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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

GRETA LEONTIEV, an individual, Plaintiff, v. **CORBETT SCHOOL DISTRICT**, an Oregon Public School District, **RANDI TRANI**, in his individual capacity; **CARRIE CHURCH**, in her individual capacity; **DAVID GORMAN**, in his official and individual capacity; **KATHERINE ZIEMANN**, in her individual capacity; **JENNY LAYTON**, in her individual capacity; **JEFF MERSHON**, in his individual capacity; and **JILL EDWARDS**, in her individual capacity, Defendants.	Case No. **COMPLAINT** **Constitutional Violation Action** **42 U.S.C. § 1983 and 14TH Amendment of the U.S. Constitution (Violation of Parental Rights and Free Exercise of Religion)** **DEMAND FOR JURY TRIAL**

PRELIMINARY STATEMENT

1.

This is a civil rights action seeking declaratory and injunctive relief, as well as monetary relief – including attorney fees, and costs – to redress blatant constitutional violations of the fundamental rights of parents to raise their children and to engage in the free exercise of religion.

2.

In this case, a public school teacher devised and began executing a plan to terminate the parental rights of Greta Leontiev ("Plaintiff") and then to adopt Plaintiff's child, a 10th grader who is transgender and identifies as a boy. The school teacher accused Plaintiff of emotionally abusing her son, based on allegations that a "Christian mother" could not possibly offer a supportive home to a transgender child. The school teacher convinced the child that he wanted to leave his mother's home and live with the teacher, who interfered with Plaintiff's parental rights by receiving mail for the child at the teacher's home, by retaining an attorney to advise her and the child on how to terminate Plaintiff's custodial rights, and by arranging for the child to stay at the other defendants' homes for a period of five days so that his mother, Plaintiff, could not find him.

JURISDICTION AND VENUE

3.

This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1331 (federal question) because it arises under the First and Fourteenth Amendments to the United States Constitution, and 28 U.S.C. § 1343, because Plaintiff seeks redress of her civil rights. This Court has authority under 28 U.S.C. §§ 2201 and 2202 to grant declaratory relief and other relief, including

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preliminary and permanent injunctive relief, pursuant to Rule 65 of the Federal Rules of Civil Procedure, based thereon.

4.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391 because the claims arose in this judicial district and division, all parties reside in this judicial district and division, and Corbett School District is authorized by the laws of the State of Oregon to operate in this judicial division.

PARTIES

5.

Plaintiff is the parent and sole legal guardian of her minor child ("FV"). Plaintiff resides in Corbett, Oregon and is a special education school teacher in the Gresham-Barlow School District. Plaintiff is a committed Christian. At all times relevant to this complaint, Plaintiff's child, FV, attended Corbett High School and was in the 10th grade. FV is transgender and identifies as a boy.

6.

Defendant Corbett School District ("the district") is a local public body governed by the laws of Oregon, with its principal place of business at 35800 E Historic Columbia River, Corbett, OR 97019. Corbett schools are administrative subdivisions of the district.

7.

At all material times, Defendant Randi Trani ("Defendant Trani") was the superintendent and final policy maker for the district. His duties included establishing and implementing the district's policies.

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8.

At all material times, Defendant Carrie Church ("Defendant Church") was a teacher employed by the district. She was also the primary leader of the district's Corbett Performing Arts Club ("theatre club"). Her duties included providing supervision to students in the theatre club and abiding by standards established by the Teachers Standards and Practices Commission ("TSPC"). Defendant Church lives in Corbett, Oregon.

9.

At all material times, David Gorman was Vice Chair of the Corbett School Board. As a school board member, Defendant Gorman's duties included evaluating Defendant Trani's performance, and also ensuring the district operated in accordance with its policies and the law. Defendant Gorman is married to Defendant Katherine Ziemann and lives in Corbett, Oregon.

10.

