

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

JOHN DOE;

COLIN COE, a minor by and through his
parent COLLEEN COE;

RICHARD ROE, a minor by and through his
parent REBECCA ROE;

JANE DOE, a minor by and through her
parent JILL DOE,

Plaintiffs,

v.

SCHOOL BOARD FOR FAIRFAX
COUNTY PUBLIC SCHOOLS;

THOMAS JEFFERSON HIGH SCHOOL OF
SCIENCE AND TECHNOLOGY;

MICHELLE C. REID, in her individual
capacity and her official capacity as
Superintendent of Fairfax County Public
Schools;

MICHAEL MUKAI, in his individual
capacity and his official capacity as Principal
of Thomas Jefferson High School of Science
and Technology;

ELIZABETH FAWCETT, in her individual
capacity and her official capacity as Associate
Principal of Thomas Jefferson High School of
Science and Technology,

Defendants.

Case No. _____

INITIAL COMPLAINT FOR CIVIL RIGHTS
VIOLATIONS AND JURY DEMAND

Plaintiffs John Doe, Colin Coe, Richard Roe, and Jane Doe, by and through undersigned counsel, allege as follows:

INTRODUCTION

1. This case arises from Fairfax County Public Schools' ("FCPS") decision to punish Muslim students for participating in the same social-media trend that other student groups engaged in without consequence.
2. Plaintiffs, students at Thomas Jefferson High School for Science and Technology ("TJHSST"), created a lighthearted promotional video for their chapter of the Muslim Student Association. The video contained no threats, no weapons, and no reference to any real-world event. It was a skit, modeled on a viral online trend, intended to invite students to their events.
3. After bad-faith actors outside of TJHSST made Islamophobic, racist, and anti-Palestinian characterizations about the video, FCPS and TJHSST adopted those characterizations as their own.
4. Defendants suspended Plaintiffs, labeled their conduct "antisemitic," barred one Plaintiff from wearing a sweatshirt displaying the map of Palestine, and placed disciplinary marks on the students' records.
5. These actions were entirely without justification, damaging the reputations of the students before their peers and teachers and significantly affecting their educational performance and future opportunities.

6. Because Defendants punished Plaintiffs' protected speech, and treated Plaintiffs differently because they were Muslim, Arab, and Palestinian, Plaintiffs are entitled to relief under the First Amendment, the Fourteenth Amendment, and Title VI.

PARTIES

7. Plaintiff John Doe is a student at TJHSST who was suspended. He is the President of the TJHSST chapter of the Muslim Student Association ("MSA").
8. Plaintiff Colin Coe is a minor and student at TJHSST who was suspended, proceeding by and through his parent, Colleen Coe. He is a member of the MSA.
9. Plaintiff Jane Doe is a minor student at TJHSST who was suspended, proceeding by and through her parent, Jill Doe.
10. Plaintiff Richard Roe is a minor and student at TJHSST who was suspended, proceeding by and through his parent, Rebecca Roe. He is the Vice President of the MSA.
11. Defendant School Board for Fairfax County Public Schools (hereinafter "FCPS" or the "School Board") is a body politic and corporation which may sue and be sued. The School Board retains full rights, authority, and responsibility to control, supervise, and manage FCPS. Located in Fairfax County, FCPS is a recipient of federal financial assistance within the meaning of Title VI of the Civil Rights Act of 1964.
12. Defendant TJHSST is a public school operated by FCPS and located in Fairfax County, Virginia.
13. Defendant Michelle C. Reid is the Superintendent of FCPS, responsible for oversight of all district policies, including disciplinary and nondiscrimination procedures. As superintendent, Defendant Reid reviewed and approved the disciplinary actions and speech restrictions imposed on Plaintiffs. She is sued in her individual and official capacities.

14. Defendant Michael Mukai is the Principal of TJHSST and responsible for enforcing student discipline and compliance with constitutional protections. He is sued in his official and individual capacities.

15. Defendant Elizabeth Fawcett is the Associate Principal of TJHSST and directly implemented the suspension process challenged herein. She is sued in her official and individual capacities.

JURISDICTION AND VENUE

16. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and 1343 because this action arises under the First and Fourteenth Amendment to the United States Constitution, 42 U.S.C. §1983 and 2000d, and Title VI of the Civil Rights Act of 1964.

17. Venue is proper in the Eastern District of Virginia pursuant to 28 U.S.C. §1391(b) and 1391(e) because the acts and injuries alleged occurred in and continue to occur in this judicial district.

FACTUAL ALLEGATIONS

Thomas Jefferson High School of Science and Technology

18. TJHSST is a prestigious magnet school in Fairfax County Public Schools.

19. TJHSST is routinely ranked as the top public high school in the country by U.S. News & World Report.

20. The application process for attending TJHSST is arduous. Applicants must take a written test and meet a minimum grade average that is not required for attendance at other schools in FCPS. TJHSST receives thousands of applications each year and only admits around five hundred students.

21. Merely being accepted to and graduating from TJHSST is a massive accomplishment that reflects positively on a student's resume.

The Muslim Student Association at TJHSS

22. The Muslim Student Association is a national, student-led organization with chapters at high schools and college campuses across the country. MSAs offer Muslim students a sense of community, an opportunity to develop their faith, and a venue for religious and educational activities.

23. The MSA at TJHSST (hereinafter "MSA") organizes weekly events and often collaborates with other student groups on campus. MSA has a stellar reputation for being inclusive, active, and diverse.

