

1 ADVOCATES FOR FAITH & FREEDOM  
Robert H. Tyler (SBN 179572)  
2 btyler@faith-freedom.com  
Julianne Fleischer (SBN 337006)  
3 jfleischer@faith-freedom.com  
25026 Las Brisas Road  
4 Murrieta, California 92562  
Telephone: (951) 600.2733

5  
6 Attorneys for Attorneys for Plaintiffs

7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 T.S., a minor by and through her father and  
11 natural guardian, RYAN STARLING; and  
K.S., a minor by and through her father and  
12 mother and natural guardians, DANIEL  
SLAVIN and CYNTHIA SLAVIN;

13 Plaintiff(s)

14 v.

15 RIVERSIDE UNIFIED SCHOOL DISTRICT;  
16 LEANN IACUONE, Principal of Martin  
Luther King High School, in her personal and  
17 official capacity; and AMANDA CHANN,  
Assistant Principal and Athletic Director of  
18 Martin Luther King High School, in her  
personal and official capacity;

19 Defendant(s)  
20

Case No.:

**VERIFIED COMPLAINT FOR  
INJUNCTIVE AND DECLARATORY  
RELIEF AND DAMAGES:**

- 1) **DEPRIVATION OF THE  
FREEDOM OF SPEECH**
- 2) **VIOLATION OF THE DUE  
PROCESS CLAUSE**
- 3) **VIOLATION OF TITLE IX**

**DEMAND FOR JURY TRIAL**

21 **INTRODUCTION**

22 1. Plaintiffs, K.S., a ninth-grade female cross-country athlete, and T.S., an eleventh-  
23 grade female cross-country athlete and team captain, at Martin Luther King High School  
24 (“MLKHS”) in Riverside Unified School District (the “District”) contend that the District’s policies  
25 and practices unfairly restrict their freedom of expression and deny them fair and equal access to  
26 athletic opportunities.  
27  
28

1           2.       This Action arises from the District's failure to comply with Title IX, which  
2 guarantees equal athletic opportunities based on biological sex, and the District's censorship of a  
3 viewpoint with which it disagrees.

4           3.       T.S. was ousted from her position on the girls' varsity cross-country team to make  
5 room for a biological male transgender athlete who did not consistently attend practices and failed  
6 to satisfy many of the team's varsity eligibility qualifications.

7           4.       As a result, T.S. missed opportunities to compete at a high-profile meet, losing  
8 valuable chances for college recruitment and recognition.

9           5.       The biological male transgender athlete who displaced T.S. on the girls' varsity team  
10 had recently transferred from another local high school after breaking that school's all-time cross-  
11 country record for the girls' cross-country team.

12          6.       Following T.S.'s removal from her position on the varsity cross-country team, T.S.  
13 and K.S. wore shirts bearing the messages "Save Girls' Sports" and "It's Common Sense. XX ≠  
14 XY." School officials ordered K.S. and T.S. to remove or conceal the shirts, claiming the messages  
15 created a "hostile" environment.

16          7.       School officials claimed the messages on Plaintiffs' shirts created the same level of  
17 hostility as a student wearing a swastika in front of Jewish students.

18          8.       Despite not allowing Plaintiffs' desired messaging on campus, MLKHS allows other  
19 political, social, and religious messages to be displayed across campus.

20          9.       MLKHS's failure to uphold Title IX policies placed female athletes at an unfair  
21 disadvantage.

22          10.       MLKHS's arbitrary and selective enforcement of the dress code violated Plaintiffs'  
23 constitutional rights.

24          11.       This Action seeks to affirm Plaintiffs' right to express their views, ensure fair athletic  
25 opportunities for female students, and hold the District accountable for discriminatory policies and  
26 practices.

**PARTIES - PLAINTIFFS**

12. Plaintiff K.S., a minor, is a ninth-grade female<sup>1</sup> student athlete at Martin Luther King High School and, at all times relevant to this Complaint, a resident of Riverside County, California.

13. Plaintiff T.S., a minor, is an eleventh-grade female student athlete at Martin Luther King High School and, at all times relevant to this Complaint, a resident of Riverside County, California.

14. Plaintiff RYAN STARLING is T.S.’s father and natural guardian. At all times relevant to this Complaint, Ryan is a resident of Riverside County, California.

15. Plaintiff DANIEL SLAVIN is K.S.’s father and natural guardian. At all times relevant to this Complaint, Daniel is a resident of Riverside County, California.

16. Plaintiff CYNTHIA SLAVIN is K.S.’s mother and natural guardian. At all times relevant to this Complaint, Cynthia is a resident of Riverside County, California.

**PARTIES - DEFENDANTS**

17. Defendant RIVERSIDE UNIFIED SCHOOL DISTRICT is a school district in Riverside County, California. Defendant District is responsible for the adoption and implementation of District policies and ensuring its agents enforce District policies.

18. Defendant LEANN IACUONE is the Principal of Martin Luther King High School. Under District policy, she is responsible for implementing and enforcing District policies related to student speech and student athletics, and she has discretion in the implementation of said policies on an individualized basis. Defendant Iacuone enforced District policy against K.S. and T.S. when she prohibited K.S. and T.S. from wearing the shirt with the message “Save Girls’ Sports” and “It’s Common Sense. XX ≠ XY” on it. She is sued in both her individual and official capacity.

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<sup>1</sup> “Male,” “Female,” “Boy,” and “Girl” used in this Complaint refer solely to binary, biological sex and not a person’s “gender identity.” See *Adams by & through Kasper v. Sch. Bd. of St. Johns Cnty.*, 57 F.4th 791, 812 (11th Cir. 2022) (Title IX defines “sex” “based on biology and reproductive function.”); Black’s Law Dictionary (5th ed. 1979) (“**Sex**. The sum of the peculiarities of structure and function that distinguish a male from a female organism[.]”); see also *Bostock v. Clayton Cnty., Ga.*, 590 U.S. 644, 655 (2020) (“Sex” in the Civil Rights Act of 1964 “refer[s] only to biological distinctions between male and female”).





**STATEMENT OF FACTS**

**A. PLAINTIFFS' BACKGROUND**

26. K.S. and T.S. are fifteen and sixteen years old respectively. Both are currently enrolled at Martin Luther King High School ("MLKHS") in the Riverside Unified School District ("District").

27. K.S. and T.S. are dedicated and skilled female student athletes at MLKHS.

28. As a current freshman, K.S. is in her first cross-country season at MLKHS. She is currently on the girls' Junior Varsity Team, consistently ranking between second and third on the Junior Varsity Team.

29. While attending Frank Augustus Miller Middle School in the District, K.S. participated on the girls' cross-country, track and field, volleyball, basketball, and soccer teams.

30. While at Frank Augustus Miller Middle School, in both seventh and eighth grade, K.S. was the District champion in cross-country and the District champion across multiple events in track and field.

31. In seventh grade, her middle school girls' soccer team won district champions, and her girls' volleyball and basketball teams came in second place. In eighth grade, her middle school girls' soccer, volleyball, and basketball teams won district champions.

32. As a current junior, T.S. is in her third cross-county season at MLKHS.

33. In 2023, T.S. received the MLKHS Most Improved Award for Cross Country, and in 2024, T.S. received the "Athlete of the Meet" after establishing a new personal record at the 45th Asics Clovis Invitational.

34. In 2024, T.S. and the MLKHS girls' cross-country team placed second at both the Inland Empire Challenge and at the Big VIII League Finals.

35. Since August 2024, T.S. has served as the MLKHS girls' cross-country Team Captain. In this leadership role, T.S. is responsible for demonstrating a strong work ethic, upholding a high standard of responsibility, and fostering a positive attitude to inspire and motivate the team.

36. In August 2024, T.S. earned a position on the girls' Varsity Top 7 on MLKHS's cross-country team.

1           37.     Since the start of the cross-country season in August 2024, K.S. and T.S. have  
2 attended every MLKHS cross-country practice.

3           38.     Both K.S. and T.S. have dedicated numerous hours each week to cross-country  
4 practices and races, all while managing their heavy academic workloads and other scholastic  
5 activities. Each week, they participate in practices, diligently training and conditioning to be better  
6 athletes.

7           39.     Both K.S. and T.S. and their families have dedicated significant money, time, and  
8 energy to the success of MLKHS girls' cross-country team.

9 **B.     SCOPE OF TITLE IX**

10          40.     In 1972, Congress enacted Title IX, 20 U.S.C. § 1681, which forbids education  
11 programs or activities receiving federal financial assistance from discriminating against persons  
12 based on their sex.

13          41.     Section 901(a) of Title IX of the Education Amendments of 1972, 20 U.S.C. §  
14 1681(a), provides that “[n]o person in the United States shall, on the basis of sex, be excluded from  
15 participation in, be denied the benefits of, or be subjected to discrimination under any education  
16 program or activity receiving Federal financial assistance.”

17          42.     Title IX was designed to eliminate significant “discrimination against women in  
18 education.” *Neal v. Bd. of Trs. of Cal. State Univs.*, 198 F.3d 763, 766 (9th Cir. 1999).

19          43.     Title IX and its implementing regulations and guidance require that, if an entity  
20 subject to Title IX provides athletic programs or opportunities separated by sex, then it must do so  
21 in a manner that “provide[s] equal athletic opportunity for members of both sexes.” 34 C.F.R. §  
22 106.41(c).

23          44.     Equal athletic opportunity can be determined by whether such athletic opportunities  
24 “effectively accommodate the interests and abilities of both sexes.” 34 C.F.R. § 106.41(c).

25          45.     Here, the “governing principle” is that “the athletic interests and abilities of male and  
26 female students must be equally effectively accommodated.” Policy Interpretation, 44 Fed. Reg.  
27 71,413, 71,414 (1979)

28

1           46. More specifically, the District must accommodate the physical abilities of girls “to  
2 the extent necessary to provide equal opportunity in . . . levels of competition,” and competitive  
3 opportunities “which equally reflect their abilities.” Policy Interpretation, 44 Fed. Reg. at 71,417-  
4 418.

5           47. As another aspect of equal athletic opportunity, implementing regulations and  
6 guidance state that male and female athletes “should receive equivalent treatment, benefits and  
7 opportunities.” Policy Interpretation, 44 Fed. Reg. at 71,415.

8           48. The “equal treatment” to which girls are entitled includes equal “opportunities to  
9 engage in . . . post-season competition,” *id.* at 71,416, equal opportunities for public recognition, 34  
10 C.F.R. § 106.41(c), and the right to be free of any policies which are “discriminatory in . . . effect”  
11 or that have the effect of denying “equality of athletic opportunity.” 44 Fed. Reg. at 71,417.

12           49. Accordingly, Title IX is understood to require the allocation of equal opportunities  
13 based on biological sex alone without regard to or consideration of gender identity.

#### 14 **C. MLKHS CROSS-COUNTY STUDENT-ATHLETE QUALIFICATIONS**

15           50. Pursuant to Board Policy 6145.2, Defendants Iacuone and Chann, as District  
16 administrators, are responsible for site-level decisions over MLKHS athletic activities.

17           51. MLKHS provides athletic programs or opportunities separated by sex.

18           52. MLKHS has four separate cross-country teams, including boys’ varsity and junior  
19 varsity teams and girls’ varsity and junior varsity teams.

20           53. The MLKHS boys’ and girls’ cross-country teams are highly competitive in the  
21 California Interscholastic Federation (“CIF”), Division 1. The MLKHS boys’ cross-county team is  
22 ranked 5th in the State of California and the MLKHS girls’ cross-country team is ranked 7th CIF  
23 Southern Section, Division 1.

24           54. In order to qualify for the girls’ Junior Varsity team, MLKHS student athletes must  
25 consistently demonstrate a strong work ethic in practice and a positive effort during meets.

26           55. According to the 2024 MLKHS Cross Country Team Handbook (“Handbook”), the  
27 girls’ Varsity Top 7 lineup is typically left to the coaching staff’s discretion based on the following  
28 criteria: (1) previous race times, (2) practice attendance, (3) “‘varsity-level effort’ at practice during

1 the week (or specifically a lack of it), (4) attitude, (5) long-term team strategy by the coaching staff,  
2 (6) illness/injury, (7) varsity “exposure,” and (8) other unforeseen issues. A true and correct copy  
3 of the 2024 MLKHS Cross Country Team Handbook is attached as **Exhibit 1**, p. 7.

4 56. The Handbook also states, “Athletes are only allowed one excused missed workout  
5 without potential consequences.” *Id.*, p. 6.

6 57. “Upon the second missed workout, even with prior notification, participation in the  
7 next race is by coaches’ discretion, but will usually result in missing the race.” *Id.*

8 58. The Handbook states that “[o]nly a doctor’s note specifically mandating ‘do not run’  
9 will be fully excused with no consequences to Letter Points or racing.” *Id.*

10 59. According to the Handbook, “[t]he coaching staff will require all juniors and seniors  
11 to be fully vested in the cross-country program and 100% of its requirements.” *See id.*, p. 3.

12 60. Each MLKHS cross-country student athlete and their parent or guardian are required  
13 to sign the Handbook, acknowledging its requirements.

