

**OFFICE OF THE ATTORNEY GENERAL, COMMONWEALTH OF VIRGINIA
OFFICE OF CIVIL RIGHTS**

Brian Vazquez and Ashok Roy, on behalf of
themselves and their three minor children,

Complainants,

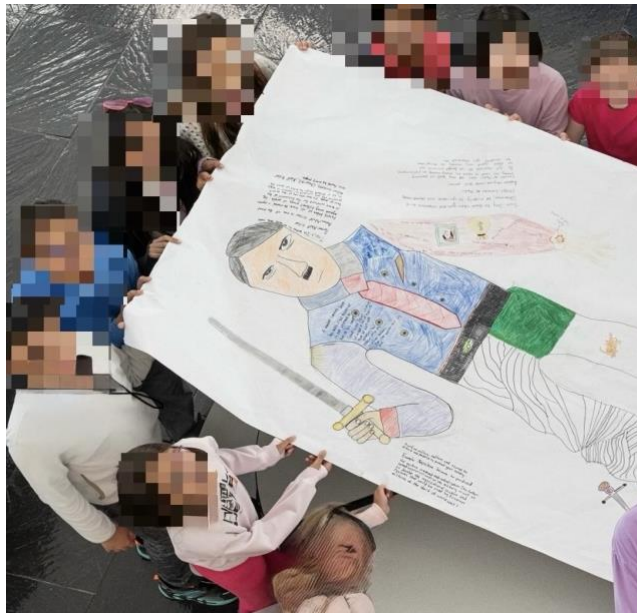
v.

The Nysmith School for the Gifted, Inc., and
Kenneth R. Nysmith,

Respondents.

COMPLAINT

1. On March 13, 2025, Complainants Brian Vazquez and Ashok Roy’s three Jewish children were expelled from the Nysmith School for the Gifted because they complained about the school’s unwillingness to respond to anti-Semitic harassment of their 11-year-old daughter. The school had allowed anti-Semitism to take root in her class—in, for example, this picture of a social studies class project depicting the attributes of a “strong historical leader”:



That photo, featuring the unmistakable face of Adolf Hitler, was shared with the entire school community. It was followed by a pattern of persistent and severe anti-Semitic harassment of Complainants' young daughter.

2. Mr. Vazquez and Dr. Roy notified Kenneth R. Nysmith ("Mr. Nysmith"), the owner and headmaster of The Nysmith School for the Gifted ("Nysmith School"), that their daughter was being harassed and bullied because she is Jewish, including persistent taunting about the October 7, 2023 Hamas terrorist attacks, which resulted in the deaths of over 1,200 Israelis and 251 others being taken hostage, and a campaign of ostracizing her because she is Jewish. Mr. Nysmith promised to take action – but did nothing. A few weeks later, after Mr. Nysmith decided to hang a Palestinian flag in the Nysmith School gym, the harassment of their daughter grew more severe. Complainants notified Mr. Nysmith that harassment of their daughter had become much worse and pleaded for his help. In response, Mr. Nysmith told them to tell their daughter to "toughen up" and abruptly ended the meeting. Two days later, on March 13, 2025, Mr. Nysmith retaliated – notifying Complainants in an email that ***all three children*** were expelled effective immediately, days before their mid-semester report cards, and long after the application periods for other local schools had passed.

3. This action arises under the Virginia Human Rights Act, Va. Code § 2.2-3900 et seq., based on Nysmith School and Mr. Nysmith's discrimination against the Complainants and their three minor children on the basis of their Jewish religion and shared ancestry, ethnicity and origin, and by their expulsion, without any prior notice, in retaliation for the Complainants' reports to Mr. Nysmith of the anti-Semitic discrimination at Nysmith School. Complainants bring this action to hold Mr. Nysmith and Nysmith School accountable for their unlawful discriminatory and retaliatory actions.

THE PARTIES

4. Complainants Brian Vazquez and Ashok Roy are the parents of three minor children, an 8-year-old son, and two now-12-year-old daughters, all of whom reside in Great Falls, Virginia. The Complainants are pursuing this action on behalf of themselves and their minor children.

