

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JENNIFER PETERSON and
MELISSA MARTEN,

Plaintiffs,

v.

COBB COUNTY SCHOOL DISTRICT;
CHRIS RAGSDALE, in his individual and official
capacity as Superintendent of Cobb County
School District; JOHN FLORESTA,
individually and in his official capacity;
JULIAN COCA, individually and in his official
capacity; NAN KIEL, individually and in her
official capacity; DANIEL VE HAR,
individually and in his official capacity; ZACH
ALDERSON, individually and in his official
capacity; AMANDA CHAMBERS,
individually and in her official capacity,

Defendants.

CIVIL ACTION No.:

**COMPLAINT FOR
DECLARATORY RELIEF,
INJUNCTIVE RELIEF,
AND DAMAGES**

JURY TRIAL DEMANDED

**VERIFIED COMPLAINT
FOR INJUNCTIVE RELIEF AND DAMAGES**

COMES NOW Plaintiffs JENNIFER PETERSON and MELISSA MARTEN
and bring this lawsuit under 42 U.S.C. § 1983 and the First and Fourteenth
Amendment of the United States Constitution for declaratory relief, injunctive
relief and small damages when Defendants intentionally manipulated sign-in
procedures for public comment to limit viewpoints critical of Cobb County

School District officials and contentious policies. These actions included secretly switching the location of the required public speaking sign up portal upon learning of the presence of protesters who openly objected to decisions made by the Cobb County Board of Education (CCBOE).

Plaintiffs are both mothers to students attending school in the Cobb County School District. They are also engaged and veteran speakers at CCBOE's public comment sessions who are well versed in the signup procedures. They were excluded from the public comment portion of a highly visible, contentious Board meeting following the termination of Katherine Rinderle, the teacher fired for reading a book that included a gender nonconforming character. Defendants planned and executed actions to alter the signup location, excluded Plaintiffs from public comment, and silenced their First Amendment right to speak about matters of public concern in a limited public forum.

PARTIES

1. **Jennifer "Jenny" Peterson** ("Ms. Peterson") moved to Cobb County in 2010. She raised two children that have attended school in the Cobb County School District since kindergarten. Ms. Peterson, who formerly worked in development for non-profit organizations, now stays home and works in her family business. Ms. Peterson believes that no government agency impacts her life more directly than the local school system, and while her children have had success in CCSD she has become politically active for the students and families

that have not had the same experience. Since March 2020, and up through the September 2023 Board meeting, Ms. Peterson has regularly attended and spoke at CCBOE meetings. Ms. Peterson wants to attend and speak at future CCBOE meetings without viewpoint-silencing actions of Defendants.

2. **Melissa Marten** (“Ms. Marten”) has lived in Cobb County for the past sixteen years. Ms. Marten’s family includes two children that attend school in CCSD. Ms. Marten serves on the Simpson Middle School Foundation and is active in the parent teacher association at her children’s schools. Ms. Marten has been politically active in Cobb County for almost ten years, and since 2020 has been regularly attending and eventually speaking publicly at CCBOE meetings. Ms. Marten advocates for positive change in the CCSD by staying engaged and motivating others to become involved in local politics. Ms. Marten wants to attend and speak at future CCBOE meetings without viewpoint-silencing actions of Defendants.

3. **Defendant Cobb County School District (“CCSD”)** is a governmental entity operating the public school system of Cobb County, Georgia, under the control and management of the Cobb County Board of Education (“the Board”), pursuant to Ga. Const. art. 8, § 5, ¶ I; O.C.G.A. § 20-2-50.

4. **Defendant Chris Ragsdale (“Ragsdale”)** is CCSD’s Superintendent and the Board’s executive officer. Ragsdale is a final policymaker and decisionmaker responsible for implementing the Board’s policies and state rules

and regulations under Ga. Const. art. 8, § 5, ¶ III; O.C.G.A. §§ 20-2-61(a); 20-2-109. Ragsdale, acting under color of law, is ultimately responsible for the intentional manipulation of the CCBOE public comment signup procedures. Ragsdale is responsible for excluding Defendants from the public comment portion of the September 2023 meeting and divesting them of their First Amendment right to speak about matters of public concern in that public forum. Ragsdale is sued in his official and individual capacities.

