

1 SIGAL CHATTAH, ESQ.  
Nevada Bar No.: 8264  
2 CHATTAH LAW GROUP  
5875 S. Rainbow Blvd. #204  
3 Las Vegas, Nevada 89118  
Tel: (702) 360-6200  
4 Fax: (702) 643-6292  
Chattahlaw@gmail.com  
5 *Counsel for Plaintiff*

6 JOSEPH S. GILBERT, ESQ.  
Nevada State Bar No.: 9033  
7 JOEY GILBERT LAW  
405 Marsh Avenue  
8 Reno, Nevada 89501  
9 Tel: (775) 284-7700  
10 Fax: (775) 284-3809  
Joey@joeygilbertlaw.com  
11 *Counsel for Plaintiff*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 RICHARD SCOTT MEAD,  
15 Plaintiff,

Case No.:

16 vs.

17 WASHOE COUNTY SCHOOL  
DISTRICT, a political subdivision of  
18 the State of Nevada, KRISTEN  
MCNEIL, and DOES I -XX  
19 Defendants.

**COMPLAINT**

**JURY DEMAND**

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21 COMES NOW, Plaintiff RICHARD SCOTT MEAD, by and through his attorneys of  
22 record, SIGAL CHATTAH, ESQ., of CHATTAH LAW GROUP and JOSEPH S. GILBERT,  
23 ESQ., of JOEY GILBERT LAW, and hereby alleges and complains against Defendants as  
24 follows:

25 **JURISDICTION AND VENUE**

26 **1.** This court has Federal subject matter jurisdiction under 42 U.S.C. § 1983.  
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1           **2.**       Venue is proper under 28 U.S.C. § 1391 in the District of Nevada, Washoe  
2 County, because this claim arose therein.

3           **3.**       Every act and omission alleged herein was done by Defendants and carried out  
4 under the color of state and federal laws, statutes, ordinances, regulations, or customs.

5           **4.**       This Court has supplemental jurisdiction over Plaintiff's State law claims  
6 pursuant to 28 U.S.C. § 1367(a) because they are part of the same case and controversy  
7 described by Plaintiff's Federal claims.

8           **5.**       Plaintiff alleges that the conduct of each Defendant deprived him of his  
9 constitutional right to free exercise and free speech.

10           **6.**       Each of the Defendants caused, and is responsible for, the unlawful conduct directed  
11 towards Mead. Each of the Defendants by participating in the unlawful conduct, or acting jointly and in  
12 concert with others who did, authorized, acquiesced, condoned, and approved the unconstitutional  
13 conduct by failing to take action to prevent said unconstitutional conduct which resulted in the financial  
14 ruin, humiliation and destruction of Mead's life and livelihood.

15           **7.**       Wherever reference is made in this Complaint to any act by Defendants, it is  
16 alleged that each Defendant was the agent of the others. Defendants were acting within the  
17 course and scope of this agency, and all acts alleged committed by any one of them shall also be  
18 deemed to mean the acts and failures to act of each Defendant individually, jointly or severally.

19           **8.**       All of the acts or failures to act herein were duly performed by and attributable to  
20 all Defendants, each acting as agent, employee, or under the direction and/or control of the  
21 others. Said acts or failures to act were within the scope of said agency and/or employment and  
22 each of the Defendants and ratified the acts and omissions by the other Defendants. Whenever  
23 and wherever reference is made in this Complaint to any acts by Defendants, such allegations  
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1 members, unless there is a specific “need to know,” they are legally required to do so, or  
2 the student has authorized such disclosure.

3 **15.** AR 5161 also mandates that Students shall have access to restrooms, locker  
4 rooms and other facilities “that correspond to their gender identity as expressed by the student  
5 and asserted at school, *irrespective of the gender listed on the student’s records . . . .*”

6 Further, should an individual fail to adhere to AR 5161, despite their own religious  
7 beliefs, they may be subject to disciplinary action.

