

THE RUTHERFORD INSTITUTE

Post Office Box 7482
Charlottesville, Virginia 22906-7482

TELEPHONE: (434) 978 – 3888 | EMAIL: staff@rutherford.org
www.rutherford.org

JOHN W. WHITEHEAD
Founder and President

April 24, 2024

By Electronic Mail

Van Ayres, Superintendent
Members of the School Board
Hillsborough County Public Schools
901 East Kennedy Blvd
Tampa, FL 33602

**Re: First Amendment and Florida Statutory Rights of Armwood High School
Collegiate Academy Valedictorian Speaker Lucas Hudson**

Dear Superintendent Ayres and School Board Members:

The Rutherford Institute is a civil liberties organization that defends individuals whose constitutional rights have been threatened or violated by the government.¹ For more than 40 years, The Rutherford Institute has championed the First Amendment rights of Americans of all ages and walks of life to not be silenced by the government, especially those of students within the public schools.

Given our long history of assisting communities in balancing the rights of students with the needs of the public schools, we have been asked by James Hudson to advocate on behalf of his son, Lucas Hudson, a senior at The Collegiate Academy at Armwood High School, who has had religious content in his valedictorian speech censored and removed by Armwood High School officials.

Based on our legal analysis of the situation and for the reasons outlined below, we believe that the censorship of the religious content in Lucas's speech by school officials violates the First Amendment, Florida law, and the School District's policy. Failure by school officials to allow Lucas to freely express his religious beliefs in his valedictorian speech at graduation or to allow Lucas to speak at all will subject the school to liability under 42 U.S.C. § 1983 and violate Florida Statute § 1002.206.

Thus, in order to rectify this situation, it is imperative that school officials allow Lucas to speak freely about his religious beliefs in his valedictorian speech at graduation. Given the short

¹ The Rutherford Institute is a nonprofit civil liberties organization which seeks to protect individuals' constitutional rights and educate the public about threats to their freedoms.

timeline, we require a response to this letter by close of business on April 30, 2024, or The Rutherford Institute will look into seeking legal action to redress the grievances against Lucas.

The U.S. Constitution, Florida law and the School District’s policy afford protections for religious speech.

The First Amendment to the U.S. Constitution states that “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech...” As the U.S. Supreme Court has recognized that “America’s public schools are the nurseries of democracy,”² the Court has thus ruled that “the First Amendment’s protections extend to teachers and students, neither of whom shed their constitutional rights to freedom of speech or expression at the schoolhouse gate.”³

Thus, while a public school may not establish or compel a particular religion, it also may not silence and suppress private religious speech. People are free to ignore, disagree with, or counter the religious speech of others, but a public school cannot censor such speech in violation of the First Amendment.

These protections are provided in Florida state law as well. The “Florida Student and School Personnel Religious Liberties Act” provides that

(2) A school district may not discriminate against a student, parent, or school personnel on the basis of a religious viewpoint or religious expression. A school district shall treat a student’s voluntary expression of a religious viewpoint on an otherwise permissible subject in the same manner that the school district treats a student’s voluntary expression of a secular viewpoint.

...

(5) (a) A school district shall adopt a policy that establishes ***a limited public forum for student speakers at any school event at which a student is to speak publicly***. The limited public forum policy shall require the school district to:

1. ***Provide the forum in a manner that does not discriminate against a student’s voluntary expression of a religious viewpoint*** on an otherwise permissible subject;
2. Provide a method ***based on neutral criteria*** for the selection of student speakers at school events, activities, and ***graduation ceremonies***;
3. Ensure that a student speaker does not engage in obscene, vulgar, offensively lewd, or indecent speech; and
4. State in written or oral form that the student’s speech does not reflect the endorsement, sponsorship, position, or expression of the school district.

² *Mahanoy Area Sch. Dist. v. B.L.*, 141 S. Ct. 2038, 2046 (2021).

³ *Kennedy v. Bremerton School Dist.*, 597 U.S. ___, 142 S.Ct. 2407 (2022) (slip op., at 15) (cleaned up), https://www.supremecourt.gov/opinions/21pdf/21-418_new_onkq.pdf.

(b) *The school district shall deliver the disclaimer required in subparagraph (a)4. at all graduation events* and any other event at which a student speaks publicly.