5. Respondent Nysmith School is a for-profit corporation organized under Virginia law. It operates a private Pre-K through 8th grade school located in Herndon, Virginia. Nysmith School holds itself out to the public as an educational institution and constitutes a place of public accommodation under the Virginia Human Rights Act, Va. Code § 2.2-3904.

6. Respondent Kenneth R. Nysmith is the sole Director, President and the headmaster of Nysmith School. Mr. Nysmith exercises total and exclusive control over Nysmith School's operations.

JURISDICTION

7. The Office of Civil Rights in the Office of the Attorney General has jurisdiction over this complaint pursuant to the Virginia Human Rights Act, Va. Code § 2.2-3900 et seq.

STATEMENT OF FACTS

A. The Vazquez-Roy Family Was a Model Nysmith School Family.

8. Brian Vazquez and Ashok Roy are the parents of three minor children, twin daughters who were 11 years old and in the sixth grade at the time of the events in this action, and a son who was then 8 years old and in the second grade. Mr. Vazquez is of Ashkenazi Jewish descent, and the family identifies as Jewish and observes Jewish holidays.

9. The Vazquez-Roy family joined Nysmith School in 2021, when Mr. Vazquez and Dr. Roy enrolled their daughters in the second grade, and their son in pre-kindergarten. Mr.

Vazquez and Dr. Roy have been active members of the Nysmith School community, regularly volunteering their time and energy to the community. Their children consistently have been high-achieving students, and none has ever had a disciplinary issue.

10. Mr. Nysmith expressly called it an honor to have the Vazquez-Roy family in the Nysmith community. In a March 20, 2024 letter, Mr. Nysmith wrote:

Since his children matriculated at this school 3 years ago, Brian has been an engaged participant. Brian is the first to volunteer for any school-related activities, including field trips, school celebrations and fund-raising events, and our bi-annual book fair. He is also involved in school-wide educational activities.

Brian also takes an active role in his children's education. His children are all performing exceptionally well at school, which is a testament to his involvement. He reaches out to his children's teacher whenever he senses any topics that his children need assistance with and gets them extra help when needed. He also has enrolled them in numerous extracurricular activities. These include both academic activities such as robotics competitions, writing clubs and math advancement along with non-academic activities such as fencing and track.

Brian is a great person. He has a cheerful disposition and shows genuine interest in this school. He is both responsible and dependable; he always follows through with his commitments. This makes Brian both liked and respected by the Nysmith staff. We are very honored to have him and his family as part of the Nysmith community.

A true and correct copy of the March 20, 2024 letter is attached hereto as Exhibit A.

11. During the 2024-25 school year, Mr. Vazquez and Dr. Roy's daughters were enrolled in the sixth grade. Each earned straight A grades in every class, maintained exemplary behavior, and participated in school leadership and extracurricular activities. Their son was enrolled in the second grade, and though children of that age did not receive academic grades, his teachers uniformly commended his performance in class and his exemplary behavior.

B. Nysmith School Permitted an Environment That Is Hostile to Jews.

12. Sadly, however, Nysmith School allowed an environment hostile to Jewish students to take root and flourish. For example, in October 2024, Complainants' daughter's social studies class included a section on strong historical leaders. At the conclusion of the

section, the teacher had the class collaborate on a project – creating a large drawing of a composite “strong historical leader” featuring the attributes of strong leaders the class had studied. Mr. Vazquez and Dr. Roy learned of the project only after they received the Nysmith School’s regular email inviting the community to view the latest photos of class activities on the school’s shared drive. It included the photo featuring the unmistakable face of Adolf Hitler.

13. Mr. Vazquez and Dr. Roy were understandably disturbed that a sixth-grade history project appeared to glamorize Adolf Hitler – and that the school would share that image with the entire community. But rather than rushing to complain to Mr. Nysmith, they first discreetly spoke to other parents and carefully considered whether to complain. After considering the matter, Mr. Vazquez and Dr. Roy decided not to take action. They mistakenly assumed it was an isolated instance of poor judgment by a single teacher.