8 **16.** During or about April, 2023, Mead became aware of AR 5161, and that WCS  
9 was providing training curriculum to teachers and staff regarding gender issues that he was  
10 concerned were against his religious beliefs.

11 **17.** Mead signed up for the training hoping to be provided with information that  
12 would set his mind at ease regarding the training, and assure him that his employer would not be  
13 complicit in such an egregious violation of his religious beliefs.

14 **18.** Mead intended on attending the training and reviewed the program materials in  
15 preparation for same.

16 **19.** The program in subject was labeled “Brave Space Training” in which teachers  
17 receive special training as indicated in the material provided by WCS to teachers in a Brave Space  
18 power-point entitled LGBTQ Education Presentation for Brave Space.

19 **20.** Mead’s Brave Space Training included a flyer for a 3-part seminar instruction to  
20 teachers stating “[D]on’t miss your chance to help the students of Washoe County School District, by  
21 being someone they can come to with concerns. There is a new program in collaboration with Civil  
22 Rights Compliance, Counseling, and Equity and Diversity. This three-part course covers an  
23 introduction to the Brave Space program, a training segment on offering support to LGBTQ+  
24 students, and a training segment focused on the collective pursuit of cultural proficiency for all  
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1 students, families and employees. Upon completion of all three courses, participants will be issued a  
2 Brave Space placard to display, indicating to students that you are a safe staff member to discuss  
3 matters pertaining to sensitive topics.”

4 **21.** In reviewing the Brave Space materials, Mead quickly understood that WCSD was  
5 seeking to fracture the parent-child relationship, by inserting themselves into gender identity matters;  
6 a gross violation of parental rights aside from Mead’s personal religious beliefs.

7 **22.** The Brave Space training included instruction on how to keep students’ sessions with  
8 Brave Space Instructors confidential and hide pertinent information regarding the students’ mental  
9 health and non-conforming/discordant gender identity from their parents.

10 **23.** Mead’s personal religious beliefs regarding gender identity and gender non-  
11 conformity, as well as legal concerns regarding AR 5161 and WCSD’s actions to assist teachers and  
12 staff to enforce AR 5161, such as the Brave Space Training led him to seek legal advice regarding  
13 the legalities of such actions by WCSD.

14 **24.** On April 10, 2023, Mead received an email from Debra Newman and employee at  
15 WCSD, notifying him that the training was being given on “Zoom” which at the time was not  
16 approved by WCSD and could not be installed on school computers.

17 **25.** Mead received a second email which included a statement that had never been  
18 seen in a training email before and stated “Please do not share these links with any other person  
19 or party.”

20 **26.** It is clear that not only did WCSD foster a culture of not disclosing a student’s  
21 mental health issues with said student’s parent/guardian, but WCSD was trying to prevent the  
22 training curriculum from being disclosed to the public, so that parents of WCSD students would  
23 not become aware of AR 5161 and WCSD’s illegal policy to keep student information from their  
24 parents/guardians.  
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1           **27.**     After reading the emails and attachments Mead forwarded the email and  
2 attachments to his personal account and to his Attorney to consult on legalities of the training.

3           **28.**     On June 8, 2023, Mead received a letter by E. Hirschman, his building supervisor  
4 informing him that he was under investigation for forwarding a “confidential” email to his  
5 private email and then forwarding said email to an attorney.

6           **29.**     Mead was informed that his action could result in termination instructing him not  
7 to discuss the matter with anyone other than his attorney.

8           **30.**     The letter further provided him with 2 business days’ notice of an investigative  
9 meeting that would determine whether he would remain a school system employee.

10          **31.**     The correspondence precluded Mead from contacting WCSD’s Office of Civil  
11 Rights regarding obtaining a reasonable accommodation for his disability, attention deficit  
12 disorder (“ADD”), prior to the meeting.