(c) *Student expression of a religious viewpoint on an otherwise permissible subject may not be excluded from the limited public forum.*

(6) The Department of Education shall develop a model policy regarding a limited public forum and voluntary expression of religious viewpoints by students and school personnel in public schools pursuant to this section. The department shall publish the model policy on its website. Each district school board shall adopt and implement the department's model policy.⁴

This Florida statute is thus reflected in Hillsborough County Public Schools Policy 8820, which states in part that

Hillsborough School District is required to establish a limited public forum for student speakers at any school event where a student is to speak publicly. Where student speakers are permitted, the district:

1. *Must provide the forum in a manner that does not discriminate against a student's voluntary expression of a religious viewpoint* on an otherwise permissible subject;
2. Must provide a method based on neutral criteria for the selection of student speakers at school events, activities, and graduation ceremonies;
3. Must ensure that a student speaker does not engage in obscene, vulgar, offensively lewd, or indecent speech; and
4. *Must state in oral or written form that the student's speech does not reflect the endorsement, sponsorship, position, or expression of Hillsborough School District. Hillsborough School District must deliver this required disclaimer at all graduation events* and at any other event where a student speaks publicly.
5. *Student expression of a religious viewpoint on an otherwise permissible subject may not be excluded from the limited public forum.*⁵

The censorship of Lucas's speech by school officials violates the First Amendment, Florida law, and the School District's policy.

Based upon information gathered by speaking with Lucas and reviewing written correspondence, it appears that Principal Dina Langston and Assistant Principal Lateshia Milton of Armwood High School have violated the First Amendment, Fla. Stat. § 1002.206, and

⁴ § 1002.206, Fla. Stat. (2023) (emphasis added), http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=1000-1099/1002/Sections/1002.206.html.

⁵ *Policy Manual*, 8820 - Religious Expression in Public Schools, HILLSBOROUGH COUNTY PUBLIC SCHOOLS (emphasis added), <https://web.hillsboroughschools.org/policymanual/detail/495>.

Hillsborough County Public Schools Policy 8820 by forcing Lucas Hudson to change the religious content in his valedictorian speech for graduation, which is to take place on May 26, 2024.

Lucas had submitted his speech to Principal Langston by email on March 21, 2024. Near the end of his speech, after having thanked the people who helped shape his character, Lucas wrote:

And if I learned anything from these past 4 years, it's that the little amount of time we have goes by so fast. And so I leave you with this, cherish your time. Take it to love the people you care about and those who care about you. And lastly, use it to serve the God who loves each and every one of you so much that He gave His one and only Son to take our punishment and die our death so that everyone who believes in Him will not perish, but have eternal life. That's the love of Jesus the Messiah, the God who saved me. If you have any questions about Jesus, I would love to talk to you....

Almost one month later, on April 17th, Principal Langston pulled Lucas out of class and expressed her disapproval of the religious statements in his speech, suggested other secular topics for Lucas to talk about instead, and told him that she was not accepting his speech and that he needed to reduce and change the religious content. This appears to come from a mistaken belief Principal Langston expressed that Lucas, as a speaker, is under the same rules as a teacher would be. Principal Langston told Lucas that he had to revise and resubmit his speech by April 22nd. However, on April 19th, Principal Langston informed Lucas that they would have to turn in his speech that afternoon. Lucas then submitted a revised speech that same day to Asst. Principal Lateshia Milton, saying near the end of his speech:

And if I learned anything from these past 4 years, it's that the little amount of time we have goes by so fast. And so I leave you with this, cherish your time. Take it to love the people you care about and those who care about you. And lastly, use it to consider your purpose here on Earth. Whether it's to be the friend who is always there for others, the mentor who guides people, or be the one who loves. I have the privilege of knowing someone who loves each and every one of you so much that He will do anything to be with you. That's the love of Jesus, the God who saved me. He can heal you of your pain, your depression, your worry, your brokenness, He can heal you, the same way He healed me. If you have any questions about Jesus, I would love to talk to you....