5. **Defendant John Floresta** is sued in his individual and official capacities. Defendant Floresta is the Chief Strategy & Accountability Officer for CCSD. In his role, Defendant Floresta collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

6. **Defendant Julian Coca** is sued in his individual and official capacities. Defendant Coca is the Director of Content and Marketing for CCSD. Defendant Coca's duties include development and distribution of social media content, news releases and materials about CCSD. In his role, Defendant Coca collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

7. **Defendant Nan Kiel** is sued individually and in her official capacities. Defendant Kiel is the Press Relations Coordinator for CCSD. Defendant Kiel is responsible for developing and executing marketing and public communications. Defendant Kiel duties include supporting public meetings, such as Board of Education meetings, public forums and other District events. She is responsible for *preparing sign-in sheets* for the public comment portions of CCBOE meetings. In her role, Defendant Kiel collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

8. **Defendant Daniel Vehar** is sued in his individual and official capacities. Defendant Vehar is the Assistant Director of Marketing. Defendant Vehar's duties include monitoring media coverage, including social media, so that Defendant Ragsdale and other senior administrators are aware of "issues and trends." Defendant Vehar also provides support during public meetings including the CCBOE monthly meetings. In his role, Defendant Vehar collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

9. **Defendant Zach Alderson** is sued in his individual and official capacities. Defendant Alderson is a CCSD Communications Specialist. In his role,

Defendant Alderson collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

10. **Defendant Amanda Chambers** is sued in her individual and official capacities. Defendant Chambers is a Secretary for the Office of Communications. In this role, Defendant Chambers collaborated with other members of the communications and CCSD leadership teams to manipulate the signup procedures that resulted in Plaintiffs exclusion from the public comment session on September 14, 2023.

JURISDICTION AND VENUE

11. This civil and constitutional action arises under 42 U.S.C. § 1983, and the First and Fourteenth Amendments of the United States Constitution.

12. This Court has subject matter jurisdiction over this action pursuant to Article III of the United States Constitution, 28 U.S.C. §§ 1331, 1343, and 1367, and 20 U.S.C. § 1681(a).

13. This Court has the authority to issue declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201 and 2202, Rules 57 and 65 of the Federal Rules of Civil Procedure, and this Court's general legal and equitable powers.

14. This Court has personal jurisdiction over Defendants because Defendants are public officials domiciled in the State of Georgia and who perform their official duties in the State of Georgia.

15. Venue in this District is proper under 28 U.S.C. § 1391(b)(1),(2) because one or more Defendants reside in this District, all Defendants are residents of the State in which this District is located, and a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred and are occurring in this District.

FACTUAL ALLEGATIONS

CCBOE Public Participation Policy BCBI

16. CCBOE holds monthly meetings. CCBOE meets for both work sessions and a full Board Meeting. At each meeting, CCBOE allows public participation pursuant to their own policies.

17. According to CCBOE Policy BCBI, Public Participation in Board Meetings, the Board reserves thirty (30) minutes for public comments from non-City of Marietta residents of Cobb County, CCSD students or family, and non-residents owning property in CCSD. Exhibit 1, Policy BCBI.

18. At each meeting, fifteen speakers are granted two minutes of speaking time. Each speaker must adhere to certain content restrictions related to profanity, student privacy, state sunshine laws, and untrue and defamatory comments. *Id.* at D(1); F(4). The policy directs speakers to be "courteous and professional," and warns that, "[d]isruptive persons will be asked to leave the meeting room. The presiding Board officer may terminate public comments that are obscene, threatening, slanderous, profane, vulgar, or defamatory." *Id.*

19. Permitted speakers are selected on a first come, first served basis, “however the Chair may give priority to those discussing Board agenda items being considered during the Board meeting.” *Id.* at E(1).

20. Speakers must disclose their personal information, discussion topic, and geographic eligibility to speak through the sign-up sheet. *Id.* at D(4).
Speakers may discuss official matters to be taken up by the Board at that meeting or, other “concerns pertinent to the operation of a school or the District.” *Id.* at F(4).

21. The policy states that, “Individuals desiring to appear before the Board must first complete a sign-in sheet which should be available 30 minutes prior to the convening of the Board meeting.” *Id.* at D(2).

Normal CCBOE Sign Up Procedures

22. Since 2020, the “sign-in sheet” referenced in Policy BCBI has been electronic and made available by CCBOE with a computer tablet (iPad).

23. Excluding meetings held during COVID, CCBOE always puts out a sign-in tablet at the lobby reception desk thirty minutes before each CCBOE meeting. Usually, CCBOE provides two tablets and speakers line up to complete the form.