C. Mr. Vazquez and Dr. Roy Discover Their 11-Year-Old Daughter Is the Target of Anti-Semitic Harassment and Bullying.

14. On February 17, 2025, Mr. Vazquez and Dr. Roy discovered that one of their daughters had been the target both of severe and pervasive anti-Semitic harassment and of bullying by other children in her class. But she had been too ashamed to tell them. Mr. Vazquez only learned of the discriminatory harassment when a classmate, worried about her safety, asked his mother to call Mr. Vazquez. With Mr. Vazquez on speakerphone, the classmate described a disturbing pattern of harassment and bullying.

15. Mr. Vazquez sat down with his daughter and asked if she was being bullied. His daughter immediately began sobbing. She said she had been trying to be well-liked, but some of the popular students had been bullying her. Although the bullying had distressed her, she was afraid if she told her parents, she would lose friends and be rendered an outcast.

16. Mr. Vazquez asked his daughter to explain how the other children treated her. His daughter said that some children said they hated her because she was Jewish and had been bullying her. For example, the children placed pro-Palestine stickers on school-issued laptops and lockers, and pointed at their stickers and taunted her for being “Israeli.” In front of her classmates, the bullying children looked at their daughter, and called Jews “baby killers,” and said that they deserve to die because of what is happening in Gaza. Pointing at the other children, the bullies told their daughter that everyone at the school is against Jews and Israel, which is why they hate you. The other children also taunted her about the death of her uncle, saying that they were glad he died in the October 7th attack, even though he had died years earlier.

D. Mr. Vazquez and Dr. Roy Alert Nysmith of the Anti-Semitic Harassment.

17. Mr. Vazquez and Dr. Roy immediately scheduled a meeting with Mr. Nysmith on February 21, 2025. They reported the anti-Semitic harassment and bullying of their daughter and asked that he intervene to end it. Mr. Nysmith acknowledged the seriousness of the misconduct and assured Mr. Vazquez and Dr. Roy that he would swiftly handle the issue. Mr. Nysmith said that he would have an administrator talk to the children who had instigated the harassment, and if that was unsuccessful, he would warn their parents that if their children continued to engage in anti-Semitic harassment, they would face expulsion.

18. Mr. Nysmith’s response eased Mr. Vazquez and Dr. Roy’s anxiety. Based on what he said in their meeting, Mr. Vazquez and Dr. Roy believed Mr. Nysmith would promptly address the matter.

E. Mr. Nysmith Cancels the Annual Holocaust Program Speaker, Purportedly to Avoid Inflaming Tensions Relating to the Israeli-Palestinian Conflict.

19. Nysmith School has held an annual Holocaust program during which a Holocaust survivor speaks to the entire school in-person about anti-Semitism. On February 26, 2025, one week after Mr. Vazquez and Dr. Roy reported that their daughter had been the victim of anti-Semitic harassment, a social studies teacher told Mr. Vazquez that their regular Holocaust speaker had passed away in 2023 and that he was he was trying to find a Holocaust survivor willing to speak during the upcoming 2025 Holocaust program.

20. Mr. Vazquez introduced the teacher to a senior representative of the Jewish Community Resources Council of D.C., who offered to arrange a Holocaust survivor to speak at Nysmith School's Holocaust program. On March 6, 2025, Mr. Vazquez's acquaintance told him that she had contacted Nysmith School to arrange a speaker but was told Nysmith School no longer needed a speaker. Mr. Vazquez assumed Nysmith School had found another speaker for the program.

21. The next afternoon, Mr. Vazquez called Mr. Nysmith to inquire whether he had arranged for another speaker for the Holocaust program. Mr. Nysmith replied that he had cancelled the annual Holocaust program speaker because of his concern that the event might inflame emotions within the Nysmith School community in light of the Israel-Gaza conflict. Mr. Vazquez explained that, in his view, hearing from a Holocaust survivor was entirely unrelated to the Israel-Gaza conflict, but they agreed to respectfully disagree.

F. Mr. Vazquez and Dr. Roy Discover That Their Daughter Is Still Being Targeted for Anti-Semitic Harassment and Bullying.