Asst. Principal Milton told Lucas the same day that he did not address the changes that Principal Langston spoke with him about, and that he needed to make appropriate adjustments to his speech and resubmit it by noon the next day or else he would not be allowed to speak at all. Asst. Principal Milton objected to the religious content of his speech and claimed that the District is very strict about separating religion from public events. Lucas replied before noon on Saturday, April 20th, providing Asst. Principal Milton with the third version of his speech, noting

it is “with the limited religious content as you and Principal Langston required.” This version of the speech now says near the end:

And if I learned anything from these past 4 years, it's that the little amount of time we have goes by so fast. And so I leave you with this, cherish your time. Take it to love the people you care about and those who care about you. And lastly, use it to consider your purpose here on Earth. Whether it's to be the friend who is always there for others, the mentor who guides people, or be the one who loves. I have the privilege of knowing many people who love and care for me. The greatest among these is the God who saved me. If you have any questions about Jesus, I would love to talk to you....

Lucas has not been told whether his third version has been approved or if he will be allowed to speak at graduation. But Lucas is not pleased or satisfied with the third version of his speech, and this is not the speech which he wants to give. He would prefer to give the second version of his speech with some possible minor changes, but it is clear that Armwood school officials are continually trying to censor and script Lucas’s speech and discriminating against his voluntary expression of a religious viewpoint in a different manner than how the school district treats discussions of secular matters.

This blatantly violates the First Amendment and fails to “provide the forum in a manner that does not discriminate against a student’s voluntary expression of a religious viewpoint” in violation of Florida Statute § 1002.206(5)(a)(1) and Hillsborough County Public Schools Policy 8820.

The Establishment Clause does not apply to private speech and it does not negate one’s First Amendment rights to freedom of speech or to the free exercise of religion.

It appears that this effort to censor the religious content in Lucas’s speech comes from concerns based on a misunderstanding about the Establishment Clause. But “[b]ecause the First Amendment binds only the government,” any claim of an Establishment Clause violation “is a nonstarter” against someone who speaks and acts as a private citizen.⁶ And, as a private citizen, Lucas has First Amendment rights under the Free Exercise Clause and the Free Speech Clause.

As the U.S. Supreme Court has explained, those two “Clauses work in tandem. Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities. That the First Amendment doubly protects religious speech is no accident. It is a natural outgrowth of the framers’ distrust of government attempts to regulate religion and suppress dissent.”⁷

⁶ See *Lindke v. Freed*, 601 U.S. ____ (2024) (slip op., at 1), https://www.supremecourt.gov/opinions/23pdf/22-611_ap6c.pdf.

⁷ *Kennedy v. Bremerton School Dist.*, 597 U.S. ____, 142 S.Ct. 2407 (2022) (slip op., at 11) (internal citations omitted), https://www.supremecourt.gov/opinions/21pdf/21-418_new_onkq.pdf.

Thus, even when considering the Establishment Clause, the Supreme Court has stated that a “natural reading of that sentence [in the First Amendment] would seem to suggest the [three] Clauses have ‘complementary’ purposes, not warring ones.”⁸ The Court explained that

the Establishment Clause does not include anything like a modified heckler’s veto, in which religious activity can be proscribed based on “perceptions” or “discomfort.” An Establishment Clause violation does not automatically follow whenever a public school or other government entity fails to censor private religious speech. Nor does the [Establishment] Clause compel the government to purge from the public sphere anything an objective observer could reasonably infer endorses or partakes of the religious.⁹

The Court said that to ignore “the First Amendment’s double protection for religious expression” and give preference to secular activity

would defy this Court’s traditional understanding that permitting private speech is not the same thing as coercing others to participate in it. It is a rule, too, that would undermine a long constitutional tradition under which learning how to tolerate diverse expressive activities has always been part of learning how to live in a pluralistic society. We are aware of no historically sound understanding of the Establishment Clause that begins to make it necessary for government to be hostile to religion in this way.”¹⁰

Hillsborough County Public Schools should learn from the mistakes and constitutional violations of the Bremerton School District, which sought to silence Coach Kennedy.

The concern that Lucas’s valedictorian speech would violate the Establishment Clause is similar to what the Bremerton School District argued to justify its efforts to silence high school football coach Joseph Kennedy. However, two years ago in *Kennedy v. Bremerton School District*, the U.S. Supreme Court ruled that the School District had violated Coach Kennedy’s First Amendment rights.¹¹ Afterwards, the School District agreed to settle the amount of Coach Kennedy’s attorneys’ fees by paying over \$1.75 million.¹²

As the Supreme Court explained, “Mr. Kennedy made it a practice to give thanks through prayer on the playing field at the conclusion of each game. ...Mr. Kennedy offered his prayers...by taking a knee at the 50-yard line and praying quietly for approximately 30 seconds.