13          **32.**     On Monday June 12, 2023, Mead attended the “investigatory hearing” and under  
14 advice of counsel, notified the Body that he had questions about the legitimacy of the training,  
15 and had questions about the constitutionality of being forced to adhere to AR 5161 which is  
16 completely in contention with his religious beliefs, as well as being investigated for contacting  
17 an attorney.

18          **33.**     Mead also notified the Body, that he had a disability and requested a reasonable  
19 accommodation of having questions regarding the investigation submitted to him in writing.

20          **34.**     Upon receiving Mead’s request for a reasonable accommodation, the Board ended  
21 the meeting abruptly. Mead was never provided with the Board’s questions in writing, as  
22 requested at the meeting. Thus, Mead was not provided the opportunity to provide any defense  
23 or participate in the investigation due to WCSD’s refusal to provide him with his requested a  
24 reasonable accommodation due to his disability.  
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1           **35.**     On June 28, 2023, Mead attended a meeting with Sean Hall, Principal, and E.  
2 Hirschman, supervisor, where he was informed that he would be suspended for 5 days without  
3 pay and provided with a “Notice of Intent to Suspend.”

4           **36.**     The “Notice of Intent to Suspend” stated the reason for Mead’s suspension was  
5 forwarding a “confidential” email.

6           **37.**     Additionally, Mead received a Letter of Admonition which again stated that he  
7 forwarded a “confidential” email and it also stated that during the Investigative Disciplinary  
8 Proceeding he repeated identical prepared statements.

9           **38.**     The correspondence regarding Mead’s discipline was sent to three additional  
10 employees along with the School Principal.

11           **39.**     Upon receiving the correspondence, Mead requested a Level 2 hearing and on August 10,  
12 2023 at 1:00 pm. Mead’s appeal was heard by Lauren Ford (hearing officer), Kevin Pick (General  
13 Counsel), Anthony Spotts (Labor Relations).

14           **40.**     It became clear by the nature of the Level 2 hearing that Mead was being retaliated  
15 against by disclosing the Brave Space Training Manuals and links to his attorneys.

16           **41.**     It also became clear that there was an orchestrated effort by members of WCSD to  
17 discipline and embarrass Mead for disclosing said materials and defame him and besmirch his character.

18           **42.**     Mead was placed on suspension without pay which has been spread over 5  
19 months at the cost of over \$2,500 to his family as well as losing 5 days credit towards his  
20 retirement benefits.

21           **43.**     The retaliatory letters in his employment file will prevent him from advancing or  
22 changing jobs within WCSD and also prevent him from being given a positive reference from  
23 WCSD.  
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1           **44.**     The status and admonishment letters also contain false and defamatory statements  
2 which have an effect on Mead seeking employment or advancement in even another school  
3 district.

4           **45.**     Mead was and remains in a state of depression from June 8, 2023 because he is  
5 forced to work in a district that has lied about him in letters within his personnel file but will not  
6 allow him to seek employment outside of the district due to having to provide a reference which  
7 is defamatory.

8           **46.**     AR 5161 deprives individuals, specifically Mead, of their first amendment rights  
9 to freedom of religion and free speech by forcing individuals within WCSD to accept and not  
10 speak out about their personal beliefs regarding transgender or gender non-conforming students.

11           **47.**     AR 5161, approved by the Washoe County School Board, is deliberately  
12 indifferent to the fact that adherence to this policy may directly violate individuals' first  
13 amendment rights to freedom of religion and free speech.

14           **48.**     It is clear that the retaliatory actions taken against Mead are a direct result of his  
15 personal religious beliefs and his refusal to adhere to a narrative presented by Defendants that  
16 violates his First Amendment right to free speech.

17           **49.**     On September 28, 2023, Mead filed a Complaint of religious discrimination  
18 against WCSD with the Nevada Labor Relations Board ("NLRB").

19           **50.**     Through the Memorandum of Understanding between the NLRB and Equal  
20 Employment Opportunity Commission, Mead received his right-to-sue letter on February 29,  
21 2024.