24. Sometimes hours before a CCBOE meeting, putative speakers form a line to complete the sign-in sheet.

Altered CCBOE Board Meeting on September 14, 2023

25. One month before the September 2023 Board meeting, CCBOE rejected recommendations from their own designated tribunal, and following public comment, voted 4-3 to terminate Katherine Rinderle, a Cobb County teacher that had read *My Shadow is Purple* to her fifth-grade gifted class.

26. In the month that followed, CCSD and Defendant Ragsdale made several public statements about the enforcement of policies to eliminate educational materials that reference or contain LGBTQ-themes or characters.

27. Defendant Ragsdale, in support of the removal of these books from the CCSD schools and libraries, and publicly explained his view that those opposed to the book removals were “evil.”

28. In response to CCSD’s actions and Defendant Ragsdale’s public comments, Plaintiffs joined the Cobb Community Care Coalition (the “Coalition”)¹, a group of Cobb County citizens that had planned a public demonstration against CCSD’s anti-LGBTQ actions on September 14, 2023, the date of the next CCBOE public meeting. The Coalition along with other

¹ The Coalition is “a group of parents, students, & community members in Cobb County who believe the acceleration of racism, bigotry, and censorship in Cobb County School District (CCSD) as well as the District’s negligence around gun violence require a strong, coordinated resistance to demonstrate the power of the people to effect positive change.” See <https://www.cobbcareco.com/> (Last visited October 31, 2024).

community members rallied and held a community circle in the parking lot of the CCBOE building starting at 3:30 p.m.

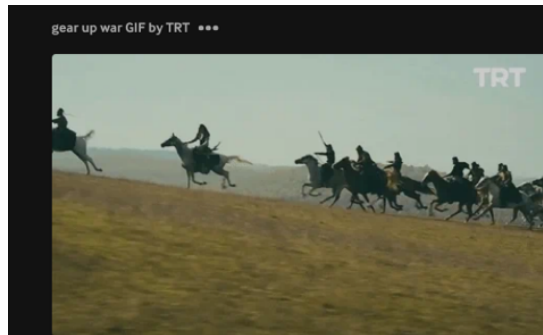
29. The Coalition wore red shirts with an anti-Ragsdale message on them. Following a press conference held by a student group, the Coalition migrated inside the CCBOE building intending to sign up for the public comment portion of the CCBOE monthly meeting at the normal location and using the normal process as set out in Paragraphs 21-23 herein.

30. CCSD was aware of the Coalition's activities and their open opposition to the CCBOE actions with respect to Ms. Rinderle and the decision to remove certain books from the school libraries. Earlier in the day, during the CCBOE work session, CCSD administrators John Floresta, Julian Coca, Eric Rauch, and Nan Kiel engaged in a Teams Messages session commenting on the turnout of the anti-Ragsdale group²:

| | |
|----------------|--|
| Nan Kiel: | The left side of the room looks a little thin today |
| Eric Rauch: | They're still making their signs for their little rally. |
| John Floresta: | We have them outmanned this afternoon [redacted] |
| Julian Coca: | What about tonight? [image] |

² CCSD Team Messages are public records obtained through a public record request to the CCBOE. The Team Messages received in response to that request depict an instant messaging conversation between CCSD Office of Communications Julian Coca (Director of Content and Marketing), Nan Kiel (Press Relations Coordinator), Amanda Chambers (Secretary), Daniel Vehar (Assistant Director of Marketing), Eric Rauch (Digital Content Specialist) and Zachary Alderson (Communications Specialist). Mr. John Floresta, the Chief of Staff for Defendant Ragsdale, is also included and actively participates in this Teams Messages Group. For an audio and visual depiction of the Messaging Activity, see [Cobb Community Care Coalition Video](#).

John Florestra: Will (sic) see about tonight
Julian Coca: I hope that the threat of a an (sic) anti-rally would bring some folks out
Nan Kiel: Uh oh! There are some signs ready to support Ragsdale



Ex. 2, *CCSD Team Messages* dated September 14, 2024, time stamped 2:16 p.m. to 2:25 p.m; see also, [Cobb Community Care Coalition Video](#).

31. Planning for the normal location and using the normal process as set out in Paragraphs 21-23 herein, and in anticipation of the full board meeting scheduled for 7:00 p.m., Plaintiffs, along with several other members of the Coalition, formed a line about two hours before the meeting and in the CCBOE lobby to speak during the thirty-minute public comment portion of the meeting. The Coalition held more than fifteen positions in the line that formed in the lobby.