24. The students who run MSA work hard to foster a sense of community belonging and engagement. Each week, MSA hosts approximately thirty students for meetings on the TJHSST campus where they can pray, learn, socialize, and plan community events.

25. While the MSA is a Muslim organization, students of all faiths attend meetings to learn about Islam, socialize, and eat foods from Muslim cultures.

The Plaintiffs

26. All Plaintiffs are hardworking high school students with a commitment to community service and a sincere dedication to their academic success. They are well-loved by their fellow classmates and teachers.

27. All Plaintiffs come from well-respected families. Their parents are well-known in the community amongst Muslims and non-Muslims alike. Several of the parents grew up in the area and are familiar with the staff at TJHSST.

Plaintiff John Doe

28. Plaintiff John Doe is a Senior at TJHSST. He is an active community member, who volunteers at the mosque and also coaches youth soccer in his community.
29. Plaintiff John Doe is MSA's current President. He joined MSA his freshman year and participated as either a member or an officer for his entire high school career. MSA allows him to connect with his fellow classmates at TJHSST.
30. Plaintiff John Doe puts a great amount of effort into growing MSA and connecting with other student groups. He helps MSA organize events for Muslims at school and for students of other faiths. For example, he helped the MSA host an Eid event that drew over 150 attendees of all faiths at TJHSST.
31. Up until the events that gave rise to this Complaint, Plaintiff John Doe enjoyed his experience at TJHSST. He is a strong student who loves his computer science classes. He is an active participant in the classroom and seeks his teachers' mentorship.
32. Plaintiff John Doe also has a knack for photography, which he uses to document both in-school and out-of-school events. For example, the organizers of HACKTJ, a schoolwide event, asked John Doe to photograph and document the event.
33. Plaintiff John Doe has ambitions to attend college to pursue a career in computer science.

Plaintiff Richard Roe

34. Plaintiff Richard Roe is a Junior at TJHSST. He has always been active in community events and groups, including as a longtime member of the Boy Scouts of America and has held leadership positions there.
35. Plaintiff Richard Roe is MSA's Vice President. During his previous years of high school, he held both member and officer roles in the student organization. MSA is where he made many of his high school friends.

36. Gaining admission into TJHSST was a big accomplishment for Plaintiff Richard Roe. He is studious and ambitious, and has maintained excellent grades.
37. Plaintiff Richard Roe participates in several extra-curricular activities on campus, including playing on both the football and wrestling teams.
38. Plaintiff Richard Roe constantly pursues a mission of giving back to his communities. He was a Camp Counselor at the McLean Islamic Center and, in 2023, he organized a donation drive after the Turkey-Syria earthquakes around 2021. This project drew so much positive attention that Defendant Reid interviewed Plaintiff Richard Roe about it.
39. Plaintiff Richard Roe plans to attend university to pursue a career in biotechnology.

Plaintiff Jane Doe

40. Plaintiff Jane Doe is a Junior at TJHSST. She found MSA to be a welcoming environment that instilled in her the importance of learning about her faith with other students and the responsibility of leadership.
41. Plaintiff Jane Doe is committed and studious, with a 3.92 GPA on a 4.0 scale.
42. Plaintiff Jane Doe actively engages with the TJHSST and local community. She is active in the TJHSST Animal Rights Club, volunteers at the local animal shelter, and was a Girl Scout until ninth grade. She is a member of the National Honor Society.
43. Plaintiff Jane Doe is also an athlete. She is an active member of the TJHSST Women's Fitness Club (WOFIT) and Track and Field Team.
44. Plaintiff Jane Doe volunteers at mosques and churches in her community. In 2021, she helped organize an Eid toy drive which raised \$8,000 for families in need.

45. Plaintiff Jane Doe is also participating in a study on the Muslim student experience in public schools, conducted by Dr. Amaarah DeCuir at American University.¹

46. Plaintiff Jane Doe plans to attend college after she graduates to pursue a career in medicine.

Plaintiff Colin Coe

47. Plaintiff Colin Coe is a Sophomore at TJHSST. He is a member of MSA. He is also active in other organizations and in the community.

48. Above all, he values the opportunities MSA has given him to make friends and engage with his TJHSST and local community. Outside of MSA he plays and referees soccer games and is a member of TJHSST's "Consulting Club," where he builds websites for local businesses.

49. Plaintiff Colin Coe is a strong student with good academic standing. He loves his teachers and classmates, and, until the events giving rise to this case, has enjoyed his time at TJHSST.

50. Plaintiff Colin Coe has ambitions to attend university and pursue a career in medicine.

The MSA Promotional Video

51. During the Fall 2025 semester, Plaintiffs and other MSA members discussed ways to increase attendance at their club meetings. The early part of the semester presents a critical opportunity to encourage students to join extra-curricular groups and attend club events throughout the year.

¹ Dr. DeCuir is a scholar of pedagogy and studies the experience of Muslims in the U.S. education system. *See, e.g.*, Amaarah DeCuir, A critical decolonial discourse analysis of secular education leadership practices impacting a local Muslim community, 57 J. OF EDU. ADMIN. AND HIST. 459 (May 10, 2025); Amaarah DeCuir, Responding to Religious Harassment in US Schools – A Guide, MuslimMatters.org (Oct. 31, 2023), <https://muslimmatters.org/2023/10/31/responding-to-religious-harassment-in-us-schools-a-guide>.