22. On March 8, 2025 – the day after Mr. Nysmith said he cancelled a Holocaust survivor speaker to avoid inflaming emotions – Mr. Vazquez and Dr. Roy discovered that a

Palestinian flag had been raised in the Nysmith School gymnasium, alongside the flags of other nations, including the Israeli flag. They had no objection to the hanging of a Palestinian flag. However, they were concerned that doing so without first addressing the anti-Semitic harassment of their daughter would only make the situation worse. They also did not understand why Mr. Nysmith thought that hosting a Holocaust speaker would inflame emotions but hanging a Palestinian flag would not.

23. In light of the new Palestinian flag, Mr. Vazquez asked his daughter how she was being treated by classmates. She broke down in tears and said the bullying had become worse. The Palestinian flag provoked more aggressive bullying and harassment. Classmates cited it as evidence that “everyone hates Jews,” taunting her that “we won” and that the flag was proof that “nobody likes you.”

24. Mr. Vazquez and Dr. Roy promptly contacted Nysmith School to seek a meeting with Mr. Nysmith. On March 11, 2025, they met with Mr. Nysmith and reported that the anti-Semitic harassment and bullying of their daughter had not only continued but had intensified following the hanging of the Palestinian flag. Mr. Nysmith told them that someone had spoken to the students leading the harassment. Mr. Vazquez and Dr. Roy said that clearly had not been effective and that the harassment had only gotten worse. They wanted to know what else Mr. Nysmith would do to protect their daughter, such as calling the parents of the children who were harassing their daughter – as he previously said he would. Mr. Nysmith dismissed their concerns and told them to tell their daughter to “toughen up.”

25. Mr. Vazquez and Dr. Roy were shocked by his response. They asked again that he intervene and take action to protect their daughter from the abhorrent harassment. Dr. Roy also explained that they were not asking for the Palestinian flag to be taken down, but he and Mr.

Vazquez asked Mr. Nysmith whether, in light of his decision to cancel the in-person Holocaust Program to avoid inflaming emotions, the raising of the Palestinian flag might also incite emotions and perhaps be construed as antipathy for Israelis and Jews. Mr. Nysmith denied any such connection and said he hung up other flags without incident.

26. Mr. Vazquez pointed out that people could view the decision to cancel the Holocaust survivor speaker, while at the same time raising the Palestinian flag in the school gym, as anti-Semitic. Mr. Nysmith interrupted and asked if they were calling him anti-Semitic. Mr. Vazquez and Dr. Roy immediately responded that they were not saying that. Mr. Nysmith, visibly agitated, abruptly stood up and told them they had to leave, which they did. At no time during the entire meeting had Mr. Vazquez or Dr. Roy raised their voices or spoken disrespectfully to Mr. Nysmith.

G. Nysmith School and Mr. Nysmith Unlawfully Retaliate by Immediately Expelling All Three Children.

27. Two days later, on March 13, 2025, Mr. Nysmith emailed a letter to Mr. Vazquez and Dr. Roy terminating the family's relationship with Nysmith School and expelling all three children effective immediately. His letter stated:

After reflecting on our emotional conversation on Tuesday, the words used make it clear that you have a profound lack of trust in both me and the school.

A healthy partnership is required to help guide and nurture young children through tumultuous times and complex current events. I do not see a path forward without trust, understanding, and cooperation. In our meeting, I felt very clearly that you do not think Nysmith is the right school for your family, and the longer we try to ignore that reality, the more pain it will cause your children.

With this in mind, I regret to inform you that today will be your children's last day at Nysmith. I do not take this step lightly, but it is necessary.

A true and correct copy of the March 13, 2025 email is attached hereto as Exhibit B.

28. Mr. Nysmith also barred Mr. Vazquez and Dr. Roy's daughter from participating in a school event the following day where she was scheduled to receive a medal for a science fair

project. He also refused other families' requests to allow them to collect the award for her. In addition, he did not send the children's personal belongings that they had left at their school without any inkling that they would not be back the following day. Incredibly, those personal belongings were kept by Nysmith School for no reason whatsoever until May 13 – two months later – when Nysmith School sent an email to Mr. Vazquez and Dr. Roy informing them that they would be permitted to retrieve the children's belongings but had to do so by May 23 or their belongings would be thrown out. Another school parent ultimately retrieved the belongings for the family.