⁸ *Kennedy*, (slip op., at 20).

⁹ *Kennedy*, (slip op., at 22) (cleaned up).

¹⁰ *Kennedy*, (slip op., at 28-29) (cleaned up).

¹¹ *Kennedy*, (slip op., at 1, 31-32) (internal citations omitted).

¹² *Bremerton school board reaches nearly \$2M settlement with praying football coach Joe Kennedy*, FOX 13 Seattle (Mar. 17, 2023), <https://www.fox13seattle.com/news/bremerton-school-board-reaches-nearly-2m-settlement-with-praying-football-coach-joe-kennedy>.

...[O]ver time, some players asked whether they could pray alongside him. ...The number of players who joined Mr. Kennedy eventually grew to include most of the team.”¹³

When this came to the School District’s attention through a compliment from another school’s employee (as there had been no complaints about this or any other religious expression by Coach Kennedy for over seven years),¹⁴ “the District issued an ultimatum. It forbade Mr. Kennedy from engaging in any overt actions that could appear to a reasonable observer to endorse prayer while he is on duty as a District-paid coach,”¹⁵ and “the only option it would offer Mr. Kennedy was to allow him to pray after a game in a ‘private location’ behind closed doors and ‘not observable to students or the public.’”¹⁶

The School District erroneously believed that it “could not allow Mr. Kennedy to engage in a public religious display” without violating the Establishment Clause.¹⁷ And the School District had previously told Coach Kennedy, incorrectly, that “an employee’s free exercise rights ‘must yield so far as necessary to avoid school endorsement of religious activities.’”¹⁸ The Supreme Court noted that this “rested on a mistaken view”¹⁹ under which “the District effectively created its own vise between the Establishment Clause on one side and the Free Speech and Free Exercise Clauses on the other.”²⁰

The Supreme Court explained that “in forbidding Mr. Kennedy’s brief prayer, the District failed to act pursuant to a neutral and generally applicable rule. A government policy will not qualify as neutral if it is specifically directed at religious practice. ...Failing either the neutrality or general applicability test is sufficient to trigger strict scrutiny,”²¹ which is the highest standard to overcome and rarely satisfied in favor of the government.

As the Court summarized,

the Bremerton School District disciplined him...because it thought anything less could lead a reasonable observer to conclude (mistakenly) that it endorsed Mr. Kennedy’s religious beliefs. That reasoning was misguided. Both the Free Exercise and Free Speech Clauses of the First Amendment protect expressions like Mr. Kennedy’s. Nor does a proper understanding of the Amendment’s Establishment Clause require the government to single out private religious

¹³ *Kennedy*, (slip op., at 2) (internal quotation marks and citations omitted). And while Coach Kennedy’s case was limited to considering his silent prayers because he had voluntarily ceased giving any religiously motivational talks and team devotions, *Kennedy*, (slip op., at 13), the Court made no ruling that his motivational talks or prayers with the team violated or would have violated the Establishment Clause.

¹⁴ *Kennedy*, (slip op., at 2-3).

¹⁵ *Kennedy*, (slip op., at 5) (cleaned up).

¹⁶ *Kennedy*, (slip op., at 6).

¹⁷ *Kennedy*, (slip op., at 7).

¹⁸ *Kennedy*, (slip op., at 3).

¹⁹ *Kennedy*, (slip op., at 31).

²⁰ *Kennedy*, (slip op., at 21) (internal quotation marks omitted).

²¹ *Kennedy*, (slip op., at 13-14) (cleaned up).

speech for special disfavor. The Constitution and the best of our traditions counsel mutual respect and tolerance, not censorship and suppression, for religious and nonreligious views alike.²²

The Court noted that “[t]o hold differently would be to treat religious expression as second-class speech and eviscerate this Court’s repeated promise that teachers [and students] do not shed their constitutional rights to freedom of speech or expression at the schoolhouse gate.”²³ The Court also explained that the School District had created “a false choice premised on a misconstruction of the Establishment Clause. And in no world may a government entity’s concerns about phantom constitutional violations justify actual violations of an individual’s First Amendment rights.”²⁴

As a student giving a personal speech, Lucas’s rights are even more clearly protected than Coach Kennedy’s.

