

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

JOHN DOE
c/o Engel & Martin, LLC
4660 Duke Dr., Suite 101
Mason, OH 45040,

PLAINTIFF,

v.

LITTLE MIAMI SCHOOL DISTRICT
95 E. U.S. Highway 22 & 3
Maineville, OH 45039

AND

DAVID WALLACE
President, Little Miami School Board
95 E. U.S. Highway 22 & 3
Maineville, OH 45039

DEFENDANTS

Case No.

Judge:

VERIFIED COMPLAINT

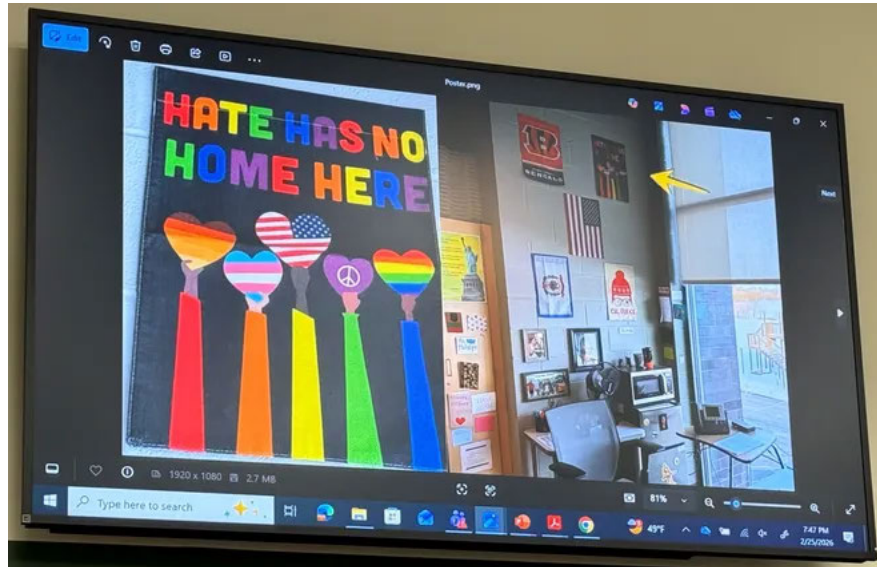
INTRODUCTION

1. Plaintiff John Doe¹ brings this action for violation of his First Amendment rights.
2. John Doe is a teacher for the Little Miami School District.
3. This case arises out of the efforts of Little Miami School Board to remove a small classroom flag bearing the message *Hate Has No Home Here*. The poster, which had hung in John Doe's classroom for approximately four years without generating any complaints, displayed five hands holding

¹ Plaintiff will seek leave of Court to proceed anonymously. *In re Polemar Constr. Ltd. P'ship*, 23 F. App'x 423, 425 (6th Cir. 2001).

heart-shaped icons representing, among other things, the American flag, a peace sign, a rainbow Pride flag, and a transgender Pride flag.

4. The Hate Has No Home Here Flag, along with its position in the classroom, is depicted here:



PARTIES

5. Plaintiff John Doe is a history teacher at Little Miami Schools.
- Plaintiff is an Ohio resident with a residence in [REDACTED].
 - The disclosure of Plaintiff's identity will cause irreparable harm. Plaintiff is challenging a governmental activity in a matter which already has received significant media attention. Plaintiff fears embarrassment and harm to his reputation in the community and fears harm and retaliation, including doxxing, if he were not allowed to proceed using a pseudonym.
6. Defendant Little Miami School District has a principal place of business at 95 E. U.S. Highway 22 & 3, Maineville, OH 45039.²

² Little Miami School District is a person for purposes of § 1983. *Ford v. Cty. of Grand Traverse*, 535 F.3d 483, 495 (6th Cir. 2008); *Doe v. Claiborne Cty., Tenn.*, 103 F.3d 495, 505 (6th Cir. 1996).

- a. Little Miami Schools is a local school district in southern Warren County, Ohio. The district includes the villages of Morrow, Butlerville, and Maineville.
 - b. The Little Miami Local School District consists of Little Miami High School, Little Miami Middle School, Little Miami Primary School, Little Miami Elementary School, and the Little Miami Early Childhood Center.
7. Defendant David Wallace is the President of the Little Miami School Board. Wallace is sued in his official capacity for injunctive relief. On information and belief, Wallace has the authority to provide all of the injunctive relief sought in this Complaint.

