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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING**

J.K. and R.L., in their individual capacity and  
on behalf of their minor daughter M.K.L,

No.: 25-2-17643-6 SEA

**COMPLAINT**

Plaintiff,

vs.

SEATTLE PUBLIC SCHOOLS, a Washington  
municipal corporation, Dr. William Jackson  
and Jane Doe Jackson, and the marital  
community thereof,

Defendants.

COMES NOW J.K., R.L. and M.K.L. (“Plaintiffs”) by the undersigned attorney, bring a  
complaint against Seattle Public Schools (“SPS”) and alleges as follows:

**I. PARTIES**

1.1 At all relevant times, Plaintiffs J.K., R.L. and M.K.L. have been residents of the  
State of Washington.

1.2 Defendant Seattle Public Schools is a Washington municipal corporation and the  
governing body for public schools in Seattle, Washington.

1.3 On information and belief, Defendant William Jackson (“Dr. Jackson”) and Jane  
Doe Jackson at all relevant times were and are residents of King County, Washington.

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1 of openly Jewish students on campus, M.K.L. was a highly visible target to her classmates. For  
2 weeks after the October 7<sup>th</sup> attack, M.K.L. had been hearing antisemitic slurs spoken both in  
3 classrooms and in the hallways as kids passed her by. This was reported to Dr. Jackson once  
4 this escalated from bigoted slurs of “Hitler’s plan should have worked” and “I hate the Jews” to  
5 aggression and threats of physical violence directed toward M.K.L. specifically.

6         3.5     A month following the attacks, there was a highly publicized walkout in support  
7 of Palestine planned for November 9, 2023. M.K.L. took down a single flier of the many fliers  
8 lining the halls to look at it. Removing this single flier resulted in a group of kids surrounding  
9 M.K.L. and yelling at her, accusing her of being racist and Islamophobic. One girl was yelling  
10 so close to M.K.L.’s face that she was spitting on her, saying she'd "do it again" and that M.K.L.  
11 "deserved it" for being Jewish. M.K.L. was told that people would be looking for her and would  
12 “jump” her if she wore her Chanukah pants to school. Despite being targeted for weeks based  
13 on her Jewish identity, M.K.L. was concerned about retaliation if she reported the threats and  
14 abuse to the school administration. However, after the threats of physical violence, M.K.L.’s  
15 mother reached out to Dr. Jackson. His response was an offer to talk on the phone, not in  
16 person. When pressed, Dr. Jackson agreed finally to an in-person meeting with M.K.L. and her  
17 mother. They met with Dr. Jackson, who promised to review the security footage to identify  
18 who had been harassing M.K.L.. J.K. and M.K.L. reported to Dr. Jackson that M.K.L. had faced  
19 harassment on a daily basis, including being told to “kill herself” due to being Jewish. Dr.  
20 Jackson stated that he had been aware that the harassment was far more than just the one  
21 incident of spitting and threats, that she was harassed on a daily basis. Given that she had been  
22 told she should kill herself for being Jewish, M.K.L.’s parents kept her home from school the  
23 day of the walkout based on those threats.

24         3.6     Over the fall and winter, the harassment continued as several students were using  
25 racial slurs and insults in addressing M.K.L.. During the winter, M.K.L. was in the bathroom

1 speaking with another Jewish student, when another student came into the bathroom and yelled  
2 “shut the fuck up” about being Jewish. This same student would frequently stare at M.K.L. in a  
3 menacing manner and would loudly tell other students that M.K.L. was “Islamophobic.” M.K.L.  
4 believed that this student spread misinformation about M.K.L. being Islamophobic based on  
5 nothing more than a false cultural stereotype that Jewish people are inherently opposed to  
6 Muslims.

7         3.7     As the year progressed, the antisemitic incidents M.K.L. experienced intensified.  
8 The ninth-grade curriculum at Nathan Hale included a section on Holocaust studies with all  
9 ELA classes reading the book *Night* by Eli Wiesel. In class discussion, M.K.L. spoke about her  
10 relatives, telling of her grandmother who was orphaned when she  
11 fled Germany as a girl, and other family members including some  
12 of whom were killed in concentration camps. Other students  
13 laughed while the book was being read aloud in class, and this  
14 routinely went unaddressed by the teacher. M.K.L. was an obvious  
15 target of much antisemitism, but she was not the only one to be  
16 affected by this growing culture of hate. Another Jewish student  
17 reported on [stophateinschools.org](http://stophateinschools.org) that a classmate stated that "the  
18 bad thing about this book is that Hitler didn't finish." Additionally, while discussing *Night*, a  
19 peer stared menacingly at M.K.L. and drew a swastika on her folder.



