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4 *Attorney for Plaintiff*

5  
6 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA IN  
AND FOR THE COUNTY OF LOS ANGELES**

7 B.S. a minor, by and through his  
parent and guardian BRIAN SELEM,

8  
9 Plaintiffs,

10 v.

11 LOS ANGELES UNIFIED  
SCHOOL DISTRICT, VENICE  
12 HIGH SCHOOL

13 Defendants.

) Case No.: **24SMCV00285**  
)  
) **COMPLAINT FOR DAMAGES,**  
) **DECLARATORY, AND**  
) **INJUNCTIVE RELIEF**  
)  
) **INTENTIONAL INFLICTION OF**  
) **EMOTIONAL DISTRESS,**  
) **NEGLIGENCE, NEGLIGENCE PER**  
) **SE AND 815.6; BANE ACT / GOV'T**  
) **CODE § 815.2;**  
) **DEMAND FOR JURY TRIAL**

14  
15 **INTRODUCTION**

16 1. BRIAN SELEM, a parent, who has convictions regarding human  
17 sexuality and permanent mental health and psychological conditions from homosexual  
18 abuse he suffered as a young adult, files this complaint pursuant to Cal. Civ. Proc.  
19 Code § 411.10 and Cal. Civ. Proc. Code § 350 against The LOS ANGELES  
20 UNIFIED SCHOOL DISTRICT.  
21



1           8.       The claims were denied by the County on May 25, 2023, as shown in  
2 Exhibit B.

3   **PARTIES**

4   **Plaintiffs**

5           9.       Plaintiff, BRIAN SELEM, is the father of B.S. and J.S., who both have  
6 attended or currently attend VENICE HIGH SCHOOL.

7           10.     B.S. is Mr. Selem's son and the one whose teacher refused to remove the  
8 LGBTQ flag and brought in the Restorative Justice speaker in retaliation for asking  
9 for an accommodation and then chose to make disparaging remarks and embarrass  
10 both the father and son in front of the whole class.

11   **Defendants**

12           11.     Defendant, LOS ANGELES UNIFIED SCHOOL DISTRICT  
13 (LAUSD) operates public schools, one of which B.S. attends. The LAUSD is a  
14 governmental actor because it was created under the California Education Code §  
15 35010 and shall be under control of either the board of school trustees or a board of  
16 education. The board prescribes and enforces the rules consistent with the law of  
17 California. The LAUSD is controlled by the Board of Education.

18           12.     Defendant, VENICE HIGH SCHOOL, is a public school operated and  
19 controlled by the LAUSD.

1 **FACTS**

2 13. Mr. Selem was homosexually abused by a group who were male from the  
3 time he was seventeen until he was twenty years old. He estimates he was  
4 homosexually raped between eight and twenty times, as an exact estimation is difficult  
5 due to his being drugged beforehand. These past experiences impacted his entire life  
6 because he has lived with constant mental anguish emotional distress, and repression  
7 from being homosexually raped.

8 14. B.S. understands LGBT activism forces participation in their advocacy.  
9 Which is advocacy for homosexual behavior and laws and policies that put boys and  
10 young men in harm's way of homosexual assault and grooming.

11 15. Mr. Selem is undergoing the process of seeing a mental health  
12 professional to obtain a formal diagnosis for his mental trauma which causes severe  
13 anxiety, depression, and other psychological symptoms and ailments.

14 16. His son, B.S., is aware of this abuse.

15 17. B.S. started at Venice High School as a student pupil in 2021.

16 18. B.S. is now in the eleventh grade.

17 19. At Venice High School Parent Night on September 8, 2022, Mr. Selem  
18 saw a LGBTQ flag in his son's classroom.

19 20. The LGBTQ flag was and is deeply psychologically and emotionally  
20 triggering for Mr. Selem because it promotes a lifestyle that was the source of his  
21 teenage and young adult abuse.

1           21. Mr. Selem explained his concerns about the flag with the teacher and  
2 offered to share his traumatic experiences with SAMANTHA KLINE about being  
3 sexually abused.

4           22. Mr. Selem asked the Teacher about the flag to confirm what it was. Ms.  
5 Kline asked if Mr. Selem had a problem with it and as Mr. Selem was beginning to  
6 note that he thought it was not appropriate. Ms. Kline said she would take down the  
7 flag. As Mr. Selem was leaving Ms. Kline shared a smirk with a colleague of hers.  
8 The next day B.S. confirmed that the flag was up. Mr. Selem's wife later asked Ms.  
9 Kline to cover up or remove the flag.