At all material times, Defendant Katherine Ziemann was married to and resided with Defendant Gorman. She also volunteered for the district as a leader of the theatre club and was co-director of the play at issue in this case. Her duties included providing supervision to students in the theatre club and abiding by the district's policies.

11.

At all material times, Defendant Jenny Layton was an educational assistant employed by the district. She also volunteered for the district as a leader of the theatre club and was co-director of the play at issue in this case. Her duties included providing supervision to students in the theatre club and abiding by the district's policies.

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12.

At all material times, Defendant Jeff Mershon was employed as a bus driver by the district. Defendant Mershon lives in Corbett, Oregon. His duties included abiding by the district's policies.

13.

At all material times, Defendant Jill Edwards was a district volunteer with the theatre club and was Defendant Ziemann's business partner. Defendant Edwards lives in Corbett, Oregon. Her duties included providing supervision to students in the theatre club and abiding by the district's policies.

FACTS

14.

On or about, September 13, 2016, Defendant Church received mail at her home from a cult called The Conscious Life Ecumenical Union, Inc. ("CLEU") addressed to FV. CLEU advocates religious beliefs contrary to Plaintiff's. *See* Exhibit 1. Upon information and belief, Defendant Church allowed FV to receive mail at her house so Plaintiff would not know

15.

On or about November 19, 2016, in the morning, FV told a family member that he and Defendant Church had a plan for Defendant Church to adopt FV. FV said that pursuant to the plan, his biological father would get full custody of FV and then give custody of FV to Defendant Church. FV said Defendant Church was helping with the plan.

16.

On or about November 19, 2016, Defendants Church, Ziemann, and Layton were in

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charge of directing and putting on a play at Corbett High School. FV performed in the play and afterwards attended a cast party with Defendants Church, Ziemann, and Layton.

17.

While at the cast party, FV texted Plaintiff that he was "not in a safe place" emotionally and intimated that he might hurt himself.

18.

On or about November 19, 2016, after the cast party, Defendants Gorman and Ziemann arranged for FV to spend the night at their home, knowing that they did not have permission from Plaintiff. Upon information and belief, Defendant Church told Defendants Gorman and Ziemann about the plan and they all agreed to start executing it.

19.

On or about November 20, 2016, after FV failed to return home from the party, at approximately 1:30 a.m., Plaintiff went to Defendant Church's home to find FV. Defendant Church was drinking alcohol and acted intoxicated, as her speech was slurred and her mannerisms were unsteady. Defendant Church was belligerent towards Plaintiff and yelled that she was a bad mother and abusive to FV. Defendant Church said that she did not know where FV was and that if she was Plaintiff's child she would not want to return home either.

20.

On or about November 20, 2016, at approximately 2:00 a.m., Plaintiff called 911 from Defendant Church's porch and reported FV as missing. Plaintiff told the 911 operator that Defendant Church knew where FV was but refused to disclose his location to Plaintiff. The 911 operator asked to speak to Defendant Church, but when Plaintiff gave her the phone, Defendant

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Church hung up on the 911 operator.

21.

On or about November 20, 2016, at approximately 2:30 a.m., Multnomah County Deputy Sheriff David Hughes ("Deputy Hughes") responded to Plaintiff's call and went to Defendant Church's home to try to locate FV. Deputy Hughes observed that Defendant Church acted intoxicated. Defendant Church told Deputy Hughes that FV is somewhere "safe" but that she did not know where. Defendant Church also told Deputy Hughes that Plaintiff is a "conservative Christian" and not supportive of FV.

22.

On or about November 20, 2016, at approximately 3 a.m., Defendant Church called the Oregon Department of Human Services ("DHS") child abuse hotline and alleged that Plaintiff was emotionally abusing FV and refusing to accept FV's gender identity. Defendant Church reported that FV was no longer living at home because Plaintiff's parenting style and decisions were allegedly abusive. Defendant Church had no good faith basis for reporting Plaintiff to the child abuse hotline.