20         3.8     Those shocking statements and drawings are merely symptomatic of the casual  
21 acceptance of hate speech and symbolism at Nathan Hale. Students clearly felt emboldened to  
22 engage in overt antisemitism due to the school administration’s inaction.

23         3.9     In November 2023, a group of students surrounded M.K.L. in the hallway in a  
24 heated exchange about the war in Palestine, and one student spat on her face while expressing  
25 antisemitic sentiments. J.K. reported this incident to Dr. Jackson and requested that he pull

1 hallway security footage of this incident. To this date, the District has not provided this footage,  
2 which has almost certainly been deleted despite J.K.'s implicit request that it be preserved. Dr.  
3 Jackson's failure to intervene by collecting this footage or otherwise addressing this violent and  
4 widespread antisemitism caused Plaintiff's considerable distress and encouraged students to  
5 continue without any consequences.

6 3.10 Similarly, students weaponized the "Free Palestine" movement to antagonize  
7 M.K.L.. While students are entitled to engage in political speech and discuss current events at  
8 school, the repeated bullying directed at M.K.L. crossed the line into overt, heinous  
9 antisemitism.

10 3.11 For instance, in April 2024, M.K.L. came  
11 across a bathroom stall which had "free Palestine"  
12 written on the wall, with a large swastika underneath.  
13 Similar graffiti featuring swastikas paired with "free  
14 Palestine" appeared throughout the school. The  
15 administration did nothing to timely remove it.



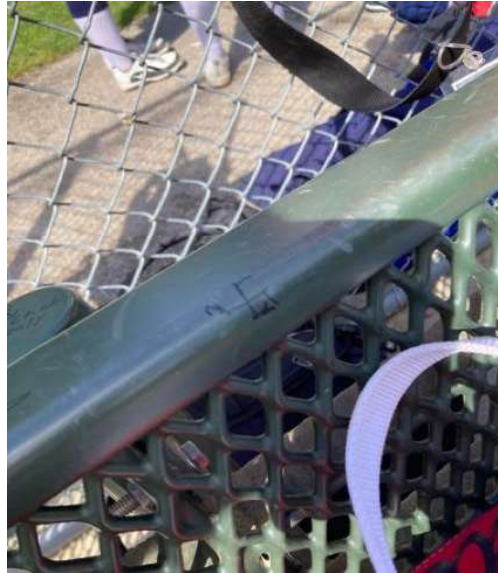
16 3.12 J.K. repeatedly contacted Dr. Jackson to  
17 report on the growing ubiquity of this hate symbol at  
18 school and its contribution to her daughter's hostile  
19 learning environment. Dr. Jackson promised an

20 investigation into this and to provide training for the school on antisemitism. To date, we are  
21 unaware of the results of any investigation or any substantive efforts to educate students about  
22 antisemitism. Dr. Jackson regularly did not respond to emails from J.K. about these urgent  
23 concerns. The school administration never attempted to mitigate this hostile environment for  
24 M.K.L. and other Jewish students, including not taking the cursory step of emailing the student  
25 body to address the swastikas appearing all over campus.

1 Continued Antisemitic Incidents

2 3.13 There was no safe space for M.K.L. and no reprieve. On April 30 someone drew  
3 a swastika on the bench in the dugout used by the Hale softball team.

4 3.14 M.K.L. was the only Jewish student  
5 on the softball team, and this was done only in the  
6 dugout used by the girls' home team and not on any  
7 of the five other dugouts on the fields. It is  
8 reasonable to conclude that this was directed at  
9 M.K.L. But when she reported the swastika to  
10 assistant coach Amelie, she dismissed this, saying it  
11 "didn't look like a swastika to her." M.K.L. was  
12 shaken by this and was deeply saddened by her



13 coach's dismissal of the incident. Though it may have been poorly drawn, it was clearly a  
14 swastika. Coach Amelie then approached M.K.L. sitting alone on the grass to ask why she was  
15 crying and suggested it was because M.K.L. hadn't been up to bat, ignoring the graffiti clearly  
16 meant to target her. The head coach ended up telling M.K.L. that he would report the hate  
17 symbol to the principal. If reported, Dr. Jackson did nothing.

