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16 ATTORNEYS FOR PLAINTIFF JOHN DOE

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA

18 FOR THE COUNTY OF LOS ANGELES

19 JOHN DOE, a minor by and through his  
20 parent and guardian ad litem, PARENT 1<sup>1</sup>

21 Plaintiff,

22 vs.

23 OAKS CHRISTIAN SCHOOL and DOES 1  
24 through 20, inclusive,

25 Defendants.

Case No. **24VECV05103**

**COMPLAINT FOR:**

- 26 **1. Negligent Hiring, Training, Retention, Supervision**
- 27 **2. Negligent Infliction of Emotional Distress**
- 28 **3. Violation of the Unruh Civil Rights Act**

(Unlimited Civil Case)

**JURY TRIAL DEMANDED**

<sup>1</sup> The names JOHN DOE and PARENT 1 used in this complaint are pseudonyms, used to protect the identity of the Plaintiff in this case. The true names of the plaintiff and his guardian ad litem, and the correlative pseudonyms, will be filled with the court under seal.

1 Plaintiff John Doe, by and through his parent and guardian ad litem, Parent 1, alleges the  
2 following:

3 **GENERAL ALLEGATIONS**

4 1. PLAINTIFF is and was at all relevant times a minor child residing in the State of  
5 California. During the school year of 2023-2024, PLAINTIFF attended Oaks Christian School  
6 (hereinafter “OAKS CHRISTIAN SCHOOL”), located in Los Angeles County, California.

7 2. OAKS CHRISTIAN SCHOOL is and at all times mentioned in this Complaint was  
8 authorized to do and doing business in Los Angeles County, California.

9 3. The true names and capacities of Defendants DOES 1 through 20, inclusive, are  
10 unknown to PLAINTIFF who, therefore, sues said Defendants by such fictitious names. PLAINTIFF  
11 is informed and believes, and thereupon alleges, that at all times herein mentioned, defendants, DOES  
12 1 to 20, and each of them, were the agents, servants, employees, permissive users, joint venturers,  
13 successors in interest, assigns and subsidiaries, each of the other, and at all times pertinent hereto  
14 were acting within the course and scope of their authority as such agents, servants, employees,  
15 representatives, permissive users, joint venturers, successors in interest, assignees and/or subsidiaries.

16 4. At all times herein mentioned, each of the Defendants were the agents and employees  
17 of each of the remaining Defendants and, in doing the things hereinafter alleged, was at all times  
18 acting within the purpose, course and scope of said agency or employment with the knowledge,  
19 consent and permission of each of the other Defendants.

20 5. Each of the Defendants designated herein as a DOE is negligently and culpably  
21 responsible in some manner for the events and happenings herein referred to and negligently and  
22 culpably caused injury and damages proximately thereby to PLAINTIFF as herein alleged. Each  
23 reference in this Complaint to “Defendant,” “Defendants,” or a specifically named Defendant refers  
24 also to all Defendants sued under fictitious names.

25 6. This court is proper because the negligent and culpable acts, conduct and omissions  
26 of the Defendants, and each of them, hereinafter complained of, occurred in Los Angeles County,  
27 and the injury to PLAINTIFF occurred within its jurisdictional area.

28 ///

1 **BACKGROUND**

2 7. PLAINTIFF has attended and continues to attend OAKS CHRISTIAN SCHOOL  
3 since the 2021-2022 school year as a high school student and is currently a senior.

4 8. PLAINTIFF is a Black student at OAKS CHRISTIAN SCHOOL which has a  
5 predominantly White student body. He is often the only Black student in his classes. Photographs  
6 displayed on the school’s website illustrate the near-racial-homogeneity of the student population.



17 9. Throughout his time at OAKS CHRISTIAN SCHOOL, PLAINTIFF has faced  
18 relentless bullying and harassment, including numerous openly racist comments, actions, and  
19 behaviors from other students, which has been ratified and ignored by the faculty and staff.