23.

On or about November 20, 2016, at approximately 3 a.m., because Deputy Hughes and Plaintiff could not find FV, Deputy Hughes advised Plaintiff to report FV as a runaway, which she did.

24.

On or about November 20, 2016, at approximately 3:40 a.m., Plaintiff texted Defendant

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Ziemann, asking: "Katherine, if you know where my child is, I need to know immediately." Later that morning, at approximately 9:35 a.m., Defendant Ziemann responded: "I'm not positive, but maybe the Church's?" Defendant Ziemann failed to inform Plaintiff that FV had spent the night at Defendant Ziemann's home.

25.

On or about November 20, 2016, Defendant Church arranged with FV to hide him from Plaintiff at various houses and to not return home to Plaintiff. Defendant Church spoke to an attorney retained to represent FV, Robert Hildum ("Hildum"), and he advised Defendant Church that FV should not stay at one house longer than one night.

26.

On or about November 20, 2016, Defendant Church agreed with Defendant Layton that Defendant Layton would keep FV that night. At this time, both Defendant Church and Defendant Layton knew that Plaintiff had reported FV as missing and they were actively preventing Plaintiff from having custody of her child.

27.

On about November 21, 2016, in the morning, Defendant Layton transported FV to school and bragged to other teachers that she had kept FV the night before. Defendant Trani overhead this.

28.

On or about November 21, 2016, Plaintiff filed a written complaint with the district and Defendant Trani complaining that Defendants Church and Gorman were acting against her authority as a parent by hiding and harboring her child, FV, who was a runaway. Specifically,

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Plaintiff complained that Defendants were violating OAR 584-020-0035 (TSPC standards) by failing to:

- Refrain from exploiting professional relationships with any student for personal gain, or in support of persons or issues;
- Maintain an appropriate professional student-teacher relationship by:
    - Not demonstrating or expressing professionally inappropriate interest in a student's personal life;
    - Honoring appropriate adult boundaries with students in conduct and conversations at all times; and
- Maintain the dignity of the profession by respecting and obeying the law, exemplifying personal integrity and honesty.

29.

On or about November 21, 2016, after receiving the complaint, Defendant Trani told Plaintiff that he had instructed district personnel to stop harboring FV at their homes, but Defendant Trani also told Plaintiff that he had no control over district personnel in this regard.

30.

On or about November 21, 2016, Defendant Church was interviewed by DHS and she told the investigator that her ultimate goal was to adopt FV. Defendant Church told DHS that she had worked out a plan pursuant to which FV's biological father will attempt to attain custody of FV from Plaintiff and then let Defendant Church have physical custody of FV. Defendant Church asked DHS to endorse this plan and allow Defendant Church to have physical custody of FV.

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31.

On or about November 21, 2016, DHS interviewed FV at school. FV told the DHS investigator that he did not feel "supported" by Plaintiff and that he wanted Defendant Church to have custody of him because she had been supportive.

32.

On or about November 21, 2016, DHS interviewed Plaintiff. Plaintiff was emotional and distraught and told the DHS investigator that she is doing the best she can to support FV during his transition, but that sometimes she accidentally uses the wrong pronoun. Plaintiff stated that she loved her son and wanted him to come home.

33.

On or about November 21, 2016, at approximately 1 p.m., Multnomah County Deputy Sherriff Rafael Cortada ("Deputy Cortada") located FV at school. Deputy Cortada advised Defendant Trani that FV was required to return home to Plaintiff after school and was not permitted to stay at any other home. Despite Deputy Cortada's explicit instructions, that evening Defendant Layton drove FV back to her home after school and kept FV for a second night. Defendant Trani failed to ensure that FV returned home to Plaintiff.

34.

On or about November 22, 2016, Defendant Church agreed with Defendant Mershon that FV would stay at his house that night. Defendant Mershon knew that Plaintiff had reported FV as missing and that Plaintiff wanted FV to return home.