10           23. Ms. Kline told Mr. Selem she would take down the flag at the meeting,  
11 and then failed to do so.

12           24. Ms. Kline, as an agent and employee of the LOS ANGELES UNIFIED  
13 SCHOOL DISTRICT discriminated against B.S. and his son by refusing to  
14 accommodate this request.

15           25. Shortly after this, Ms. Kline brought in Ms. Karen DeCosta Rowley-  
16 Brooks who is a former outside consultant, and now the Restorative Justice teacher,  
17 to disparage and demonize Mr. Selem and B.S. rather than accommodating Mr. Selem  
18 and his pupil son's request to cover up the flag because of the intense mental and  
19 emotional triggering it causes.

20           26. The teacher did not notify parents before bringing in this unapproved  
21 speaker.

1 27. The next day Mr. Selem learned that the flag was still up and called the  
2 guidance counselor, JENNIFER VICTORIN, to set up a meeting. The guidance  
3 counselor called the Assistant Principal, RICHARD VALERIO.

4 28. Mr. Selem's wife, HEIDI SELEM, emailed Ms. Kline and explained the  
5 issue and asked the flag to be covered on September 28th, 2022.

6 29. Mr. Selem and his son were embarrassed and demonized by the  
7 Restorative Justice speaker because Mr. Selem had asked the teacher to take down the  
8 LGBTQ flag.

9 30. The teacher was presented with Mr. Selem's concern based on Mr.  
10 Selem's sociological views and trauma and understanding of the effects of LGBTQ  
11 activism. Mr. Selem expressed his concerns over the flag and offered to meet Ms.  
12 Kline at a later time to let her know of Mr. Selem's own personal experiences and  
13 trauma the activism causes.

14 31. The Restorative Justice consultant used the opportunity to chastise the  
15 class and ridicule Mr. Selem for opposing the teacher's view on homosexuality and  
16 transgenderism. Previously Mr. Selem noted that none of this should be spoken about  
17 with B.S. or presented to him in anyway.

18 32. Mr. Selem and B.S. were both humiliated in class when the Restorative  
19 Justice speaker shamed the father and others for having any issues with the LGBTQ  
20 flag in the classroom.

1 33. The LOS ANGELES UNIFIED SCHOOL DISTRICT employed Ms.  
2 Kline and can be held liable for her actions under an agency theory.

3 34. Mr. Selem met with the school Vice Principal RICHARD VALERIO and  
4 Guidance Counselor JENNIFER VICTORIN to share Mr. Selem experiences and  
5 request for accommodation for the LGBTQ flag to be covered on September 19,  
6 2022.

7 35. Mr. Selem met with Ms. Victorin and Mr. Valerio, who took notes and  
8 refused to comment. Mr. Selem informed them about his concerns regarding the  
9 LGBTQ flag, its relation to his traumatic experiences in childhood, and how it  
10 distresses his son who is aware of the abuse and is sitting in a classroom. Mr. Selem  
11 offered to have a conversation with people of authority as well about his  
12 accommodation request.

13 36. These two only referred Mr. Selem to the Diversity Department. Vice  
14 Principal Valerio reached out to Mr. Selem the next day September 20th and told him  
15 to email the Diversity Department at LAUSD. They did not refer Mr. Selem to the  
16 Department until the next day.

17 37. Mr. Selem met with the Principal on October 14, 2022, after the Vice  
18 Principals Richard Valerio and Emily Bautista and the guidance counselor took no  
19 corrective action.  
20  
21

22

1           38.   Principal Cynthia Headrick denied Mr. Selem’s request for a transcript of  
2 the Restorative Justice speaker’s agenda or for more details on the background of the  
3 speaker.

4           39.   The principal also refused to answer emails from Mr. Selem’s wife  
5 requesting more details on the Restorative Justice speaker Karen DeCosta Rowley-  
6 Brooks who berated their son and Mr. Selem in the class.

7           40.   Mr. Selem found non-age-appropriate sexual education materials in both  
8 of his sons’ homework and was appalled at sheets discussing anal sex, oral sex, and  
9 the like for children in middle school.