29. The statements in Mr. Nysmith's expulsion letter were wholly false and a transparent attempt to obscure the real reason for expelling the Vazquez-Roy family – because they had complained about his deliberate indifference to a hostile environment at Nysmith School. Mr. Vazquez and Dr. Roy never indicated that they had lost trust in Nysmith School or Mr. Nysmith, or that Nysmith School was not the right school for their children. They had never even *considered* sending their children to another school – indeed, they had already paid the deposits for their children's tuition for the next academic year. And if Mr. Nysmith really were concerned about the risk of causing pain to the Vazquez-Roy children, he would *not* have summarily expelled all three children, refused to allow them to accept academic awards they had earned, refused to promptly send their belongings home, and refused to allow them to say good-bye to their teachers and friends. Mr. Nysmith did not even consult with the children's teachers about his plan to expel the entire family. He just wanted to get rid of a Jewish family who had pleaded with him to take action against the anti-Semitic harassment of an 11-year-old girl.

30. Mr. Nysmith's unilateral decision to suddenly expel all three children in the middle of the spring semester left Mr. Vazquez and Dr. Roy unable to enroll the children in a

comparable school close to their home. As a result, they were forced to enroll their children in online classes, isolated and alone in their home, for the remainder of the school year, as well as separate extra-curricular activities.

31. Moreover, Mr. Nysmith knew when he expelled the children that the application period for all other schools in the area had long passed, which significantly reduced each child's prospect of being able to enroll in a comparable school in their community. Worse still, he expelled them just days before the end of the first grading period for the spring semester. As a result, their Nysmith School transcripts had no information following the December 2024 grading period, which further imperiled the applications to other schools.

32. Mr. Nysmith's expulsion of the children from the only school they had ever known has devastated them. The expulsion has caused, among other things, emotional trauma, social disruption, loss of friendships, and loss of academic routine. It also has impaired their academic, social, and emotional development. They also have suffered a profound loss of well-being and trust. They cannot understand why Mr. Nysmith, someone they looked up to, kicked them out of school, and at various times have blamed themselves, their siblings, and their parents.

33. Mr. Vazquez and Dr. Roy also are seeking professional advice to help them respond to their children's pain and anxieties, while also scrambling to aid and monitor their children's online education, and to enroll their children in another school in time for the start of the 2025-26 school year. Because Nysmith School expelled the children in March, long after the deadline for applying to most private schools had long since passed, they still have not been able to enroll their son in a new school.

34. Nysmith School's expulsion of all three children violates the Virginia Human Rights Act and also constitutes a breach of contract. Nysmith issued a pro rata refund of tuition which purportedly represented the remainder of school days following expulsion. Mr. Vazquez and Dr. Roy paid tuition for an entire and uninterrupted academic year for each of their children. Nysmith School's unlawful and unwarranted expulsion deprived their children of an entire and uninterrupted academic year at Nysmith School. Mr. Vazquez and Dr. Roy therefore are entitled to a refund for the entire amount of tuition paid for each child's education for the entire academic year.

CAUSES OF ACTION

Count I

Discrimination on the basis of religion and ethnicity in violation of the Virginia Human Rights Act, Va. Code § 2.2-3900 et seq.

35. Complainants repeat and re-allege each of the foregoing allegations of the Complaint.

36. The Virginia Human Rights Act ("VHRA"), Va. Code § 2.2-3900 prohibits discrimination on the basis of religion, ethnicity, and national origin in places of public accommodation. Under the VHRA, an educational institution that holds itself out as open to the general public and accepts tuition falls within the meaning of a "public accommodation."

37. Nysmith School is a private K-8 school that holds itself out to the general public and accepts tuition from its students, and therefore is a public accommodation within the meaning of the VHRA.

38. For much of the 2024-25 academic year, Mr. Vazquez and Dr. Roy's 11-year-old daughter was subjected to severe and pervasive anti-Semitic harassment and discrimination on account of her religion, shared ancestry and ethnicity.

39. Nysmith School and Mr. Nysmith knew that Mr. Vazquez and Dr. Roy's 11-year-old daughter had been subjected to severe and pervasive anti-Semitic harassment and discrimination. Mr. Nysmith claimed he would take action to end anti-Semitic bullying and discrimination, and if necessary, expel the children responsible for bullying and discrimination.