14 61. The MLKHS girls’ cross-country team generally practices Tuesdays and Thursdays  
15 from 6:30 A.M. to 7:45 A.M. (Varsity Only), Monday through Friday from 2:10 P.M. to 4:45 P.M.  
16 (Varsity and Junior Varsity), and Saturdays from 7:00 A.M. to 9:00 A.M. (Varsity and Junior  
17 Varsity).

18 62. Given its ranking, the MLKHS girls’ Varsity Top 7 is regularly invited to the annual  
19 Mt. SAC Cross Country Invitational (“Mt. SAC Invitational”). The Team Sweepstakes Races are  
20 reserved for schools with exceptionally strong teams. Typically, schools ranked in the top ten in the  
21 State or the top ten in the California Southern Section request to be placed in the Mt. SAC  
22 Invitational Team Sweepstakes Race.

23 63. The Mt. SAC Invitational is a premier cross-country event in which qualifying teams  
24 from around the country participate and compete in. The Mt. SAC Invitational is also the host of the  
25 California Interscholastic Federation (“CIF”) in Southern California.

26 64. This year, the 76th Annual Mt. SAC Invitational was held on October 25, 2024, and  
27 October 26, 2024.

28

65. The 76th Annual Mt. SAC Invitational was presented by Nike, and a live webcast of the High School division was broadcasted by RunnerSpace+ showcasing the best cross-country runners from around the state and country.

66. College scouts can attend the Mt. SAC Invitational in person or watch digitally to observe participating high schools and athletes.

67. College coaches often attend the Mt. SAC Invitational to scout and recruit prospective collegiate athletes.

**D. IN VIOLATION OF TITLE IX, DEFENDANTS ALLOWED M.L. TO DISPLACE T.S. ON THE GIRLS' VARSITY TOP 7**

68. The Varsity Top 7 is updated before every meet and the varsity team may change from week to week depending on the qualifications set forth in the Handbook as referenced above. Pursuant to the Handbook, the discretion for determining the Varsity Top 7 is left to the coaching staff. *See Exhibit 1, p. 7.*

69. On or about October 22, 2024, approximately one week before the Mt. SAC Invitational, T.S. and her teammates received the updated girls' Varsity Top 7 list.

70. T.S., who had held a position on the girls' Varsity Top 7 since August 2024 was removed from the girls' Varsity Top 7 to make room on the girls' Varsity Top 7 for an eleventh-grade transgender student and T.S. was relegated to the junior varsity team for one of the most important meets of the season for college recruitment.

71. For purposes of this Complaint, the transgender student is referred to as M.L. and is a biological male.<sup>2</sup>

72. Because M.L. displaced T.S. on the girls' Varsity Top 7, T.S. no longer qualified to compete with the girls' Varsity Top 7 at the October 2024 Mt. SAC Invitational.

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<sup>2</sup> To protect the identity of the transgender student, alternative initials—M.L.—are used in place of the real name or initials of the student in this Complaint.

1           73.     M.L. transferred from another Riverside Unified School District high school to  
2 MLKHS on or about June 2024.

3           74.     At M.L.'s previous high school, M.L. ranked #1 on the girl's high school cross-  
4 country team.

5           75.     At M.L.'s previous high school, M.L. broke the previous school's existing girls' all-  
6 time cross-country record, a record that had not been broken since 2014.

7           76.     The MLKHS varsity coach initially identified T.S. on the Varsity Top 7 list for the  
8 Mt. SAC Invitational. However, Defendant Chann intervened, modified the list, and place M.L. on  
9 the Varsity Top 7 replacing T.S.

10          77.     As the athletic director and assistant-principal supervising the varsity coach,  
11 Defendant Chann exercised the authority provided to her by school district policy and by Defendant  
12 Iacuone when she removed T.S. and replaced her with M.L.

13          78.     Contrary to the varsity eligibility qualifications listed in the Handbook, M.L. did not  
14 regularly attend MLKHS cross-country practices.

15          79.     M.L. attended approximately 13 out of 74 cross-country practices between August  
16 2024 and October 2024.

17          80.     When M.L. attended practices, of the approximately two and a half hour-practice,  
18 M.L. would often only attend the last 50-60 minutes of practice.

19          81.     When M.L. did attend practice, Defendant Chann would join M.L. for M.L.'s runs.

20          82.     Oddly, Defendant Chann and M.L. would run together, but separately from the other  
21 girls' cross-country team members. Defendant Chann was never designated as a coach or assistant  
22 coach. However, Defendant Chann inserted herself into the team by her authority as the athletic  
23 director and assistant principal when she began to attend practices with M.L. in October of 2024,  
24 something she had not done previous to her replacing T.S. for M.L. on the Varsity Top 7.

25          83.     On or about October 19, 2024, after not attending any cross-country practices that  
26 week, M.L. competed, for the first time, at a varsity-level race with the MLKHS girls' cross-country  
27 team. M.L.'s time was 19:41.

28          84.     T.S. also competed at this same meet. Her time was 20:42.

1           85. T.S. has attended every cross-country practice this season and has demonstrated a  
2 concerted effort to retain a position on the girls' Varsity Top 7.

3           86. Plaintiffs were informed by Defendant Chann that a reason for M.L. not attending  
4 practices was because M.L. was taking extra classes by taking a 6th period class.

5           87. T.S., however, took summer school classes in order to make room in her schedule  
6 during the academic year so that she could attend 6th period MLKHS cross-country practices.

7           88. M.L.'s race time, alone, did not qualify M.L. for a position on the girls' Varsity Top  
8 7 according to the Handbook.

9           89. As a result of being placed on the Junior Varsity team, T.S. was no longer qualified  
10 to participate in the Mt. SAC Invitational as a varsity athlete in the Team Sweepstakes Race.

11           90. As a result, T.S. missed opportunities to compete at a high-profile meet, losing  
12 valuable chances for college recruitment and recognition.

13           91. Because M.L. was placed on the girls' Varsity Top 7, M.L. competed at the Mt. SAC  
14 Invitational as a varsity athlete instead of T.S.

15           92. K.S.'s high ranking on the girls' Junior Varsity Team places her as one of the  
16 immediate contenders for the Varsity Top 7 in the event the girls' Varsity Top 7 is short on athletes  
17 due to injury or illness.

18           93. Because Defendants did not apply equal standards when considering the girls'  
19 Varsity Top 7, Defendants treated M.L. more favorably than K.S., T.S., and the other female athletes  
20 who have consistently satisfied many of the varsity eligibility qualifications.

21           94. On or about October 24, 2024, prior to the Mt. SAC Invitational, T.S. and her parents  
22 met with Defendant Chann, Defendant Iacuone, and the cross-country head coach regarding M.L.'s  
23 displacement of T.S. from the girls' Varsity Top 7.

24           95. T.S.'s parents addressed the expectations listed in the Handbook. T.S.'s parents  
25 referenced the mandatory practice attendance and the varsity attitude requirements to place on the  
26 Varsity Top 7 position.

27  
28



1           96. Immediately following this meeting, on the same day, T.S.'s mother filed a Title IX  
2 complaint with the District citing gender discrimination. A true and correct copy of this Title IX  
3 complaint is attached as **Exhibit 2**.

4           97. In her complaint, T.S.'s mother told the District she believed T.S. was being  
5 discriminated against based on her choice of gender for a few reasons:

- 6           a. She [T.S.] was told she MUST be in the 6th-period class, even though she  
7 does not need PE credits and had to take summer school in order to keep room  
8 in her schedule. The other athlete [M.L.] has not been required to be in the  
9 6th-period class.
- 10          b. My daughter [T.S.] attends ALL practices, even when injured, and stays until  
11 4:30-4:45 every day. The other athlete [M.L.] is not required to attend 6th-  
12 period nor the time allotted after school for practice. This person [M.L.] gets  
13 to go home instead of coming to the part of practice they are free to attend  
14 outside of academic hours.
- 15          c. This person [M.L.] has chosen to try and graduate a year early. We think that  
16 is a great accomplishment and a worthwhile goal to pursue; however, there  
17 are many instances of cisgender girls giving up their sport or missing out on  
18 competition (games/races) because they are not allotted the same rules as this  
19 transgender person, specifically not being mandated to attend practices. Cisgender girls would be required to attend as much of practice as they can  
20 or they would be excluded from competition, why is the standard being  
21 applied differently? King Administration has notified us that this person is  
22 making a CHOICE to graduate early, attending zero period, sixth period, and  
23 an outside class at night. The law intends to allow students who participate in  
24 sports to make up assignments, tests, etc. when missing for travel to away  
25 games, for example, and not be punished academically, or when a senior  
26 needs a class that is REQUIRED to graduate on time. In this case, it is being  
27 applied to get this person [M.L.] ahead of everyone else. My daughter could've  
28 graduated early, but she is being held to the expectation that she MUST be at  
practice in order to compete. She is being treated unequally and  
disadvantageously.
- 21          d. My cisgender daughter, is held to the ALL policies in the team handbook yet  
22 this person [M.L.] is not required to follow them. Again, why is my daughter  
being held to tougher standards in order to race?
- 23          e. Varsity athletes are held to EVEN higher standards and requirements in order  
24 to be on Varsity. My daughter meets all of these requirements, but she has  
25 been bumped down to JV now and this athlete [M.L.] has been moved up to  
26 Varsity, despite only meeting one requirement and not attending any  
27 practices. My daughter is a Team Captain and was an Athlete of the Meet in  
Clovis. My daughter has been a dedicated member on the Varsity team and  
now that rules are being changed for this person [M.L.], it has unfairly  
displaced my daughter because she is not transgender.

*Id.*



1           98.     On October 25, 2024, the Title IX coordinator for the District, Bethany Scott,  
2 informed T.S.'s mother that the District would begin a "formal investigation."

3           99.     Ms. Scott also informed T.S.'s mother that Defendant Chann had stated that T.S.  
4 would not be harmed by running with the Junior Varsity team at the Mt. SAC Invitational.

5           100.    T.S.'s mother informed Ms. Scott that T.S. would be harmed because she would miss  
6 out on the opportunity to be recognized by college scouts at the Mt. SAC invitational.

7           101.    On or about November 1, 2024, after T.S.'s mother followed up on two separate  
8 occasions regarding the Title IX complaint, the District informed T.S. that the Title IX complaint  
9 was being converted to a confidential personnel matter rather than a gender discrimination complaint  
10 because "[t]he allegations, even if true, would not support a finding of sex-based discrimination."

11           102.    M.L. was placed on the girls' Varsity Top 7 despite not regularly attending cross-  
12 country practices (as required by the Handbook), attending only a portion of the practices, or  
13 showing any effort to be a part of the girls' Varsity Top 7.

#### 14 **E.     DEFENDANTS' SPEECH POLICY**

15           103.    Defendant District approved and enacted Board Policy 5132: Dress and Grooming  
16 on or about June 26, 2018 (hereinafter, "Speech Policy"). A true and correct copy of the Speech  
17 Policy is attached as **Exhibit 3**.

18           104.    Defendants Iacuone and Chann, as District administrators, had unbridled discretion  
19 to enforce the Speech Policy against K.S. and T.S.

20           105.    The Speech Policy "provides guidance to school sites to maintain safe, healthy, and  
21 effective learning environments." *See Exhibit 3*.

22           106.    The Speech Policy includes a section entitled "Students Cannot Wear" which  
23 incorporates Defendants' Speech Policy. *Id.*

24           107.    Students cannot wear clothing or accessories with images or language that:

- 25                   (a)     Is violent
- 26                   (b)     Depicts drugs or alcohol (or any illegal item or activity) or their use
- 27                   (c)     Includes hate speech, profanity, or pornography (including symbols)

- (d) Is likely to create a hostile or intimidating environment based on any protected class.

*Id.*

108. If a student violates the dress code, school sites “will implement progressive interventions,” including:

- (a) Warning and self-correct dress code violation
- (b) Offer students a change of nondescript and/or school-specific clothing
- (c) Offer parent/guardian the opportunity to bring a change of clothes.

*Id.*

109. “Repeated violations may result in a parent-school conference and/or other means of correction.” *Id.*

110. Under the Speech Policy, school officials can censor expression that they deem inappropriate or that they subjectively determine targets a certain group even if this expression is not materially and substantially disruptive.

#### **F. CENSORSHIP OF PLAINTIFFS’ SPEECH**

111. On or about October 26, 2024, while attending the Mt. SAC Invitational, approximately 18-20 parents and grandparents of MLKHS student athletes wore t-shirts with the message “Save Girls’ Sports” on the front of the shirt and the message “It’s Common Sense. XX ≠ XY” on the back of the shirt (hereinafter, ““Save Girls’ Sports’ shirts”). These are pictures of the front and back of the “Save Girls’ Sports” shirts:



112. Three MLKHS student athletes, including K.S. and T.S. and the student athlete who opted out of her girls' Varsity Top 7 position, wore the "Save Girls' Sports" shirts. K.S. and T.S. wore their "Save Girls' Sports" shirts at the end of their races, while the other student athlete wore the shirt during the whole meet. This is a picture of K.S. and T.S. wearing their "Save Girls' Sports" shirts:



113. Parents from Santiago High School, another school in attendance at the Mt. SAC Invitational, wore shirts with the message, "Protect Women's Sports XY Does Not Equal XX."