32. CCSD administrators knew the Coalition had occupied the first fifteen positions in the public speaker signup line and from 5:01 p.m. to 5:54 p.m. initiated a plan to prevent the Coalition from speaking:

Amanda Chambers: There is over 15 in line already
Julian Coca: Are they all bad guys?

Julian Coca: Maybe we say the line can't form until 6:30?
(Only half kidding)
Julian Coca: Daniel Vehar and Zachary Alderson when you
get back see Amanda...there's gonna be
fireworks.

Ex. 3, *CCSD Team Messages* dated September 14, 2024, time stamped 5:01 p.m. to 5:54 p.m.; see also, [Cobb Community Care Coalition Video](#).

33. From 5:26 p.m. to 6:32 p.m., CCSD administration, including John Floresta, Amanda Chambers and Julian Coca, and at the direction of Defendant Ragsdale, ordered Daniel Vehar and Zachary Alderson to deliver the public comment signup iPads to a **new and different location outside the CCBOE building and away from the area where the Coalition stood in line for hours** (altering the normal location and deviating from the normal process set out in Paragraphs 21-23 herein). The Teams Messages show that John Floresta, senior administration and part of Defendant Ragsdale's leadership team, coordinated the delivery of the iPads:

Zachary Alderson: Dan 6:28 we go out
Julian Coca: or 6:27
Zachary Alderson: John [Floresta] said 28
Julian Coca: whelp. listen to him. [image]
Amanda Chambers: You on the way
Amanda Chambers: Here we go!
Amanda Chambers: They are yelling
Julian Coca: Of course
Amanda Chambers: It's very elevated

Ex. 4, *CCSD Team Messages* dated September 14, 2024, time stamped 6:24 p.m. to 6:32 p.m.; see also, [Cobb Community Care Coalition Video](#). Upon delivery of the iPads to the new and different location outside the CCBOE building, a physical altercation ensued because the Coalition members who had been waiting in the normal location were left to scramble outside to the new location. A video of the altercation Plaintiffs shows Daniel Vehar and Zachary Alderson behind the signup iPads while citizens with red anti-Ragsdale shirts are trying to restore their original place in the public comment signup line.

34. As a result of the change in placement of the public comment signup iPads, members of the Coalition were pushed out of line and replaced by speakers with viewpoints supportive of Defendant Ragsdale and the CCBOE. Citizens that had been participating in the anti-Ragsdale protest in front of the CCBOE building were physically moved away from the signup iPad. A video of the altercation shows a transgender student crying as the student was violently pushed to the ground and suffered injuries.

35. Despite Defendants' efforts to silence or limit their critics comments by moving the location and changing the process for sign-up, some Coalition members were nevertheless able to sign up for public comment. Plaintiffs, however, were unable to restore their place in the newly formed line outside the building and were not among the first fifteen citizens to sign up for public

comments. As a result, Plaintiffs were completely excluded from the public comment agenda.

36. During this time, CCSD administrators continued their Teams conversation recognizing their viewpoint-silencing actions had caused chaos and violence, and celebrated achieving their intended goal of excluding anti-Ragsdale constituents, such as Plaintiffs, from participating in the public comment portion of the evening board meeting:

| | |
|------------------|------------------------------------|
| Amanda Chambers: | I can hear them inside |
| Amanda Chambers: | They are screaming at Zack and Dan |
| Amanda Chambers: | Officers just went out |
| Julian Coca: | Of course |
| Amanda Chambers: | Media is filling (sic) all of it |
| Julian Coca: | Great |
| John Floresta: | Absolutely perfect |

Ex. 5, *CCSD Team Messages* dated September 14, 2024, time stamped 6:32 p.m. to 6:52 p.m.; see also, [Cobb Community Care Coalition Video](#).

37. Beyond silencing persons through the altered placement designed to limit public commenters who spoke against the CCBOE and Defendant Superintendent's policies and actions, the sequence of speakers also changed so that persons who spoke in favor of the Board were permitted to speak even though they were not among the first 15 persons at the normal location.

38. The first public commenter was now Ariel Kurtz who spoke in support of the CCBOE and the Defendant Superintendent, elevating to the first position the message in favor of Defendants. Ms. Kurtz would not have been

eligible to speak, as she had not even been waiting in the line inside the CCBOE lobby but was nevertheless able to speak because of Defendants' altering the signup process and moving the signup iPads.

39. Similarly, Leslie Litt, one of the last public commenters, did not join the signup line until after the signup iPads had been moved outside and would not have been eligible to speak. Mr. Lit spoke in support of the CCBOE and Defendant Ragsdale.