JURISDICTION AND VENUE

8. This case arises, in part, under the laws of the United States, specifically the Free Speech guarantees of the United States Constitution, and 42 U.S.C.S. § 1983. Accordingly, this Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1331 and 1343.
9. This Court is an appropriate venue for this cause of action pursuant to 28 U.S.C. § 1391. The defendant is a resident of the State in which this district is located and a substantial part of the events or omissions giving rise to the claim occurred in this district.

FACTS

10. John Doe first hung the Hate Has No Home Here Flag in his classroom in August 2022. John Doe did not receive any complaints from about the Hate Has No Home Here Flag before the events in this lawsuit.
11. The Hate Has No Home Here Flag is one of a number of displays in his classroom, including an American Flag and a Bengals Flag. John Doe also has a “COEXIST” poster in another location of his classroom, that uses various religious symbols from around the world for letters, including the Star of David. John Doe has framed photographs of Presidents and civil rights leaders with quotes, a Rosie the Riveter poster, and some Uncle Sam “I Want You” recruitment posters. He

has some personal items, including West Virginia University flags, a batman poster, an “Oh Fudge” *Christmas Story* poster, and pictures of his family.

12. The Little Miami School District generally permits teachers to display personal items on the walls of their classrooms and teachers are given a lot of freedom to decorate classrooms. Examples of posters or flags displayed by teachers include: flags for various sports teams, images of movie stars, and letters from colleges and universities that former students attend. During holidays, the school has a competition for Christmas decorations on classroom doors. Some teachers have family photos; during his initial training, the human resources personnel from the District encouraged teachers to put up family photos.
13. The Little Miami School Board has a history of animus towards the message that LGBTQ individuals are entitled to equal rights.
 - a. Prior to the summer of 2023, a number of teachers put up “safe space” rainbow stickers. On information and belief, the former superintendent ordered custodial staff to remove the stickers during the summer of 2023.



- b. In September 2023, the District decided to scale back and alter their Scholastic Book Fairs following complaints about the inclusion of certain graphic novels.

- i. A parent allegedly complained to the school board about the graphic novel series *Heartstopper* by Alice Oseman, which centers on a gay boy, arguing that it contained inappropriate content for school-aged children.³
- ii. Wallace, then a candidate for school board, wrote a letter asking for a stop to all Scholastic Book Fairs in the district until a committee could evaluate all the titles to be made available. Many believed that the complaint about “inappropriate material” was pretextual. One parent was quoted saying, “This was about censorship and bigotry. If *Heartstopper* had been about a boy falling in love with a girl, no one would have said a word about this book.”⁴
- c. In October 2023, the District removed books from vending machines operated by the school’s PTO.⁵ On information and belief, the District was reviewing the books to determine if they had views of LGBTQ rights that were contrary to the views of certain School Board Members.
 - i. The District later put out a statement suggesting that the District was only conducting an “inventory” – although this statement never explained why only certain books were removed in order to conduct this inventory.”⁶

³ 'Heartstopper' books about gay student lead to shorter book fair at Ohio school – Cincinnati Enquirer, Sept. 26, 2023. (<https://www.cincinnati.com/story/news/education/2023/09/26/heartstopper-book-fair-ohio/70970137007>).

⁴ Parental supervision required: Little Miami Schools changes book fairs after queer series sparks controversy – WCPO Sept. 27, 2023. (<https://www.wcpo.com/news/local-news/parental-supervision-required-little-miami-schools-changes-book-fairs-after-queer-series-sparks-controversy>).