40. But Mr. Nysmith and the school took no meaningful action to curb the anti-Semitic bullying and discrimination. Instead, they cancelled an annual in-person Holocaust program featuring a live Holocaust survivor speaker, and days later hung a Palestinian flag, which predictably led to more aggressive discriminatory harassment.

41. Nysmith School and Mr. Nysmith's deliberate indifference to, and incitement of, significant and pervasive discrimination has caused substantial damages as well as harm to every member of the Vazquez-Roy family, including, among other things, the unrefunded tuition paid for the 2024-25 academic year, the tuition for on-line classes for the remainder of the 2024-25 academic year, the costs of other extra-curricular activities, and the costs for mental health and other counseling.

Count II
Unlawful Retaliation in Violation of the
Virginia Human Rights Act, Va. Code § 2.2-3900 et seq.

42. Complainants repeat and re-allege each of the foregoing allegations of the Complaint.

43. The VHRA prohibits retaliation against a person who complains about unlawful discrimination in violation of the VHRA.

44. Mr. Vazquez and Dr. Roy reported to Mr. Nysmith that their 11-year-old daughter had been subjected to severe and pervasive anti-Semitic harassment and discrimination, and asked him to take action to eliminate the harassment and discrimination. It was their right under

the VHRA to demand an educational environment for their daughter free of significant and pervasive anti-Semitic discrimination.

45. But rather than meet their legal obligations, Nysmith School and Mr. Nysmith retaliated against the Vazquez-Roy family by expelling all three children from Nysmith School, terminating the family's connection to the Nysmith School community. Their retaliation violated the VHRA.

46. Nysmith School and Mr. Nysmith's deliberate indifference to, and incitement of, significant and pervasive discrimination has caused substantial damages as well as harm to every member of the Vazquez-Roy family, including, among other things, the unrefunded tuition paid for the 2024-25 academic year, the tuition for on-line classes for the remainder of the 2024-25 academic year, the costs of other extra-curricular activities, and the costs for mental-health and other counseling.

PRAYER FOR RELIEF

WHEREFORE, Complainants request that the Office for Civil Rights of the Office of the Attorney General open an investigation, determine that The Nysmith School for the Gifted, Inc. and Kenneth Nysmith violated the Virginia Human Rights Act, Va. Code § 2.2-3900 et seq., and initiate an action against Respondents The Nysmith School for the Gifted, Inc. and Kenneth Nysmith, seeking the following relief:

- a. Entry of judgment against the Respondents declaring that Respondents violated the VHRA;
- b. Compensatory damages, including the aggregate amount of tuition payments, deposits and other charges paid to Nysmith School for all three children for the 2024-25 and 2025-26 academic years not already refunded, the tuition and other charges for the children's online classes for the spring and summer of 2025; the costs of the children's extracurricular activities for spring 2025, the costs of the family's mental-health care, and

educational and developmental services attributed to the children's expulsion, in an amount to be determined at trial;

- c. Punitive damages;
- d. An injunction preliminarily and permanently ordering Respondents to enforce their nondiscrimination policies, and to implement an immediate plan for the elimination of a hostile environment at Nysmith School;
- e. An injunction preliminarily and permanently mandating that Respondents provide expert training on combating anti-Semitism and broadly promote annual training for the Nysmith School community focused on recognizing and combating anti-Semitism;
- f. Appointment of an outside monitor to ensure Defendants' compliance with all orders for such time as warranted;
- g. An award of reasonable attorneys' fees; and
- h. Such other and further relief as just and appropriate.

Dated: July 1, 2025

THE LOUIS D. BRANDEIS CENTER
FOR HUMAN RIGHTS UNDER LAW
Marci Lerner Miller
Jeffrey I. Lang
Christina Harvell Brown
1717 Pennsylvania Avenue, NW
Suite 1025
Washington, D.C. 20006
(202) 559-9296
mmiller@brandeiscenter.com
jlang@brandeiscenter.com
cbrown@brandeiscenter.com

DILLON PLLC

/s/ Justin Dillon
Justin Dillon
Virginia Bar No. 48233
1717 K Street, Suite 900
Washington, DC 20006
(202) 787-5858
jdillon@dillonpllc.com

EXHIBIT A



A Joy-Filled World-Class Education

March 20, 2024

To Whom It May Concern,

Brian Vazquez is an active parent at Nysmith School. He has three children enrolled at Nysmith: [REDACTED] and [REDACTED] who are both 5th graders, along with his son [REDACTED] who is in 1st grade. Brian is intimately involved with his children's educational development at school.