20 10. Students have regularly taunted him at OAKS CHRISTIAN SCHOOL by using the  
21 racial slurs “Nigger” and “Nigga” toward and around PLAINTIFF and asking PLAINTIFF  
22 for permission to call him “Nigger” and “Nigga.”

23 11. On multiple occasions, students deliberately addressed PLAINTIFF using a veiled  
24 version of the N-word, intentionally blending PLAINTIFF’S first name and the “er” sound, for  
25 example, “Hey \*\*\*\*-errr ... you going to the game tonight?” Additionally, PLAINTIFF and several  
26 Black peers reported being bombarded with questions like “Can I say the N-word?”, “Would you  
27 care if I said the N-word,” or “What would you do if I called you the N-word right now?” They were  
28 often greeted with phrases like “Hey, niiii...ce person” and other suggestive and racially motivated

1 phrases.

2 12. Faculty at OAKS CHRISTIAN SCHOOL openly used terms like the N-word in class  
3 discussions and included audiobooks containing offensive language in their syllabi, playing them in  
4 class without any effort to skip over the derogatory terms or provide warnings about their  
5 inappropriateness. This behavior allowed students to believe they were permitted to use such  
6 language themselves.

7 13. Names such as “Monkeython,” “Darkathan,” and “Blackethan” were frequently used  
8 by White students to refer to Black students in front of PLAINTIFF, further contributing to the hostile  
9 environment at OAKS CHRISTIAN SCHOOL.

10 14. PLAINTIFF endured racist remarks while walking through the school, such as “Where  
11 are the police?” and “How is he walking around freely?” Additionally, students would approach him  
12 when he was with a classmate, yelling, “Look out behind you, it’s <<<JOHN DOE>>>.” His peers  
13 also reported experiencing racially charged behavior, including being followed by students who made  
14 clicking noises to mock tribal Africans.

15 15. If the classroom lights went out, white students would jokingly ask, 'Where did  
16 <<<JOHN DOE>>> go?' insinuating that, due to his skin color, he was somehow invisible.

17 16. When PLAINTIFF spoke with classmates during group assignments, they often  
18 dismissed him, claiming they “couldn't understand [his] thick accent,” despite him speaking with a  
19 typical American accent.

20 17. If PLAINTIFF engaged in activities perceived as stereotypical for Black Americans  
21 —such as eating chicken or watermelon, or watching football games or basketball videos— students  
22 would publicly mock him, even in the presence of OAKS CHRISTIAN SCHOOL faculty and staff—  
23 with comments such as “well, well, well” and “of course”.

24 18. In one instance, a teacher observed and heard another student say to PLAINTIFF, after  
25 eating a piece of candy, "Too bad there is no chicken flavor for you, JOHN DOE." The teacher  
26 acknowledged the racist nature of the comment to JOHN DOE but failed to take any action against  
27 the other student in response.

28 19. PLAINTIFF also had watermelon-flavored candies thrown at him by other students,

1 who claimed it was 'what he liked.' Other Black students reported similar experiences of being  
2 targeted based on racial stereotypes.

3 20. Since this relentless behavior went unchecked, it fostered a toxic atmosphere at OAKS  
4 CHRISTIAN SCHOOL, where racism became normalized, and students felt empowered to see how  
5 far they could terrorize PLAINTIFF and other Black students.

6 21. In such an instance, students dehumanized PLAINTIFF by holding fried chicken  
7 above his head as if he were an animal begging for food. This degrading behavior was accompanied  
8 by comments such as, "Here, <<<JOHN DOE>>>, I know **YOU** people like this."

9 22. During PLAINTIFF's sophomore year (2022-2023), students downloaded an app  
10 called "Pocket Whip," which produced whip sounds and used it in his presence, pretending to whip  
11 him as a "White master would whip his slave." This app became a tool for racial torment, used to  
12 humiliate and degrade Black students at OAKS CHRISTIAN SCHOOL. Despite the app being  
13 extremely well-known among students, with many having downloaded or used it in the presence of  
14 OAKS CHRISTIAN SCHOOL Staff, the administration failed to intervene, allowing these harmful  
15 acts to persist.