⁵ Little Miami parents concerned after 'book vending machine' empty following controversy – Fox19, Oct. 16, 2023. (<https://www.fox19.com/video/2023/10/16/little-miami-parents-concerned-after-book-vending-machine-empty-following-controversy/>). A list of available books is here: <https://www.lmccpto.org/bookvending>

⁶ “We are currently doing an inventory of the books in our book vending machine so that parents may have a list of what’s available for students.” Little Miami schools screening books in vending machine

- ii. Some teachers in the District decided to remove all books available from students rather than submit to the “inventory.”
 - d. In December 2024 the school board introduced a policy that would limit classroom displays, generally allowing only U.S. and Ohio state flags and curriculum-related materials to be displayed.⁷
 - i. Wallace stated that the policy was aimed at teacher speech, stating, “It is not the district's job to influence our children on social, political or sexual issues. As a parent, we should not have to worry that children are being subjected to materials that go against our household values and beliefs.”⁸
 - ii. Although ostensibly neutral, commentary on social media and public comment focused on photos of classrooms with LGBTQ symbols, including various signs and stickers containing rainbow coloring displayed in classrooms, which contained messages such as “Safe Space,” “I am a safe person,” and “You are safe with me.”⁹
 - iii. This policy was not adopted after significant public backlash.
14. In January 2025, the Ohio Assembly passed H.B. 8, known as the Ohio Parent’s Bill of Rights. This Statute provides that school districts “provide parents the opportunity to review any instructional material that includes sexuality content.” and “Upon request of the student's parent, a student shall be excused from instruction that includes sexuality content and be permitted to

following controversy -- Fox19, Oct. 18, 2023. (<https://www.fox19.com/2023/10/19/warren-county-school-screening-books-vending-machine-following-controversy>).

⁷ Ohio school board considers restricting posters, flags at schools – Cincinnati Enquirer, Dec. 19, 2024. (<https://www.cincinnati.com/story/news/education/2024/12/19/school-board-in-ohio-might-restrict-flags-posters-in-classrooms/77065048007/>).

⁸ *Id.*

⁹ Ohio village board of ed introduces policy to ban most classroom displays, including Pride flags – Buckeye Flame, January 2, 2025. (<https://thebuckeyeflame.com/2025/01/02/little-miami-flag-ban/>).

participate in an alternative assignment.” R.C. 3313.473(B)(1)(b). The Statute, R.C. 3113.473(G)(5), defines “sexuality content” as follows:

"Sexuality content" means any oral or written instruction, presentation, image, or description of sexual concepts or gender ideology provided in a classroom setting.

"Sexuality content" does not mean any of the following:

(a) Instruction or presentations in sexually transmitted infection education, child sexual abuse prevention, and sexual violence prevention education provided under division (A)(5) of section 3313.60 or section 3314.0310 or 3326.091 of the Revised Code;

(b) Instruction or presentations in sexually transmitted infection education emphasizing abstinence provided under section 3313.6011 of the Revised Code;

(c) Incidental references to sexual concepts or gender ideology occurring outside of formal instruction or presentations on such topics, including references made during class participation and in schoolwork.

15. In October 2025, following the adoption of HB5, the School Board adopted Board Policy 5780.01, entitled Parents' Bill of Rights.¹⁰ This Policy was adopted to The Policy provides:

Prior to providing instruction that includes sexuality content or permitting a third party to provide such instruction on behalf of the District, the Board will provide parents the opportunity to review any instructional material that includes sexuality content. Upon request of the student's parent, a student shall be excused from instruction that includes sexuality content and shall be permitted to participate in an alternative assignment.

The Policy defines “Sexuality content” as follows:

“Sexuality content” means any oral or written instruction, presentation, image, or description of sexual concepts or gender ideology provided in a classroom setting.

“Sexuality content” does not mean any of the following:

¹⁰The Policy is available here:

<https://go.boarddocs.com/oh/lmls/Board.nsf/goto?open&id=DP9MRY5B4A79>

A. Instruction or presentations in sexually transmitted infection education, child sexual abuse prevention, and sexual violence prevention education provided under division (A)(5) of section 3313.60 or section 3314.0310 or 3326.091 of the Revised Code;

B. Instruction or presentations in sexually transmitted infection education emphasizing abstinence provided under section 3313.6011 of the Revised Code;

C. Incidental references to sexual concepts or gender ideology occurring outside of formal instruction or presentations on such topics, including references made during class participation and in schoolwork.