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**FIRST CAUSE OF ACTION**

***(Declaratory Relief Under 42 U.S.C. § 1983)***

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**51.** Plaintiff repeats and re-alleges all prior paragraphs of this Complaint and incorporates them herein by reference as though fully set forth herein.

**52.** Pursuant to 42 U.S.C. § 1983, Plaintiff is entitled to a Declaration from the Court that Defendants violated Plaintiff’s constitutional right to equal protection under the laws and deprived him of his constitutional right to procedural due process; that Defendants acted with conscious disregard and malicious intent, under color of state law, when they failed to protect Plaintiff, failed to prohibit the discriminatory conduct, failed to provide a safe and respectful employment environment free from discrimination and retaliation; and that Defendants demonstrated deliberate indifference to Plaintiff through customs and/or policies and/or practices and usage so pervasive and widespread as to constitute the force of law.

**53.** Defendants denied Plaintiff of his right to equal protection under the law, retaliated against him for his religious beliefs and his first amendment rights to express himself, all violations of which are actionable under 42 U.S.C. § 1983.

**54.** Defendants acted with conscious disregard and malicious intent towards Plaintiff when they carried out these acts and were deliberately indifferent to the plight of Plaintiff, violations of which are actionable under 42 U.S.C. § 1983.

**55.** Defendants deprived Plaintiff of his right to procedural due process and subsequent procedural safeguards, violations of which are actionable under 42 U.S.C. § 1983.

**56.** Defendants’ act and omissions were the direct and proximate cause of harm to Plaintiff, in violation of his rights and actionable under 42 U.S.C. § 1983.



1           **66.**     The First Amendment guarantees that Plaintiff will not be retaliated against, due  
2 to his religious beliefs by his employer.

3           **67.**     Defendants’ retaliation against Plaintiff because of his religious beliefs violates  
4 that First Amendment, free exercise clause because of such expression.

5           **68.**     Plaintiff’s actions did not elicit a suspension, and as a direct and proximate result  
6 of the malicious and intentional conduct by Defendants, whose acts were directed and ratified by  
7 Defendants collectively, Plaintiff suffered damages, the exact amount which will be proven at  
8 trial.

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10          **69.**     The intentional conduct of Defendants was so despicable, oppressive, malicious,  
11 and engaged in with such conscious disregard for Plaintiff’s rights and economic benefit that  
12 punitive damages are warranted.

13          **70.**     That it has become necessary for Plaintiff to retain the services of legal counsel  
14 for which Plaintiffs is entitled to recover such costs and expenses from Defendants.

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16                                   **THIRD CAUSE OF ACTION**  
17                                   ***(Violation of First Amendment- Free Speech)***  
18                                   ***(Retaliation)***

19          **71.**     Plaintiff repeats and re-alleges all prior paragraphs of this Complaint and  
20 incorporates them by reference as though fully set forth herein.

21          **72.**     That it has become necessary for Plaintiff to retain the services of legal counsel  
22 for which Plaintiff is entitled to recover such costs and expenses from Defendants.

23          **73.**     “[A]s a general matter the First Amendment prohibits government officials from  
24 subjecting an individual to retaliatory actions” for engaging in protected speech. *Hartman v.*  
25 *Moore*, 547 U.S. 250, 256 (2006).

26          **74.**     A First Amendment retaliation claim brought under 42 U.S.C. § 1983 requires the  
27 Plaintiff to show that (1) he engaged in protected speech under *Pickering/Garcetti*, (2) the  
28 government’s retaliatory conduct adversely affected that speech, and (3) the speech was at least a

1 “substantial or motivating factor in the adverse employment action.” See also *Givhan v. Western*  
2 *Line Consolidated School District*, 439 U.S. 410 (1979).

3 **75.** Defendants’ decision to take adverse employment action against Plaintiff because  
4 of his religious beliefs violate his First Amendment right to Free Speech.

5 **76.** Defendants, acting under color of state law, retaliated against Mead, and violated  
6 his First Amendment rights by prosecuting an investigation against him, fabricating evidence  
7 used against him, issuing the Letter reprimanding him and suspending him, due to his protected  
8 speech regarding the Brave Space Program.