10          41.   The next day Mr. Selem learnt that the flag was up again and called the  
11 guidance counselor, Ms. Victorin, to set up a meeting. The guidance counselor called  
12 the Assistant Principal, Mr. Valerio.

13          42.   On September 19, 2022, Mr. Selem met with Ms. Victorin and Mr.  
14 Valerio, who took notes and refused to comment. Mr. Selem informed them of his  
15 concerns with the LGBTQ flag, its relation to his traumatic experiences, and its effects  
16 on his son who is aware of that experience. Mr. Selem offered to have a conversation  
17 with people of authority over these topics to discuss his trauma and his request to  
18 remove the LGBTQ flag from the classroom.

19          43.   Mr. Selem received a call from Mr. Valerio, noting to contact the school  
20 Diversity Department via email.

21

22



1           44.    The school officials had actual knowledge of Mr. Selem’s abuse and  
2 trauma he suffered by men who are party to LGBTQ activism. The school officials  
3 also knew that B.S. was aware of the distressing and disturbing experiences of his  
4 father being raped multiple times by homosexuals as a teenager and young adult.

5           45.    Mr. Selem was demeaned by the Restorative Justice speaker in front of  
6 the whole class and his son. The words were provocative and hurtful, causing B.S. to  
7 feel embarrassed and humiliated.

8           46.    Mr. Selem met with the Principal, CYNTHIA HEADRICK, to discuss  
9 the unjust and unaccommodating situation the school put him and his son in. It was  
10 noted to the Principal that Mr. Selem’s son was not to have any sexualize material,  
11 sexual discussions nor imagery including the LGBT flags and symbols presented to  
12 him.

13          47.    Ms. Headrick acknowledged what happened was wrong and deferred Mr.  
14 Selem to the Diversity Department.

15          48.    Mr. Selem asked for the transcript of the unapproved talk by the  
16 Restorative Justice consultant to see the content but was refused.

17          49.    Mr. Selem’s wife had correspondence with Ms. Kline, in which she  
18 informed the English teacher about Mr. Selem’s prior abuse and asked the teacher to  
19 cover the LGBTQ flag, at least when Mr. Selem’s son was in the class. That request  
20 was also ignored by Samantha Kline and denied by Principal Headrick.

1 50. Over the years Mr. Selem has sent multiple notices that his son was not  
2 permitted to be exposed to sexual content, imagery, or activism.

3 51. Mr. Selem learned that B.S. was given surveys and documents containing  
4 sexual content. Mr. Selem also learned that his son was lectured by the teacher on  
5 sexual topics.

6 52. Mr. Selem has never received notice from the school asking for parental  
7 permission or notifying him of his sons' exposure to hyper sexualized content.

8 53. Mr. Selem suffered emotional distress, mental anguish, embarrassment,  
9 and humiliation, which caused him to endure sleeplessness, anxiety, and fear.

10  
11 **FIRST CAUSE OF ACTION**

12 **VIOLATION OF PARENTAL RIGHTS**  
13 **UNDER 42 U.S.C. § 1983**  
**Fourteenth Amendment to the U.S. Constitution**

14 Plaintiff Against All Government Defendants, under Cal Civ Code § 52.1 (b)

15 54. The Plaintiff repeats and realleges the allegations above and incorporates  
16 those allegations herein by reference.

17 55. The Fourteenth Amendment Due Process Clause protects the  
18 fundamental rights of parents to direct the care, upbringing, and education of their  
19 children. The liberties under the Fourteenth Amendment apply to the states and their  
20 political subdivisions.

1           56.    The actions of the LAUSD have been, and continue to be, done under  
2 the color of law.

3           57.    Defendants violated that right by exposing B.S. to hyper sexualized  
4 material against the father’s expressed wishes that they are not exposed to LGBTQ  
5 messaging and propaganda.

6           58.    Examples of this include all kinds of surveys and documents with  
7 inappropriate sexualized content including surveys asking about anal sex.

8           59.    Defendants also violated that right when the teacher refused to take  
9 down the LGBTQ flag, or cover it, albeit even if only when Mr. Selem’s son was  
10 coming to that class.

11          60.    Defendants have no legitimate or compelling interest in removing the  
12 ability for Mr. and Mrs. Selem to control the upbringing of their children or in  
13 sexualizing children or in brainwashing them to accept lifestyles which go against the  
14 natural order.