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35.

On or about November 22, 2016, at approximately 8:30 p.m., Plaintiff contacted the Multnomah County Sheriff's Office to report that FV had not returned home. Multnomah County Deputy Sheriff Felipe Hidalgo re-entered FV into the law enforcement data system as missing.

36.

On or about November 22, 2016, at approximately 9:25 p.m., FV emailed Plaintiff that he was staying at Defendant Mershon's home. Plaintiff went to Defendant Mershon's home to get FV. Plaintiff repeatedly knocked on the door but no one answered despite lights being on inside the house.

37.

On or about November 23, 2016, Plaintiff again went to Defendant Mershon's home to locate FV. Again, there was no answer at the door.

38.

On or about November 23, 2016, at approximately 6:26 p.m., Plaintiff sent a text to Defendant Ziemann asking: "Do you know where FV is?" Defendant Ziemann responded: "No idea."

39.

On or about November 23, 2016, at approximately 9:30 p.m., FV emailed Plaintiff that he would be staying at Defendant Edward's home. Immediately after receiving the email, Plaintiff went to Defendant Edward's home and demanded to see FV. Initially, Defendant Edwards denied that FV was there, but later told FV to come outside. Plaintiff told FV and Defendant Edwards that FV had no permission to be there and must return home. Plaintiff told Defendant

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Edwards that she was committing a crime by harboring FV against Plaintiff's wishes, to which Defendant Edwards shrugged and walked back into her home with FV.

40.

On or about November 23, 2016, at approximately 11:35 p.m., Plaintiff called the Multnomah County Sherriff's Office to report that FV was staying at Defendant Edward's home.

41.

On or about November 24, 2016, at approximately 1:45 a.m., Multnomah County Deputy Sherriff Michael Lee ("Deputy Lee") responded to Defendant Edward's home and located FV. Deputy Lee then transported FV to Plaintiff's home.

42.

The district investigated Plaintiff's complaint, discussed in paragraph 28 above, and on or about December 12, 2016, the district issued a report that concluded Defendant Gorman was not subject to the TSPC Code of Ethical Conduct and that "no violation can be established" against Defendant Church. The district made this conclusion even though the investigative report stated,

> Ms. Church's responses to [DHS] relayed that she felt very entitled to be involved in [FV's] welfare and decision-making, without considering the parent's perspective, and that Ms. Church continued to probe for information about the case, asking when DHS [] was going to create a safety plan so [FV] could stay with the Church family. * * * Ms. Church's concerns about [FV's] welfare could have been addressed by an earlier call to DHS if she felt could not speak to [FV's] mother directly. Further, after Nov. 20, Ms. Church continued to engage with [FV] about finding places to "land" each night rather than return home. By that time, Ms. Church was aware that (1) Ms. Leontiev wanted her child to return home and (2) Ms. Church had given information about her concerns for [FV] to a DHS "hot line" staff member in a 20-30 minute phone call at 3:09 a.m. At that point, the responsibility was with DHS to intervene if their staff believed [FV] was at risk because of [FV's] home situation.

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The district's investigative reports were addressed to Defendant Trani and he personally decided to adopt the conclusions in the report and dismiss Plaintiff's complaints.

43.

On or about December 20, 2016, following its own investigation, DHS concluded that Defendant Church's allegations of child abuse against Plaintiff were unfounded. DHS concluded that Defendant Church's factual allegations to the child abuse hotline were false and that FV was "thriving" in his home under Plaintiff's care.

44.