9 **77.** Defendants violated Mead’s First Amendment rights by undertaking actions  
10 designed to deter him from ever expressing a viewpoint different from that of Defendants, on the  
11 threat of additional investigations, proceedings, and even termination.

12 **78.** There is no state interest, compelling or otherwise, justifying Defendants’  
13 retaliatory actions against Mead.

14 **79.** Defendants’ prosecution, punishment, and suspension, have deprived and are  
15 depriving Mead of his First Amendment rights to free speech and association, as secured against  
16 state infringement by the Fourteenth Amendment to the United States Constitution and 42 U.S.C.  
17 § 1983.

18 **80.** Defendants were aware of and informed of Mead’s constitutional rights to express  
19 opinions different from their own, and therefore were motivated by evil motive or intent, or acted  
20 with reckless or callous indifference to Meade’s constitutional rights, when they violated,  
21 misrepresented, and interfered with his constitutional rights.

22 **81.** Meade has suffered irreparable harm, damage, and injury inherent in the violation  
23 of First and Fourteenth Amendment rights, for which there is no adequate remedy at law.  
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1           **82.**     If not enjoined by this Court, Defendants and/or their agents will continue to  
2 affect the aforementioned deprivations and abridgments of Plaintiff’s constitutional rights,  
3 thereby causing further irreparable harm, damage, and injury for which there is no adequate  
4 remedy at law.

5           **83.**     As a direct result of Defendants’ concerted actions, Mead has suffered monetary  
6 damages and other harm.

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8                                   **FOURTH CAUSE OF ACTION**  
9                                   *(Violation of First Amendment- Free Speech)*  
10                                   *(Compelled Speech)*

11           **84.**     Plaintiff repeats and re-alleges all prior paragraphs of this Complaint and  
12 incorporate them by reference as though fully set forth herein.

13           **85.**     The Supreme Court of the United States has declared, with regard to the First  
14 Amendment prohibition on compelling speech that, “[i]f there is any fixed star in our  
15 constitutional constellation, it is that no official, high or petty, can prescribe what shall be  
16 orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess  
17 by work or act their faith therein.” *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 642  
18 (1943).

19           **86.**     Accordingly, “when government directly regulates speech by mandating that  
20 persons explicitly agree with government policy on a particular matter, it plainly violates the  
21 First Amendment.” *303 Creative LLC v. Elenis*, 385 F. Supp. 3d 1147 (D. Colo. 2019), *aff’d*, 6  
22 F.4th 1160 (10th Cir. 2021)

23           **87.**     The First Amendment protects Mead from being forced to support or otherwise  
24 agree with Defendants’ policies and actions as a condition of employment.  
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1           **88.** Defendants, acting under color of state law, forced Meade to take part in the  
2 Brave Space Training and voice or otherwise pledge his support for their gender identity  
3 opinions.

4           **89.** Defendants also sought to force Meade to voice or otherwise pledge his support of  
5 keeping the curriculum secret from parents' knowledge, by prosecuting an investigation against  
6 him, fabricating evidence used against him, suspending him, all because he expressed an opinion  
7 and viewpoint different from Defendants' own.

8           **90.** There is no state interest, compelling or otherwise, justifying Defendants'  
9 requirement that individuals, not disclose gender identity curriculum to the public and  
10 specifically to parents who send their children to school at the WCSD.

11           **91.** Defendants, by forcing Mead to refrain from any speech that they disagree with,  
12 deprived and are depriving Mead of his First Amendment rights to free speech and association,  
13 as secured against state infringement by the Fourteenth Amendment to the United States  
14 Constitution and 42 U.S.C. § 1983.

15           **92.** Defendants, by prescribing the speech and views they deem acceptable for Mead  
16 to express, upon risk of employment consequences in the future, deprived and are depriving Mr.  
17 Mead of his First Amendment rights to free speech and association, as secured against state  
18 infringement by the Fourteenth Amendment to the United States Constitution and 42 U.S.C. §  
19 1983.