16 23. In fact, OAKS CHRISTIAN SCHOOL's High School Vice Principal, Bryndyn  
17 Crutcher, was aware of the explosive fallout that the topic of slavery would have during the  
18 sophomore year. He called PLAINTIFF into his office to discuss the upcoming lesson in U.S. History.  
19 Mr. Crutcher noted that the topic would be "*difficult*" and warned PLAINTIFF that there were some  
20 "**jokesters**" in the class who might say something inappropriate. Instead of taking measures to ensure  
21 that PLAINTIFF would not be subjected to racist taunts, he advised him to "**brace for it**".

22 24. During PLAINTIFF's junior year (2023-2024), students at the school conducted a  
23 mock slave auction in the cafeteria. They openly debated PLAINTIFF's worth as if he were a  
24 commodity for sale. Students asked PLAINTIFF about his height and physical capabilities in an  
25 attempt to determine a selling price. When PLAINTIFF did not respond, the students made unfounded  
26 assumptions and began to announce prices at which they claimed they would sell him. This mock  
27 auction was characterized by students displaying money and cards, while one student, acting as an  
28 auctioneer, shouted phrases such as, "350, do I have anything more than 350?" and "400, anything

1 for 400?" The auctioneer concluded with, "Sold to the white man in the uniform for (amount)."

2 25. PLAINTIFF was also notified by several students of a specific date and time at which  
3 they would lynch him.

4 26. PLAINTIFF endured these distressing events daily at OAKS CHRISTIAN SCHOOL  
5 for years.

6 27. This blatant harassment was open and obvious, occurring in the very space meant for  
7 learning. Teachers and school administration failed to provide the safe and supportive environment  
8 touted by OAKS CHRISTIAN SCHOOL on its website and in its advertising materials, in statement  
9 such as:

- 10 - "This is a close community where students thrive and grow, parents can connect and  
11 contribute, and alumni are a vital part of the OCS family. Whether you are a student,  
12 staff, parent, or alumni, this is your home. **This is where you belong.**"
- 13 - "ONE OAKS CHRISTIAN is the feeling of community, camaraderie, and united  
14 purpose that is intentionally cultivated on our campus. We foster fellowship with one  
15 another through student retreats, parent groups, beloved traditions, and volunteer  
16 opportunities. We support student wellness with compassion and care."
- 17 - "The formative years in a student's life take place here and now: in elementary, middle  
18 school, and high school. The experiences and relationships they have now help shape  
19 their future and the foundation of a God-honoring life. Each of our programs provides  
20 an authentic, age-appropriate curriculum and opportunities to help students sharpen  
21 their intellect while developing cultural competence."
- 22 - "As they move from freshmen to seniors, the focus is on preparing students to lead  
23 and serve in a fast-changing global community. Through our robust academic, artistic,  
24 and athletic programs, we aim to graduate difference-makers: compassionate,  
25 independent young men and women who will make an impact beyond the OCS  
26 campus."

27 28. OAKS CHRISTIAN SCHOOL was aware of the history of racial harassment and  
28 discrimination that the Black students endured within its walls.

29 On June 4th, 2020—over a year before PLAINTIFF's abuse at OAKS CHRISTIAN  
30 occurred—a petition titled "Black Oaks Christian Alumni and Allies Against Racism" was posted  
31 and signed by over 8,100 OAKS CHRISTIAN SCHOOL alumni. The comments section reflected

1 the deep scars left by the school's culture, with numerous alumni sharing experiences of racism and  
2 discrimination from both faculty and non-Black students. Alumni expressed their desire for change,  
3 with one poignant comment stating, "I don't want my alma mater to scar Black and Brown people  
4 the way it scarred me." Many alumni reported being met with dismissal when they raised these  
5 issues, with faculty admitting they "didn't want to get fired." Non-Black alumni shared their guilt  
6 and regret for remaining silent, acknowledging their complicity. One striking account revealed the  
7 impact of the school's failures: "I attribute so much of my internalized racist biases and shameful  
8 acts of microaggression to Oaks' failure."