52. Plaintiffs and other MSA members are familiar with social media platforms and identified that MSA's Instagram page was a uniquely effective tool to reach and recruit potential members.
53. Through their social media use, Plaintiffs were familiar with a specific, viral comedy skit circulating nationwide. In this viral skit, student groups of all kinds filmed a promotional video where a student group member asks other students if they will come to the group's event. When one of the students respond "no," that student is suddenly grabbed and taken away by other student group members.
54. The comedy skit did not arise in reference to any particular event or group of people. The skit is not intended to be mistaken as real, or as a reference to any real event. The skit is comedic and the mock violence depicted is a humorous overreaction in the context of a student group or community business spreading news of an event.
55. The comedy skit has been adopted by student groups nationwide, across high schools and college campuses. Local businesses have also used this marketing tactic as a lighthearted and humorous way to promote themselves and attract customers and clients.
56. The individuals participating in these skits participate voluntarily and do so to help promote their organization.
57. The skit gained popularity within FCPS. For example, the Indian Student Association at Chantilly High School in FCPS made a skit in the school parking lot where the students who refused to go to the meeting were bagged and put in the trunk of a car.
58. FCPS and Chantilly High School did not reprimand members of the Indian Student Association for the video. The video, in fact, remained on the student group's Instagram account while the investigation described above was ongoing.

59. Other groups at FCPS and in TJHSST have posted similar skits and videos intended to be outlandish and comedic.
60. For example, the Student Government Association at TJHSST (“SGA”) posted a skit on Instagram where the student group markets the improvement of a Mental Health and Wellness Room by tossing a pretend grenade in the classroom and shutting the door.
61. Identifying the comedy skit as a playful and effective way to engage with their peers and increase attendance at their event and having seen so many of their peers do the same without punishment, Plaintiffs chose to create their own skit video.
62. On Thursday, October 23, 2025, the TJHSST MSA students filmed their skit during lunchtime in the school’s prayer room. Plaintiffs John Doe, Richard Roe, Colin Coe, and Jane Doe, as well as other MSA members, were present.
63. In the skit, Plaintiff Jane Doe asks two student members of MSA if they plan to attend the next MSA meeting. The two students respond “no” and pretend that they do not know what MSA is.
64. Plaintiffs John Doe and Richard Roe then pretend to sneak up on the two student members and grab them, putting them in a large plastic bin.
65. After the two students are taken off-screen, Plaintiff Jane Doe then turns to ask two other students, including Plaintiff Colin Coe and another MSA member, if they will attend the MSA meeting. This time, the two new students enthusiastically respond “yes,” marking the conclusion of the skit.
66. The MSA video ends with an additional comedic scene. The first two students, the ones who were grabbed in the skit, smiling widely and giving the camera a thumbs up. A caption reads, “no one was harmed in the making of this video.”

67. The MSA video was light-hearted, with the students acting playfully and repeatedly having difficulty containing their laughter.
68. The video directly followed the structure of a viral comedy skit trend.
69. The MSA video contained no threats, weapons, violent imagery, or inappropriate content.
70. The MSA video contained no references to any events or people beyond MSA and its upcoming meeting.
71. Likewise, Plaintiffs and other MSA members had no intention to reference any event or group. They merely sought to participate in and reference the viral comedy skit.
72. Plaintiffs and other MSA members did not anticipate that the comedy video would create any controversy, accusations, or sanctions from any group.

The Plaintiffs' Attire in the Promotional Video

73. None of the attire worn in the video was worn as a costume or as a part of the video. Plaintiffs and all MSA student participants were wearing their normal, everyday clothing and attire as they would wear to school any day of the week.
74. Plaintiff Colin Coe was wearing a sweatshirt with a graphic on the front of a map of historic Palestine filled with the colors of the Palestinian flag. The geographical outline featured on Plaintiff Colin Coe's sweatshirt is widely recognized as the historic outline of Palestine.
75. Plaintiff Colin Coe is Palestinian and regularly wears this Palestine sweatshirt to school. He even wore the shirt for his yearbook photo. The yearbook photos are closely monitored by staff to ensure compliance with dress code.
76. He has never been admonished or disciplined in any way for his sweatshirt. Plaintiff Colin Coe's sweatshirt has never caused any disruption or caused any issues at school.

77. Plaintiff Richard Roe was wearing a sweatshirt with the Crescent Moon and Star symbol on it, a widely recognized symbol of the Islamic faith, similar to the Cross in Christianity and the Star of David in Judaism.

78. Plaintiff Richard Roe was also wearing a Keffiyeh. The Keffiyeh is a patterned scarf that has historically been worn across the Middle East, including by Bedouins in Palestine.² Its modern pattern resembles fishnets and olive leaves, symbolizing Palestine's proximity to the Mediterranean Sea and the centrality of olives and olive trees to Palestinian culture.

79. Plaintiff Jane Doe and another MSA member were wearing the Islamic hijab. In addition to her hijab, Plaintiff Jane Doe wore a sweatshirt with the Keffiyeh pattern on the hood.

The MSA Video Prompts Online Hysteria

80. On Friday, October 24, 2025, an MSA member posted the comedy skit video on the MSA's Instagram page. While MSA has previously posted photos promoting their events, the comedy skit video was the first video ever posted on the Instagram page.