On or about April 3, 2017, FV's biological father filed an Ex Parte Order of Restraint Re: Immediate Danger in order to attain full custody of FV, despite years of estrangement from FV. Hildum appeared on behalf of FV and submitted a declaration, dated April 2, 2017, that consisted of accolades and praise for Defendants Ziemann, Gorman, and Church. In his declaration, Hildum complained that these "highly respected" defendants no longer have access to FV and can no longer discuss private family matters with FV because of parenting restrictions put in place by Plaintiff. Hildum's declaration also included confidential information discussed at a Section 504 plan meeting that took place at Corbett High School on March 3, 2017, that only Plaintiff and district personnel had access to. The release of this information to Hildum is a violation of the Family Educational Rights and Privacy Act of 1974 ("FERPA"), 20 U. S. C. § 1232g, and shows that the district provided this information to Hildum to assist in terminating Plaintiff's custodial rights.

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45.

In Hildum's declaration, he is highly critical of Plaintiff and alleges that she is abusive toward FV; however, Hildum has never spoken to or met Plaintiff. Contrarily, Hildum's declaration admits to that he has spoken with FV's biological father on various occasions, beginning in November 2016. These conversations were kept secret from Plaintiff. Despite the fact that Hildum knew that FV had been estranged from his biological father for years, Hildum recommended that FV be placed in the custody of his biological father, who lives several hours away Corbett.

46.

At the time of his filing, FV is living with his biological father, in accordance with the plan devised by Defendant Church. FV's biological father drives FV to Corbett once every ten business days to attend school, and FV does not otherwise attend school. When FV is in Corbett, he has no contact with Plaintiff and spends time with Defendants.

47.

Defendant Trani has not disciplined any of the Defendants for their conduct in this case. Defendant Gorman has failed to bring this matter to the full board's attention. Defendant Trani's acts and omissions constitute the official policy of the district.

48.

Upon information and belief, the school district has received prior complaints from parents alleging that district personnel had inappropriate relationships with their children that infringed upon parental rights. In spite of these prior complaints, the district failed to train teachers, staff, volunteers, and personnel regarding the rights of parents and students in relation

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to confidential family matters. The district's policy has been to allow teachers to have inappropriate relationships with students and other teachers.

FIRST CLAIM FOR RELIEF
Against All Defendants
42 U.S.C § 1983 – Violation of Parental Rights

49.

Plaintiff re-alleges and incorporates by reference paragraphs 1 through 48, above.

50.

Pursuant to the First and Fourteenth Amendment to the United States Constitution, Plaintiff is entitled to the fundamental right to direct the care, custody, and nurture of her child, FV.

51.

Plaintiff's parental rights were violated by all individual Defendants without due process of law and without compelling justification.

52.

Having actual knowledge of the individual Defendants' unconstitutional actions, the district and Defendant Trani condoned and failed to stop such unconstitutional actions. By dismissing Plaintiff's complaints against Defendants Gorman and Church, with no disciplinary consequences, Defendant Trani and the district adopted and reaffirmed its policy of allowing unconstitutional interference with parental rights. Individual Defendants were aware of this policy and their actions conformed to this policy. The district knew or should have known that individual Defendants continued to interfere with Plaintiff's constitutional right.

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53.

The actions taken by all Defendants proximately caused the violation to Plaintiff's parental rights.

54.

All individual Defendants had access to and influence over FV by virtue of their positions in the district as school club leaders, teachers, staff, and volunteers. At all relevant times Defendants acted under color of state law or in conspiracy with Defendants acting under color of state law.

55.

As a result of Defendants' actions, Plaintiff has incurred economic, non-economic, and special damages in an amount to be proven at trial.

56.

If successful against Defendants, Plaintiff is entitled to reasonable attorney fees pursuant to 42 U.S.C. § 1988.

SECOND CLAIM FOR RELIEF
Against Defendant Corbett School District
Failure to Train

57.

Plaintiff re-alleges and incorporates by reference paragraphs 1 through 56, above.

58.

The district's training program was inadequate to train its school club leaders, teachers,

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staff, and volunteers in relation to the tasks they must perform.

59.

The district was deliberately indifferent to the need to properly train its school club leaders, teachers, staff, and volunteers regarding the rights of persons with whom they come into contact.

60.