9         30. On June 11th, 2020, OAKS CHRISTIAN SCHOOL's Head of School, Rob Black,  
10 issued a written response to the petition, claiming that "Oaks Christian School is committed to  
11 enhancing a more robust anti-harassment and anti-discrimination policy that adds additional focus on  
12 matters of intolerance, bias and racism towards students, including updated policies that affect  
13 students who are victims of hate and racism." He outlined various measures to support Black students,  
14 including hiring a Director of Diversity, driven by a "desire to acknowledge where we have been  
15 wrong and have failed to understand many of the issues Black students may have faced at Oaks  
16 Christian School. We desire to bring about racial healing on our campus and in our community."

17         31. However, despite these promises, nothing changed. Since the release of this statement,  
18 no meaningful actions were taken. The experiences of PLAINTIFF, his peers, and others who have  
19 endured similar treatment at OAKS CHRISTIAN SCHOOL since the petition was released highlight  
20 the school's failure to act. The institution's words have proven hollow as it continues to tolerate and  
21 foster a despicable cauldron of racism within its walls. Rather than root out the evil at the school,  
22 OAKS CHRISTIAN made a few empty platitudes, did nothing, and tried to sweep the entire matter  
23 under the rug.

24         32. OAKS CHRISTIAN SCHOOL had a duty to provide a safe educational environment  
25 but breached that duty and failed to uphold its own Policy Statement on racial unity by neglecting to  
26 prevent or adequately address racism. Their racial unity policy claims:

27         " School is an educational community that values racial/ethnic/cultural diversity,  
28         acceptance, and understanding leading to unity for all its community members. Oaks  
       Christian School strives to provide an environment free of inappropriate treatment of

1 individuals due solely to race, ethnicity, skin color, or national origin. **Oaks Christian**  
2 **School does not tolerate inappropriate introduction or discussion of**  
3 **race/ethnicity in the classroom environment or on the campus.”**

3 33. Additionally, the school handbook includes a bullying clause stating:

4 “Oaks Christian School will not tolerate harassment or bullying of any kind, whether it is of  
5 a general or specific nature. It is the policy of the school that all employees, volunteers,  
6 parents, and students will deal with all persons in ways that convey respect and consideration  
7 for individuals regardless of race, color, marital status, national origin, creed, religion, gender,  
8 age, or disability. Harassment and/or bullying includes easily identified acts of verbal,  
9 written, or physical abuse and more subtle but equally damaging forms of harassment and/or  
10 bullying such as graffiti, epithets, and that which is targeted at an individual or group.”

9 34. The policy lists direct examples of racial misconduct. Some of their own examples  
10 include “1) unwelcome comments and conduct with a racial connotation(s) or subject matter that may  
11 reasonably be demeaning to an ethnic group or people of a particular skin color or group, 2) offensive  
12 and vulgar jokes, name-calling, ridicule or mockery, insults, or put-downs, acts of bullying,  
13 stereotyping based on a person’s skin color, ethnicity, or national origin, physical gestures, or  
14 enactments, or displaying racist photographs or objects; that a reasonable person may find offensive,  
15 3) bullying, acts of harassment (including sexual), physical assaults or threats and intimidation based  
16 on one’s skin color, ethnicity, race, or national origin, 4) denial or obstruction of access to programs  
17 or services based solely on one’s skin color, ethnicity, race, or national origin, 5) any other racial  
18 misconduct that may be reasonably understood to interfere with, or distract from, an individual’s  
19 work or academic performance.”

20 35. Rather than adhering to their stated commitments, OAKS CHRISTIAN SCHOOL has  
21 failed to implement and enforce its own policies on racial unity, tolerance, and diversity. The  
22 administration’s inaction in the face of numerous instances of racism and discrimination has rendered  
23 their promises null and void. By allowing – *and in fact, fostering*—a culture of racism and  
24 intolerance, OAKS CHRISTIAN SCHOOL has failed to fulfill its obligations to PLAINTIFF and  
25 others. The experiences of PLAINTIFF and his peers exemplify the very racial misconduct that the  
26 school’s policy explicitly condemns, indicating that OAKS CHRISTIAN SCHOOL has, in practice,  
27 condoned and encouraged the very despicable behavior it purports to reject.