40. At no time during the meeting were Plaintiffs permitted to share their specific viewpoints.

41. Public commenters, Gabriele Sanchez and Shannon Deisen, upset by the Defendants' gamesmanship, felt compelled to use a portion of their two-minute public comment to object to the chaos created by the Defendants manipulation of the signup procedures rather than direct their full time to the topic at hand.

42. Plaintiffs were blocked from speaking publicly in opposition to Defendants actions and policies. Plaintiffs continue to regularly participate in public comment portions of CCBOE's meetings and fear being excluded from future meetings by viewpoint-silencing manipulation of the sign-in process.

CLAIMS FOR RELIEF

COUNT ONE: VIOLATION OF FREE SPEECH U.S. CONST. AMEND. I AND U.S. CONST. AMEND. XIV (INJUNCTIVE RELIEF, DECLARATORY RELIEF AND DAMAGES)

43. Plaintiffs hereby realleges and incorporates all allegations contained in paragraphs 16 through 41 as if fully set forth herein.

44. The First Amendment, applicable to the State of Georgia by the Fourteenth Amendment enforceable under 42 U.S.C. § 1983, provides in part that the government “shall make no law . . . abridging the freedom of speech.”

45. Recently, the Eleventh Circuit in *Moms for Liberty - Brevard Cnty., FL v. Brevard Pub. Sch.* explained the importance of school board meetings public comment time:

For many parents, school board meetings are the front lines of the most meaningful part of local government—the education of their children. And sometimes speaking at these meetings is the primary way parents interact with their local leaders or communicate with other community members. No one could reasonably argue that this right is unlimited, but neither is the government’s authority to restrict it.

Moms for Liberty - Brevard Cnty., FL v. Brevard Pub. Sch., 23-10656, 2024 WL 4441302, at *1 (11th Cir. Oct. 8, 2024)

46. In that context, the Eleventh Circuit provided guidance on viewpoint neutrality analysis, noting that viewpoint-based limits are nearly categorically prohibited. *Moms for Liberty*, at *4. The Court stated:

The First Amendment generally “forbids the government to regulate speech in ways that favor some viewpoints or ideas at the expense of others.” Indeed, though the Supreme Court has never categorically prohibited restrictions based on viewpoint, it has come close: “Discrimination against speech because of its message is presumed to be unconstitutional.” Viewpoint discrimination is thus “the greatest First Amendment sin.” That constitutional constraint holds in limited public forums, meaning that the “government must abstain from regulating speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.”

Moms for Liberty, at *4 (internal citations omitted).

47. With respect to public comment at school board meetings, this Circuit explained that the reasonableness analysis is contextual and searching:

The reasonableness inquiry, on the other hand, is more flexible and context specific, and will depend on the nature and purpose of the forum. To pass muster, such purpose-based restrictions must be “wholly consistent with the government’s legitimate interest in ‘preserving the property for the use to which it is lawfully dedicated,’” and prohibited speech must be “‘naturally incompatible’ with the purposes of the forum.” (internal citations omitted).

So what is reasonable in one forum may not be reasonable in another. “[T]he purpose of a university,” for example, “is strikingly different from that of a public park.” And a speech restriction in a limited public forum “need not be the most reasonable” or even “the only reasonable limitation.” But flexible is not the same thing

as nonexistent—though reasonableness is a “forgiving” test, it is not a blank check.

Moms for Liberty, at *4 (internal citations omitted).

48. Limitations on public comment that lack objective and workable standards are unreasonable as explained in *Moms for Liberty*:

In fact, even restrictions that pursue legitimate objectives can be unlawful if their enforcement cannot be ‘guided by objective, workable standards.’ ... A ‘grant of unrestrained discretion to an official responsible for monitoring and regulating First Amendment activities is facially unconstitutional.’ The government, in short, must avoid enforcement that is ‘haphazard and arbitrary.’ In the context of the “reasonableness” analysis specifically, our Court has explained that a law or policy found to be constitutionally unreasonable ‘due to lack of standards and guidance is by definition facially invalid.’ That is because whether a policy is ‘incapable of reasoned application’ does not depend on the speaker’s identity or the message they wish to convey, but on ‘the vagueness and imprecision’ of the policy ‘in a vacuum.’ Thus, a policy that is invalid for those reasons is necessarily invalid in all of its applications.

Moms for Liberty, at *4-5 (internal citations omitted).

49. Plaintiffs sought to express their viewpoints on matters of public concern by lining up two hours before the CCBOE public meeting at the established location where the signup iPad had been placed in the months and years preceding the meeting.