20           **93.** Defendants were aware of and informed of Mead's constitutional rights to  
21 express opinions different from their own, and therefore were motivated by evil motive or intent,  
22 or acted with reckless or callous indifference to Mead's constitutional rights, when they violated,  
23 misrepresented, and interfered with his constitutional rights.





1           **102.** Defendants' offending customs and/or policies and/or practices and usage arise  
2 from an express policy made through the decisions of Defendants' personnel with final policy-  
3 making authority, violations of which are actionable under 42 U.S.C. § 1983.

4           **103.** Defendants did not exercise due and reasonable care in the performance of their  
5 duties and undermined and detracted from Mead's instruction and educational experience of and  
6 students of WCSD, creating an offensive and discriminatory environment that became hostile  
7 and dangerous, violations of which are actionable under 42 U.S.C. § 1983.

8           **104.** Defendants condoned, ratified, and carried out the prohibited conduct retaliated  
9 against Defendant and denied Mead from participation in his employment, violations of which  
10 are actionable under 42 U.S.C. § 1983.

11           **105.** Defendants' acts and expressions were so objectionably offensive that they  
12 created an environment where Plaintiff was subject to hostility and retaliated against harming his  
13 employment and future employment.  
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15           **106.** Defendants acts and omissions proximately and directly caused harm to Plaintiff,  
16 violating his Constitutional, Federal, and States' rights, where such damage was foreseeable.  
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18           **107.** Plaintiff is entitled to recover from Defendants for all damages directly and/or  
19 proximately resulting from the violation of his Constitutional right to equal protection under the  
20 law.

21           **108.** Plaintiff suffered injuries in his emotional and psychological harm, humiliation,  
22 degradation, damaged relationships, and general emotional distress, where Plaintiff claims both  
23 past and future damages, in an amount in excess of \$75,000.  
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25           **109.** Because Defendants' actions, and possibly other employees, agents, and/or  
26 representatives of the WCSD, were motivated by evil motive or intent and/or involve[d] a  
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1 reckless or callous indifference to the federally protected rights of Mead, an award of punitive  
2 damages is appropriate to the fullest extent permitted by law.

3 **110.** Pursuant to 42 U.S.C. § 1988, Plaintiff is entitled to recover against Defendants  
4 for all reasonable attorneys' and expert fees expended in prosecuting this action.

5 **SIXTH CAUSE OF ACTION**

6 ***(Violation of 5<sup>th</sup> and 14<sup>TH</sup> Amend. – Procedural Due Process)***

7 **111.** Plaintiff repeats and re-alleges all prior paragraphs of this Complaint and  
8 incorporates them by reference as though fully set forth herein.

9 **112.** Whereas the Due Process Clause of the Fourteenth Amendment affords Plaintiff  
10 the right to procedural due process, and here, Defendants denied Plaintiff his right when they,  
11 under color of state law, refused to provide a reasonable accommodation for Plaintiff during the  
12 investigatory process, and deprived Plaintiff of his subsequent procedural safeguards, violations  
13 of which are actionable under 42 U.S.C. § 1983.

14 **113.** At all relevant times herein, Defendants exercised substantial control over the  
15 administrators acting in their professional capacity while denying Mead his religious rights,  
16 suspending him thereafter, for refusing to keep confidential the Gender Discordant Curriculum,  
17 violations of which are actionable under 42 U.S.C. § 1983.

18 **114.** Defendants' offending customs and/or policies and/or practices and usage arise  
19 from an express policy made through the decisions of Defendants' personnel with final policy-  
20 making authority, violations of which are actionable under 42 U.S.C. § 1983.

