



KAPLAN LAW FIRM, PLLC

3901 S Lamar Blvd # 260, Austin, Texas 78704 P: (512) 553-9390 F: (512) 692-2788

September 2, 2022

Via email

Grapevine-Colleyville Independent School District
Attn: Dr. Robin Ryan, Superintendent
Attn: Dr. Bradley Schnautz, Deputy Superintendent
3051 Ira E. Woods Avenue
Grapevine, TX 76051
robin.ryan@gcisd.net; bradley.schnautz@gcisd.net;

**RE: Laura Leeman v. Grapevine-Colleyville Independent School District
NOTICE TO CEASE AND DESIST**

Dear Dr. Ryan and Dr. Schnautz,

This law firm represents Laura Leeman—a Grapevine-Colleyville Independent School District (“GCISD”) parent. The purpose of this letter is to notify GCISD of its ongoing noncompliance with Section 1.004 of the Texas Education (“Section 1.004”). Accordingly, GCISD is directed to **CEASE AND DESIST any and all: (1) unlawful display(s) of noncompliant Section 1.004(a) materials; and (2) unlawful refusals to display compliant Section 1.004(a) materials.**

Texas Senate Bill 797 revised Section 1.004 of the Texas Education Code to require schools to conspicuously display a durable poster or framed copy of the United States national motto, “In God We Trust,” in every school building when such displays are donated. The Code requires:

1. The display must contain a representation of the United States Flag centered under the national motto;
2. Must contain a representation of the state flag; and
3. May **not** depict **any** other words or images.

The poster GCISD is currently displaying violates Section 1.004 of the Texas Education Code:



GCISD’s current sign (shown above) is noncompliant for multiple reasons. It contains no fewer than thirty-one (31) fully or partially visible five-pointed stars, all of which are prohibited by the plain language of the statute. Section 1.004 also *only* permits “a representation of the state flag”, whereas the GCISD poster unlawfully depicts multiple state flags. Because the statute forbids any extraneous images or information—including dozens of five-point stars and an extra state flag—the GCISD poster is clearly noncompliant. **GCISD is accordingly directed to immediately CEASE AND DESIST its ongoing display of the noncompliant GCISD poster in all campuses and institutions.**

GCISD is unlawfully refusing to display compliant signs:

In an effort to remedy GCISD’s ongoing noncompliance, our client has recently attempted to donate several compliant posters for immediate use in all GCISD facilities (the “Parent Displays”). The design for the Parent Displays is provided below:



The Parent Displays would immediately bring GCISD into proper compliance with state law. Moreover, in accordance with Section 1.004, the schools “must display” the Parent Displays, as they are compliant, donated displays. Nonetheless, GCISD has unlawfully refused to accept and display the Parent Displays. **GCISD is accordingly directed to immediately CEASE AND DESIST its unlawful refusal to conspicuously post the Parent Displays in its schools.**

Litigation Hold Notice

GCISD is put on notice not to alter, conceal, or destroy any documents, records, correspondences, or other materials, whether physically or electronically stored (including metadata and backup data) which concern or in any way relate to:

- (a) any display(s) of materials described by Section 1.004 in any GCISD campus(es);
- (b) any decision(s) by GCISD or its agents to accept any donations of materials described by Section 1.004;
- (c) any decision(s) by GCISD or its agent to reject any donations of materials described by Section 1.004;

- (d) any private donation(s) made available to any GCISD school or institution used to purchase any materials described by Section 1.004;
- (e) any current or past rules, protocols, or procedures enforced or maintained by GCISD or its constituent institutions concerning materials described by Section 1.004; and
- (f) any other materials which may be relevant in potential litigation.

Please notify GCISD legal counsel and direct all correspondence regarding this matter to our office. Additionally, you are hereby directed to submit a copy of this notice to any individuals with custodial responsibility for the materials described above.

Please contact our office no later than the close of business on **Friday, September 9, 2022** to confirm GCISD's compliance with this notice. Otherwise, our client will be left with no choice but to seek court intervention to promptly compel such compliance with the law, to include any fees and costs for having to unnecessarily force GCISD to comply with the law.

Sincerely,

A handwritten signature in black ink, appearing to read "Trenton Lacy", written in a cursive style.

