

[redacted]

Sign up for our newsletter!



From: [redacted]
Sent: Wednesday, April 22, 2026 10:47 AM
To: shbell@pvschools.net; Kader, Sarah <[redacted]>
Cc: Staff.Leah Knaeble <lknaeble@pvschools.net>; [redacted] Casmussen@pvschools.net; Gcolonna@pvschools.net; Psweeney@pvschools.net; Hlindsay@pvschools.net; Dcourson@pvschools.net; skalter@pvschools.net; smoushey@pvschools.net; kjoiner@pvlearners.net; kkodawenger@pvschools.net
Subject: Re: Immediate Action Required: Anti-Semitic Harassment of Our Daughter in [redacted] Class

You don't often get email from [redacted] Learn why this is important

[Quoted text hidden]

[redacted] Wed, Apr 22, 2026 at 4:54 PM
To: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, "shbell@pvschools.net" <shbell@pvschools.net>
Cc: [redacted] "Casmussen@pvschools.net" <Casmussen@pvschools.net>, "Gcolonna@pvschools.net" <Gcolonna@pvschools.net>, "Psweeney@pvschools.net" <Psweeney@pvschools.net>, "Hlindsay@pvschools.net" <Hlindsay@pvschools.net>, "Dcourson@pvschools.net" <Dcourson@pvschools.net>, "skalter@pvschools.net" <skalter@pvschools.net>, "smoushey@pvschools.net" <smoushey@pvschools.net>, "kjoiner@pvlearners.net" <kjoiner@pvlearners.net>, "kkodawenger@pvschools.net" <kkodawenger@pvschools.net>, "Kader, Sarah" [redacted]

Dear Principal Knaeble, Principal Bell, and PV Administration,

We are writing to provide additional, serious information following our previous communication. [redacted]

[redacted]

Additionally, our understanding is that student [redacted] who was found to have made antisemitic statements, flatly denied his actions to Principal Bell. This misrepresentation appears to have influenced how the situation was handled and contributed to the environment that allowed retaliation to occur. We understand that [redacted] has now been suspended, which should have occurred a day earlier. The delay in taking action allowed the situation to escalate. As a direct result, our daughter was targeted today by another student, [redacted] who threatened her personal safety because she reported [redacted] antisemitic behavior. We are also aware that [redacted] [redacted]

[redacted] should not be placed in an environment where she is targeted, retaliated against, and made to feel unsafe for reporting discrimination. At this point, this is no longer a single incident. This is a pattern of antisemitic harassment followed by retaliation and now threats to our daughter's personal safety.

We are scheduled for a safety meeting tomorrow at 9:30 AM. We expect that meeting to include:

- A concrete safety plan ensuring [redacted] has no contact with any involved students
- Immediate disciplinary action for retaliatory behavior and threats
- Clear consequences for repeated antisemitic conduct
- [redacted]
- A district-level response to prevent further incidents

We also reiterate that we are aware of our rights to involve law enforcement and have already copied the Anti-Defamation League. Given today's escalation to threats, we are actively evaluating additional steps to ensure our daughter's safety.

We expect immediate action and a definitive plan at tomorrow morning's meeting.

[redacted]

[Quoted text hidden]

Christopher Asmussen <casmussen@pvschools.net> Thu, Apr 23, 2026 at 7:29 AM
Reply-To: casmussen@pvschools.net
To: [redacted]
Cc: "Staff.Leah Knaeble" <lknaeble@pvschools.net>, "shbell@pvschools.net" <shbell@pvschools.net>, [redacted] "Gcolonna@pvschools.net" <Gcolonna@pvschools.net>, "Psweeney@pvschools.net" <Psweeney@pvschools.net>, "Hlindsay@pvschools.net" <Hlindsay@pvschools.net>, "Dcourson@pvschools.net" <Dcourson@pvschools.net>, "skalter@pvschools.net" <skalter@pvschools.net>, "smoushey@pvschools.net" <smoushey@pvschools.net>, "kjoiner@pvlearners.net" <kjoiner@pvlearners.net>, "kkodawenger@pvschools.net" <kkodawenger@pvschools.net>, "Kader, Sarah" <[redacted]

Good morning,

Thank you for providing these resources.