21 **115.** Defendants did not exercise due and reasonable care in the performance of their  
22 duties and undermined and detracted from Mead's employment, which became hostile and  
23 unconstitutional, violations of which are actionable under 42 U.S.C. § 1983.  
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1           **142.** Policymakers for WCSD, have vigorously defended the School District superintendent  
2 for engaging in wrongful policy that is unconstitutional and retaliatory and discriminatory acts.

3           **143.** Upon information and belief, policy makers at the WCSD have a custom and practice of  
4 failing and/or refusing to discipline superintendents involved in systematically and unlawfully retaliating  
5 against teachers, students and the like.

6           **144.** Upon information and belief, policy makers at the WCSD have a custom and practice of  
7 improperly and systematically justifying violations of teachers and students' rights that are in fact  
8 unjustifiable.

9           **145.** Upon information and belief, policy makers at the WCSD have failed to thoroughly  
10 investigate many of its superintendents' violations trickling down to administrators and faculties and have  
11 a custom and practice of failing to take remedial steps after such violations.

12           **146.** Upon information and belief, WCSD have ratified, condoned, approved, and encouraged  
13 the use retaliatory acts by its superintendent and others in administration.

14           **147.** WCSD was deliberately indifferent to the rights of Mead to be free from retaliation for  
15 engaging in constitutionally protected acts. WCSD engaged in the deliberate indifference and misconduct  
16 of its employees.

17           **148.** As a direct result of WCSD' longstanding customs and practice of deliberate indifference  
18 to Mead's constitutional rights, and rights of others so situated, it was deliberately indifferent to a  
19 substantial risk of serious harm, embarrassment and humiliation of Mead.

20           **149.** The unlawful and illegal conduct of Defendant WCSD, its policies, procedures, customs,  
21 and practices, deprived Mead of the rights, privileges and immunities secured to him by the Constitution  
22 of the United States and federal statutory law.

23           **150.** Municipal liability can attach under *Monell v. Department of Social Services*, 436  
24 *U.S. 658 (1978)*, for even a single decision made by a final policymaker in certain circumstances,  
25 regardless of whether or not the action is taken once or repeatedly. *See Pembaur v. City of*  
26 *Cincinnati*, 475 *U.S. 469, 481, 106 S. Ct. 1292, 89 L. Ed. 2d 452 (1986)*.  
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1           **151.** If an authorized policymaker approves a subordinate’s decision and the basis for  
2 it, such ratification would be chargeable to the municipality under *Monell*. See *City of St. Louis v.*  
3 *Praprotnik*, 485 U.S. 112, 127 (1988).

4           **152.** The Washoe County School Board voted to approve a policy, AR 5161, which  
5 deprives WCSD staff, students and parents of their first amendment and fourteenth amendment  
6 rights.

7           **153.** Defendant Dr. Kristen McNeil, has had a custom, pattern, practice, and/or  
8 procedure of discriminating against teachers who object to progressive curriculums, such as AR  
9 5161, individuals such as Mead herein.

10           **154.** When these Defendants commit acts of discrimination WCSD would ratify their  
11 unconstitutional acts and assist in same.

12           **155.** As evidence of the above-stated custom, pattern, practice, and/or procedure,  
13 WCSD knew that individual advisors discriminated against Mead and ratified such action.

14           **156.** Consistent with and as a result of WCSD’s customs, patterns, practices, and/or  
15 procedures, these administrators unjustifiably and unlawfully allowed, ratified and collaborated  
16 with Defendants to discriminate against Plaintiff and engage in such conduct against Plaintiff.

17           **157.** As a direct and proximate result of the WCSD’s customs, patterns, practices,  
18 and/or procedures, as stated herein above, the Plaintiff’s rights guaranteed to him by the United  
19 States Constitution, were violated.

20           **158.** As a direct and proximate result of the Defendants’ unreasonable and unlawful  
21 actions, Plaintiff has suffered and continues to suffer substantial past and future damages, both  
22 compensatory and general, including, but not limited to, medical bills, severe emotional distress,  
23 mental anguish, embarrassment, humiliation, disfigurement, and physical pain and suffering.  
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