16. In September 2025, the High School Principal approached John Doe. The Principal stated that Wallace had come to John Doe's classroom earlier one morning and took pictures of the Hate Has No Home Here Flag. The Principal indicated that Wallace had taken pictures of a display or book in one other classroom in the Middle School. Wallace later went through the media center searching for 'objectionable' books. When Wallace could not find any objectionable materials, he allegedly told the librarian that he "must have received bad intelligence."
17. In January 2026, at a School Board meeting, Wallace read Board guidelines around displays on building laws. A Board member then reached out to the Superintendent with a question about two posters, including the Hate Has No Home Here Flag.
18. On February 2, 2026, the High School Principal informed John Doe that Wallace had contacted the Superintendent and was requesting that John Doe take down the Hate Has No Home Here Flag. Wallace later clarified that he was making the request as a School Board Member, and not as a parent. The High School Principal indicated that he would not order John Doe to remove the Hate Has No Home Here Flag.
19. John Doe refused to comply with Wallace's request. John Doe subsequently, at the Principal's request, drafted an email to defend the display of the Hate Has No Home Here Poster. John Doe provided specific American History and AP European History curriculum standards indicating

that “the specific content standards ... where I feel the flag I have in my room... is especially applicable.” This email was forwarded to the superintendent.

20. On February 3, 2026 the Superintendent wrote an email indicating that she had “reviewed the poster in question and its association with the attached curricula standards.” She provided her opinion that while the poster “contains symbols of identities” she did not “believe a reasonable observer would conclude its primary purpose is to prompt discussion, provide instruction, or solicit student engagement on sexual concepts or gender ideology.”
21. On February 4, 2026 John Doe met with the Principal and Superintendent. The Superintendent Regina explained she had relayed the Principal’s refusal to order John Doe to take down the Hate Has No Home Here Flag to Wallace, as well as John Doe’s refusal to comply with Wallace’s request, to Wallace. The Superintendent indicated that Wallace was now requesting that the Superintendent order John Doe to remove the Hate Has No Home Here Flag. John Doe explained that the Hate Has No Home Here Flag was not some “meaningless display” but that he had put a lot of thought into purchasing and displaying the Flag. John Doe expressed his belief that Little Miami had a diverse student population that the District had a legal, ethical, and moral obligation to support. John Doe also indicated that the Hate Has No Home Here Flag was intended to symbolize support for marginalized students who could be some of the most at-risk students. He further explained that he chose a flag with multiple skin tones because it was important for that all of his students saw themselves represented in the Flag.
22. The Superintendent told John Doe that she would not order him to take down the Hate Has No Home Here Flag. The Superintendent further explained that if the School Board voted to remove the Hate Has No Home Here Flag, a refusal would be insubordination and subject John Doe to discipline in accordance with union procedures.

23. On February 4, 2026, following John Doe's meeting with the Superintendent and the High School Principal, the Board's outside counsel, Omar Tarazi, emailed the Superintendent and Wallace. Tarazi focused on the message conveyed by the rainbow image in the Hate Has No Home Here Flag.

- a. Tarazi stated that "Board Policy 5780.01 is not directed at general messages encouraging kindness, respect, or anti-bullying" and suggested further that the Board policy would not be implicated if the same message is "displayed over a neutral image, such as the American flag or a generic student image."
- b. Tarazi claimed that "depending on context and interpretation, displays incorporating images that could reasonably be viewed as presenting or describing sexual concepts or gender ideology may implicate parental notification and opt-out requirements under HB 8 and District policy."
- c. Tarazi suggested that the teacher "utilize more neutral versions of the anti-hate and respect theme images..."

24. On February 9, 2026, John Doe responded that "this flag is at most an incidental reference as I do not explicitly provide instruction on the flag or incorporate it into my curricular materials." John Doe also noted the alternative display suggested by Tarazi was not acceptable. He wrote:

My concern is that attempting to find a different, "neutral" image may inadvertently lead to the erasure of LGBTQ+ representation. My preference would be to discuss any additional representation that could potentially be added to the existing flag, rather than removing any of the represented groups.

25. On February 10, 2026 Tarazi emailed the Superintendent to inform her that Wallace has asked for the matter to be placed on the agenda for the next Board meeting.