114. The winner of the Girls' Sweepstakes Race, a female student from Santiago High School, put her "Protect Women's Sports XY Does Not Equal XX" shirt on as soon as she crossed the finish line. This is a picture of the shirt this female student athlete wore:



115. To Plaintiffs' knowledge, no student, parent, or District employee complained about the "Save Girls' Sports" shirts during or following the Mt. SAC Invitational to the District, to K.S.

1 or T.S., or to their parents. In fact, there was no disruption that occurred at the Mt. SAC Invitational  
2 as a result of the shirts.

3 116. On or about November 1, 2024, K.S. and T.S. wore the “Save Girls’ Sports” shirts  
4 to their cross-country practice.

5 117. K.S. and T.S. are Christians with sincerely held religious beliefs regarding human  
6 identity. They believe that God created boys and girls with unique biological differences.

7 118. To K.S. and T.S., the expressions “Save Girls’ Sports” and “It’s Common Sense. XX  
8 ≠ XY” are intended to express their religious viewpoint and to advocate for the protection of fair  
9 competition for girls based on biological sex.

10 119. K.S. and T.S. are advocates of fairness and equal opportunities within girls’ sports,  
11 including on their cross-country team.

12 120. The messages on the shirts were not directed toward any teammate or student or  
13 individual.

14 121. At this November 1 practice, no student complained about the “Save Girls’ Sports”  
15 shirts to K.S. or T.S. or was visibly upset by the girls’ shirts. There was no disruption whatsoever at  
16 the school or within the practice as a result of the shirts.

17 122. During this cross-country practice, Defendant Chann approached K.S. and T.S. and  
18 told them they needed to remove their shirts or wear their shirts inside out so the “Save Girls’ Sports”  
19 messaging could not be seen.

20 123. When K.S. and T.S. asked why Defendant Chann was asking them to change their  
21 shirts, Defendant Chann expressed that the shirts’ messages created a “hostile” environment.

22 124. K.S. and T.S. further asked how the shirts created a “hostile” environment and  
23 Defendant Chann stated that wearing the “Save Girls’ Sports” shirts was analogous to a student who  
24 wore a shirt with a swastika in front of a Jewish student.

25 125. T.S. asked Defendant Chann whether bracelets or messages expressing viewpoints  
26 different from T.S.’s or those considered hostile by T.S. would be allowed. Defendant Chann  
27 responded that such items and messages would be permitted.

28

1           126. T.S. apologized, and though in disagreement to Defendant Chann's directive to  
2 change their shirts, K.S. and T.S. changed their shirts so they could continue to participate in  
3 practice.

4           127. M.L. was not in attendance at this practice when Defendant Chann directed Plaintiffs  
5 to change their shirts.

6           128. Following the censorship of the messages on Plaintiffs' shirts, K.S.'s mother  
7 contacted the District asking for further explanation as to why K.S. was directed to remove her  
8 "Save Girls' Sports" shirts. *See Exhibit 4.*

9           129. Following the censorship of the messages on Plaintiffs' shirts, T.S.'s mother  
10 contacted the District asking for further explanation as to why T.S. was directed to remove her "Save  
11 Girls' Sports" shirts. *See Exhibit 5.*

12           130. On or about November 4, 2024, T.S.'s mother filed a Uniform Complaint regarding  
13 the November 1 shirt incident. *See Exhibit 6.*

14           131. To date, T.S.'s mother has not received a response to her Uniform Complaint.

15           132. On or about November 4, 2024, Defendant Chann responded to T.S.'s mother's  
16 inquiry and wrote, "I am looking into a couple of things, and I will get back to you as soon as  
17 possible." *See Exhibit 5.*

18           133. On or about November 5, 2024, Defendant Chann responded to K.S.'s mother's  
19 inquiry and wrote, "We are working on a few things and hope to have something for you soon." *See*  
20 **Exhibit 4.**

21           134. On or about November 5, 2024, T.S.'s mother reached out to the Equity Officer and  
22 to the School Board Executive Assistant requesting an explanation regarding the t-shirt censorship  
23 issue.

24           135. The School Board Executive Assistant asked whether T.S.'s mother would like her  
25 to forward this communication to the Riverside Unified School District Board of Education. T.S.'s  
26 mother confirmed that she wanted her communication to be forwarded.

27           136. To date, T.S.'s mother has not received a response from any of these individuals or  
28 members addressing the t-shirt censorship issue.

1           137. On or about November 6, Defendant Iacuone sent separate written responses to  
2 Plaintiffs' mothers with the same message addressing the t-shirt incident.

3           138. Defendant Iacuone referenced District dress code and stated that the "Save Girls'  
4 Sports" shirts "create a hostile environment for one of the athletes on the team." She stated, "[T]he  
5 t-shirts are reasonably understood as being directed at a specific transgender athlete on the team,  
6 and reasonably may be understood as intended to intimidate, belittle, or hurt that athlete."

7           139. Defendant Iacuone reiterated Defendant Chann's example that similarly "a student  
8 who wore a shirt with a swastika to school was creating a hostile environment for Jewish students."  
9 *Id.*

10           140. Defendant Iacuone stated that "[i]t is standard practice at MLKHS that when students  
11 are in violation of the dress code, administrators explain the violation, ask the student to change and  
12 offer an alternative clothing article so they can continue about their day without disruption." *Id.*

13           141. Defendant Iacuone confirmed that the interaction that took place between K.S. and  
14 T.S. and Defendant Chann was done "in accordance with this process."

15           142. Defendant Iacuone also stated that if there was ever something that Plaintiffs deemed  
16 "hostile," they would need to go to Student Support Services and file an incident report.

17           143. On information and belief, no incident report was filed regarding Plaintiffs' "Save  
18 Girls' Sports" shirts.

19           144. In Plaintiffs' experiences, many of their teammates agree with their views of human  
20 identity, sex, and gender but are afraid to express their views because of the social consequences of  
21 expressing a view that differs from the view promoted by authority figures in the school community.

22           145. K.S. and T.S. respect the right of others to express views that differ from their own.  
23 They seek only the right to engage with the topics that are already being addressed and to express  
24 their own views on these topics.

25           146. Defendants regularly permit K.S. and T.S.'s teammates and classmates to wear  
26 clothing and apparel with various political, social, and religious messages on them.

27           147. To date, K.S. and T.S. have only received positive comments from their teammates  
28 regarding their "Save Girls' Sports" shirts.





1           155. K.S. and T.S.’s expression is fully protected under the First Amendment, which  
2 prohibits the government from “abridging the freedom of speech.” This prohibition applies to state  
3 and local governments through the Fourteenth Amendment.

4           156. Non-disruptive, individual student expression is protected by the First Amendment  
5 of the United States Constitution.

6           157. Defendant District approved and enacted the Speech Policy.

7           158. Pursuant to Defendants’ Speech Policy, Defendants Iacuone and Chann, as District  
8 administrators, singled out Plaintiffs’ expression and have prevented them from displaying their  
9 messages on their shirts at MLKHS.

10           159. K.S. and T.S.’s expression—wearing a shirt with the messages “Save Girls’ Sports”  
11 and “It’s Common Sense.  $XX \neq XY$ ”—did not and does not materially and substantially interfere  
12 with the orderly conduct of educational activity at MLKHS.

13           160. Defendants’ Speech Policy is vague and overbroad because it restricts student speech  
14 that does not and will not materially and substantially disrupt the educational process.

15           161. Defendants’ Speech Policy discriminates against speech because of its content.

16           162. Defendants’ Speech Policy discriminates against speech on the basis of the speaker’s  
17 viewpoint.

18           163. Defendants’ Speech Policy restrains constitutionally protected speech in advance of  
19 its expression, with virtually no guidelines or standards to guide the discretion of school officials  
20 charged with enforcing the Policy.

21           164. Defendants’ Speech Policy chills the free speech of Plaintiffs and other students.

22           165. Defendants’ Speech Policy allows the exercise of unbridled discretion.

23           166. Defendants’ Speech Policy improperly prohibits speech merely because it may  
24 allegedly be “hostile.”

25           167. Defendants censor Plaintiffs’ shirts but permit other students to wear apparel with  
26 different messages and the District to display messages on related topics.

27           168. Defendants censor Plaintiffs’ shirts but permit other students to wear apparel with  
28 different messages on different types of topics.



1 169. Defendants have no compelling reason that would justify their censorship of  
2 Plaintiffs' "Save Girls' Sports" shirts.

3 170. Defendants have no compelling or legitimate reason that would justify their  
4 censorship of the messages that Plaintiffs seek to express.

5 171. Defendants' Speech Policy and practice are not reasonably related to any legitimate  
6 pedagogical concerns.

7 172. Defendants' policies, and the enforcement thereof, thus violate the Free Speech  
8 Clause of the First Amendment to the United States Constitution, made applicable to the states  
9 through the Fourteenth Amendment.

10 173. Plaintiffs respectfully pray the Court grant the equitable and legal relief set forth in  
11 the prayer for relief.

12 **SECOND CAUSE OF ACTION**

13 **FOURTEENTH AMENDMENT: DUE PROCESS**

14 **(42 U.S.C. § 1983)**

15 **(As Against All Defendants)**

16 174. Plaintiffs re-allege and incorporate herein, as though fully set forth, Paragraphs 1  
17 through 173 of this Complaint.

18 175. The Speech Policy is vague and lacks sufficient objective standards to curtail the  
19 discretion of school officials, which allow Defendants to enforce the policies in an *ad hoc* and  
20 discriminatory manner.

21 176. Defendant District approved and the Speech Policy.

22 177. Defendants Iacuone and Chann, as District administrators, had unbridled discretion  
23 to enforce the Speech Policy against K.S. and T.S.

24 178. The Speech Policy requires Defendants to arbitrarily determine what is and is not  
25 "likely to create a hostile or intimidating environment based on any protected class."

26 179. Students of common intelligence must guess as to whether their expression is "likely  
27 to create a hostile or intimidating environment based on any protected class."  
28

1 180. Defendants' Speech Policy and practice allow school officials to act with unbridled  
2 discretion when deciding whether student expression is "likely to create a hostile or intimidating  
3 environment based on any protected class."

4 181. Defendants have no compelling reason that would justify their censorship of the  
5 expression on Plaintiffs' "Save Girls' Sports" shirts.

6 182. The Speech Policy, and Defendants' enforcement thereof, therefore, violate the Due  
7 Process Clause of the Fourteenth Amendment to the United States Constitution.

8 183. Plaintiffs respectfully pray the Court grant the equitable and legal relief set forth in  
9 the prayer for relief.

10 **THIRD CAUSE OF ACTION**

11 **TITLE IX: SEX DISCRIMINATION**

12 **FAILURE TO PROVIDE EQUAL TREATMENT, BENEFITS, AND OPPORTUNITIES**

13 **(As Against All Defendants)**

14 184. Plaintiffs re-allege and incorporate herein, as though fully set forth, Paragraphs 1  
15 through 183 of this Complaint.

16 185. All Defendants are subject to the obligations of Title IX.

17 186. MLKHS participates in the California Interscholastic Federation.

18 187. Defendant District approved and enacted Board Policy 6145.2: Athletic Competition.

19 188. Pursuant to Board Policy 6145.2, Defendants Iacuone and Chann, as District  
20 administrators, are responsible for site-level decisions over MLKHS athletic activities.

21 189. Pursuant to Board Policy 6145.2, school officials "shall ensure that equivalent  
22 athletic opportunities are provided for males and females."

23 190. All Defendants have chosen to provide athletic opportunities in cross-country  
24 separated by sex.

25 191. As a result, all Defendants have an obligation to ensure that female athletes receive  
26 equivalent treatment, benefits, and opportunities in athletic competition as compared to boys.

1           192.   Equivalent treatment and opportunities require equal opportunities to engage in post-  
2 season competition, and more broadly the right to be free of any policies which are “discriminatory  
3 in language or effect” or have the effect of denying “equality of athletic opportunity.”

4           193.   As detailed herein, Defendants deprived Plaintiff T.S. of equal opportunities to  
5 engage in competition.

6           194.   Female athletes should be treated at least equally to transgender students in terms of  
7 qualifying for varsity sports.

8           195.   Defendants exercised the discretion granted to them to unlawfully discriminated  
9 against T.S. when they collectively chose M.L., a biological male, to displace T.S. on the girls’  
10 Varsity Top 7, despite M.L. not satisfying many of the varsity qualifications.

11           196.   M.L. has consistently missed practices, attending only 13 out of the 74 practices held  
12 between August 2024 and October 2024, and attending approximately only the last 50-60 minutes  
13 of the two+ hour practices when in attendance. Meanwhile, T.S., as team captain, has shown a  
14 concerted effort, strong work ethic, and desire to be on the girls’ Varsity Top 7, attending all  
15 practices and races and training diligently for the entirety of practices.

16           197.   The MLKHS varsity coach initially identified T.S. on the Varsity Top 7 list for the  
17 Mt. SAC Invitational. However, Defendant Chann intervened, modified the list, and place M.L. on  
18 the Varsity Top 7 replacing T.S.

19           198.   Rather than equally apply the varsity qualifications to all students, Defendants chose  
20 to favor M.L. over T.S. because M.L. is transgender.

21           199.   Defendants’ decision to displace T.S. resulted in T.S. being disqualified from racing  
22 on the varsity team at the Mt. SAC Invitational.

23           200.   This practice is discriminatory in effect, and denies T.S., a female, equality in athletic  
24 opportunities, including equal opportunity to achieve and be recognized for victory.