28 36. OAKS CHRISTIAN SCHOOL’s failure to address and prevent incidents of racial



1 misconduct has profoundly affected PLAINTIFF’s educational experience and well-being. By  
2 neglecting its obligations and tolerating actions herein described, the school has deprived  
3 PLAINTIFF of his right to enjoy the resources and benefits of his private education. PLAINTIFF  
4 felt compelled to wait for hallways to “clear” and felt unsafe in common areas, often opting to eat  
5 lunch in classrooms to avoid harassment.

6 37. OAKS CHRISTIAN SCHOOL’S failure to protect PLAINTIFF has caused him  
7 severe emotional distress and has significantly affected his overall well-being prompting PLAINTIFF  
8 to seek therapy to address the trauma.

9 **FIRST CAUSE OF ACTION**

10 ***NEGLIGENT HIRING, TRAINING, RETENTION, SUPERVISION***

11 38. PLAINTIFF re-alleges and incorporates by reference the allegations set forth in the  
12 preceding paragraphs of this Complaint as if fully set forth herein.

13 39. OAKS CHRISTIAN SCHOOL had a duty to supervise student conduct at all times on  
14 its grounds and to enforce the necessary rules and regulations for the protection of its students.  
15 Specifically, OAKS CHRISTIAN SCHOOL was responsible for supervising students to ensure that  
16 acts of harassment and bullying did not occur or persist on its premises. The school had a duty to  
17 exercise ordinary care to protect students from harassment and bullying.

18 40. OAKS CHRISTIAN SCHOOL was negligent and careless by allowing students to  
19 harass, humiliate, and bully the plaintiff with impunity. Prior to the injuries alleged herein, the school  
20 staff and faculty had actual and constructive notice that students were harassing and bullying the  
21 plaintiff and other Black students, as evidenced by written notices, complaints, texts, social media  
22 messages, and other communications within the school’s control. This conduct was persistent and  
23 would continue in the absence of adequate supervision, even despite the ostensible presence of faculty  
24 and staff who observed these acts but failed to intervene.

25 41. OAKS CHRISTIAN SCHOOL was negligent in supervising its faculty, staff, and  
26 student body. Despite being fully aware of the deeply ingrained racism, harassment, and bullying  
27 targeting its minor Black population, including PLAINTIFF, the school failed to exercise ordinary  
28 care during school hours. It neglected to provide adequate training or supervision that could have

1 prevented these acts and their resulting harms.

2 42. Specific examples of this negligence include faculty members using racially charged  
3 language, including the N-word, in the classroom without facing consequences, thereby creating a  
4 hostile and unsafe environment for PLAINTIFF. This highlights the school's failure to supervise and  
5 hold its faculty accountable for their actions. Additionally, teachers and staff witnessed racially  
6 motivated comments and behaviors directed at PLAINTIFF but did nothing to address them,  
7 reinforcing the notion that racism in the classroom is acceptable.

8 43. By failing to properly train and supervise its staff, OAKS CHRISTIAN SCHOOL  
9 breached its duty of care to PLAINTIFF. The school knew or should have known that its faculty  
10 members were complicit in and tolerant of the heinous treatment endured by its students of color,  
11 particularly Black students like PLAINTIFF. As a result, PLAINTIFF has suffered and continues to  
12 endure an environment that perpetuates racism and discrimination, rather than being provided a safe  
13 space to explore his interests and further his education. The school's history of inaction in the face  
14 of such behavior underscores its failure to provide a supportive educational environment, directly  
15 contributing to PLAINTIFF's emotional distress.

16 44. As a proximate result of OAKS CHRISTIAN SCHOOL's negligence, PLAINTIFF has  
17 suffered and continues to suffer severe emotional distress and mental anguish.

18 45. As a further proximate result of OAKS CHRISTIAN SCHOOL's negligence,  
19 PLAINTIFF has incurred and will continue to incur medical and related expenses.