26. On February 16, 2026 John Doe sent another email to the Superintendent to reiterate that the Hate Has No Home Here Flag's sole intent has always been a general message of inclusion and anti-bullying. He stated:

The flag is not, nor has it ever been, intended to engage students on sexual concepts or gender ideology. My purpose and intent in purchasing that flag for my classroom four years ago was to convey a general message of inclusion. There is no subversive message or hidden intent underlying the flag. It is simply intended to convey that bullying and/or targeting will not be tolerated. I have never incorporated the flag into the curriculum itself or used it as an instructional item when covering any sensitive topics in class.

Additionally, from what I can tell, it has not had the effect of engaging students on sexual concepts or gender ideology, as they have for the most part not mentioned the flag to me at all, either during in-class discussions, in submitted assignments, or during one-on-one discussions outside of class.

27. On February 25, 2026, the Board of Education voted 4–1 to order the Hate Has No Home Here Flag's removal.¹¹ The issue was framed as a determination of whether the poster constituted “sexuality content” HB 8 and Policy 5780.01.¹²

28. Comments from Board Members made it clear that the decision was not based on the words of the poster itself, but rather an effort to silence the pro-LGBTQ message associated with the rainbow imagery.¹³ The Board's rationale was that the Hate Has No Home Here Flag engaged

¹¹Little Miami school board votes to remove 'Hate Has No Home Here' poster from classroom – WCPO 9 News, Feb. 26, 2026. (<https://www.wcpo.com/news/local-news/warren-county/morrow/little-miami-school-board-votes-to-remove-hate-has-no-home-here-poster-from-classroom>).

¹²Ohio school district bans 'Hate Has No Home Here' poster over inclusion of rainbow, trans flags – The Buckeye Flame, Feb. 28, 2026. (<https://thebuckeyeflame.com/2026/02/28/little-miami-poster/>).

¹³ The School Board meeting is available at: <https://www.youtube.com/watch?v=nCJssVnVs3k>

students on topics of sexual orientation or gender identity requiring prior parental notice and an opt-out opportunity.

- a. The Superintendent told the board that the poster was used as a “peacekeeper” and was not utilized as instructional material.¹⁴
- b. Comments from School Board members made it clear that the opposition to the Hate Has No Home Here Flag was focused on the association of the rainbow symbol with a position on LGBTQ rights that the Board Members disagreed with and anti-LGBTQ animus.¹⁵

One Board Member said:

I mean, you've got the colors that we all now associate with certain groups that not everyone agrees with in terms of their values. But you also have the American flag, which involves everyone, and then you alluded to the pink and white and blue, which I'm not, as [unintelligible] with that transgender. So it is unfortunate that it's all kind of muddled together. And I feel like if you could just have the message without bringing in certain aspects and certain values that not everyone else has, that it would be more acceptable. And when you're in a public system, you've got lots of different people with lots of different values and backgrounds and religions, so you have a really challenging circumstance where you can all come together and focus and have shared a shared focus. And so everyone kind of has to veil certain parts of themselves in order for that to happen.

- c. Another Board Member said:

We love people. Jesus loved people. But I tell you what he didn't love he didn't love sin, and He let that be known. All you have to do is read the word. It's right there. It's not... me saying that's his... his words. He loved all people. He loved all people, but he told them to

¹⁴School board removes 'Hate Has No Home Here' sign from classroom – Cincinnati Enquirer, Feb. 2026. (<https://bluewaterhealthyliving.com/news/national-news/ohio/school-board-removes-hate-has-no-home-here-sign-from-classroom/>).

¹⁵Jesus, 'Sin' And A Pride Poster: Little Miami School Board Ignites Firestorm – Hoodline, Feb. 2026. (<https://hoodline.com/2026/02/jesus-sin-and-a-pride-poster-little-miami-school-board-ignites-firestorm/>).

go and sin no more. He didn't condemn them. He loved them, but he didn't leave them as they were, because where their lifestyle, where it was going, was not going to be a good place. So when you label all those different rainbow things there and the trans things you're identifying with that, and you expect us to love that and to even like it, but we don't, but we do love people. And so if you want to put a sign up, it says hate has no home here, yeah, but the rainbow colors puts it into another category.¹⁶

29. On March 4, the Board issued a Statement that “The decision was not based on the phrase ‘Hate Has No Home Here.’”

a. The Board claimed that HB 8 and the Board Policy “require parental notification and the opportunity to review and opt out when classroom materials, under the totality of the circumstances, go beyond incidental references and engage students on sexual concepts or gender ideology.”¹⁷

b. Wallace later explained the reasoning for the decision: “Depending on context and interpretation, displays incorporating images that could reasonably be viewed as presenting or describing sexual concepts or gender ideology implicate parental notification and opt-out requirements under House Bill 8 and district policy.”¹⁸

30. John Doe complied with the Board action. John Doe risks disciplinary action, up to an including termination, if he does not comply with the Board decision to remove the Hate Has No Home Here Flag.