25           201.   As a result of Defendants’ actions, T.S. missed opportunities to compete at a high-  
26 profile meet, losing valuable chances for college recruitment and recognition.

27           202.   T.S. is harmed by Defendants’ failure to provide competitive opportunities that fairly  
28 and effectively accommodate her athletic abilities.

203. Such harm includes loss of the experience of fair competition; loss of victories and the public recognition associated with victories; loss of opportunities to advance to higher-level competitions; loss of visibility to college recruiters; emotional distress, pain, anxiety, and other damages to be proven at trial.

### PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief against defendants as follows:

1. That this Court issue a Declaratory Judgment, declaring Defendants' Speech Policy prohibiting messages that are "likely to create a hostile or intimidating environment based upon any protected class" on clothing unconstitutional, facially and as applied to K.S. and T.S.'s speech;

2. Injunctive relief enjoining Defendants, their officials, agents, employees, and all persons in active concert or participation with them, from enforcing Defendants' Speech Policy challenged herein both facially and as applied to the extent the Speech Policy prohibits K.S. and T.S. from wearing a shirt with the messages "Save Girls' Sports" and "It's Common Sense. XX ≠ XY" or similar messages at MLKHS;

3. A declaration that Defendants have violated Title IX by failing to provide equal treatment, benefits, and opportunities for girls in athletic competition;

4. An award of nominal compensatory damages and other monetary relief as permitted by law;

5. For costs, attorneys' fees and interest, as allowed by law; and

6. For such other relief the Court determines is proper.

### DEMAND FOR JURY TRIAL

Plaintiffs hereby demand trial by jury.

DATED: November 20, 2024

ADVOCATES FOR FAITH & FREEDOM

By: 

Julianne Fleischer, Esq.  
Attorneys for Plaintiffs


1 **VERIFICATION**

2 I have read the foregoing **VERIFIED COMPLAINT FOR INJUNTIVE AND**  
3 **DECLARATORY RELIEF AND DAMAGES** and know its contents.

4 I am a party to this action. The matters stated in the foregoing document are true of my own  
5 knowledge except as to those matters which are stated on information and belief, and as to those  
6 matters, I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing  
8 is true and correct.

9 Executed on November 20, 2024, at Riverside, California.

10  
11   
Ryan Starling (Nov 20, 2024 09:36 PST)

12 T.S., a minor by and through her father and  
13 natural guardian, RYAN STARLING  
14  
15  
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28

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6 matters, I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing  
8 is true and correct.

9 Executed on November 20, 2024, at Riverside, California.

10  
11 *Cynthia Slavin*  
Cynthia Slavin (Nov 20, 2024 09:45 PST)

12 K.S., a minor by and through her mother and  
13 natural guardian, CYNTHIA SLAVIN

14 *Dan Slavin*  
Dan Slavin (Nov 20, 2024 09:51 PST)

15 K.S., a minor by and through her father and  
16 natural guardian, DANIEL SLAVIN and  
17 CYNTHIA SLAVIN  
18  
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# MARTIN LUTHER KING HIGH SCHOOL CROSS COUNTRY



TEAM HANDBOOK 2024

# KING CROSS COUNTRY TEAM HANDBOOK

Volume 26

Written and compiled by Alfonso Ibarra

with input by the current and former coaching staff

Coaches: Alfonso Ibarra, Jim Griesinger, Dalton Seckinger, Mario Machuca, Kalea Ibarra

Martin Luther King High School 9301 Wood Road Riverside, CA 92508

Founded August 3, 1999

[www.kingcrosscountry.com](http://www.kingcrosscountry.com)





## HOW TO STAY ELIGIBLE AND ON THE TEAM

After team selections have been made, the coaching staff reserves the right to remove athletes who have become unruly or disruptive to the team goals and a healthy team atmosphere.

**Displays a Consistent Positive Attitude.** Athletes of any ability level who are viewed by the coaching staff as being negative toward their teammates, the sport, training, the coaching staff or the well-being of the program may be suspended from competition or, if egregious, expelled from the team mid-season.

Electronic forms of dialogue (social media and otherwise) that are damaging, demeaning to individuals or the team as a whole will not be tolerated and if discovered will be grounds for team discipline up to and including dismissal from the team.

Conversation, texting, joking, or any other form of communication that demeans another person's race, gender or identity will not be tolerated and will be grounds for team discipline up to and including dismissal from the team.

**Shows Consistent Quality Effort in practice.** Deliberately cutting a prescribed route to gain a shorter distance is viewed as showing a distinct lack of effort. Walking during workouts, except for injury or illness, is not allowed, and if chronic, will result in disqualification from racing or dismissal from the team.

**Maintains minimum GPA in class.** CIF-SS and the RUSD establish a policy that all student athletes must maintain a minimum 2.0 GPA at each grading cycle in order to compete and participate. If a student's GPA falls below that mark at the end of the first quarter, they will not be able to compete and will forfeit all rewards at the end of the season, including a varsity letter. This is in effect, even if the quarter grades are posted AFTER your last race at League Finals.

## STATEMENTS AND POLICIES REGARDING CLUB SPORT INVOLVEMENT

The coaching staff will require all juniors and seniors to be fully vested in the cross country program and 100% of its requirements.

Specifically, this means there is to be no involvement in club sports of any kind (including running clubs) during the cross country season. Missing Saturday invitationals (or leaving early) is not acceptable due to club games, club races or other activities. Participation in Saturday invitationals is an expectation except for illness or family emergencies.

Exceptions are made for underclassmen (9th and 10th graders) or for rookies who are in the 11th and 12th grade, as we feel the first two years of high school are a time of experimentation and growth and

trying a new sport is commendable. In time, we believe it is healthy for student-athletes to make a choice to either run cross country or pursue other endeavors.

**PHILOSOPHY REGARDING DUAL INVOLVEMENT IN TRACK CLUBS** While many of the high school sports have been supplemented or challenged by the existence of club teams or “travel ball”, such has not been the case in the sports of cross country and distance running. While there are a few running clubs in existence that cater to distance running, (most exist to develop sprinters) college coaches still widely look to achievement within the context of organized high school competitions, under the auspices of high school institutions and high school coaches, as the pinnacle of the sport. It is at the major high school invitationals and the CIF/State Championship rounds that colleges flock to find potential college athletes. There is no Club-sponsored meet that even comes close to the attraction of CIF-sanctioned high school cross country and track meets.

CIF, the governing body of California high school sports, changed its rules in 2010 regarding off season involvement between high school coaches and their athletes. In short, they allowed “year-round” development between high school coaches and their runners, where in prior years it was severely limited. King High Cross Country and Track and Field have benefitted from this change by implementing an organized system in all four seasons of the year. Winter Camp, Summer Camp and the competitive seasons in the Fall and Spring now help to develop distance runners throughout the year if that is their choice.

Furthermore, we believe it is in the best interest of the individual as well as the collective team that student athletes not divide their attention or loyalty with competing groups or clubs. While we do not claim to have “the answer” to all things distance running, we do have a proven record of nurturing young runners through their high school years to achieve beyond what they thought was capable. We have a long and growing list of students who have competed at the collegiate level. We have guided novices to becoming collegiate scholarship runners. And while running clubs and off-site coaches may be alluring, entertaining a second “voice” when it comes to the periodization of training, strategy and the development of a young runner is very confusing to the young person and is not a healthy way to advance one’s skills or interest in the sport of distance running.

Therefore, if focusing on the sport of distance running (cross country and track) is of great interest to you, we believe that the coaching staff at King High Cross Country and Track is all you will need to succeed and we would make a strong appeal to dissuade you from the divisive nature that Club Sports and other coaching voices create while competing for King High.

# KING GRADUATES WHO COMPETED IN COLLEGE



2002 - 2003 - Steve Griesinger - RCC  
 2003-2004 - Shamari LaCour - Houghton College, NY  
 2003- 2006 - Angella Nanyonyi - RCC  
 2003 - 2006 - Laura Fairley - RCC , San Jose State  
 2003-2007 - Laura Moore - RCC, Cal Lutheran  
 Brian Brierly - UC Irvine 2004-2008  
 2004-2005 - Megan Fairley - UC Irvine  
 2005 - Stephanie Fematt - RCC  
 2005 – 2008 - Kristina Moore - UCSB  
 2002-2006 - Morgan Sjogren - Cal State San Marcos  
 2006 - Lindsay Vitort - Loyola Marymont University  
 2006 to 2012 - Bridget Gonzalez - Southern Virginia University  
 2007 - Daniel Beld - RCC  
 2007 – 2012 - Matt Cummins - Harvey Mudd/Claremont  
 2007- 2010 - Alec Fillmore - University of Redlands  
 2007-2011 - Monika Valenzuela - Cal State San Marcos  
 2007 1 Nashatar Gill - Cal Poly Pomona  
 2008 - Colton Underwood - RCC  
 2008-2012 Larissa Davis - RCC/UNLV  
 2008 - 2009 Rebekah Fairley - RCC  
 2008 -2012 - Carissa Bowman - Biola University  
 2008 - Stacy Yarbrough - Azusa Pacific University  
 2008 - Patrick Gonzalez - Southern Virginia University  
 2009 - 2010 - Charlie Alvarez - RCC  
 2009 - 2013 - Casey Candelaria – RCC and CS Fullerton  
 2010 –2011 Rebecca Asplund - Biola University and CBU  
 2010 - Rebecca Trupp - CBU  
 2010 - 2014 - Katrina Graham - The Masters College  
 2010 - 2011 - Kelsi Tippetts BYU  
 2010 - Jarod Nocella - RCC  
 2011 - 2015 - Carrie Soholt - Biola University  
 2011 -2016 - Hanna Peterson - University of Arizona  
 2011- 2016 - Lane Werley - UCLA  
 2011 - Nick Rini - RCC  
 2011 - 2012- Rafi Perez - RCC  
 2011 - Aaron Youngren - RCC  
 2012 - Taylar Amiot - Cal State San Bernardino  
 2012 - Ethan McAbee - University of LaVerne  
 2012 – 2016 - Nathan Meier - University of Redlands  
 2012 – 2016 - Tyler Parrish – RCC, Tabor College  
 2013 – 2018 - Raelyn Werley - Cal State San Marcos  
 2013 - 2017 - Brandon Berz - Biola University  
 2013 - 2017 - Lisa Garside - Embry Riddle, Prescott  
 2013 – 2015 Katelyn Fatten—Bethel College, Kansas  
 2013 – 2016 - Perry Elerts—Nortre Dame De Namure  
 2013 – 2017 - Bayleigh Porter - Vanguard University  
 2013 – 2017 - Lauren Soholt, Vanguard University  
 2013 – 2017 - Joe Casco, Cal State Fullerton  
 2014 - Aimee Martinez, UCR  
 2014 – 2018 - Brianna Jacklin, RCC and Cal State Fullerton  
 2015—Dalton Seckinger, RCC  
 2015 – 2016 - Rolando Phalen, RCC, Sterling College (KS) 2017 to 2018  
 2015 – 2016 —Carlos Ramirez, RCC  
 2015 – 2016 - Isaiah Quiambao, RCC. 2017-present University of San Diego  
 2015 – 2016 – Hannah Johnson, Carroll College, Montana  
 2015 - 2020 - Emily Sanchez UCR  
 2016 – 2021 - Tyler Janes, UCLA  
 2016 – 2018 - Jessica Ferguson, Cal State San Marcos  
 2016 – 2018 - Mark Werley, Cal State San Marcos  
 2016 – 2017 - Michael Robinson, RCC  
 2016 – 2018 - Samantha Chapa, RCC, San Marcos  
 2016 – present - Alyssa Haring, Dixie State, Utah  
 2017 - present – Kathryn Hammar, UCR  
 2017- 2018 – Rebekah Pendleton UCR  
 2017-2019 – Austin Dai, RCC, UCR  
 2017 – Riley Figurate, RCC  
 2018 - Daniel Gonzalez, Southern Utah University  
 2018 - Carissa Avila, University of Redlands  
 2018 - Allison Janes, Cal Baptist  
 2018 - Connor Sharp, RCC  
 2019 - Lauren Peurifoy - Liberty University, VA  
 2019 - Dathan Chann- New Haven University, CT  
 2019 - Garrett Vasta - Portland State, 2020 - CS San Marcos  
 2019 - Matthew Castro - RCC  
 2019 - Amanda Sosa, UCR  
 2019 - Matt Castro, RCC  
 2019 - Jeff Ortiz, RCC  
 2019 - Isaiah Cunningham, RCC  
 2020 - Austin Fortenberry, CS San Marcos  
 2020 - Mitchell Machuca - CS San Marcos  
 2020 - Kela Mavhera - CBU  
 2021 - Edgar Ortega - Chico State  
 2021- Franscico Zavaleta - Cal Poly Pomona  
 2021- Justine Marshall - CBU  
 2022- Audrey Brunken- University of Colorado-Colorado Spring  
 2022 - Gray Mavhera - CBU  
 2022- Andrea Guadian - Cal Poly Pomona  
 2023 - Jack Slavin - RCC  
 2023 - Damien Zemanek - RCC  
 2023 - Christian De Loye - Mt. Sac

## DAILY AND RACE DAY REQUIREMENTS

**PRACTICE HOURS:** Morning practice during the summer starts at 6:30 AM and afternoon practices will start during 6th period. In the case of extreme heat, we may postpone the start of practice to 6:00 PM. Attendance is required for all athletes who are at school during the day, including those who are injured or slightly ill. All athletes must dress out even if injured or ill.