Dr. Chris Asmussen
Director of Student Services - Secondary
[redacted]
casmussen@pvlearners.net

[Quoted text hidden]

[redacted] Thu, Apr 23, 2026 at 8:59 AM
To: casmussen@pvschools.net
Cc: [redacted] "Staff.Leah Knaeble" <lknaeble@pvschools.net>, "shbell@pvschools.net" <shbell@pvschools.net>, "Gcolonna@pvschools.net" <Gcolonna@pvschools.net>, "Psweeney@pvschools.net" <Psweeney@pvschools.net>, "Hlindsay@pvschools.net" <Hlindsay@pvschools.net>, "Dcourson@pvschools.net" <Dcourson@pvschools.net>, "skalter@pvschools.net" <skalter@pvschools.net>, "smoushey@pvschools.net" <smoushey@pvschools.net>, "kjoiner@pvlearners.net" <kjoiner@pvlearners.net>, "kkodawenger@pvschools.net" <kkodawenger@pvschools.net>, "Kader, Sarah" [redacted]

Is the RSO from Horizon coming to the meeting?
[Quoted text hidden]

[redacted] Sun, May 17, 2026 at 12:22 PM
To: shbell@pvschools.net, "Staff.Leah Knaeble" <lknaeble@pvschools.net>
Cc: [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net, Sarah Kader <[redacted]>, Charlee McDermott <charlee.mcdermott@phoenix.gov>, lorenzo.melvin@phoenix.gov

Principal Knaeble, Principal Bell, and Paradise Valley Unified School District Administration,

We are writing to formally express our outrage and profound disappointment regarding the ongoing anti-Semitic harassment our daughter, [redacted] has endured at Desert Shadows Middle School and the administration's repeated failure to stop it.

This is now the FOURTH anti-Semitic incident involving our daughter, despite prior reports, meetings, and assurances from school leadership that the situation would be addressed appropriately.

Most recently, on Wednesday, May 13, 2026, during [redacted] a student named [redacted] — who is friends with [redacted] the student previously involved in the April 14, 2026 incident where [redacted] was subjected to a Hitler salute accompanied by chants of "Jew! Jew! Jew!" — again directed the phrase "Jew! Jew! Jew!" toward [redacted]

This behavior is not teasing. It is not immature joking. It is targeted anti-Semitic harassment, and it is creating a hostile educational environment for our daughter.

What is equally disturbing is the apparent inability or unwillingness of Desert Shadows Middle School administration to effectively intervene after repeated incidents. The fact that another student felt comfortable engaging in the exact same anti-Semitic conduct after the April incident demonstrates that the school's response has been wholly ineffective and has failed to send any meaningful message that this behavior will not be tolerated.

With classes ending on May 21, we are especially concerned that the administration may attempt to delay meaningful action until the school year concludes. That is unacceptable. The timing of the school calendar does not diminish the seriousness of repeated anti-Semitic harassment or the district's responsibility to address it fully and immediately.

During our April 16th meeting with school & district leadership, we were deeply troubled by what appeared to be a greater emphasis on programs designed to support the perpetrators rather than protecting the student being targeted. The discussion repeatedly focused on how several of the accused students were protected because of their special needs status, while far less attention was given to the ongoing impact these anti-Semitic incidents have had on [redacted]

Our daughter deserves to attend school without fear of harassment, intimidation, humiliation, or religious discrimination. Instead, [redacted] has repeatedly been singled out because she is Jewish, while the adults responsible for maintaining a safe educational environment have failed to stop it.

At this point, confidence in the school's and district's handling of these matters has been severely damaged. Repeated anti-Semitic incidents against the same student should never become normalized, minimized, or tolerated in any educational environment.

We are requesting a formal written response from both school and district leadership no later than May 19th, 2026, outlining the specific actions being taken to address these incidents and ensure this behavior stops immediately.

[redacted]

> On Apr 21, 2026, at 10:51AM, Shawn Bell <shbell@pvschools.net> wrote:
>
> [Quoted text hidden]

Victim's Rights.pdf
194K

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Sun, May 17, 2026 at 12:22 PM
To: [redacted]

Address not found

Your message wasn't delivered to **Selse@pvschools.net** because the address couldn't be found, or is unable to receive mail.

LEARN MORE

The response was:

```
550 5.1.1 The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos or unnecessary spaces. For more information, go to https://support.google.com/mail/?p=NoSuchUser a92af1059eb24-1353b07facasor1121097c88.18 - gsmtp
```

Final-Recipient: rfc822; Selse@pvschools.net
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try
550-5.1.1 double-checking the recipient's email address for typos or
550-5.1.1 unnecessary spaces. For more information, go to
550 5.1.1 https://support.google.com/mail/?p=NoSuchUser a92af1059eb24-1353b07facasor1121097c88.18 - gsmtp
Last-Attempt-Date: Sun, 17 May 2026 12:22:17 -0700 (PDT)

noname
4K

Dan Courson <dcourson@pvschools.net> Mon, May 18, 2026 at 10:01 AM
Reply-To: dcourson@pvschools.net
To: [redacted]

Dear [redacted]

Thank you for reaching out and for sharing your concerns regarding these deeply troubling incidents involving [redacted] I want to acknowledge the seriousness of what you have described and the understandable frustration and hurt your family is experiencing.