¹⁶ Ironically, this Board Member recently resigned from the school board after social media posts he made came to light in which he denied the Holocaust and praised Hitler. Little Miami School Board member resigns over pro-Hitler social media posts – WVXU, March 12, 2026. (<https://www.wvxu.org/education/2026-03-12/little-miami-school-board-resigns-nazi-social-media-posts>).

¹⁷ <https://www.littlemiamischools.com/o/lmes/article/2745035>

¹⁸ Little Miami board votes to remove poster with rainbow, transgender flag from classroom – Fox19, Feb. 26, 2026. (<https://www.fox19.com/2026/02/26/little-miami-board-votes-remove-poster-with-rainbow-transgender-flag-classroom/>).

COUNT I
DECLARATORY JUDGMENT – VIOLATION OF FREE SPEECH
42 U.S.C. § 1983

31. Plaintiff repeats and incorporates all of the allegations of this Complaint, as if fully set forth herein.
32. This Count is brought against the Defendants for declaratory and injunctive relief.
33. The First Amendment (as incorporated through the Fourteenth) prohibits state legislatures from "mak[ing any] law... abridging the freedom of speech." U.S. Const. amend. I.
34. The First Amendment's protections extend to public-school teachers. First Amendment protections also extend to government employees. Accordingly, the First Amendment protects John Doe's right, in certain circumstances, to speak as a citizen addressing matters of public concern.
35. The message conveyed on the Hate Has No Home Here Flag related to matters of political, social, or other concern to the community.
36. The Hate Has No Home Here Flag caused no disruption or interference in his classroom or elsewhere in the school.
37. The Hate Has No Home Here Flag did not interfere with the basic educational mission of the school district.
38. The Hate Has No Home Here Flag was extra-curricular, as it was not part of activities supervised by faculty members and designed to impart particular knowledge or skills to student participants and audiences.
39. Defendants' actions were motivated by a desire to silence those with whom they disagreed on the matter of LGBTQ identity and status.
40. The justification offered by the School Board – that district feared violating the Ohio Parent's Bill of Rights and the District's Parents Rights Policy – was not justified and pretextual. There was

no realistic danger that an observer would think that the Hate Has No Place Here Flag constituted “instruction, presentation, image, or description of sexual concepts or gender ideology.” At most, the Hate Has No Home Here Flag’s inclusion of a rainbow symbol was an incidental reference to sexual concepts or gender ideology “occurring outside of formal instruction.”

41. John Doe is entitled to a declaration that the actions of Defendants in banning the Hate Has No Home Here Flag violates the Free Speech guarantees of the United States Constitution.
42. John Doe is entitled to an injunction prohibiting Defendants from prohibiting John Doe from hanging the Hate Has No Home Here Flag in his classroom.
43. Pursuant to 42 U.S.C. §1988, John Doe is entitled to his attorney’s fees incurred in bringing this action.

Wherefore, Plaintiff seeks the following relief from the Court:

- Judgment in favor of John Doe on all counts, including a declaration that the actions of the Little Miami School Board is invalid under the First and Fourteenth Amendments to the United States Constitution.
- Pursuant to Fed. R. Civ. P. 65, a Preliminary Injunction ...and prohibiting further acts in a manner that violates the First and Fourteenth Amendments to the United States Constitution.
- A Permanent Injunction ...and prohibiting further acts in a manner that violates the First and Fourteenth Amendments to the United States Constitution.
- Court costs and other reasonable expenses incurred in maintaining this action, including reasonable attorney’s fees as authorized by 42 U.S.C. §1988.