**ATTENDANCE POLICY: IF YOU MUST MISS PRACTICE:** Notify Coach Ibarra IN ADVANCE OF PRACTICE. **REPORTING AN ABSENCE MUST BE DONE USING THE Remind app.**

Failure to notify before practice of intended non-participation will result in the loss of competition at our next meet.

**ATHLETES ARE ALLOWED ONLY ONE EXCUSED MISSED WORKOUT WITHOUT POTENTIAL CONSEQUENCES** “Excused” means you gave prior notification to Coach Ibarra during the season. Upon the second missed workout, even with prior notification, participation in the next race is by coaches’ discretion, but will usually result in missing the race.

Bad Weather will not cancel practice. The coaching staff will cancel practice. If it is excessively smoggy or raining hard, practice will be modified to accommodate. Modification of practice may include postponing the start of practice to 6:00 PM.

**RUNNING, PRACTICE AND LETTER POINTS:** All absences or days of non-participation (meaning, you did not physically run the workout but were present at the workout) will be deducted from letter eligibility. Tardies are deducted a “half-day” point.

Only a doctor’s note specifically mandating “do not run” will be fully excused with no consequences to Letter Points or racing. However, do note that an injury in which a doctor states an athlete should not run will usually mean that athlete should not race either.

Each time you miss running a workout, you will lose a point toward letter points. This includes ALL reasons, **including:** - Normal doctor’s/dentist/ortho appointments - Family vacations or weekend getaways - Illness or injury - School related extracurricular activities Should a doctor’s note restricting practice be attainable, it must be submitted within one week of missed practice in order to clear attendance deductions on the letter program. After one week, a doctor’s note will not clear absences for attaining letter points. Designated “second-workouts” for the specified groups are required of those groups. Attendance is taken and counted in all aspects of the attendance/letter points policy

**RACE DAY POLICIES:** Attendance: King emphasizes the value of competition. Therefore, it is unacceptable for athletes to miss a race unless he or she is sick. Injured athletes are expected

to attend the races and support the team. Attendance at all meets is expected as well unless the athlete is being disciplined for attendance or effort-related issues.

**Dress Code at meets:** All athletes must wear the school issued sweats to and from meets. Individual sweats of school colors are NOT allowed. Civilian clothes are not permitted to travel to or from meets. The current team shirt is the ONLY shirt allowed to be worn at meets while not racing.

Running shoes must be worn ALL times. No slippers, flip-flops, casual shoes or barefoot are allowed before or after your race.

**Travel:** All athletes must travel to and from a race on the school bus or coach-organized transportation. NO ONE IS ALLOWED TO LEAVE A MEET EARLY. Leaving a meet prior to the team leaving will result in a half-day deduction from letter points.

**Varsity Designation:** The coaching staff determines the “varsity lineup” on a weekly, race-by-race basis. The varsity seven each week will be selected each race based on a variety of factors, including but not limited to: Previous times, attendance and “varsity-level effort” at practice during the week (or specifically a lack of it), attitude, long-term team strategy by the coaching staff, illness/injury, varsity “exposure” and other unforeseen issues. The decision may be made on one or a combination of all of the factors noted above.

## 6<sup>TH</sup> PERIOD, ATHLETIC PE GRADING POLICY

Students are earning PE credit for being involved in a sport. Therefore, the students will earn a grade based on their effort, participation and success in the sport of cross country. They are NOT earning a grade for attendance in 6th period, they are earning a grade for the work they do as athletes involved in a sport. Therefore, all events or practices that King Cross Country participates in will be considered for their grades, including Saturday meets and practices.

For practice, athletes are graded per day, 10 points being assigned to each day King XC holds practice, event or competition, including Saturdays. The athlete must successfully complete the workout to earn the points. Students will also be graded for study hall performance during 6th period.

**The semester grade is weighted:**

Attendance/Class Participation	50%
Grade checks	20%
Race evaluations	30%

Grades are averaged:

90% A; 80% B; 70% C; 60% D; 0-59% F

## ANTI-HAZING POLICY

The purpose of high school athletics is to provide student-athletes a safe place to grow within a competitive environment. Therefore, it is unacceptable to treat fellow teammates with disrespectful words or actions.

Any behavior that is deemed as “hazing” - the deliberate attempt to humiliate in any way a member of the team - will NOT be tolerated, even on the first offense. Hazing or humiliation of others, even “in fun” will be grounds for team discipline, up to and including dismissal from the team.

## SAFETY REQUIREMENTS

Though cross country is basically a very safe sport, the fact remains that there are inherent dangers involved in the sport, as there are with any athletic endeavor.

The greatest dangers to running cross country are found in the fact that most of our workouts take place outside of the school campus, on the roads and pathways of the surrounding community. Basic knowledge of the rules of the road are required, and adherence to them is expected.

Athletes of King Cross Country are expected to do the following:

### **On the Streets**

1. Obey all rules of the road. Athletes must cross intersections at the crosswalks and wait for green lights. “J-Walking” is prohibited at all times.
2. Athletes may run on the side of the street opposing traffic, but must remain close to the curb of the street or on the sidewalk.
3. Athletes are encouraged to run on the sidewalks whenever possible.
4. Athletes should avoid running in large, wide groups; stay 2-3 abreast along the side of the road

### **On Trails and Pathways**

1. Watch for gopher holes or other divots that could cause injury.
2. Do not run recklessly. Run in such a way as to keep from falling or slipping on loose gravel.
3. Keep your eye on the trail for snakes or other potentially harmful wildlife.
4. Make noise (within reason) while running on trails. This alerts wildlife to your presence and frightens them away.

### **When ill or Injured**

1. If a student/athlete is sick or otherwise not feeling well, it is up to the athlete to inform Coach Ibarra PRIOR TO PRACTICE BEGINNING.
2. If a student/athlete feels that he/she cannot finish a workout once the workout begins, he/she must inform a coach and seek permission to end the workout early.
3. Please do not attempt to run if you are legitimately sick or injured.



**Hydration:** It is paramount that the athletes properly and consistently stay hydrated throughout the school day in order to safely conduct afternoon workouts. 32-64 ounces of WATER is the recommended amount of fluid to consume per day before practice. In order for the body to properly absorb and apply the benefits of hydration, the fluid intake must be done over a period of hours, not minutes. While water intake right before practice is good, it cannot take the place of hydration throughout the day.

## STATEMENT OF RISKS ASSOCIATED WITH RUNNING CROSS COUNTRY

The coaching staff has taken great care in planning the structure of the program to assure the safety and well-being of the athletes who participate in it. However, it is imperative that students and parents alike be aware of the risks inherent in the sport and the recommendations for safe conduct.

The team uses the surrounding streets and neighborhoods of King High School for training. Virtually all of the workouts are held off campus. Potential life threatening dangers from dogs, people and cars are part of the training environment on a daily basis. Injuries can and do happen when participating in sports. Injuries common to distance runners are sprains, joint pain, pulled muscles and shin splints. Wearing of quality running shoes and proper stretching and warm up routines can alleviate injuries. When possible, runners should avoid running on concrete.

**Health concerns associated with heat are potentially life threatening.** Proper hydration with water or sport drinks throughout the day as well as while training is strongly recommended to avoid heat-related illnesses. Coaches provide ongoing encouragement to hydrate THROUGHOUT THE DAY to avoid heat-related issues/concerns.

Asthmatic conditions can be exacerbated with exercise. Those diagnosed with any level of asthma are encouraged to take precautions and use appropriate inhaler medication even while training if necessary.

**King Cross Country will act to assure the safety of those participating including:**  
**“Jay-walking” on any non-residential street is strictly prohibited. Penalty for jaywalking is a one-week suspension from the team. On the second violation, the student will be cut from the team.**

Practice times are adjusted to avoid excessive heat and smog. This may include postponing the start of practice to a later hour than immediately after school. Coaches actively try to monitor all athletes, but due to disparate ability and effort levels, athletes are encouraged to use the “buddy system” – letting others on the team know if they are turning around mid-workout or are in physical trouble. Coaches are assigned different ability group levels to monitor on a workout so that as much adult supervision as possible is present.

On hot days, the coaching staff provides water stops within the workout. On all days, runners are encouraged and allowed to stop for water at any point along a running route when the athlete feels it's necessary.

IF ANY LIFE THREATENING EVENT HAPPENS DURING PRACTICE, WE WILL CALL 911 FIRST FOR ASSISTANCE TO SECURE BEST POSSIBLE OUTCOME.

## BANQUET, AWARDS AND EXPECTATIONS

We award athletes as a reflection of our program values: Learning, Integrity, Faithfulness, Excellence. Each of our primary awards are given to student-athletes who highly demonstrated these four characteristics.

All athletes who finished the season in good standing and academically eligible are honored and awarded at the banquet to some degree. Only those, however, who finished the first quarter of school academically are eligible to receive such distinction. Those who did not remain academically eligible during the first quarter are welcome to be a part of the banquet but will not be publicly recognized.

### **Most Valuable Runner**

This is a person who displays a consistently valuable character to the competitive outcome of the team all year long. These qualities are demonstrated in a variety of ways, among which for consideration are:

Speed and skill on the race path,  
competitive contribution to the success of the team in racing,  
strong, positive contribution to the success of the team in practice,  
positive attitude toward the sport and teammates,  
coachability,  
demonstrated enthusiasm for King High,  
consistent demonstration of unselfishness, integrity, and verbal leadership and inspiration toward the team throughout the season.

It is a high standard. **DO NOT** presume that just because you're the "fastest runner on the team" that the award will be bestowed upon you regardless of the other, equally important characteristics stated above. The MVPs of our teams are young people who demonstrate "value" (as defined above) to our team all season long, not just on race days.

### **Four Year Athlete Award:**

Athletes who compete in cross country at King High all four years of high school are honored with a paper certificate. Those who, during their senior year, finish with exceptional attitude and effort, will receive a distinguished plaque. In order to qualify for this plaque, athletes must meet the minimum requirements in all of the following categories during their senior season:



- 1) Miss less than 5 days of running and
- 2) Compete in 75% of the invitationals and
- 3) remain eligible academically and
- 4) meet the minimum request of fundraising and
- 5) finish in good standing with their teammates and coaches having demonstrated a positive attitude toward training, coaches, the sport, teammates and development in the sport of distance running.

### **Most Improved Runner:**

This is a person who demonstrably shows dramatic improvement in their race times from one season to the next or within the context of one season.

### **Rookie of the Year:**

The most impressive new-comer to King High XC, both boy and girl. A rookie who demonstrated an above average success in racing and commitment to the sport and the team. The athlete demonstrated not only talent but a commitment to the team and a positive attitude.

### **League Championship and CIF Patches:**

League Championship patches are made available only for letter earners who raced in the top nine (9) of King's finishers at least once during the season. CIF Finalist/championship patches will be available to those who raced in, or served as an alternate on the CIF teams.

### **Letters:**

***Please Note: While the coaches do reserve the right to award a letter to any athlete regardless of point total, due to the objective nature of the lettering system and its broad-based, multi-faceted approach, such awards have never been given since this system's adoption in 2002. 6 requirements are required to earn a letter.***

### **Letter Requirements:**

#### **DISQUALIFIERS FOR EARNING A LETTER**

1. Fall BELOW a 2.0 GPA on the first quarter grade reports. Ineligibility will disqualify an athlete from lettering.
2. Quitting for any reason prior to the end of the season will disqualify an athlete from a letter.
3. Refusal to compete in a CIF race (if qualified to do so) will disqualify an athlete from a letter.