81. MSA initially received no significant response or engagement with the video.

82. Over the weekend, on Sunday, October 26, 2025, Asra Nomani posted the MSA's video skit on her X account with the caption: "*Since 10/7, @fcpsnews Muslim Student Association chapters have protested Israel. Now @MSAnational at ex-#1 HS @TJHSST_Official posts a public video of a kidnapping skit, throwing a keffiyeh over a captive. Bad-taste or the outgrowth of a protest culture that's glorified Hamas?*"³

² Linah Mohammad, *What Is a Keffiyeh, Who Wears It, and How Did It Become a Symbol for Palestinians?*, NPR (Dec. 6, 2023), <https://www.npr.org/2023/12/06/1216150515/keffiyeh-hamas-palestinians-israel-gaza>

³ <https://x.com/AsraNomani/status/1982630721673199856?s=20>

83. Nomani’s tweet ends with a loaded question that sensationalizes MSA’s harmless video. Nomani had the immediate effect of fearmongering and directing harassment at these students.
84. Asra Nomani is a right-wing influencer who has previously made sensationalist claims about MSAs and their expression of Palestinian identity. In early October 2025, before the MSA video at issue, Nomani made a post and published an article about MSA’s participation in Keffiyeh Week, an event intended to commemorate the ongoing genocide in Gaza. In her article, she claimed that Keffiyehs are anti-Israel garments and called Keffiyeh Week “antisemitic.”⁴
85. Nomani’s X post about the MSA video skit immediately received attention online from her followers and other influencers known for anti-Palestinian and Islamophobic content.
86. For example, Matthew Feinberg, an account with thousands of followers, re-posted Nomani’s post alongside the text: “The Muslim Student Association at Thomas Jefferson High School for Science and Technology filmed a ‘promotional’ video reenacting hostage-taking and murder—complete with keffiyehs, kidnapping, hiding of bodies—glorifying Hamas terrorism. This is antisemitism, not art. Demand the club’s permanent suspension, expulsion of all participants, and accountability from school leadership now.”
87. Another X user re-posted Nomani’s post, saying “Students from TJ and many other FCPS high schools participated in a mockery of the kidnapping and murder of thousands of Jews...If you care about your Jewish friends whatsoever, send a message to FCPS and demand accountability.”

⁴ Asra Q. Nomani, “*Kuffiyeh Week*” *Protests Put Local High Schools in National Spotlight*, Fairfax Times (Oct. 8, 2025), https://www.fairfaxtimes.com/articles/kuffiyeh-week-protests-put-local-high-schools-in-national-spotlight/article_e05a112a-2c41-4611-8801-152b3242efc4.html.

88. These posts attracted hateful Islamophobic and anti-Arab comments towards the Plaintiffs.

One commenter called the students “Muslim terrorists in training,” and another comment read “Deport, deport, deport.”

89. The online hate campaign put the Plaintiffs, all minors at the time, the other members of MSA, and the student members of other MSA chapters in FCPS, in immediate fear of violence by exposing them to hateful comments and serious threats.

90. The online hate campaign quickly made its way to the FCPS community. One parent sent a message on a WhatsApp group with other TJHSST parents, stating “Is your child in this video? It was posted to the TJ MSA Instagram site. It is incredibly offensive and promotes violence. I’m without words. I reported this to the school, the county and the attorney general’s office. I will also be submitting it to the [Anti-Defamation League (“ADL”).]”

91. Several people responded that the parent was overreacting. One wrote: “Guys, they're kids. Do we really need to shame them?”

92. But the hysteria continued to build momentum. On Monday, October 27, 2025, the Jewish Community Relations Council (“JCRC”) released a statement, calling on TJHSST to discipline Plaintiffs and other students. The statement included that FCPS had a “history of struggling with school-based antisemitism” and stated that the MSA comedy skit included “hostage-taking and violent deaths.”⁵

93. The JCRC statement continued:

“JCRC has been in close contact with the highest levels of FCPS leadership to ensure that school officials understand the gravity of this situation and to demand accountability. FCPS must determine whether students have violated school conduct codes with this behavior, and if so discipline them accordingly. The district should take any steps necessary, including legal action if needed, to ensure that school names, images, and logos do not appear on unauthorized social media

⁵ [JCRC Statement on Cruel Social Media Video Posted by Fairfax County High Schoolers](#)

accounts. School officials must communicate transparently and with moral clarity to the entire school system about these incidents. All people of goodwill should be horrified by this.”⁶

94. A JCRC representative later appeared on a local media outlet where she stated that her principal concern with the video was the fact that Plaintiff Colin Coe wore what she called a “map of Israel” with Palestine colors on it. In reality, it was a historic map of Palestine.

Thomas Jefferson High School’s Public Response

95. TJHSST officials responded, not by protecting their students who were the victims of racist hysteria and threats, but by immediately capitulating to those who sought to have Plaintiffs punished for an innocent video.

96. On Monday, October 27, 2025, TJHSST officials summoned Plaintiffs to the front office one-by-one.

97. Defendant Fawcett, the Assistant Principal of TJHSST, brought Plaintiffs into a conference room and questioned each of them in a room in the front office.

98. Fawcett questioned the students aggressively, as if she had already concluded that Plaintiffs had done something wrong. Her questions included: “What was the intention of making this video,” “Who was in this video,” “Did you want to make it look violent.” Fawcett also asked each Plaintiff if they were the one who “came up with this whole thing.”

99. Plaintiffs answered truthfully, informing Fawcett that the comedy skit was simply part of an online trend and that several other student groups had posted similar videos.