As Coach Kennedy’s prayer on the football field following games—even when voluntarily joined by high school students “‘within the office’ environment”²⁵—was considered to be private speech protected by the First Amendment rather than being the School District’s speech or state-action in violation of the Establishment Clause, even more so is Lucas’s personal graduation speech protected.

The Supreme Court explained in Coach Kennedy’s case that “[r]espect for religious expressions is indispensable to life in a free and diverse Republic—whether those expressions take place in a sanctuary or on a field [(i.e., on public high school property or at a public high school event)], and *whether they manifest through the spoken word or a bowed head.*”²⁶ And as the Court confirmed that Coach Kennedy’s publicly displayed postgame silent “prayer constituted private speech on a matter of public concern,”²⁷ Lucas’s verbal expressions of his religious beliefs must also be included in this category of protected speech.

Moreover, Lucas is not an adult or a school employee like Coach Kennedy was, and all in attendance at the graduation ceremony will clearly understand that Lucas is expressing his own personal opinions and not formal statements on behalf of the school. The Supreme Court explained that it “has long recognized as well that *secondary school students* are mature enough to understand that a school does not endorse, let alone coerce them to participate in, speech that it merely permits on a nondiscriminatory basis.”²⁸ Additionally, pursuant to Florida Statute § 1002.206(5)(a)(4) and (5)(b) as well as Hillsborough County Public Schools Policy 8820,

²² *Kennedy*, (slip op., at 1).

²³ *Kennedy*, (slip op., at 19) (internal quotation marks omitted).

²⁴ *Kennedy*, (slip op., at 31) (internal citation omitted).

²⁵ *Kennedy*, (slip op., at 18)

²⁶ *Kennedy*, (slip op., at 31) (emphasis added).

²⁷ *Kennedy*, (slip op., at 19 n.2).

²⁸ *Kennedy*, (slip op., at 26) (emphasis added).

Armwood High School is to give a disclaimer “that the student’s speech does not reflect the endorsement, sponsorship, position, or expression of Hillsborough School District.”

Further, Coach Kennedy was not expressing himself in a public forum as Lucas will be. By providing a limited public forum (“limited” as to what students have earned the opportunity to speak “based on neutral criteria”), it is even more clear that the students who speak are giving their own personal message, not the government’s message.

For any public forum, the Supreme Court has ruled that “restrictions based on content must satisfy strict scrutiny, and those based on viewpoint are prohibited.”²⁹ Therefore, the Court has explained that “[w]hen a government does not speak for itself, it may not exclude speech based on religious viewpoint; doing so constitutes impermissible viewpoint discrimination.”³⁰ Thus, for example, the Court held that when the City of Boston created a public forum for groups to fly their personal flags on the City’s flagpole near the City Hall entrance, the City’s refusal to allow a group to fly a Christian flag, based on erroneous concerns that doing so would violate the Establishment Clause, “discriminated based on religious viewpoint and violated the Free Speech Clause.”³¹

Lucas merely seeks to use the opportunity he has earned as valedictorian in the limited public forum to briefly express some of his religious beliefs in his speech. He is not asking those in attendance to engage in a religious act of worship or prayer, which categorically distinguishes his situation from those where a school had officially endorsed a time of prayer and compelled participation in a religious exercise.

Acknowledging God is grounded in the religious convictions of many Christians, like Coach Kennedy,³² because Jesus said, “So everyone who acknowledges me before men, I also will acknowledge before my Father who is in heaven, but whoever denies me before men, I also will deny before my Father in heaven.”³³ Likewise, Romans 1:21 states, “For although they knew God, they did not honor him as god or give thanks to him, but they became futile in their thinking, and their foolish hearts were darkened.”³⁴ And Acts 12:23 states that after the people praised Herod, “[i]mmediately an angel of the Lord struck [Herod] down, because he did not give God the glory.”³⁵ So, not to publicly acknowledge and give glory to God could go against Lucas’s deeply held religious convictions and beliefs, as it did for Coach Kennedy.

²⁹ *Minn. Voters Alliance v. Mansky*, 138 S.Ct. 1876, 1885 (2018).