### **TO EARN A LETTER:**

The Letter for King Cross Country is awarded for both talent and effort. It is designed to be a valued award for running ability, hard work and dedication. The achievement of a letter is not a right, but rather the result of a personal responsibility to act and behave all season in a positive way ... meaning, an above average commitment to the team, the sport, to hard work and improvement. A letter can be earned by anyone from any grade level. To earn a letter in Cross Country, **the athlete must do ALL SIX of the following requirements.**

1. Finish the season in good standing with the coaches, having demonstrated throughout the entire season a positive, team-oriented, success-minded attitude and conduct.
2. Compete in at least three of the in-season Saturday invitationals
3. Maintain a "varsity attitude" throughout the season. A varsity attitude is demonstrated by an above-average commitment to the team's goals, to the sport and to one's individual improvement.
4. Finish the first quarter with a minimum of 2.0 GPA.
5. Don't quit. Quitting for any reason prior to the end of the season will disqualify an athlete from a letter.
6. **AND**, earn 100 or more points from any of the categories in the chart below:

CATEGORIES	Points Awarded
<b>Boosters:</b> Parent attendance at a booster meeting (Aug, Sep, Oct, Nov.)	5 each day
<b>Improvement:</b> Athlete displays consistent and substantial improvement from prior year of King XC in race times throughout the season and on a variety of courses.	20
<b>DNR:</b> (defined as "the student <u>Did Not Run</u> the intended workout." Is NOT defined as "student was present for attendance or watched the workout") Athlete has 2 or fewer days of non-running - DNR - (for any reason) from scheduled practices and meets from the first official day of the season to the day after league finals (only academic events/testing and doctors notes are excused) <i>After 8 days of non-running, an athlete forfeits a letter regardless of points earned. Doctor's excuses must be delivered to Coach Ibarra within one week of the injury/illness to excuse non-running days.</i>	30
<b>DNR:</b> Athlete has 3 or fewer DNR's (for any reason) from scheduled practices and meets from the first official day of the season to the day after league finals (only academic events/testing and doctors notes are excused) <i>After 8 days of non-running, an athlete forfeits a letter regardless of points earned. Doctor's excuses must be delivered to Coach Ibarra within one week of the injury/illness to excuse non-running days.</i>	20
<b>DNR:</b> Athlete has 4 or fewer DNR's (for any reason) from scheduled practices and meets from the first official day of the season to the day after league finals (only academic events/testing and doctors notes are excused) <i>After 8 days of non-running, an athlete forfeits a letter regardless of points earned. Doctor's excuses must be delivered to Coach Ibarra within one week of the injury/illness to excuse non-running days.</i>	5
<b>Participation in King Cross Country</b> For Four Years For Three Years For Two Years For One Year	30 25 20 10
<b>Racing Accomplishment:</b> Finish the season with your name on the Top-7 Grade Level Record List (all time), or Top 15 MSAC All-time List (one only) – Improving upon a Mt.SAC time already listed in top 15 will count toward points	10
<b>Racing Accomplishment:</b> Finish in the top 7 combined King finishers of a competitive day or race in the actual varsity race regardless of finish place (8 <sup>th</sup> and 9 <sup>th</sup> place runners earn 5 points)	10 or 5

<b>Racing Accomplishment:</b> Compete in the varsity race at League Finals	5
<b>Racing Accomplishment:</b> Compete at CIF Prelims	20
<b>Racing Accomplishment:</b> Compete at CIF Finals	25
<b>Racing Accomplishment:</b> Compete at State Championships	30

## CIF TEAMS: ELIGIBILITY AND SELECTION PROCESS

King XC has had a tradition of qualifying for the CIF Championships every year since our beginning in 1999. The CIF Championships are held in the weeks following League Finals and are for varsity only. The CIF officially “recognizes” only 10 athletes per gender team during the rounds. Teams may take more than 10 athletes, but they serve in an unofficial capacity.

**CRITERIA FOR SELECTION** The selections are based on a variety of criteria, among which but not exclusively are:

- 1) Positive attitude and expressed enthusiasm to compete at a high level
- 2) Overall contribution to the team through the first six weeks of racing
- 3) Varsity level achievement during the season
- 4) Projected ability to impact the CIF team scoring
- 5) Demonstrated strength on the CIF course,
- 6) Leadership ability.

**The coaching staff reserves the right to grant priority to freshmen or underclassmen who may benefit from “CIF exposure”.** The fact that one is a Senior in high school does not in its own right, grant one a right to CIF action.

Athletes who portray negative attitudes toward their teammates, the sport, the coaches or toward CIF-level effort will NOT be considered for the CIF teams.

## COMMUNICATION BETWEEN XC PARTICIPANTS

Every effort is made by the coaching staff to keep the lines of communication open between the staff, the runners, the parents and the community. The following are useful to keep abreast of the many events and happenings of King XC

**REMIND:** All parents and athletes are required to sign up for the text communication that the coaching staff will utilize for **IMPORTANT** information that needs to be relayed quickly to all participants. There are new Reminds for XC Fall 2024. King Cross Country/Coach Ibarra will use Remind to get text messages out to the athletes and parents. You are all asked to sign up for the appropriate Remind account: To sign up for this free service, to the number “81010” text the following (based on your group)

[Parents:] @pmlkxc2024 [Boys Team:] @bmlkxc2024 [Girls Team:] @gmlkxc2024

**WEBSITE:** WWW.KINGCROSSCOUNTRY.COM This site is an up-to-the-day portal of information for all that goes on with our program. Most questions parents may have can usually be answered by a 1-3 minute perusal of the home page of the site. Each week's schedule is posted by Sunday evening. Links on the site can take you to find directions to events, event websites with start times etc, a calendar of the entire season, varsity letter requirements and more. We encourage you to use the website almost daily. Bookmark it on your computer for easy access. Have a question? Consult the website first!

**BOOSTER CLUB:** Our booster club, one of the oldest on campus, is a vibrant group of parents who seek to aid coaches in a variety of ways, foremost, fundraising. If you are seeking to be involved at a greater level, come on out to our monthly meeting.

## FUNDRAISING – A NECESSITY!

**WHERE THE MONEY COMES FROM** Fundraising is a necessary evil in today's high school athletic arena. Quite simply, the RUSD and the school does not fund what is necessary to operate a full program. What the district/school do provide is the following: Bus transportation to and from selected meets, and the provision of three coaching stipends, despite the reality that we compete on four (sometimes six) different levels and provide coaching for both genders.

**WHERE THE MONEY GOES** All other expenses incurred by the program, which includes providing stipends for needed coaches beyond our allotted two, and some of the following: supplies and equipment, team sweats, rewards and prizes, runner of the week shirts, league champion shirts, website fees, publishing, paper, etc, etc, all have to come from fundraising. Hence, the term "necessary evil."

**WHAT THE MONEY MEANS** Our goal as coaches is to put as little burden of fundraising on the kids as possible. Though we cannot require students to fundraise, we trust that each student and family is aware of the needs of a team like ours and that when many pitch in for the common good, the rewards are greater.

We keep a very careful accounting of all the money we earn through fundraising, and all of it goes back to the kids for their benefit. Please attend booster club meetings for full disclosure of our budget and spending.

[Fill out these forms electronically here](#)

## PARENT CODE OF CONDUCT

We ask that all parents understand and endorse the purpose of MLK XC: *To use the sport of cross country to help young people grow in integrity, faithfulness and a pursuit of excellence as they compete and live life.*

- Support the coaches by applauding behavior in your child and his/her teammates that demonstrates characteristics of integrity, empathy, sacrifice and personal responsibility
- Acknowledge and appreciate athletes growth toward maturity and their effort toward establishing stronger relationships with teammates, coaches and each other
- Affirm your child when good character, healthy sportsmanship and other-centered behavior are displayed. Do not limit your affirmation to only athletic performance.
- Serve the team as a role model by speaking politely and acting courteously toward coaches, opponents, other parents and fellow spectators
- Model good sportsmanship. Applaud great effort, regardless of what time your child races or what place he/she finishes a race. Support the team regardless of the position of your son/daughter on the "depth chart".
- Remind yourself that your son or daughter is in process. High school athletics is not the apex of their athletic careers. They are growing, learning, expanding their horizons, and MLK XC doesn't believe their ultimate destiny is high school. This is a step in life.
- Refrain from boasting about your child's running achievements
- When problems arise or questions come, please have your child present the issue to the coaches. We want your child to develop self-advocacy.

*Because I'm a parent with the power and platform to make a positive difference in the life of every student, I commit to this code of conduct and will, to the best of my ability, encourage the educational essence of high school athletics in general, and cross country specifically.*

\_\_\_\_\_  
Signature

\_\_\_\_/\_\_\_\_/\_\_\_\_  
date

Name Printed \_\_\_\_\_



[Fill out these forms electronically here](#)

# STUDENT CONTRACT

As a voluntary member of this cross country team, I agree to:

- Act responsibly while representing King High during practice and competition. I understand that what I do and say affects my teammates, my school, and other people either positively or negatively.
- Lead courageously and live with integrity by speaking up against injustice and on behalf of others, even when it's unpopular or difficult
- Act with respect toward myself and the people and things around me, including my parents, my coaches, my teammates, my teachers, my opponents, and the spectators.
- Judge others by the content of their character
- Work towards developing empathy for others, seeking to understand others so that I can be supportive and encouraging of my teammates
- Serve as a role model by speaking positively and acting courteously toward coaches, teammates, opponents, officials and spectators. I understand that it is a privilege to represent my family, school and community as a student-athlete
- Act with good sportsmanship, applauding others and encouraging my teammates with positive statements. I will refrain from boasting to my teammates of my accomplishments and "trash-talking" members of other teams. I will accept defeat graciously by congratulating my opponents on a race well-run.
- Give 100 percent effort in practice, and races. I understand that effort will demonstrate my commitment to the team and my respect for my coaches, my talent, my teammates and the sport of cross country.

\_\_\_\_\_  
*Signature*

\_\_\_\_/\_\_\_\_/\_\_\_\_\_  
*date*

*Name Printed* \_\_\_\_\_



[Fill out these forms electronically here](#)

## PARENT-STUDENT STATEMENT OF UNDERSTANDING

We have read and understand the policies of the Martin Luther King High School Cross Country Team as they are detailed in this handbook.

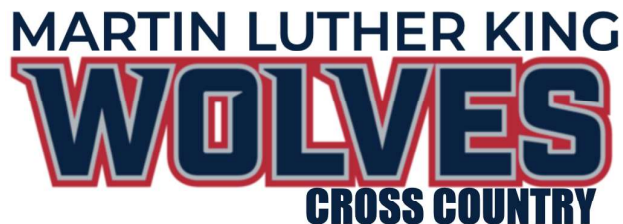
We recognize that there are inherent risks associated with running cross country; that injuries, aggressive dogs, automobile traffic, and pedestrians are all potential dangers when participating in the practice and racing and that we enter onto this team willingly and voluntarily.

We have read, understand and agree to abide by policies of the team but have paid particular attention to the a) attendance policy, b) safety guidelines and c) letter policy.

Student Signed \_\_\_\_\_

Parent Signed \_\_\_\_\_

Date \_\_\_\_/\_\_\_\_/\_\_\_\_



**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fw: Title 9 Procedures  
**Date:** Tuesday, November 5, 2024 4:29:12 PM

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----- Forwarded Message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** Tuesday, November 5, 2024 at 04:26:04 PM PST  
**Subject:** Fwd: Title 9 Procedures

## Forwarded Conversation

**Subject: Title 9 Procedures**

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**From:** [REDACTED]  
**Date:** Wed, Oct 23, 2024 at 1:58 PM  
**To:** Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

I sent an email regarding a Title IX complaint, did you receive that email?

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**From:** Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
**Date:** Wed, Oct 23, 2024 at 3:49 PM  
**To:** [REDACTED]

Hi [REDACTED],

I have not received an email. Let me know if you would like to connect.

Thanks,  
Bethany

-----  
**From:** Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
**Date:** Wed, Oct 23, 2024 at 4:00 PM  
**To:** [REDACTED]

Hi [REDACTED],

I just found your first email in my spam folder.

Yes, you can send a complaint to me. Obtaining counsel is your choice and does not have to determine



when you send a complaint in, both are up to you.

I hope that helps answer questions. Let me know if you would like to schedule a call as well.

Thanks,  
Bethany

From: [REDACTED]  
Date: Thu, Oct 24, 2024 at 4:04 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

Good afternoon, Ms. Scott. My daughter, [REDACTED], has been on the Cross-Country team at Martin Luther King [REDACTED] since freshman year and has been a Varsity athlete all three years, as well. A transfer student became eligible last week and has not attended any morning or afternoon practices the entire season and likely will not for the remainder of the season due to outside reasons. This other athlete has spoken out about being a transgender girl and we know the law allows athletes to play a sport based on their gender identity- totally fine; however, the handbook clearly states that ALL athletes must attend all practices and will not be able to race if they don't. My daughter is cisgender and being held to a completely different set of standards in order to compete in an athletic sport at Martin Luther King. We believe she is being discriminated against based on her choice of gender for a few reasons:

1. She was told she MUST be in the 6th-period class, even though she does not need PE credits and had to take summer school in order to keep room in her schedule. The other athlete has not been required to be in the 6th-period class.

2. My daughter attends ALL practices, even when injured, and stays until 4:30-4:45 every day. The other athlete is not required to attend 6th-period nor the time allotted after school for practice. This person gets to go home instead of coming to the part of practice they are free to attend outside of academic hours.

3. This person has chosen to try and graduate a year early. We think that is a great accomplishment and a worthwhile goal to pursue; however, there are many instances of cisgender girls giving up their sport or missing out on competition (games/races) because they are not allotted the same rules as this transgender person, specifically not being mandated to attend practices. Cisgender girls would be required to attend as much of practice as they can or they would be excluded from competition, why is the standard being applied differently? King Administration has notified us that this person is making a CHOICE to graduate early, attending zero period, sixth period, and an outside class at night. The law intends to allow students who participate in sports to make up assignments, tests, etc. when missing for travel to away games, for example, and not be punished academically, or when a senior needs a class that is REQUIRED to graduate on time. In this case, it is being applied to get this person ahead of everyone else. My daughter could've graduated early, but she is being held to the expectation that she MUST be at practice in order to compete. She is being treated unequally and disadvantageously.

4. My cisgender daughter, is held to the ALL policies in the team handbook yet this person is not required to follow them. Again, why is my daughter being held to tougher standards in order to race?

5. Varsity athletes are held to EVEN higher standards and requirements in order to be on Varsity. My daughter meets all of these requirements, but she has been bumped down to JV now and this athlete has been moved up to Varsity, despite only meeting one requirement and not attending any practices. My daughter is a Team Captain and was an Athlete of the Meet in Clovis. My daughter has been a dedicated member on the Varsity team and now that rules are being changed for this person, it has unfairly displaced my daughter because she is not transgender.