100. The Plaintiffs were held in a questioning room in the front office until their parents were called to take them home.

⁶ *Id.*

101. When the Plaintiffs' parents arrived, they were told there was going to be an investigation into the making and posting of the video skit.
102. When Plaintiff Richard Roe's mother arrived, she asked to speak with Defendant Principal Mukai. An administrative assistant told her that the principal was busy "sending emails." She tried persistently for the next few days to meet with Defendant Mukai, who refused to make time to see her despite the accusations and the hateful campaign being levied at her child.
103. When Plaintiff John Doe's father arrived, he asked Defendant Fawcett how long the investigation would take and how long the kids would be barred from attending their classes. Defendant Fawcett replied "Maybe a week, maybe a month, or more." Defendant Fawcett stated that the disciplinary decision was hers to make, and that she was just looking for "the proper code violation."
104. Plaintiffs and their parents showed Defendant Fawcett several videos made by student groups at TJHSST and FCPS following the same viral video trend. Defendant Fawcett said she would look into these other videos and groups.
105. No other group at TJHSST was investigated or disciplined for a similar comedy skit.
106. The same day, the Council on American-Islamic Relations ("CAIR") issued a letter to Principal Mukai and Superintendent Reid, informing the Defendants of the popular social media trend, flagging the disparate treatment of Plaintiffs compared to other groups posting similar skits, and also flagging that the campaign against Plaintiffs was being led by online agitators using blatantly anti-Arab and Islamophobic rhetoric. TJHSST did not respond to CAIR's letter.

107. Later that day, before any investigation was concluded and before any process was afforded to Plaintiffs, Principal Mukai published an open letter via email to the entire TJHSST community—around two thousand families. In the letter, Mukai described MSA’s comedy skit as an act of “antisemitism.”

The Investigation and Disciplinary Process

108. On Tuesday, October 28, 2025, eight students—Plaintiffs and the other students involved in making the video—were put into an “Alternative Instructional Area” (“AIA”) room. The AIA room is a small room with no windows. The students were kept in this room from 8:00 AM to 4:00 PM.

109. The staff member escorting the Plaintiffs to the room told the students that he did not know where the room was located in the school, and that he had never seen the room in his nineteen years working at TJHSST.

110. While in AIA, Plaintiffs were barred from their normal routine and denied educational resources. They were expected to complete academic assignments with no guided instructions. Plaintiffs requested meetings with their teachers to provide educational instruction or assistance, as TJHSST policy requires, but these requests were denied.

111. The Plaintiffs were not allowed to speak to each other for the entire period of their detention.

112. Each day they were in AIA, Plaintiffs would arrive at school and have to report to the office. From the office, they would be escorted to the isolated AIA room.

113. One day in the office, Plaintiffs John Doe and Richard Roe raised concerns to Defendant Fawcett over their lack of instructional resources and the conditions in the AIA room. They identified violations from their Student Rights and Responsibilities handbook.

114. The eight students were also placed in the AIA room on Tuesday, October 28, and Wednesday, October 29, and subjected to the same treatment.

115. During the investigation, Plaintiff Richard Roe's mother was called into the school by campus police to answer questions about social media posts allegedly made by Richard Roe. The police claimed to receive "screenshots" of the posts in question from an anonymous number.

116. The posts were plainly not real. One of the posts appeared to praise Abubakr Al-Baghdadi, the former leader of ISIS who was killed in 2019—when Richard Roe would have been a small child. When asked to read the post, Plaintiff Richard Roe could not pronounce the name "al-Baghdadi" and said, "Who is that?" Richard Roe disclaimed ever making the posts.

117. After Richard Roe's statements, the campus police stated that they believed the messages were doctored but that they needed to investigate nonetheless.

118. Defendant Mukai disagreed with the police, expressing his continued belief that Richard Roe made the posts. Mukai cited no additional evidence or reason for his conclusion.

119. The campus police ultimately determined that the screenshots were fake.

120. On Thursday, October 30, 2025, Defendant Fawcett called Plaintiffs' parents to the school and informed them that the investigation was concluded.

121. Defendant Fawcett gave Plaintiffs' parents a suspension notice stating that their children would receive one week of in-school suspension ("ISS").

122. The suspension notice stated:

"These arrangements are necessary because your student participated in the creation and/or dissemination of a video on school property that

utilized imagery and symbols reasonably interpreted as menacing, hostile, and intimidating toward members of the school community, constituting an invasion of the rights of others in the school. Your student was involved in making, posting, distributing, displaying or sharing of this inappropriate video, including by electronic means. This conduct is in violation of Fairfax County Public Schools Student Rights and Responsibilities, Regulation 2601.”

123. The suspension notice lists specific findings of “On-Campus Creation of Menacing Imagery,” suggesting that the comedy skit contained acts of violence or depictions of death. The letter did not provide any facts differentiating MSA’s video from other FCPS and TJHSST student groups’ identical or substantially similar videos.
124. The suspension notice also lists a finding that Plaintiffs used “Eliminationist Symbols.” It described the Palestine map, with Palestine flag colors, as “a map of the state of Israel covered entirely by a Palestinian flag, a symbol widely interpreted as an eliminationist message against all Jews in the state of Israel.”
125. This is substantively identical to how the JCRC representative described the sweatshirt in the media interview referenced at ¶89, establishing that TJHSST and FCPS took directions for how to punish the students from JCRC.
126. At no point during the investigation did Defendant Fawcett or any TJHSST staff ask about the Palestine map or what Plaintiff Colin Coe’s intentions were in wearing the map. Plaintiff Colin Coe, as a Palestinian American, simply wishes for Palestine to have its statehood recognized and for Palestinians to have freedom from genocide and apartheid.
127. The idea that a historic map of Palestine communicates a message to “eliminate all Jews” is an untrue, anti-Palestinian, and Islamophobic trope that paints Palestinians and Muslims as inherently genocidal or violent.