50. Without any guidepost/standards, Defendants intentionally manipulated and changed the signup procedures by moving the signup iPad from the established location inside the CCBOE building to outside the building for the purpose of limiting critical viewpoints and elevating and empowering supportive viewpoints.

51. Defendants' internal communications reflect their hostility to the viewpoints in opposition of the CCBOE's Superintendent and their perception that those constituents holding those viewpoints were "bad guys."

52. Defendant John Floresta directed CCSD employees to place the signup iPad in a location where the "bad guys" would not be standing. As a result, Plaintiffs, and other constituents that had lined up early to sign up for public comments, were not among the first fifteen citizens to complete the signup form and prevented from speaking at the public meeting.

53. Plaintiffs have "an enormous first amendment interest" in speaking directly about public issues to their elected representatives.

54. Defendants have no reasonable or legitimate interest in the intentional and viewpoint-silencing manipulation of the public comment sign up procedures to limit access to the signup form to those speakers that do not agree with the Defendants actions or policies.

55. Defendants' actions violate the First and Fourteenth Amendments as (1) viewpoint discrimination (2) unreasonable and (3) completely lacking

standards and exhibiting unbridled discretion. As a result, a declaratory judgment and preliminary and permanent injunctive relief should issue as well as small damages for the unconstitutional actions causing Plaintiffs, as citizens and parents, harm in not being allowed to express their viewpoints on matters of public concern during a public meeting.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiff requests this Court:

- a) Hold a trial by jury on all damages issues so triable;
- b) Declare that the Defendants' actions of moving the signup Ipads and eliminating Plaintiffs opportunity to provide their viewpoint during the public comment portion of the CCBOE public meeting was unconstitutional as a violation of free speech;
- c) Declare unconstitutional and enjoin Defendants from manipulation of the signup procedures limiting the opportunity of disfavored viewpoints from speaking during the during the public comment portion of the CCBOE public meeting;
- d) Enter a preliminary injunction and permanent injunction preventing Defendants from (1) engaging in conduct to prevent Plaintiffs and other critics from signing up for public comment and (2) specifically preventing the of moving the location of sign-up to silence critics.

- e) Award nominal, presumed and actual damages against the CCSD and nominal, presumed, actual and punitive damages against the individual defendants;
- f) Award reasonable attorneys' fees and expenses under 42 U.S.C. § 1988 and as otherwise permitted by law;
- g) Grant further relief as this Court deems just and proper.

Dated this 31st day of October, 2024.

/s/ Craig Goodmark

Craig Goodmark
Georgia Bar No. 301428
Goodmark Law Firm
1425A Dutch Valley Place
(404) 719-4848
cgoodmark@gmail.com

/s/ Gerald Weber

Gerald Weber
Georgia Bar No. 744878
LAW OFFICES OF GERRY WEBER, LLC
Post Office Box 5391
Atlanta, Georgia 31107
(404) 522-0507

UNITED STATES DISTRICT COURT
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JENNY PETERSON and
MELISSA MARTEN,

Plaintiffs,

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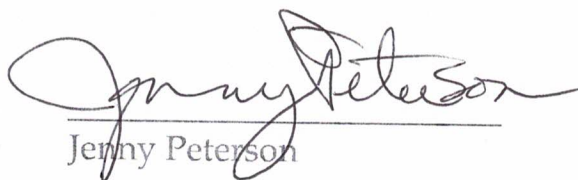
VERIFICATION OF PLAINTIFF MELISSA MARTEN

I, MELISSA MARTEN, appearing before the undersigned officer and after
being first duly sworn, depose and state on oath and under penalty of perjury
that the facts set forth in the foregoing Complaint are true and correct.

I declare (or certify) under penalty of perjury that the foregoing is true and correct.

Executed on this the 31st day of October, 2024.

See 28 U.S.C. Sec. 1746.


Jenny Peterson

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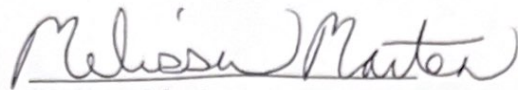
VERIFICATION OF PLAINTIFF MELISSA MARTEN

I, MELISSA MARTEN, appearing before the undersigned officer and after being first duly sworn, depose and state on oath and under penalty of perjury that the facts set forth in the foregoing Complaint are true and correct.

I declare (or certify) under penalty of perjury that the foregoing is true and correct.

Executed on this the 31st day of October, 2024.

See 28 U.S.C. Sec. 1746.


Melissa Marten