Gender discrimination is when someone is treated unequally or disadvantageously based on their gender. I know that my daughter is being discriminated against and this does violate Title IX. Her right to fair and equitable treatment and her right to not be discriminated against based on gender is being violated here. Additionally, her right to be provided with an equitable opportunity to participate in athletics is being violated. She is not being treated equally and fairly based on the fact that she is not transgender and instead cisgender. There is literally a different set of rules, expectations, and requirements being applied to cisgender and transgender girls. The State of California has stated that, "All persons, regardless of their gender, should enjoy freedom from discrimination of any kind." Title IX prohibits discrimination based on gender, gender expression, gender identity, and sexual orientation. We met with Coach Ibarra, Dr. Iacuone, and Mrs. Chann this morning at King to discuss this matter and they they had some things to consider and think about. I have no idea if this will be corrected, and I have given them ample time to correct this discrimination. Thank you for your time.

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From: **Bethany Scott** <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
Date: Thu, Oct 24, 2024 at 4:43 PM  
To: [REDACTED]

Hi [REDACTED],

Thank you for your email. I appreciate all you included to help me understand the situation.

If it's ok with you I would love some time tomorrow morning to do some research on this one. Would it be ok for us to chat after school?

Let me know if that works for your schedule or if something else is better.

Thanks again,  
Bethany

On Oct 24, 2024, at 4:04 PM, [REDACTED] wrote:

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From: [REDACTED]  
Date: Thu, Oct 24, 2024 at 5:37 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

You are very welcome, and I appreciate you looking into it. Yes, I can speak with you after school. Thank you so much.

[REDACTED]

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From: [REDACTED]  
Date: Thu, Oct 24, 2024 at 6:41 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

One thing I wanted to add is to let you know that Coach Ibarra has done his absolute best to protect our daughter, [REDACTED], and we believe his hands have been tied based on what we, and my daughter, have experienced.

[REDACTED]

On Oct 24, 2024, at 5:37 PM, [REDACTED] wrote:

You are very welcome, and I appreciate you looking into it. Yes, I can speak with you after school. Thank you so much.

-----  
From: **Bethany Scott** <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
Date: Fri, Oct 25, 2024 at 2:14 PM  
To: [REDACTED]

Thanks so much [REDACTED]. Will you give me a call if you're able after school? My extension is 80135.

Thanks,  
Bethany

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From: [REDACTED]  
Date: Fri, Oct 25, 2024 at 2:25 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

Yes, I will call you after school. [REDACTED] Thank you.

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From: [REDACTED]  
Date: Tue, Oct 29, 2024 at 3:47 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

Hi, Bethany, I just wanted to check-in and see if there has been any progress. I know you said this is a formal investigation, and I assume you will need both sides on the record, so I wanted to see if you had an idea of when my husband and I will need to be interviewed. [REDACTED]

[REDACTED] Also, Amanda Chann/Admin has now taken over the entry process (deciding who will race). This worries us, and many of the girls and parents, for many reasons. Do you already know about this? Thank you so much. We appreciate all you are doing!

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From: **Bethany Scott** <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
Date: Tue, Oct 29, 2024 at 4:19 PM  
To: [REDACTED]

Hi [REDACTED],

Thanks for checking in. I'm sorry I do not have an update for you. We are continuing to work through the situation. I hope to have an official answer for you soon.

Thank you,  
Bethany

-----  
From: [REDACTED]  
Date: Fri, Nov 1, 2024 at 1:37 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

Hi, Bethany, is there anything you can tell me about the progress of the investigation? How long should we expect to wait to be updated? As you know, we tried meeting with King Administration to come to a resolution before putting in the complaint. This is a time-sensitive thing, as I know you understand. I was trying to give the District time, but I am not sure how much longer to just wait on this. Thank you so much for any information you have.

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From: **Bethany Scott** <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>  
Date: Fri, Nov 1, 2024 at 4:11 PM  
To: [REDACTED]

Hello [REDACTED],

We appreciate your patience as we gathered information regarding the allegations you reported. Thank you for bringing this to our attention and for the detail you provided. We take these matters seriously and need to take the necessary time to investigate thoroughly.

RUSD is addressing your complaint as a personnel matter. The complaint alleges that district staff failed to implement team standards and requirements consistently for all students on the Cross Country team at Martin Luther King High School. We will conduct a personnel investigation to determine the facts and, if the allegations are true, will take appropriate action. While personnel matters are generally confidential, programmatic changes usually are apparent and publicized.

The allegations will not be investigated under Title IX regulations. These allegations would not support a determination that gender was the basis for any accommodation provided. Although the assertion that "[c]isgender girls would be required to attend as much of practice as they can or they would be excluded from competition," the allegations did not demonstrate that [REDACTED] or any other cisgendered student requested academic accommodations and was thereby denied such as those referred to in the complaint. The allegations, even if true, would not support a finding of sex-based discrimination.

Thank you again for bringing this to my attention. RUSD strives to operate every program in a consistent and equitable manner. We appreciate all who bring matters to our attention for investigation.

Sincerely,  
Bethany

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From: [REDACTED]  
Date: Fri, Nov 1, 2024 at 4:40 PM  
To: Bethany Scott <[bscott@riversideunified.org](mailto:bscott@riversideunified.org)>

Hi, Bethany, I appreciate your response. Like we spoke about on the phone, I have triplets in 5 different Varsity sports at King and there is not one instance, other than this one that I am aware of, that allows a person to not attend any practices and go home while the rest of the team is *still* practicing and still compete. I have to ask myself: Why is this particular student being given preferential treatment? I have not received an answer to that question yet. To your point, [REDACTED] follows the rules in the handbook and does not ask for preferential treatment. She works very hard and stays up late to juggle all that is required of student-athletes. This student has made a choice to graduate early a commendable choice, but still a choice). Thank you for your time and have a nice weekend.

--  
[REDACTED]

**Policy 5132: Dress And Grooming****Status:** ADOPTED**Original Adopted Date:** 06/26/2018 | **Last Revised Date:** 05/17/2022 | **Last Reviewed Date:** 05/17/2022**Purpose**

This districtwide policy provides guidance to school sites to maintain safe, healthy, and effective learning environments.

**Position**

The Board of Education believes that:

1. Students and parents/guardians shall be informed about the school dress code at the beginning of the year and whenever the dress code is revised. A student who violates this dress code shall be subject to progressive interventions.
2. Interventions and/or other means of correction should minimize the impact on learning time and participation in school events.
3. Student's dress code should be free from stereotypes based on body maturity, body size, race, gender, ethnicity, religion, sexual orientation, socioeconomic status, gender identity, or cultural observance.

**Requirements****Basic Principle:**

The student dress code provides expectations to students, staff, and families regarding appropriate attire for school. When students come to school, they will dress in accordance with the following guidelines:

**Students Must Wear:**

- Shirt/Top/Dress (must have at least one strap to secure over the shoulder or neck during school)
- Pants/Sweatpants/Shorts/Skirt/Dress (that cover undergarments; straps on undergarments and visible waistbands are acceptable)
- Shoes: activity-specific shoes are required for physical education (PE), outdoor and co-curricular activities
- Attire for activities as part of a specific curriculum (for example, job/career readiness, Junior Reserve Officers' Training Corps [JROTC])
- Students shall be allowed to wear sun-protective clothing, including school-appropriate hats and sunglasses for outdoor use during the school day, without a physician's note or prescription. School sites are authorized to establish a policy regarding the use of sunscreen. (EC 35183.5)

**Students Cannot Wear:**

- Clothing or accessories with images or language that:
  - Is violent
  - Depicts drugs or alcohol (or any illegal item or activity) or their use
  - Includes hate speech, profanity, or pornography (including symbols)
  - Is likely to create a hostile or intimidating environment based on any protected class
- Undergarments, sheer materials and swimwear of similar design worn as outerwear.
- Headwear or clothing that obscures the face (except as a religious observance or health/safety-related guidelines, including health and safety facial coverings).
- In consultation with law enforcement or other gang experts, the school administration may limit clothing or

apparel where there is a reasonable basis for identifying such clothing or apparel where a gang is affiliated. Limitations and prohibitions will be applied equally to all students. In no instance will a student's clothing or apparel be identified as gang-related based on the student's race, national origin, or ancestry.

### **Uniforms**

In order to promote student safety and discourage theft, peer rivalry, and/or gang activity, the principal, staff, and families at a school may establish a reasonable dress code requiring students to wear uniforms. Such a dress code may be included as part of the school safety plan and must be presented to the Board for approval. The Board shall approve the plan upon determining that it is necessary to protect the health and safety of the school's students.

If a school's plan to require uniforms is adopted, the Superintendent or designee shall establish procedures whereby parents/guardians may choose to have their children exempted from the school uniform policy. Students shall not be penalized academically, otherwise discriminated against, or denied attendance to school if their parents/guardians so decide.

The Superintendent or designee shall ensure that resources are identified to assist economically disadvantaged students in obtaining uniforms.

### **Parent Notification Of Student Dress Code**

The Site Parent/Student Handbook shall be provided to each student at the beginning of the school year and to any student upon enrollment at any point after the beginning of the school year. The school may choose to separately notify parents/guardians of the school's student dress code. This notification should include the following:

1. A copy of the student dress code.
2. Designated contacts should the parent/guardian need economic assistance to comply.
3. Any consequences for failure to follow the student dress code.
4. The complaint procedure and contact person(s) at the school.

### **Progressive Interventions**

The primary responsibility for a student's attire resides with the student and their parent/guardian. The school district and individual schools are responsible for ensuring that student attire does not interfere with the health or safety of any student, and that student attire does not contribute to a hostile or intimidating environment for any student.

A student who violates the dress code shall be subject to progressive interventions. Dress code violations should be resolved quickly to reduce loss of instructional time and addressed privately with individual students. No academic grade of a student shall be adversely affected based on non-compliance with the dress code, except Physical Education when failure to wear appropriate apparel arises from circumstances within the student's control. (See EC Section 49066(c)).

School sites will implement progressive interventions for dress code violations as follows:

- Warning and self-correct dress code violation
  - Offer students a change of nondescript and/or school-specific clothing
  - Offer parent/guardian the opportunity to bring a change of clothes
  - Repeated violations may result in a parent-school conference and/or other means of correction
-



On Tue, Nov 5, 2024 at 8:20 PM [REDACTED] wrote:

Thank you for getting back to me .

However, I'm confused as to why you need to work on a few things to be able to explain the incident ?

Sent from my iPhone

On Nov 5, 2024, at 5:38 PM, Amanda Chann  
<[achann@riversideunified.org](mailto:achann@riversideunified.org)> wrote:

Hello Mrs. [REDACTED],

We are working on a few things and hope to have something for you soon.

Thank you for your patience,

AC & LI

**Amanda Chann**

Assistant Principal, Athletics

Martin Luther King High School



On Mon, Nov 4, 2024 at 7:29 AM [REDACTED]

[REDACTED] wrote:

Good Morning, Mrs. Iacuone and Mrs. Chann,

[REDACTED] and I wanted to reach out to you both to get some clarification and insight on Friday's Incident with [REDACTED] and her teammate. From what we understand they were told to change shirts because the shirt "Save Girls Sports" created a hostile environment.

Perhaps an in person meeting could benefit this situation, as we have a few other things we would like to clarify .

Thank you and I look forward to hearing from you both .

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, November 5, 2024 4:34 PM  
**To:** [REDACTED]  
**Subject:** Fw: [REDACTED]

**Categories:** Filed to Clio

----- Forwarded Message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fwd: [REDACTED]

## Forwarded Conversation

**Subject:** [REDACTED]

**From:** [REDACTED]  
**Date:** Sun, Nov 3, 2024 at 8:03 AM  
**To:** Leann Iacuone <[liacuone@riversideunified.org](mailto:liacuone@riversideunified.org)>

Hello, Dr. Iacuone, I am not sure whether you are aware or not that Mrs. Chann made [REDACTED] and another student change their "Save Girls Sports" shirt on Friday at practice. She called them over, told them their shirts were considered "hostile" under the dress code, made to change, and told them they would face disciplinary action if they wore it again. She likened their shirts to something having to do with Jewish people?? [REDACTED] could not recall exactly what she said to her about that but that concerned me greatly and maybe you can shed some light on what was expressed to [REDACTED]. [REDACTED] also asked about other viewpoints that are shared through clothing and Mrs. Chann said those were all permitted. Why is that? Is she allowing only viewpoints she agrees with? The American Civil Liberties Union says, "Schools can't discriminate based on the viewpoint expressed by your clothing." Although we already believe [REDACTED]'s First Amendment rights were violated, I thought I should email you because this seemed egregious and I need some answers regarding this situation:

1. Who decides what is "hostile" at King? That seems highly subjective and open to an administrator's personal viewpoints.
2. Where should [REDACTED] go to report things she views as hostile? Will this practice be applied in this manner to other viewpoints/words/slogans/buttons/wristbands any student/teacher/administrator considers hostile?
3. The ACLU says that "The First Amendment prohibits schools from picking and choosing which views students are allowed to express. All views must be treated equally, so long as they are not obscene or disruptive. This means that if a school permits items like t-shirts with slogans, buttons, or wristbands, it has to permit them no matter what message they express." How did [REDACTED]'s shirt cause a disruption at practice and why is she not able to express her views?
4. Lastly, the Supreme Court has recognized that public school students do not "shed their constitutional rights to freedom of speech or expression at the schoolhouse gate," and that schools can't discriminate based on the viewpoint expressed by their clothing. Do you believe this violated her First Amendment rights or do you support her being disciplined a second time if she wears the shirt again to practice? What will happen to her if she wears it to school?