128. The suspension notice continues on to say that MSA’s comedy skit “creates foreseeable and direct intimidation to the rights of all students and staff to feel secure in the educational environment, including, but not limited to, Jewish students and staff.”

129. The notice concludes by offering Plaintiffs and their parents to participate in a “Restorative Justice Circle” class as an alternative to two additional days of ISS.

130. In addition to the suspension notice, Plaintiff Colin Coe was told he was no longer allowed to wear his Palestine sweatshirt to school.

131. Thursday, October 30, was the first day Richard Roe’s mother Nadia was able to meet with Principal Mukai. Mukai told Nadia that he wanted to “remain neutral,” and that he does not personally believe that Richard Roe or any of the MSA students are antisemitic. He did not try to justify his earlier decision to publish an open letter condemning Plaintiffs and MSA’s video as antisemitic.

132. After receiving the suspension notice, Plaintiffs were placed in the same small, windowless AIA room to serve their ISS for one week.

133. Plaintiffs faced the same struggles as they had earlier in the week. Plaintiffs tried several times to arrange meetings with their teachers to get help with completing assignments. They received no response from their teachers or assistance from the ISS administrators to contact their teachers.

134. The lack of communication, educational resources, and loss of instructional time caused Plaintiffs to fall behind on their assignments.

135. Plaintiffs were also barred from participating in extracurricular activities, creating additional isolation and distress.

Complaint Filed With School District

136. Plaintiffs' parents submitted a formal complaint to FCPS about the school's handling of the situation. The complaint regarded the investigation and disciplinary action itself, as well as the condition and lack of resources in ISS.

137. FCPS responded by stating that the complaint would be investigated.

138. In February 2026, FCPS issued a letter in response to Plaintiffs' formal complaint, finding no wrongdoing by TJHSST administrators, including Mukai and Fawcett.

139. The letter stated that "the administration's actions were consistent with FCPS regulations."

Ongoing Harm

140. Plaintiffs returned to their normal school routine on Friday, November 7, 2025.

141. Plaintiffs returned to their classes confused, behind on assignments, and struggling to transition back into the learning environment.

142. Defendants initially assured Plaintiffs and their parents that the disciplinary actions would not show on the students record, but the ISS appears on each Plaintiff's student records as a Level 3 Infraction.

143. Plaintiffs and other MSA members believe they were targeted for speech identical to other groups because they are Arab and Muslim, because their speech promoted a Muslim organization, and because their clothing referenced Palestine.

144. Plaintiffs and other MSA members further believe they were targeted for speech that expresses basic Arab and Muslim identity and solidarity with Palestine and Palestinians.

145. Plaintiffs and other MSA members wanted to make a video for the Eid holiday. However, out of fear of launching another round of hysteria and sanctions by the school, the students decided against it.

146. Attendance at MSA events and meetings decreased significantly after the events described herein. Several students who have stopped attending MSA events have cited fear of continued public harassment and sanctions from the school.

147. The hysteria instigated and encouraged by the school continues to harm Plaintiffs. For example, the Washington Post published an article on November 6, 2025, detailing the incident for a wider audience.⁷

Plaintiff Richard Roe

148. Plaintiff Richard Roe performed poorly on several assignments that he completed during ISS, because he had trouble understanding the concepts and instructions without access to his teachers. His grades also dropped and lost his perfect 4.0 GPA, dropping half a point to 3.5 after his suspension. He is still working to improve his grades so that he can submit competitive college applications.

149. A Level 3 Infraction requires that a School Counselor includes a Counselor's Note describing the offense and disciplinary action whenever Plaintiffs' transcript is sent to an institution of higher learning, such as with Plaintiffs' college applications.

150. Plaintiff Richard Roe had been working his entire high school career towards a Senior internship.

⁷ [Muslim Student Association 'kidnapping' video sparks outrage in Virginia - The Washington Post](#)

151. When he asked for a letter of recommendation from his Chemistry teacher, he was told she could not provide him with one. Plaintiff Richard Roe believes the discipline imposed against him by TJHSST is the reason his teacher declined.

152. Plaintiff Richard Roe also discovered that the mark on his student record disqualified him from the senior internship program.

Plaintiff John Doe

153. Plaintiff John Doe missed several assignments because he did not understand the material and was unable to access his teachers during ISS. It took him several weeks to catch up with his lessons, and his grades dropped significantly.

154. Plaintiff John Doe has been rejected from all of the colleges he has applied to thus far, despite his stellar resume other than the discipline he faced by the school. Plaintiff John Doe believes that it is the discipline Defendants imposed on him that has led colleges to reject his otherwise competitive application.

Plaintiff Colin Coe

155. Plaintiff Colin Coe also missed several assignments because he did not understand the material and was unable to access their teachers during ISS. It took him several weeks to catch up with their lessons, and his grades dropped significantly.

156. Plaintiff Colin Coe goes to school in fear that he will be targeted and punished again from wearing any attire acknowledging his Palestinian nationality and heritage or expressing solidarity with his people, who continue to face genocide.