PVSchools does not tolerate harassment, discrimination, or behavior that targets students. Every student deserves to feel safe, respected, and supported at school, and I recognize the significant impact repeated incidents such as these can have on a student and family.

I have shared your email with our Student Services Department, and members of that team will be reaching out to you directly to gather additional perspective, discuss next steps, and ensure the matter is reviewed appropriately at both the school and district level.

Thank you again for bringing your concerns forward. We appreciate your advocacy for your daughter and take these matters very seriously.

Sincerely,
Dan Courson

[Quoted text hidden]

Christopher Asmussen <casmussen@pvschools.net> Mon, May 18, 2026 at 10:21 AM

Reply-To: casmussen@pvschools.net
To: dcourson@pvschools.net
Cc: [redacted]

Good morning,

[redacted] Dr. Sweeney and I just finished speaking with Ms. Knaeble and Ms. Bell. They began an investigation and have already spoken with several students and staff members. Ms. Knaeble will be reaching out to you by phone and will follow up with a response in writing.

Please expect a call from her soon.

Dr. Chris Asmussen
Director of Student Services - Secondary
[redacted]
casmussen@pvlearners.net

[Quoted text hidden]

[redacted] Mon, May 18, 2026 at 2:11 PM
To: [redacted]

Begin forwarded message:

From: Dan Courson <dcourson@pvschools.net>
Date: May 18, 2026 at 10:01:46 AM MST
To: [redacted]
Subject: Re: Immediate Action Required: Anti-Semitic Harassment of Our Daughter in [redacted]Class
Reply-To: dcourson@pvschools.net

[Quoted text hidden]

[redacted] Mon, May 18, 2026 at 2:12 PM
To: [redacted]

Begin forwarded message:

From: Christopher Asmussen <casmussen@pvschools.net>
Date: May 18, 2026 at 10:21:33 AM MST
To: Dcourson@pvschools.net
Cc: [redacted]
Subject: Re: Immediate Action Required: Anti-Semitic Harassment of Our Daughter in [redacted]Class
Reply-To: casmussen@pvschools.net

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Leah Knaeble <lknaeble@pvschools.net> Mon, May 18, 2026 at 5:19 PM
Reply-To: lknaeble@pvschools.net
To: [redacted]
Cc: shbell@pvschools.net, [redacted] Casmussen@pvschools.net, Gcolonna@pvschools.net, Psweeney@pvschools.net, Selse@pvschools.net, Hlindsay@pvschools.net, Dcourson@pvschools.net, skalter@pvschools.net, smoushey@pvschools.net, kjoiner@pvlearners.net, kkodawenger@pvschools.net, Sarah Kader <[redacted]>, Charlee McDermott <charlee.mcdermott@phoenix.gov>, lorenzo.melvin@phoenix.gov

Dear [redacted]

Thank you for contacting the Desert Shadows Middle School administration and Paradise Valley Unified School District leadership. We have received your email dated May 17, 2026, and understand your profound concern, frustration, and urgency regarding the safety and well-being of your daughter, [redacted]

Please accept our assurance that we treat all reports of anti-Semitism, discrimination, and harassment with the utmost seriousness. Our primary objective remains maintaining a safe, welcoming, and supportive educational environment for [redacted]

Below is a thorough summary of the school's formal investigative findings, the disciplinary actions taken, and the systemic safety measures implemented to ensure [redacted] is protected through the remainder of the school year.

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1. Summary of Investigative Findings & Disciplinary Actions

Every report filed by [redacted] has been immediately and thoroughly investigated in compliance with Arizona Revised Statute § 15-341 regarding victim rights.

- **Incident on April 20, 2026 ([redacted]Class):**
  - **Findings:** The school launched an immediate investigation into anti-Semitic statements made by two students (Student 1 and Student 2). Based on a preponderance of evidence, both statements were corroborated.
  - **Action Taken:** Administrative and school consequences were promptly issued to both students in accordance with the PVSchools Family-Student Handbook. Both students reviewed and signed the Victim's Rights Bullying Policy statement alongside administration.
- **Incident on April 22, 2026 (Retaliation):**
  - **Findings:** [redacted] reported that a third student (Student 3) made a retaliatory threat, "You messed up. You're going to regret it", in defense of his peers.
  - **Action Taken:** This was immediately classified as a threat and a form of retaliation. Formal school consequences were issued, and Student 3 reviewed and signed the Victim's Rights Bullying Policy.