The district's failure to provide proper training caused Plaintiff's deprivation of rights protected by the Constitution of the United States.

61.

As a result of Defendant's actions, Plaintiff has incurred economic, non-economic, and special damages in an amount to be proven at trial.

62.

If successful against Defendant, Plaintiff is entitled to reasonable attorney fees pursuant to 42 U.S.C. § 1988.

THIRD CLAIM FOR RELIEF
Against Defendant Corbett School District and Defendant Church
42 U.S.C § 1983 – Violation of Free Exercise of Religion

63.

Plaintiff re-alleges and incorporates by reference paragraphs 1 through 62, above.

64.

Pursuant to the First and Fourteenth Amendment of the United States Constitution, Plaintiff is guaranteed the right of free exercise of religion.

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65.

Plaintiff's religious rights were violated by Defendant Corbett School District and Defendant Church when Plaintiff was discriminated against and maligned due to her Christian beliefs. Defendant Church falsely accused Plaintiff of emotionally abusing FV based on Plaintiff's Christian views, and Defendant Corbett School District allowed this religious discrimination. These actions by Defendants proximately caused a violation of Plaintiff's free exercise rights.

66.

As a result of Defendants' actions, Plaintiff has incurred economic, non-economic, and special damages in an amount to be proven at trial.

67.

If successful against Defendants, Plaintiff is entitled to reasonable attorney fees pursuant to 42 U.S.C. § 1988.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for a judgment against Defendants, and each of them, as follows:

A. **Declaratory and injunctive relief:** enter a judgment against all Defendants declaring their actions to be in violation of Plaintiff's parental and free exercise rights, and to compel the district to train of all personnel, staff, and volunteers regarding these rights;

B. **Permanent injunction:** issue a permanent injunction enjoining Defendants from engaging in any activity that interferes with Plaintiff's parental and free exercise rights;

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C. Damages: enter a judgment awarding Plaintiff economic, non-economic, and special damages, in an amount to be determined at trial;

D. Costs and attorneys fees: award Plaintiff her costs and reasonable attorneys fees pursuant to the Civil Rights Attorneys' Fees Award Act of 1976, 42 U.S.C. § 1988; and

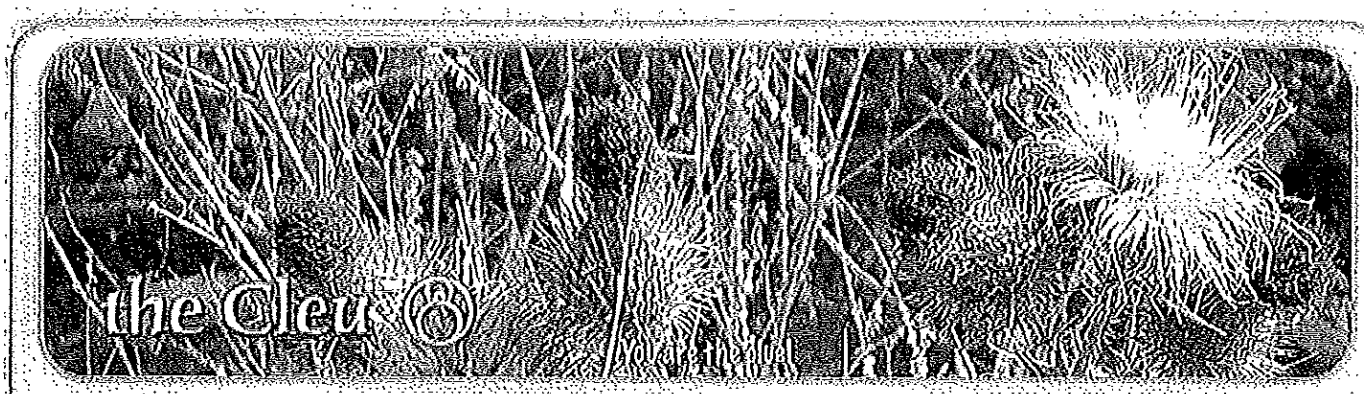
E. Other relief: grant Plaintiff such other and additional relief as the Court may deem just and proper.