## ***Speaking out with your clothing***

- If your school allows students to wear t-shirts, buttons, wristbands, or other garments or accessories that express their views, then all views are protected by the First Amendment. Schools shouldn't ban rainbows, Pride symbols or slogans, or messages about LGBT, feminist, or political issues or identity.

## ***If your school says the way you dress is disruptive***

- School officials often try to justify censoring student expression by claiming it's disruptive, when what they're really worried about is that other students or their parents might not like it. But courts have consistently ruled that a school's concern about other students' reactions to an LGBT or political message or image doesn't justify censoring it.

--  
[REDACTED]

-----  
From: [REDACTED]  
Date: Sun, Nov 3, 2024 at 8:07 AM  
To: [REDACTED]

Here is the email I sent to the principal after what happened Friday.

Begin forwarded message:

From: [REDACTED]  
Date: November 3, 2024 at 8:03:30 AM PST  
To: Leann Iacuone <[liacuone@riversideunified.org](mailto:liacuone@riversideunified.org)>  
Subject: [REDACTED]

-----  
From: [REDACTED]  
Date: Sun, Nov 3, 2024 at 12:19 PM  
To: Amanda Chann <[achann@riversideunified.org](mailto:achann@riversideunified.org)>  
Cc: Leann Iacuone <[liacuone@riversideunified.org](mailto:liacuone@riversideunified.org)>

Hi, Mrs. Chann, I emailed you Friday evening, but I have not received a response, so I sent this email to Dr. Iacuone this morning regarding Friday's incident. If you can help provide some clarity on any of these points and your conversation with my daughter, that would be greatly appreciated. I also need to know if anything was recorded against [REDACTED] as a warning somewhere in her records. I do not see anything under my parent Aeries. Thank you.

----- Forwarded message -----

From: [REDACTED]  
Date: Sun, Nov 3, 2024 at 8:03 AM



Subject: [REDACTED]  
 To: Leann Iacuone <[liacuone@riversideunified.org](mailto:liacuone@riversideunified.org)>

Hello, Dr. Iacuone, I am not sure whether you are aware or not that Mrs. Chann made [REDACTED] and another student change their "Save Girls Sports" shirt on Friday at practice. She called them over, told them their shirts were considered "hostile" under the dress code, made to change, and told them they would face disciplinary action if they wore it again. She likened their shirts to something having to do with Jewish people?? [REDACTED] could not recall exactly what she said to her about that but that concerned me greatly and maybe you can shed some light on what was expressed to [REDACTED]. [REDACTED] also asked about other viewpoints that are shared through clothing and Mrs. Chann said those were all permitted. Why is that? Is she allowing only viewpoints she agrees with? The American Civil Liberties Union says, "Schools can't discriminate based on the viewpoint expressed by your clothing." Although we already believe [REDACTED]'s First Amendment rights were violated on Friday, I thought I should email you because this seemed egregious and I need some answers regarding this situation:

1. Who decides what is "hostile" at King? That seems highly subjective and open to an administrator's personal viewpoints.
2. Where should [REDACTED] go to report things she views as hostile? Will this practice be applied in this manner to other viewpoints/words/slogans/buttons/wristbands any student/teacher/administrator considers hostile?
3. The ACLU says that "The First Amendment prohibits schools from picking and choosing which views students are allowed to express. All views must be treated equally, so long as they are not obscene or disruptive. This means that if a school permits items like t-shirts with slogans, buttons, or wristbands, it has to permit them no matter what message they express." How did [REDACTED]'s shirt cause a disruption at practice and why is she not able to express her views?
4. Lastly, the Supreme Court has recognized that public school students do not "shed their constitutional rights to freedom of speech or expression at the schoolhouse gate," and that schools can't discriminate based on the viewpoint expressed by their clothing. Do you believe this violated her First Amendment rights or do you support her being disciplined a second time if she wears the shirt again to practice? What will happen to her if she wears it to school?

### ***Speaking out with your clothing***

- If your school allows students to wear t-shirts, buttons, wristbands, or other garments or accessories that express their views, then all views are protected by the First Amendment. Schools shouldn't ban rainbows, Pride symbols or slogans, or messages about LGBT, feminist, or political issues or identity.

### ***If your school says the way you dress is disruptive***

- School officials often try to justify censoring student expression by claiming it's disruptive, when what they're really worried about is that other students or their parents might not like it. But courts have consistently ruled that a school's concern about other students' reactions to an LGBT or political message or image doesn't justify censoring it.

[REDACTED]

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 From: Amanda Chann <[achann@riversideunified.org](mailto:achann@riversideunified.org)>  
 Date: Mon, Nov 4, 2024 at 4:33 PM  
 To: [REDACTED]  
 Cc: Leann Iacuone <[liacuone@riversideunified.org](mailto:liacuone@riversideunified.org)>

Hello [REDACTED],

I am looking into a couple of things and I will get back to you as soon as possible.

Thanks for your patience,

**Amanda Chann**

Dv1w0w#Subf1sc0#Dw0wfv#

Pdw0Dwkh#Nlj#Klk#Fkro



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From: [REDACTED]  
Date: Mon, Nov 4, 2024 at 7:58 PM  
To: Amanda Chann <[achann@riversideunified.org](mailto:achann@riversideunified.org)>

I will look forward to your response. Thank you.

--  
[REDACTED]



## RIVERSIDE UNIFIED SCHOOL DISTRICT

**Uniform Complaint Procedures Form**

The Riverside Unified School District has the primary responsibility to ensure compliance with applicable state and federal laws and regulations, including those related to unlawful discrimination, harassment, intimidation, or bullying against any protected group, and all programs and activities that are subject to the uniform complaint procedures. The District will investigate and seek to resolve complaints in accordance with Administrative Regulation 1312.3, Uniform Complaint Procedures (UCP). As the complainant (person filing the complaint), please complete this form, providing as much information as possible and attaching any applicable supporting documentation, to assist the District in its investigation of the complaint. (Note: For complaints that are not related to subjects listed on this form, please contact the School Principal, District Resolution Officer, or the Director of Pupil Services.)

Last Name		First Name		Preferred Pronoun	
Address			City		Zip Code
Email				Phone #1	
Preferred Language	English	Translation Needed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Phone #2	
Complainant is a:	<input type="checkbox"/> Student <input checked="" type="checkbox"/> Parent/Guardian/Caregiver <input type="checkbox"/> Employee <input type="checkbox"/> Community member <input type="checkbox"/> Public agency <input type="checkbox"/> Organization <input type="checkbox"/> Other (specify):				
Complaint is filed on behalf of:	<input type="checkbox"/> Myself <input checked="" type="checkbox"/> A student, not the complainant named above <input type="checkbox"/> Not applicable				
Name of Affected Student (if applicable)					
Student's Date of Birth		Age		Gender	female
Grade Level	11				
School/Office of Alleged Violation	King Athletics			Date of Alleged Violation	11-1-2024

**PROGRAM OR ACTIVITY** ☐ Check if not applicable

If the complaint is alleging the District's noncompliance in the implementation of specified programs and activities, indicate below the program or activity that is the subject of this complaint. More than one may be selected.

- |  |  |
|--|--|
| <input type="checkbox"/> Accommodations for pregnant and parenting students  | <input type="checkbox"/> Every Student Succeeds Act (ESSA)                 |
| <input type="checkbox"/> Adult Education program   | <input type="checkbox"/> Instructional Materials and Curriculum: Diversity |
| <input type="checkbox"/> After School Education and Safety program (ASES)  | <input type="checkbox"/> Local Control and Accountability Plan (LCAP)      |
| <input type="checkbox"/> Agricultural career technical education   | <input type="checkbox"/> Migrant education                                 |
| <input type="checkbox"/> Career Technical Education (CTE)  | <input type="checkbox"/> Physical education instructional minutes          |
| <input type="checkbox"/> Child care and development program  | <input type="checkbox"/> Reasonable accommodations for a lactating student |
| <input type="checkbox"/> Compensatory education  | <input type="checkbox"/> Regional occupational centers and programs        |
| <input type="checkbox"/> Consolidated categorical aid programs   | <input type="checkbox"/> School Plans for Student Achievement (SPSA)       |
| <input checked="" type="checkbox"/> Course periods without educational content   | <input type="checkbox"/> School Site Councils (SSC)                        |
| <input type="checkbox"/> Educational and graduation requirements, regarding:   | <input type="checkbox"/> State preschool programs                          |
| <input type="checkbox"/> foster <input type="checkbox"/> homeless <input type="checkbox"/> military <input type="checkbox"/> migratory | <input type="checkbox"/> State preschool health and safety issues          |
| <input type="checkbox"/> newcomer <input type="checkbox"/> formerly in a juvenile court school   | <input type="checkbox"/> Student fees                                      |

**DISCRIMINATION, HARASSMENT, INTIMIDATION, AND/OR BULLYING** ☒ Check if not applicable

If the complaint is alleging unlawful discrimination, harassment, intimidation, and/or bullying, indicate below all applicable actual or perceived characteristics subject to this complaint.

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Ancestry                    | <input type="checkbox"/> Age                           | <input type="checkbox"/> Gender              |
| <input type="checkbox"/> Ethnic group identification | <input type="checkbox"/> Color                         | <input type="checkbox"/> Gender expression   |
| <input type="checkbox"/> Ethnicity                   | <input type="checkbox"/> Parental status               | <input type="checkbox"/> Gender identity     |
| <input type="checkbox"/> Immigration status          | <input type="checkbox"/> Pregnancy                     | <input type="checkbox"/> Genetic information |
| <input type="checkbox"/> National origin             | <input type="checkbox"/> Marital status                | <input type="checkbox"/> Medical condition   |
| <input type="checkbox"/> Nationality                 | <input type="checkbox"/> Physical or mental disability | <input type="checkbox"/> Sex                 |
| <input type="checkbox"/> Race                        | <input type="checkbox"/> Religion                      | <input type="checkbox"/> Sexual orientation  |



1. Please give the facts about your complaint. Provide details that may be helpful to the complaint investigator, such as the names of those involved, dates, location(s), frequency, whether witnesses were present, etc. (If necessary, continue the response to this question on a separate page. Be sure to indicate any additional pages by marking "Yes" to Question 3.)

On Friday, November 1st, my daughter was at Cross Country practice at Martin Luther King.

Upon practice beginning, Amanda Chann (Athletic Director) called my daughter and another runner, over and told them they would need to change their shirts. They were told that they were "hostile" and if they wore them again there would be disciplinary action and this would be their warning. Their said said "Save Girls Sports" and did not have anything obscene nor did they disrupt practice in an way. They asked about other bracelets, pins, shirts, etc. that other students wear. It is my understanding that schools cannot censor based on opposing viewpoints or agreement with words, slogans, etc.

2. What is the resolution/outcome you are seeking?

I originally wanted an explanation of why this occurred, unfortunately, I have not received any response. Now, since nobody is responding, I being forced to begin seeking legal help.

3. Have you attempted to discuss your complaint with any Riverside Unified School District personnel? If so, with whom, on what date(s), and what was the result/outcome?

I emailed Amanda Chann on Friday afternoon at 6:02 pm and Dr. Iacuone on Sunday morning at 8:03 am. I have not received a response from anyone as of 1:30 on Monday the 4th.

4. What other measures have you taken to resolve the issue before filing this complaint?

We filed a Title IX complaint based on the unfair treatment and inconsistency of requirements being implemented across the Cross Country team. I believe Mrs. Chann was retaliating against my daughter for the original complaint and, in doing so, violated my daughter's First Amendment rights.

5. Do you have any written documents and/or other types of evidence that you can provide that may be relevant or supportive of your complaint?

☐ No ☒ Yes, copies of the documents/evidence are attached to this complaint

Signature of Complainant: \_\_\_\_\_

Date: 11/4/2024

**Submit your complaint/documents to either of the two compliance officers listed below:**

Raúl Ayala, Director of Pupil Services  
[rayala@riversideunified.org](mailto:rayala@riversideunified.org)  
 5700 Arlington Avenue, Riverside, CA 92504  
 Phone: (951) 352-1200 • Fax: (951) 274-4202

David Marshall, Resolution Officer  
[drmarshall@riversideunified.org](mailto:drmarshall@riversideunified.org)  
 3380 14th Street, Riverside, CA 92501  
 Phone: (951) 788-7135 • Fax: (951) 274-4202

*The Riverside Unified School District prohibits discrimination, intimidation, harassment (including sexual harassment) and bullying based on actual or perceived age, ancestry, ethnicity, parental status, pregnancy status, color, mental or physical disability, gender, gender identity, gender expression, genetic information, immigration status, marital status, medical condition, nationality, race, religion, sex, sexual orientation, or association with a person or group with one or more of these actual or perceived characteristics.*