- **Incident on April 23, 2026:**
  - **Findings:** [redacted] reported that Student 2 instructed Student 4 to use a Nazi hand gesture and chant anti-Semitic slurs. A comprehensive investigation was launched; however, administration was unable to corroborate the incident through classroom witnesses, and there was insufficient evidence to issue formal consequences.
- **Incident on May 14/15, 2026 [redacted]:**
  - **Findings:** [redacted] reported that on Thursday, May 14, Student 5 made an anti-Semitic hand (Opening and Closing it) gesture and mouthed "Jew, Jew, Jew" while taking a test. Administration immediately interviewed Student 5, the classroom teacher [redacted], the instructional assistant, and all surrounding students.
  - **Action Taken:** No other individuals in the classroom observed or heard the gesture or words, resulting in an absence of a preponderance of evidence required for formal consequences. However, the administration met with Student 5 and formally reviewed the Victim's Rights Bullying Policy with him.
- **Incident Reported on May 18, 2026 (Cafeteria Incident from Friday, May 15):**
  - **Findings:** On Monday, May 18, [redacted] reported that while waiting in the cafeteria snack line on Friday, May 15, Student 7 informed her that Student 8 had referred to her using an anti-Semitic slur ("ugly Jew"). Student 6 was present and witnessed this exchange. Preliminary interviews indicate this arose from a private conversation between Students 6, 7, and 8 regarding whether Student 8 liked [redacted] during which Student 8 stated he did not like [redacted] because she is ugly and she is Jewish, which is a religion that is not shared between the two of them.
  - **Action Taken: This investigation is actively ongoing.** The administration is currently gathering information, interviewing the involved parties, and reviewing evidence. We will enforce formal consequences consistent with the PVSchools Family-Student Handbook as necessary upon completion of the interviews.

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2. Implemented Interventions & Safety Infrastructure

We recognize that disciplinary action alone is not enough; proactive infrastructure must be in place to ensure [redacted] feels secure on campus. The following protocols were established and remain actively enforced:

- **No-Contact Agreements:** Formal campus No-Contact Agreements were generated and signed. Agreements between [redacted] and Students 1, 3, and 4 were finalized on April 23, 2026. The final agreement with Student 2 was completed on April 27, 2026. Admin verified as recently as May 18, 2026, that these boundaries are being monitored and maintained.
- **Campus Escort & Safe Adults:** A campus assistant has been assigned specifically to walk near [redacted] as she travels from class to class during unstructured transition times. Furthermore, [redacted] schedule was altered to place her in the classroom of [redacted] whom [redacted] explicitly identified as a trusted, safe adult on campus.
- **Law Enforcement Collaboration:** On April 23, 2026, District leadership, DSMS administration, and the Phoenix Police Department met with your family to establish a formal safety plan. Phoenix Police generated Official Report # [redacted] to ensure documentation exists beyond the district level.
- **Open-Door Office Access:** [redacted] has been granted an unrestricted Anytime Pass to the back office at any point during the day if she ever feels uncomfortable or needs to report an issue directly to administration.

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3. Systemic Education & Cultural Reform

We acknowledge your concern that the school must address the root causes of bias and hate speech. To prevent the normalization of these behaviors, the school has taken the following campus-wide actions:

- **Bias Crimes Presentations:** From April 28 to April 30, 2026, Officer Mac visited Desert Shadows Middle School to deliver targeted presentations to the entire student body regarding the definition, legalities, and profound psychological impact of bias crimes and hate speech.
- **"No Place for Hate" Framework:** On May 13, 2026, DSMS administration connected with leadership at Greenway Middle School to learn more about how this program is being used. The Greenway Coordinator is willing to assist our team in adopting and implementing the Anti-Defamation League's *No Place for Hate* curriculum at Desert Shadows Middle School to build long-term cultural accountability. This will be on the DSMS School Council Agenda in August as a discussion item for potential implementation during the 2026-27 School Year.

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4. Next Steps Through the End of the School Year

With classes concluding on May 21, 2026, we want to explicitly state that the school will not delay, minimize, or defer our obligations.

1. **Staff Oversight:** All eighth-grade teachers and campus assistants have been re-alerted to strictly observe interactions surrounding [redacted] and other students during the final days of school.
2. **Behavioral Reinforcement:** Administration will maintain active daily communication with [redacted] to ensure her comfort and to guarantee that her safe-adult network is functioning exactly as intended.

We understand that your confidence in the school's handling of these incidents has been strained. We are fully committed to ensuring [redacted] finishes her academic year in an environment where she is safe, respected, and valued.

If you would like to schedule a follow-up phone call or meeting to discuss these measures further, please contact our office directly.

Sincerely,

Leah Knaeble
Principal
Desert Shadows Middle School
[redacted]

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