Plaintiff Jane Doe

157. Plaintiff Jane Doe describes feeling “fogged up” when returning to class. It took her two weeks to catch up on the lessons and assignments that she missed. She also missed an exam and several quizzes that TJHSST did not allow her retake.

158. Plaintiff Jane Doe expects similar difficulty when applying to colleges this fall.

* * *

159. The foregoing facts have established that as a direct and proximate result of Defendants’ actions, Plaintiffs have suffered actual and ongoing harm, including:

- a. Missed instructional time and significant educational disruption;
- b. An ongoing infraction on each Plaintiff’s permanent record that can and will be sent to prospective colleges, hurting their chances at admission;
- c. Public stigmatization and reputational damage within their school and community;
- d. Emotional distress, anxiety and humiliation; and
- e. Chilling of Plaintiffs’ future exercise of free speech and expression.

CLAIMS FOR RELIEF

CLAIM I FOURTEENTH AMENDMENT OF THE U.S. CONSTITUTION EQUAL PROTECTION CLAUSE 42 U.S.C. § 1983 Against all Defendants

160. Plaintiffs incorporate by reference all preceding paragraphs as set forth herein.

161. At all times relevant to this claim, Defendants acted under color of state law.

162. The Fourteenth Amendment prohibits state actors like public schools from treating similarly-situated individuals differently based on national origin or religion, unless the state actor can show that the differential treatment was the least restrictive means of achieving a compelling government interest.

- 163.** Defendants treated Plaintiffs, all Muslim, all Arab, and some Palestinian, different from other groups who made similar or essentially identical videos, by claiming that Plaintiffs actions in the video were violent, “menacing,” and “antisemitic,” and subsequently sanctioning them under school policy.
- 164.** Despite using similar or more serious imagery, such as mock grenade explosions, bullying in locker rooms, and “kidnappings” involving cars, other student groups were not sanctioned and did not have their actions described as “menacing” or “antisemitic.”
- 165.** Defendants’ disparate treatment of Plaintiffs was motivated by Plaintiffs’ Muslim, Arab, and Palestinian identities.
- 166.** Plaintiffs were sanctioned by Defendants for an activity attributed to the Muslim Students Association chapter at TJHSST. Plaintiffs are all visibly Arab American by race or ethnicity. Plaintiff Jane Doe is visibly Muslim through her use of hijab. Defendants knew that all Plaintiffs were Muslim and Arab.
- 167.** Defendants evoked common anti-Muslim, anti-Arab, and anti-Palestinian stereotypes and tropes when they claimed that Plaintiffs innocent behavior was violent, “menacing,” and “antisemitic.” This conclusion was informed by Plaintiffs’ religious and racial identities.
- 168.** Defendants credited and relied upon the discriminatory statements of third party groups, including JCRC, which were themselves motivated by animus against Plaintiffs’ religion, race, and national origin.
- 169.** As further evidence of discriminatory motive and disparate treatment, Defendants punished all Plaintiffs because one student expressed his Arab-Palestinian identity by wearing a sweatshirt featuring only the historic map and flag of Palestine.

170. The sweatshirt is the same as any other attire displaying a map and flag representing any homeland or nationality.
171. Defendants had no compelling interest in sanctioning Plaintiffs' innocent and peaceful behavior and attire, which were identical in all relevant ways to the unsanctioned behavior and attire of other groups and individuals.
172. Defendants did not narrowly tailor their treatment of Plaintiffs to achieve any compelling interest, because the sanctions were unreasonable and overly broad in type, scope, and degree.
173. Defendants' actions therefore do not satisfy strict scrutiny.

CLAIM II
FIRST AMENDMENT OF THE U.S. CONSTITUTION
FREE SPEECH CLAUSE
42 U.S.C. § 1983
(Against All Defendants)

174. Plaintiffs incorporate by reference all preceding paragraphs as set forth herein.
175. At all times relevant to this claim, Defendants acted under color of state law.
176. The First Amendment's Free Speech Clause prohibits the government from unlawfully restricting or retaliating against an individual for their speech. It applies against state actors, like public schools, through the Fourteenth Amendment's incorporation doctrine.
177. Plaintiffs engaged in expression by recording a comedy skit intended to communicate an open invitation to the TJHSST community to attend MSA events.
178. Plaintiffs also engaged in expression through their choice of attire, namely, Plaintiffs Richard Roe and Nadine's Keffiyehs and Plaintiff Colin Coe's sweatshirt

featuring the map of Palestine. This attire expressed Palestinian and Arab identity, and solidarity with Palestinian people.

179. Plaintiffs' recorded comedy skit was similar or essentially identical to skits recorded by other student groups within TJHSST and FCPS, and by various other groups throughout the country.

180. Plaintiffs wore the same attire at TJHSST on numerous occasions in the past without incident.

181. Defendants unlawfully retaliated against Plaintiffs, in violation of Plaintiffs' First Amendment rights. Plaintiffs were (1) engaged in protected speech, (2) subjected to sanctions that would objectively chill that speech, and (3) sanctioned for their speech.

182. Defendants further told Plaintiff Colin Coe that he is no longer allowed to wear that sweatshirt to school, constituting an unlawful restraint on Plaintiff Colin Coe's speech.