15          61.    Venice High School failed to correct the actions of its teacher when  
16 notified that she was infringing on Mr. Selem’s rights to control the upbringing of his  
17 children and to prevent his son from psychological harm caused by the LGBTQ flag  
18 and the loss of innocence from being exposed to sexual ideas and descriptions not age  
19 appropriate, some of which borderline on sodomy.

20          62.    Venice High School also infringed on Mr. Selem’s right to control the  
21 upbringing of his son by refusing his requests that B.S. not be exposed to the

1 sexualized content in the public schools, and particularly the LGBTQ material, for  
2 which he has deeply held views.

3 63. Mr. Selem and B.S. have both suffered emotional and psychological  
4 trauma through the actions of the school.

5 64. The school has interfered with the decision-making authority of Mr. and  
6 Mrs. Selem as parents to control the upbringing and education of their children.

7 **SECOND CAUSE OF ACTION**

8 **NEGLIGENCE *PER SE* (§ 815.2, § 815.4, § 815.6)**  
9 **VIOLATION OF EDUCATION CODES § 49091, § 51100, § 51101, § 51933, § 51934, §**  
10 **51937, § 51938, § 51939, § 56046,**  
11 **Plaintiff Against All Government Defendants under Cal Civ Code § 52.1 (b)**

12 **VIOLATION OF § 49091**

13 65. The defendants violated § 49091 when they tried to indoctrinate B.S.  
14 through the Restorative Justice teacher claiming that it was wrong for them to be  
15 against the LGBTQ activism and to not want the flag hung in the classroom.

16 66. The teacher and thereby the school singled out B.S. for harassment and  
17 embarrassment by claiming that it was wrong for anyone to request the LGBTQ flag  
18 be covered and comments that anyone who does is bigoted.

19 67. This violation caused B.S. and his father mental anguish and B.S. a loss of  
20 innocence through exposure to overly explicit content.

21 68. Therefore, the defendant was negligent per se because of its breach of  
22 duty which caused severe emotional distress which for Mr. Selem results in physical

1 distress over reliving his rapes as a young adult and the trauma it causes other young  
2 men who are experiencing the same trauma.

3 ///

4 ///

5 **VIOLATION OF § 51101**

6 69. Venice High School violated the Mr. and Mrs. Selem’s parental rights “to  
7 observe the classroom,” “to have a school environment for their child that is safe and  
8 supportive of learning,” “to examine the curriculum materials,” and “to receive  
9 information about any psychological testing the school does involving their child and  
10 to deny permission to give the test.” Cal. Educ. Code § 51101 (a)(1)(7)(8)(13).

11 70. This failure to uphold their parental rights has caused great emotional  
12 suffering to Mr. Selem and B.S. because both are triggered by content affiliated with  
13 the LGBTQ movement.

14 71. This has also caused B.S. to come to school thinking of his father’s sexual  
15 abuse and rape and then causing his father to have PTSD flare ups when he brings  
16 home the sexual content and discusses his activities at home with his father.

17 72. Therefore, the defendants were negligent per se because of the breach of  
18 this duty.

19 **VIOLATION OF § 51933**

20 73. The defendants violated § 51933 and 51934 by bringing in the restorative  
21 justice speaker who was neither “medically... objective” nor “age appropriate” and the

1 instruction from the outside restorative justice speaker was not appropriate for  
2 children of all backgrounds, disabilities, and sexual orientations as the speaker  
3 discriminated against those with PTSD and heterosexuals. Cal. Educ. Code § 51933 (a),  
4 (b), (d)(1).

5 74. The speaker caused Mr. Selem and B.S. much distress and triggered a  
6 weeklong episode for Mr. Selem and made his son feel unwelcome in his own  
7 classroom.

8 75. Therefore, the defendants were negligent per se because of their breach  
9 of this duty.

10 **VIOLATION OF § 51937**

11 76. The defendants violated § 51937 when refusing to uphold the parents'  
12 right to control the upbringing of their children which included when and how to  
13 expose them to sexual content at school by refusing to take down the LGBTQ flag in  
14 B.S.' classroom.

15 77. The school also violated this statute by failing to excuse B.S. from class  
16 when speakers are discussing LGBTQ issues.