20 46. OAKS CHRISTIAN SCHOOL and its agents had a special relationship with  
21 PLAINTIFF and had a duty to reasonably care for him and protect his rights, safety and  
22 physical/mental well-being. OAKS CHRISTIAN SCHOOL breached this duty by committing the  
23 acts alleged herein.

24 47. As a direct and proximate result of Defendant's act/omissions alleged herein,  
25 PLAINTIFF has suffered general damages in excess of jurisdictional minimums in an amount to be  
26 proven at trial.

27 48. The conduct of OAKS CHRISTIAN SCHOOL and its agents was despicable, and was  
28 perpetrated with malice, oppression and/or reckless disregard for the rights and safety of PLAINTIFF.

1 PLAINTIFF therefore entitled to recover exemplary and punitive damages against these defendants.

2 **SECOND CAUSE OF ACTION**

3 ***NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS***

4 49. PLAINTIFF re-alleges and incorporates by reference the allegations set forth in the  
5 preceding paragraphs of this Complaint as if fully set forth herein.

6 50. OAKS CHRISTIAN SCHOOL knowingly tolerated a hostile school environment,  
7 allowing racist behavior to persist unchecked and failing to take meaningful action to protect students  
8 like PLAINTIFF. Despite repeated reports from Black students and students of color experiencing  
9 harassment, discrimination, and racially motivated bullying, the school’s administration and faculty  
10 actively chose to ignore the severity of these situations. By essentially disregarding the systemic  
11 racism within its walls, OAKS CHRISTIAN SCHOOL not only violated its own policies but also  
12 failed to fulfill its duty to provide a safe and inclusive learning environment for its students of color.

13 51. Despite ostensibly having policies in place, such as its “Racial Unity Policy” and  
14 “Bullying/Harassment” section, OAKS CHRISTIAN SCHOOL was negligent in its failure to enforce  
15 these protections for the benefit of Black students and other students of color.

16 52. OAKS CHRISTIAN SCHOOL’s negligence resulted in PLAINTIFF enduring years  
17 of bullying, harassment, and humiliation in the presence of the school’s faculty and staff,  
18 transforming what was ostensibly a prestigious academic institution into a site for the ritual  
19 humiliation of Black students like PLAINTIFF.

20 53. PLAINTIFF recounts, “I felt alone like nobody could help me, so I went through this  
21 every day for years.” This profound sense of isolation and helplessness was worsened by OAKS  
22 CHRISTIAN SCHOOL’s failure to address or acknowledge the ongoing racist activities that plagued  
23 its campus.

24 54. The consistent history of ignoring and accepting racist activities, combined with the  
25 lack of intervention by OAKS CHRISTIAN SCHOOL, has caused severe emotional trauma and  
26 distress to PLAINTIFF, including, but not limited to, mental anguish, fright, horror, nervousness,  
27 grief, anxiety, worry, shock, humiliation, and shame. As a result, he has been required to seek therapy  
28 to receive treatment to cope with the lasting effects of these experiences.

1 55. OAKS CHRISTIAN SCHOOL and its agents had a special relationship with  
2 PLAINTIFF and had a duty to reasonably care for him and protect his rights, safety and  
3 physical/mental well-being. OAKS CHRISTIAN SCHOOL breached this duty by committing the  
4 acts alleged herein.

5 56. As a direct and proximate result of Defendant's act/omissions alleged herein,  
6 PLAINTIFF has suffered general damages in excess of jurisdictional minimums in an amount to be  
7 proven at trial.

8 57. The conduct of OAKS CHRISTIAN SCHOOL and its agents was despicable, and was  
9 perpetrated with malice, oppression and/or reckless disregard for the rights and safety of PLAINTIFF.  
10 PLAINTIFF is therefore entitled to recover exemplary and punitive damages against these  
11 defendants.

12 **THIRD CAUSE OF ACTION**

13 ***VIOLATION OF THE UNRUH CIVIL RIGHTS ACT***

14 58. PLAINTIFF re-alleges and incorporates by reference the allegations set forth in the  
15 preceding paragraphs of this Complaint as if fully set forth herein.