³⁰ *Shurtleff v. Boston*, 142 S.Ct. 1583, 1593 (2022) (internal quotation marks omitted).

³¹ *Shurtleff*, 142 S.Ct. at 1588, 1593.

³² Coach Kennedy initially tried to comply with the School District’s demands not to pray publicly, but, when “[d]riving home after a game, . . . felt upset that he had ‘broken his commitment to God’ by not offering his own prayer, so he turned his car around and returned to the field” to pray. *Kennedy*, (slip op., at 4).

³³ Matthew 10:32-33 (translated in the English Standard Version (“ESV”).

³⁴ ESV.

³⁵ ESV.

Just as it is a violation for the “government [to] script everything a teacher or coach says in the workplace,”³⁶ even more so is it a violation for the government to script a student’s graduation speech in a public forum as school officials have tried to do with Lucas’s speech here.

The U.S. Supreme Court has explained that “[t]he First Amendment envisions the United States as a rich and complex place where all persons are free to think and speak as they wish, *not as the government demands.*”³⁷ Thus, the Court has held that compelling individuals to speak a particular message is a content-based regulation of speech³⁸ “whether the government seeks to compel a person to speak its message when he would prefer to remain silent or to force an individual to include other ideas with his own speech that he would prefer not to include. All that offends the First Amendment just the same.”³⁹

Therefore, Hillsborough County Public Schools should learn from the mistakes and constitutional violations committed by the Bremerton School District against Coach Kennedy and the City of Boston against a group requesting to fly a Christian flag, and not treat Lucas’s religious expression in a public forum as unprotected second-class speech.

Failure by school officials to allow Lucas to freely express his religious beliefs in his valedictorian speech at graduation or to allow Lucas to speak will subject the school to liability under 42 U.S.C. § 1983 and violate Florida Statute § 1002.206.

If school officials fail to allow Lucas to freely express his religious beliefs in his graduation speech, that will violate Lucas’s rights to the freedom of speech and the free exercise of religion under the First Amendment, right to equal protection under the Fourteenth Amendment, and right to speak in a limited public forum without religious discrimination under Florida Statute § 1002.206.

Additionally, based on the school’s response to Lucas’s speech, there is a concern that school officials could try to use other excuses to deny Lucas an opportunity to speak at all.

Specifically, Lucas informed Principal Langston by email on March 27th that he had already paid and committed to be away on a church trip the same weekend as the graduation rehearsal before that rehearsal date was announced. Lucas has offered to attend alternative preparations for graduation, and he has not been told that there will be any adverse consequence for missing the rehearsal or that he will not be permitted to speak because of that.

³⁶ See *Kennedy*, (slip op., at 28).

³⁷ *303 Creative LLC v. Elonis*, 600 U.S. ____ (2023) (slip op., at 26) (emphasis added).

³⁸ *Nat’l Inst. of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361, 2371 (2018).

³⁹ *303 Creative LLC*, (slip op., at 9) (internal citations omitted).

However, any failure to reasonably accommodate Lucas's unavailability for the rehearsal, any attempts to prevent Lucas from speaking at all, or any other unjustified adverse actions will be seen as First Amendment retaliation subject to liability under 42 U.S.C. § 1983 as well.⁴⁰


Given the short timeline until graduation, **we ask that you reply by email to legal@rutherford.org by the close of business on April 30, 2024**, stating that you will agree to allow Lucas to speak freely about his religious beliefs in his valedictorian speech at graduation, or The Rutherford Institute will consider pursuing legal action.

You are also hereby notified to preserve all documents and communications (including any and all emails and texts with Lucas as well as both official and personal emails and texts between staff members and school officials) regarding this matter as they may be subject to discovery in a legal proceeding.

It is our hope that you will take immediate steps to ensure that Lucas is fully afforded the right to freely express his religious beliefs in his valedictorian speech at graduation.

If America's schools are to impart principles of freedom and democracy to future generations, they must start by respecting the constitutional rights of their students.

For freedom,

A handwritten signature in black ink that reads "John W. Whitehead". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John W. Whitehead
President

CC: Rob Nelson, Region Superintendent
Dina Langston, Principal of Armwood HS
Lateshia Milton, Asst. Principal for Admin. of Armwood HS

⁴⁰ "Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress...." 42 U.S.C. § 1983.