18 3.15 The pervasive culture of antisemitism at Nathan Hale became untenable and  
19 inescapable for M.K.L. While some attacks were verbal and physically threatening, others were  
20 more subtle, as when a classmate said to her, "you dropped this" then handed M.K.L. a paper  
21 with the words "Free Palestine" on it. The harassment and intimidation were never ending. J.K.  
22 reported each incident to Dr. Jackson and/or other Nathan Hale administrators to no effect.  
23 Additionally, M.K.L. consistently reported these incidents to teachers, coaches and the  
24 administration.

1           3.16 It was not only while she was physically at school that M.K.L. was being  
2 harassed. She was being cyberbullied as well and, in the spring, this morphed from comments  
3 and messages from individual students to insults and attacks coming from the Nathan Hale  
4 Muslim Student Association Instagram account. Again, this was brought to Dr. Jackson's  
5 attention with no known response and no apology or investigation into who was responsible for  
6 that cyberbullying. Another student posted a TikTok video accusing M.K.L. of being blatantly  
7 racist and using a racial slur. The school did not respond to this incident and the video  
8 remained. The rumors quickly spread so that not only was M.K.L. facing antisemitism from  
9 within the Hale community, but students from other local schools began shunning her believing  
10 these allegations of bigotry. This conflation of her Jewish religious identity, political opinion,  
11 and allegations of racism/Islamophobia is inherently antisemitic. This cruelty invokes  
12 stereotypes to reduce this young woman's Jewish identity and diminishes her Jewish religion  
13 and culture.

14 May 22, 2024, Incident

15           3.17 The buildup of a school years' worth of antisemitic bullying, violence, and  
16 harassment culminated in an incident on May 22, 2024. On this date, students were coming into  
17 M.K.L.'s classes one or two at a time trying to get her out in the hallway. This went on  
18 throughout the day until the final class.

19           3.18 In her 6th period, her teacher, Ms. Lynch, became suspicious that those attempts  
20 to pull her from class were a real threat to M.K.L.'s safety and repeatedly sent the kids back out.  
21 As class was ending, she could see a group forming in the hall and pulled M.K.L. aside to stay  
22 back and then locked the door, keeping M.K.L. inside with her. It was at this time that a group  
23 of about twenty students gathered outside of Ms. Lynch's classroom. They were banging on the  
24 door and yelling for M.K.L. to come out, all the while she was getting texts from others warning  
25 her that these kids were going to assault her. Ms. Lynch called for security. She kept M.K.L.

1 locked inside the classroom with her for 5 long minutes while this mob of students yelled  
2 threats, banged on and rattled the door, and used antisemitic slurs.

3 3.19 M.K.L. texted her mother at 2:30 pm with the frantic message “Mom. I rilly rilly  
4 rilly need you” and then phoned her dad. Her father spoke to Ms. Lynch who told him she had  
5 M.K.L. behind the locked door to keep her from getting beaten up by kids whom he could hear  
6 trying to get into the room. It is impossible to overstate how terrifying this incident was to  
7 M.K.L. and her parents. M.K.L. believed that if the students were able to access her inside the  
8 locked classroom, these students would have physically attacked her, and she feared for her life.

9 3.20 J.K. finally spoke to a tearful and very shaken M.K.L. when she was being  
10 escorted to the office by security. Though she was given an escort, the day following this  
11 attempted attack, Vice Principal Makela Steward-Monroe explained to J.K. that the school did  
12 not have the resources to protect M.K.L. and that they could not continue with escorts for  
13 M.K.L. throughout the halls. Due to those safety concerns, M.K.L. was unable to return to  
14 Nathan Hale for the remainder of the school year.