Respectfully submitted,

/s/ Joshua A. Engel
Joshua Adam Engel (0075769)
Jim Hardin (0056247)
ENGEL AND MARTIN, LLC
4660 Duke Dr., Suite 101
Mason, OH 45040
(513) 445-9600
engel@engelandmartin.com

VERIFICATION

I am the person identified as "John Doe" in the Verified Complaint. I have reviewed this Verified Complaint. I have personal knowledge of my actions and the action of Defendants in regard to the allegations described in this Verified Complaint. The averments of the Verified Complaint in regard to these matters within my personal knowledge are true and correct to the best of my knowledge.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of April 2026.

[REDACTED] a/k/a John Doe

VERIFICATION

I am the person identified as "John Doe" in the Verified Complaint. I have reviewed this Verified Complaint. I have personal knowledge of my actions and the action of Defendants in regard to the allegations described in this Verified Complaint. The averments of the Verified Complaint in regard to these matters within my personal knowledge are true and correct to the best of my knowledge.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of April 2026.



[REDACTED] a/k/a John Doe

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

John Doe, c/o Engel & Martin, LLC

(b) County of Residence of First Listed Plaintiff Warren
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Engel & Martin, LLC
4660 Duke Dr., Mason, OH 45040 513-445-9600

DEFENDANTS

Little Miami School District, et al.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Law Office of Omar Tarazi
614-226-2823

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act
☐ 120 Marine	☐ 310 Airplane	☐ 690 Other	☐ 423 Withdrawal 28 USC 157	☐ 376 Qui Tam (31 USC 3729(a))
☐ 130 Miller Act	☐ 315 Airplane Product Liability		INTELLECTUAL PROPERTY RIGHTS	☐ 400 State Reapportionment
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander		☐ 820 Copyrights	☐ 410 Antitrust
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability		☐ 830 Patent	☐ 430 Banks and Banking
☐ 151 Medicare Act	☐ 340 Marine		☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce
☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	☐ 345 Marine Product Liability		☐ 840 Trademark	☐ 460 Deportation
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	LABOR	☐ 880 Defend Trade Secrets Act of 2016	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☐ 710 Fair Labor Standards Act	SOCIAL SECURITY	☐ 480 Consumer Credit (15 USC 1681 or 1692)
☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 720 Labor/Management Relations	☐ 861 HIA (1395ff)	☐ 485 Telephone Consumer Protection Act
☐ 195 Contract Product Liability	☐ 362 Personal Injury - Medical Malpractice	☐ 740 Railway Labor Act	☐ 862 Black Lung (923)	☐ 490 Cable/Sat TV
☐ 196 Franchise		☐ 751 Family and Medical Leave Act	☐ 863 DIWC/DIWW (405(g))	☐ 850 Securities/Commodities/Exchange
REAL PROPERTY	CIVIL RIGHTS	☐ 790 Other Labor Litigation	☐ 864 SSID Title XVI	☐ 890 Other Statutory Actions
☐ 210 Land Condemnation	☒ 440 Other Civil Rights	☐ 791 Employee Retirement Income Security Act	☐ 865 RSI (405(g))	☐ 891 Agricultural Acts
☐ 220 Foreclosure	☐ 441 Voting		FEDERAL TAX SUITS	☐ 893 Environmental Matters
☐ 230 Rent Lease & Ejectment	☐ 442 Employment	IMMIGRATION	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 895 Freedom of Information Act
☐ 240 Torts to Land	☐ 443 Housing/Accommodations	☐ 462 Naturalization Application	☐ 871 IRS—Third Party 26 USC 7609	☐ 896 Arbitration
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment	☐ 465 Other Immigration Actions		☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other			☐ 950 Constitutionality of State Statutes
	☐ 448 Education			
	PRISONER PETITIONS			
	Habeas Corpus:			
	☐ 463 Alien Detainee			
	☐ 510 Motions to Vacate Sentence			
	☐ 530 General			
	☐ 535 Death Penalty			
	Other:			
	☐ 540 Mandamus & Other			
	☐ 550 Civil Rights			
	☐ 555 Prison Condition			
	☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC 1983

Brief description of cause:

Violation of First Amendment rights related to a classroom Flag bearing the message Hate Has No Home Here.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

4/7/2026

/s/ Joshua Engel (OH 0075769)

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____