17 78. This failure to honor these requests caused Mr. Selem much mental harm  
18 and suffering from being exposed to the LGBTQ flag and from the constant exposure  
19 at home whenever his children would bring home the surveys and flyers encouraging  
20 promiscuous and unnatural behavior.

1           79.     Therefore, the defendants were negligent per se because of its breach of  
2 this duty.

3   **VIOLATION OF § 51938**

4           80.     Mr. Selem submitted a notice requesting his son be exempted from any  
5 sexual education and assessments related to that education. During 7th Grade Mr.  
6 Selem noted to B.S' English Teacher that B.S. is not to be exposed to any sexual  
7 material including images nor conversation as well as to any activism. On February 9th  
8 2022 an email was sent that another one of Mr. Selem's sons is not to be exposed to  
9 sexual material or conversations. On September 19th, 2022, in the presences of Ms.  
10 Victorin and Mr. Valerio Mr. Selem noted that B.S. is not to be exposed to any sexual  
11 material including images nor conversation as well as to any activism. On October 9th,  
12 2022, Mr. Selem emailed on behalf of his other son that B.S. is not to be exposed to  
13 sexual material or conversation, On October 14th in the presence of Principal  
14 Headrick and Vice Principal Batista Mr. Selem noted again that B.S. is not to be  
15 exposed to any sexual material including images nor conversation as well as to any  
16 activism such as the LGBTQ flag.

17           81.     California Education Code § 51938 requires the school to notify parents  
18 about instruction in comprehensive sexual education and must notify them of their  
19 right to excuse the child from sexual education in writing.

1 82. LAUSD failed to notify Mr. Selem within the fourteen days prior as  
2 required by statute that there would be an outside speaker coming to B.S.' classroom  
3 to promote the LGBTQ agenda.

4 83. This speaker was there to demonize those opposing it, especially those  
5 that have been a witness to homosexual rape and grooming.

6 84. LAUSD is required to notify the parents about instruction in  
7 comprehensive sexual education. It must provide the date of the instruction.

8 85. Mr. Selem submitted a notice demanding his son be excused from sexual  
9 content. In the spring of 2021, Mr. Selem's son was lectured on the Unity Series by  
10 one of the teachers, which included sexual topics, after Mr. Selem submitted a notice  
11 to excuse his child from any sexual education.

12 86. LAUSD and its actors were on notice of such a request and still allowed  
13 the teacher to talk to B.S. on topics his parents did not approve of and had been  
14 excused from by the parents' demands in notifications sent to the school.

15 87. Further, § 51938 allows the school to conduct voluntary and anonymous  
16 research to measure students' public health behaviors with the use of tests, surveys,  
17 and questionnaires with questions about their attitudes relating to sex. However, the  
18 school district must notify the parents in writing about the occurrence of such tests.

19 88. The school administered the surveys after Mr. Selem directed that his son  
20 be excused from participating in such surveys.  
21





1 96. Mr. Selem and his wife have submitted many requests over the years that  
2 their children were not to be exposed to the LGBTQ sexualized content because of  
3 Mr. Selem's PTSD and prior history.

4 97. This request was ignored, and their children were irreversibly harmed as a  
5 result.

6 98. Therefore, the school district and high school were both negligent.

7 99. The violations of the school district by refusing to abide by these statutes  
8 resulted in emotional harm to the plaintiffs and went directly against the duty the  
9 school must honor - parental rights to have their children excluded from instruction in  
10 the LGBTQ agenda and unnatural sexual lifestyles.

11 **THIRD CAUSE OF ACTION**

12 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS - § 51936**  
13 **(§ 815.2, § 815.4, § 815.6)**

14 Plaintiff Against All Government Defendants

15 100. The Plaintiffs repeat and reallege the allegations above and incorporates  
16 those allegations herein by reference.

17 101. The actions of the English teacher, Ms. Kline, were outrageous when she  
18 refused to take down or cover up the LGBTQ flag after Mrs. Selem educated her on  
19 Mr. Selem's history as a homosexual male rape victim suffering from PTSD and his  
20 son's knowledge of this abuse.

21 102. Her decision to bring in an unauthorized speaker to disparaged B.S. and  
22 Mr. Selem for their protected views was also outrageous.