15 May 2024 to present

16 3.21 The repeated victimization of M.K.L. within her hostile learning environment  
17 has caused M.K.L. and her family such emotional distress that she could not return to Nathan  
18 Hale High School after the May 22, 2024, event. She remains terrified that she will be attacked  
19 by her former peers should she return to campus. M.K.L. has experienced poor sleep and  
20 terrifying nightmares and flashbacks related to the unabated antisemitism she endured at Nathan  
21 Hale. Her family life suffered, and her parents were deeply impacted by the events as well.  
22 M.K.L. was not able to complete much of her schoolwork for the term and had to request a  
23 safety transfer to a different high school. The District refused to provide that and instead invited  
24 her to engage in a typical transfer process like any student changing schools instead of the  
25 victim of a hate crime seeking sanctuary and a fresh start.



1 4.2. M.K.L. was harassed and bullied because of her religious preference.

2 4.3. Defendants Seattle Public Schools (“SPS”) and Jackson knew of M.K.L.’s  
3 religious preference.

4 4.4. Defendants SPS and Dr. Jackson failed to provide a safe environment for  
5 M.K.L. because of her religious preference. All Defendants discriminated against M.K.L.  
6 because of her religious preference, opting to allow others to harass, threaten, and assault her.  
7 Defendants SPS and Dr. Jackson discriminated against M.K.L. by encouraging others to treat  
8 her differently.

9 4.5. Nathan Hale High School is a place of public accommodation pursuant to RCW  
10 49.60.040(2).

11 4.6. Defendants SPS and Dr. Jackson deprived M.K.L. of the accommodations,  
12 advantages, facilities, or privileges of a place of public resort, assemblage or amusement.  
13 M.K.L.’s religious preference was a substantial factor that caused the Defendants’  
14 discriminatory treatment. Non-Jewish students were not subject to the same treatment as  
15 M.K.L..

16 4.7. Defendant SPS is strictly liable for the discriminatory acts engaged in by their  
17 employees as a place of public accommodation.

18 4.8. As a result of Defendants SPS and Dr. Jackson’s acts and omissions, Plaintiff  
19 M.K.L. has been damaged in an amount to be proven at trial, plus attorney fees and costs as  
20 allowed by statute and common law.

21 **Second Cause of Action:**

22 **Intentional Infliction of Emotional Distress**

23 5.1 Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth  
24 herein.



1 **Fourth Cause of Action:**

2 **Negligent Supervision and Training**

3 7.1 Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth  
4 herein.

5 7.2 Defendant SPS had a duty to protect students from being endangered by tasks,  
6 premises or instrumentalities entrusted to an employee.

7 7.3 Defendant SPS knew or should have known that their employees were unfit to  
8 supervise, protect and educate M.K.L.

9 7.4 Defendant SPS failed to take reasonable steps to supervise its employees.

10 7.5. As a result of Defendant SPS' acts and omissions Plaintiff M.K.L. has been  
11 damaged in an amount to be proven at trial, plus attorney fees and costs as allowed by statute  
12 and common law.

13 **Fifth Cause of Action:**

14 **Loss of Consortium**

15 8.1 Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth  
16 herein.

17 8.2 J.K. and R.L. are the natural parents of M.K.L. and have supported her since  
18 birth.

19 8.3 As a direct and proximate result of the Defendant SPS and Jackson's tortious  
20 conduct, both R.L. and J.K. have suffered a loss of consortium with their sons, resulting in  
21 general and special damages in an amount to be proven at trial.

22 **V. PRAYER FOR RELIEF**

23 WHEREFORE, having fully identified the injuries and damages sustained by Plaintiffs  
24 and the legal duties breached by Defendants that were the direct and proximate cause of those  
25 injuries and damages, Plaintiffs prays for the following relief:

1 a. judgment against the above-named Defendants in an amount sufficient to  
2 fully compensate Plaintiffs for all emotional, educational and physical damage established in  
3 this complaint which are proven at trial;

4 b. an award against these Defendants for attorneys' fees and statutory costs  
5 incurred in the filing of this action to the fullest extent permitted under Washington law;

6 c. an award of pre-judgment and post-judgment interest to the fullest extent  
7 permitted under Washington law; and

8 d. such other and further relief as this Court deems just and equitable.  
9

10 DATED this 12th day of June 2025.

11  
12 **SEATTLE LITIGATION GROUP, PLLC**

13 

Emma Aubrey (Jun 12, 2025 16:09 PDT)

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