Since his children matriculated at this school 3 years ago, Brian has been an engaged participant. Brian is the first to volunteer for any school-related activities, including field trips, school celebrations and fund-raising events, and our bi-annual book fair. He is also involved in school-wide educational activities.

Brian also takes an active role in his children's education. His children are all performing exceptionally well at school, which is a testament to his involvement. He reaches out to his children's teacher whenever he senses any topics that his children need assistance with and gets them extra help when needed. He also has enrolled them in numerous extracurricular activities. These include both academic activities such as robotics competitions, writing clubs and math advancement along with non-academic activities such as fencing and track.

Brian is a great person. He has a cheerful disposition and shows genuine interest in this school. He is both responsible and dependable; he always follows through with his commitments. This makes Brian both liked and respected by the Nysmith staff. We are very honored to have him and his family as part of the Nysmith community.

Sincerely,

Kenneth Nysmith
Head of School

EXHIBIT B

From: Ken Nysmith <KNysmith@nysmith.com>
Date: March 13, 2025 at 11:15:50 AM EDT
To: [REDACTED]@gmail.com, [REDACTED]@gmail.com
Subject: Nysmith Enrollment

Dear Mr. Roy and Mr. Vazquez,

I apologize for the brevity of this note; a note of this gravity should be much longer; however, I do not feel there is anything else I can add to clarify the situation or alleviate the pain of the message.

After reflecting on our emotional conversation on Tuesday, the words used make it clear that you have a profound lack of trust in both me and the school.

A healthy partnership is required to help guide and nurture young children through tumultuous times and complex current events. I do not see a path forward without trust, understanding, and cooperation. In our meeting, I felt very clearly that you do not think Nysmith is the right school for your family, and the longer we try to ignore that reality, the more pain it will cause your children.

With this in mind, I regret to inform you that today will be your children's last day at Nysmith. I do not take this step lightly, but it is necessary. To end their enrollment today, we will prorate and refund all fees for this year and all fees you have paid for next year. You will receive a check for the full amount in the next two weeks.

Sincerely,

Kenneth Nysmith

Kenneth Nysmith
Head of School

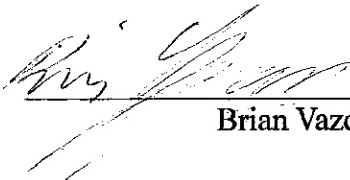


13625 EDS Drive | Herndon, VA 20171
office 703-713-3332 ext.1003 | fax 703-652-0047

Verification

I am a Complainant in the foregoing Complaint. I understand that by submitting this document with the Office of Civil Rights, I have filed an official complaint with this Office. I understand, however, that this does not mean that the Complaint will be accepted for investigation. I also understand that none of the allegations in this Complaint are submitted confidentially, except as to the identification of witnesses. I understand that the Office will notify the person or organization named in my Complaint that I have submitted this Complaint and of these allegations therein. I declare under penalty of perjury that the information provided herein is true and correct to the best of my knowledge.

Date: June 30, 2025

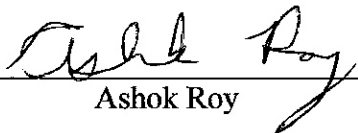


Brian Vazquez

Verification

I am a Complainant in the foregoing Complaint. I understand that by submitting this document with the Office of Civil Rights, I have filed an official complaint with this Office. I understand, however, that this does not mean that the Complaint will be accepted for investigation. I also understand that none of the allegations in this Complaint are submitted confidentially, except as to the identification of witnesses. I understand that the Office will notify the person or organization named in my Complaint that I have submitted this Complaint and of these allegations therein. I declare under penalty of perjury that the information provided herein is true and correct to the best of my knowledge.

Date: June 30, 2025



Ashok Roy