16 59. The Unruh Civil Rights Act provides, "[all] persons within the jurisdiction of this state  
17 are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin,  
18 disability, medical condition, genetic information, marital status, sexual orientation, citizenship,  
19 primary language, or immigration status are entitled to the full and equal accommodations,  
20 advantages, facilities, privileges, or services in all business establishments of every kind whatsoever."  
21 Cal. Civ. Code § 51(b).

22 60. PLAINTIFF, a Black student, is a member of a protected class under the Unruh Civil  
23 Rights Act.

24 61. OAKS CHRISTIAN SCHOOL engages in activities that categorize it as a "business  
25 establishment" under the Unruh Civil Rights Act. As an educational institution, OAKS CHRISTIAN  
26 SCHOOL provides instruction and educational services to students and their families. The school  
27 actively seeks to attract and enroll students from the community and charges tuition for admission.  
28 Furthermore, OAKS CHRISTIAN SCHOOL promotes and sells tickets for its plays and athletic

1 events on its website, indicating its role in providing entertainment and community engagement. This  
2 public access to events underscores its function as a business establishment. By hosting and  
3 promoting these events, OAKS CHRISTIAN SCHOOL invites participation from the broader  
4 community, not just enrolled students and their families. This inclusive approach aligns with the  
5 characteristics of a public-facing business.

6 62. During the time PLAINTIFF attended OAKS CHRISTIAN SCHOOL, he experienced  
7 bullying and harassment, including numerous openly racist comments and behaviors from other  
8 students, as discussed above.

9 63. PLAINTIFF was subjected to discriminatory treatment when he was the victim of  
10 these actions; however, teachers and administrators admonished him to brace himself for an onslaught  
11 of racist behaviors by his classmates, expecting him to remain silent and tolerate the abuse.

12 64. The harassers and bullies, who are not Black and do not belong to PLAINTIFF's  
13 protected class, were treated more favorably and acted without any repercussions.

14 65. PLAINTIFF felt that, as a Black student, he needed to wait for hallways to "clear" and  
15 felt unsafe in common areas, often opting to eat lunch in classrooms to avoid harassment, while the  
16 non-Black assailants were able to walk freely without facing consequences for their behavior.

17 66. As specifically outlined above, OAKS CHRISTIAN SCHOOL was aware of the  
18 ongoing racial bullying and harassment yet failed to take appropriate action to address or rectify the  
19 situation, and in fact fostered this hateful activity.

20 67. OAKS CHRISTIAN SCHOOL's actions constitute discrimination against  
21 PLAINTIFF based on his race.

22 68. By allowing discriminatory practices to persist and failing to act upon its knowledge  
23 of the ongoing racial harassment and bullying, OAKS CHRISTIAN SCHOOL violated the Unruh  
24 Civil Rights Act.

25 69. As a direct and proximate result of OAKS CHRISTIAN SCHOOL's actions,  
26 PLAINTIFF has suffered emotional distress, mental anguish, and other damages, including social  
27 situational distress and therapy costs. PLAINTIFF has suffered general damages in excess of  
28 jurisdictional minimums in an amount to be proven at trial.

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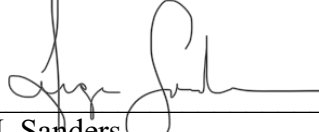
**PRAYER FOR RELIEF**

WHEREFORE, PLAINTIFFs pray for judgment against OAKS CHRISTIAN SCHOOL,  
and all unascertained defendants, as follows:

- a. For general damages in a sum in excess of the jurisdictional minimums of this court;
- b. For special damages;
- c. For punitive damages as allowed by law;
- d. For prejudgment interest as allowed by law;
- e. For costs of suit; and
- f. For such other and further relief as the Court deems just and proper.

Dated: October 15, 2024

**SANDERS LAW GROUP**

By:   
\_\_\_\_\_  
Inga N. Sanders  
Attorneys for PLAINTIFF JOHN DOE, a  
minor by and through his parent and  
guardian ad litem, PARENT 1