1 103. Ms. Kline intended to cause Mr. Selem and B.S. emotional distress to  
2 discourage any other students or parents from speaking out against the LGBTQ flag or  
3 the LGBTQ agenda by inviting with reckless disregard Ms. Brooks.

4 104. Ms. Brooks then proceeded to actively indoctrinate and insult B.S. for his  
5 and his father's views on homosexuality as expressed at the parent night.

6 105. Mr. Selem and B.S. both experienced severe emotional trauma from  
7 having to view the LGBTQ flag in the classroom and from being mocked by Ms.  
8 Kline and her coworkers at the parent night.

9 106. The Restorative Justice speaker's monologue demonizing those opposed  
10 to the LGBTQ agenda to sexualize children at a young age via grooming, by labeling  
11 them as discriminatory or bigoted, also was a reckless disregard of the duty of care.

12 107. Mr. Selem and B.S. both experienced severe emotional distress as the  
13 result of the interactions with Ms. Kline, Ms. Brooks, and VENICE HIGH SCHOOL.

14 108. Employees of the LAUSD were the cause of that distress and therefore  
15 the LAUSD is liable for the emotional distress caused to the Plaintiffs.

#### 16 **FOURTH CAUSE OF ACTION**

##### 17 **NEGLIGENT SUPERVISION**

18 **(§ 815.2, § 815.4, § 815.6)**

19 **Plaintiff Against All Government Defendants**

##### 20 **NEGLIGENT SUPERVISION**

21 109. The Plaintiffs repeat and reallege the allegations above and incorporates  
22 those allegations herein by reference.



1 commented to Mr. Selem later that they appreciated him raising the inappropriateness  
2 of the LGBTQ flag in the classroom.

3 116. The LAUSD and Venice High School had actual knowledge of the  
4 teacher's failure to accommodate Mr. Selem and her bringing in Ms. Brooks to defame  
5 the Selem's. The administrators did nothing to correct the situation or chastise the  
6 intentionally negligent teacher except to refer Mr. Selem to another department.

7 117. It was foreseeable by a reasonable person under the circumstances that  
8 B.S., who was aware of his father's tragic experiences of sexual abuse committed by  
9 men, would be hurt and suffer embarrassment when someone would humiliate people  
10 for having issues with the LGBTQ flag without giving any regards to the reasons for  
11 having those issues.

12 118. The actions of the school caused B.S. to suffer emotional distress. But for  
13 the negligent supervision of its teachers and staff, B.S. would not have had emotional  
14 trauma from reliving his father's stories at school by seeing the LGBTQ flag and  
15 hearing a false narrative regarding the LGBTQ agenda in schools.

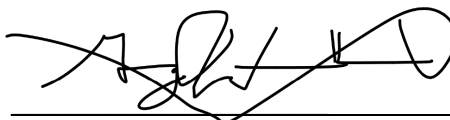
16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiffs request that the Court enter judgment in their favor, and  
18 against the Defendants, for full relief, including the following:

- 19
- 20 1. Damages;
  - 21 2. Damages for emotional distress;
  - 22 3. Relief from Discrimination under Mental Disability and/or Sexual Orientation;

- 1 4. Declaratory relief as to whether the LAUSD is complying with  
2 California Education Code sections: 49091, 51100, 51101, 51933,  
3 51934, 51937, 51938, 51939, 56046;
- 4 5. Preliminary and permanent injunctions requiring the Defendants to  
5 comply with California Education Code sections: 49091, 51100,  
6 51101, 51933, 51934, 51937, 51938, 51939, 56046;
- 7 6. Injunctive relief requiring all LGBTQ flags and other LGBTQ  
8 symbolism be not allowed any longer in classrooms in the LAUSD  
9 unless the district is going to allow all flags and symbolism of  
10 countering viewpoints to be hung in classrooms.
- 11 7. Reasonable attorneys' fees;
- 12 8. Costs of suit;
- 13 9. Grant Plaintiffs such additional or alternative relief as the Court  
14 deems just and proper.

15 Dated: November 17, 2023



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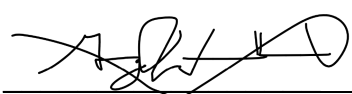
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21 *Attorney for Plaintiffs*

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**DEMAND FOR JURY TRIAL**

Plaintiffs request a trial by jury for all causes of action where the court  
deems appropriate.



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