183. Defendants' sanction of all Plaintiffs, and restriction against Plaintiff Colin Coe, on the basis of Plaintiff Colin Coe's sweatshirt, cannot be justified under *Tinker*. The sweatshirt never caused substantial disruption to TJHSST operations, and no student or teacher had raised concerns about the sweatshirt before the events giving rise to this case. So Defendants had no basis to reasonably believe the sweatshirt would cause disruption in the future.

CLAIM III
DISPARATE TREATMENT DISCRIMINATION ON THE BASIS OF RACE, COLOR,
OR NATIONAL ORIGIN IN ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL
FINANCIAL ASSISTANCE IN VIOLATION OF TITLE VI
(Against All Defendants)

184. Plaintiffs incorporate by reference the preceding paragraphs as set forth herein.

185. Title VI prohibits any school that receives federal financial assistance, including FCPS and TJHSST, from excluding students from participation because of their race or

national origin. Title VI creates an implied private right of action when the illegal discrimination is intentional.

186. As stated in Count I, Defendants treated Plaintiffs different from other similar student groups because they are Muslim, Arab, and Palestinian.

187. As stated in Count I, Plaintiffs' identities as Muslims and Arabs formed the basis of Defendants' actions.

188. Therefore, Defendants' violated Title VI by sanctioning Plaintiffs, and Plaintiffs have right to redress under Title VI's private cause of action.

WHEREFORE, Plaintiffs request this Honorable Court grant relief in the form described in the Prayer for Relief below, plus all such other relief this Honorable Court deems just and proper, including costs and attorney's fees incurred in this action.

CLAIM IV
FOURTEENTH AMENDMENT OF THE U.S. CONSTITUTION
DUE PROCESS CLAUSE
42 U.S.C. § 1983
(Against All Defendants)

189. Plaintiffs incorporate by reference the preceding paragraphs as set forth herein.

190. At all times relevant to this claim, Defendants acted under color of state law.

191. The Fourteenth Amendment protects individuals from deprivations of freedom and property by state actors without due process of law, including so called "stigma-plus" injuries that arise from state action that publicly stigmatizes an individual and subsequently denies the individual a cognizable liberty or property interest.

192. As established under the Constitution of Virginia, Article 8, Section 1, Plaintiffs had a property interest in a public secondary education, including regular attendance of classes at TJHSST.

193. Plaintiffs had a liberty interest in their reputation with their fellow pupils and teachers, and in tangible opportunities for extracurricular activities, higher education, and employment.

194. Defendants publicly stigmatized Plaintiffs by publishing a public statement to the TJHSST community, labeling Plaintiffs' actions as "antisemitic." All individuals in the TJHSST who could recognize Plaintiffs from the video in question would understand Defendants' to be claiming that Plaintiffs' committed acts amounting to antisemitism.

195. Defendants subsequently infringed on Plaintiffs' property interest by placing Plaintiffs in isolated in-school suspension for three days during an "investigation," and another five days following a conclusion that Plaintiffs' violated policy.

196. Defendants further infringed on Plaintiffs' liberty interests by damaging Plaintiffs' relationships with other students and with faculty and causing Plaintiffs to lose extracurricular opportunities, higher education opportunities, and possibly career opportunities through Defendants' stigmatization and subsequent suspension of Plaintiffs.

197. Defendants further violated Plaintiffs' property interest in continued public education in the Commonwealth of Virginia by suspending students without a meaningful opportunity to be heard or to view evidence against them.

198. Defendants pre-determined that Plaintiffs had violated policy, as evidenced by Principal Mukai's label of "antisemitic" behavior prior to the conclusion of an investigation. Defendants were therefore not neutral arbiters of the decision to sanction.

199. Defendants relied on the statements or beliefs of third-party groups such as JCRC, whom Plaintiffs had no opportunity to cross-examine and whose evidence Plaintiffs had no opportunity to review or rebut.

200. Defendants subsequently suspended Plaintiffs in error and would not have done so had Plaintiffs received due process.

201. By suspending Plaintiffs, Defendants' caused Plaintiffs' to be denied their public classroom education, to lose class ranking due to drops in their grade point averages, to lose reputational status with fellow students and teachers, including the loss of recommenders for extracurricular activities and higher education, to lose opportunities to attend prestigious institutions of higher learning, and to suffer severe mental and emotional distress from all of the above.

PRAYER FOR RELIEF

WHEREFORE, in light of the foregoing facts and arguments, Plaintiffs respectfully request that this Honorable Court enter judgement in favor of Plaintiff and against Defendants, on each and every count in this Complaint, and enter an order awarding the following relief:

- Declaratory judgment that Defendants violated Plaintiffs' First and Fourteenth Amendment rights, and violated Title VI of the Civil Rights Act of 1964;
- An injunction ordering that Defendants expunge any disciplinary record related to the actions or attire described herein, and that any required disclosure of an expunged record includes a statement explaining the reasons for the expungement;
- A permanent injunction prohibiting Defendants from further sanctions against Plaintiffs for the actions or attire described herein;
- An injunction enjoining enforcement of Defendants' policy prohibiting Plaintiff Colin Coe from wearing a sweatshirt depicting the map of Palestine;

- An award of monetary damages, including compensatory and punitive or nominal damages, in the amount found equitable to violations of Plaintiffs' statutory and constitutional rights;
- Costs and attorneys' fees;
- Any further relief to which Plaintiffs are entitled or that this Honorable Court deems just and proper.

DATED: June 4, 2026

Respectfully submitted,

/s/ Lena Masri

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