DATED: May 16, 2017

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the CLEU

The Conscious Life Ecumenical Union, Inc. (CLEU), an Oregon nonprofit religious corporation, was founded in early 2004 to serve as a focus for our vision and to carry out our mission of:

- Promoting the Cleu as a symbol of our spiritual values and identity.
- Assisting in the formation of local Cleu circles.
- Providing online inspiration, guidance, and resources for local Cleu circles and people looking to form a Cleu circle in their community.
- Supporting and counseling local Cleu circles who wish to obtain the legal status of a 501c3 nonprofit religious organization or church.
- Establishing a Cleu circle in a major city and developing a prototype meeting space and typical Cleu service.

The People

The major portion of the energy, inspiration, insights, and just plain work put into the spread of the vision and the Cleu is provided by some very dedicated individuals. A special thanks goes out to Tom Reeves and Hank Davis for checking links and pointing out errors, and to Yoko Silk, our very first ordained CLEU guide. We also owe thanks and hugs to many others for making us feel that our efforts are not in vain, especially the folks who participated in the first Circus Numen and whose enthusiasm gave us the courage to reach out further, and our friends at Burning Man who annually remind us that giving comes naturally to humans.



Glan Anello, *Head Guide*

Glan (pronounced "John") has been the force behind the scenes from the very beginning. As a founding member of the Conscious Life Ecumenical Union and the Conscious Life Community Church, he hosted our weekly gatherings, and organized drummers and poets for Circus Numen, our first community outreach. Legend has it that late one night, he was doodling at his workbench down in the basement and the Cleu symbol just appeared on the paper before him. As the "the force," Glan has been solely responsible for the development of our websites, and instrumental in defining and refining our vision, mission, values, and challenges. For years reluctant to be associated with any organized religion, he now dreams of starting McChurch, where beliefs are replaced by values, and the service consists of

EXHIBIT 1

sharing food followed by a high tech celebration of human rites. Currently, he spends most of his time managing or working on our website, playing music, twisting copper wire into Cleus, or preparing our flagship, the " Rites of Man," for our annual pilgrimage.



Emma Cornell, *Head Scout*

Emma is a founding member of the Conscious Life Ecumenical Union and the Conscious Life Community Church, choreographer, musician, props and games organizer for Circus Numen, and is the impetus and energy behind every form of outreach we have undertaken. Behind? Not likely! Emma's the one out front dancing and drumming, handing out Cleus, and inviting everyone to celebrate their human rites. "Dr.Em" has a Ph.D. in English. She teaches online, works for a local community college, and volunteers at the local prison. In her "spare" time, she strategizes ways of hastening the next paradigm and discusses the finer points of mystic philosophy with Glan. She also writes and edits for our website, strings Cleus, and plays her bass. Someday in the not too distant future, she plans to hit the road with a traveling band of dancers, drummers, musicians, wordsmiths, and other guides to inspire people in communities all over the Northwest and beyond to create Cleu circles of their own. As the Cleu Lady, she loves to be on the road, seeking conscious Life wherever she goes. Look for her at a celebration near you!



Ernest Brown, *QuarterMaster and Magician*

Ernest has been a member and contributor to the Conscious Life Ecumenical Union and the Conscious Life Community Church for almost a decade. He saw the universal acceptance to the ideas that the CLEU represented to all that it has been presented to and realized the power of the CLEU can have in everyone's life. His main contributions to the organization is the support of sharing the CLEU at various events and providing a "brainwashing" space called the StarMan Dome at some events. With expertise in computer science, Ernest has been also providing tools for the organization and for promoting the CLEU. Ernest is accomplished in music and the theater arts as well, giving those skills to the group when needed. Expect to see him in a circle near you as more get CLEUed in.

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