Trenton Lacy



KAPLAN LAW FIRM, PLLC

3901 S Lamar Blvd # 260, Austin, Texas 78704 P: (512) 553-9390 F: (512) 692-2788

September 2, 2022

Via email

Keller Independent School District
Attn: Dr. Rick Westfall, Superintendent
Attn: Gaye Montemayor, Superintendent Secretary
350 Keller Parkway
Keller, TX 76248
rick.westfall@kellerisd.net;
gaye.montemayor@kellerisd.net;

**RE: Laney Hawes v. Keller Independent School District
NOTICE TO CEASE AND DESIST**

Dear Dr. Westfall,

This law firm represents Laney Hawes—a current Keller Independent School District (“KISD”) parent. The purpose of this letter is to notify KISD of its ongoing noncompliance with Section 1.004 of the Texas Education (“Section 1.004”). Accordingly, KISD is directed to **CEASE AND DESIST any and all: (1) unlawful display(s) of noncompliant Section 1.004(a) materials; and (2) unlawful refusals to display compliant Section 1.004(a) materials.**

Texas Senate Bill 797 revised Section 1.004 of the Texas Education Code to require schools to conspicuously display a durable poster or framed copy of the United States national motto, “In God We Trust,” in every school building when such displays are donated. The Code requires:

1. The display must contain a representation of the United States Flag centered under the national motto;
2. Must contain a representation of the state flag; and
3. May **not** depict **any** other words or images.

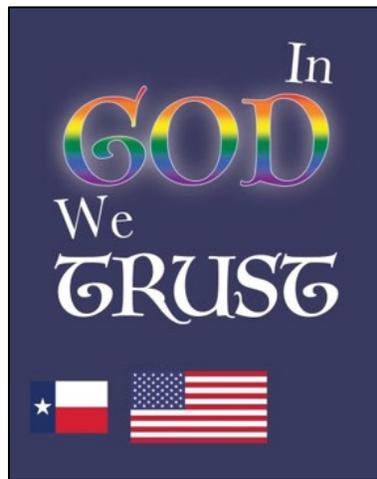
The poster KISD is currently displaying violates Section 1.004 of the Texas Education Code:



KISD’s current sign (shown above) is noncompliant for multiple reasons. It contains no fewer than thirty-one (31) fully or partially visible five-pointed stars, all of which are prohibited by the plain language of the statute. Section 1.004 also *only* permits “a representation of the state flag”, whereas the KISD poster unlawfully depicts multiple state flags. Because the statute forbids any extraneous images or information—including dozens of five-point stars and an extra state flag—the KISD poster is clearly noncompliant. **KISD is accordingly directed to immediately CEASE AND DESIST its ongoing display of the noncompliant KISD poster in all campuses and institutions.**

KISD is unlawfully refusing to display compliant signs:

In an effort to remedy KISD’s ongoing noncompliance, our client has recently attempted to donate several compliant posters for immediate use in all KISD facilities (the “Parent Displays”). The design for the Parent Displays is provided below:



The Parent Displays would immediately bring KISD into proper compliance with state law. Moreover, in accordance with Section 1.004, the schools “must display” the Parent Displays, as they are compliant, donated displays. Nonetheless, KISD has unlawfully refused to accept and display the Parent Displays. **KISD is accordingly directed to immediately CEASE AND DESIST its unlawful refusal to conspicuously post the Parent Displays in its schools.**

Litigation Hold Notice

KISD is put on notice not to alter, conceal, or destroy any documents, records, correspondences, or other materials, whether physically or electronically stored (including metadata and backup data) which concern or in any way relate to:

- (a) any display(s) of materials described by Section 1.004 in any KISD campus(es);
- (b) any decision(s) by KISD or its agents to accept any donations of materials described by Section 1.004;

- (c) any decision(s) by KISD or its agent to reject any donations of materials described by Section 1.004;
- (d) any private donation(s) made available to any KISD school or institution used to purchase any materials described by Section 1.004;
- (e) any current or past rules, protocols, or procedures enforced or maintained by KISD or its constituent institutions concerning materials described by Section 1.004; and
- (f) any other materials which may be relevant in potential litigation.

Please notify KISD legal counsel and direct all correspondence regarding this matter to our office. Additionally, you are hereby directed to submit a copy of this notice to any individuals with custodial responsibility for the materials described above.

Please contact our office no later than the close of business on **Friday, September 9, 2022** to confirm KISD's compliance with this notice. Otherwise, our client will be left with no choice but to seek court intervention to promptly compel such compliance with the law, to include any fees and costs for having to unnecessarily force KISD to comply with the law.

Sincerely,

A handwritten signature in black ink, appearing to read "Trenton Lacy", written in a cursive style.

Trenton Lacy



KAPLAN LAW FIRM, PLLC

3901 S Lamar Blvd # 260, Austin, Texas 78704 P: (512) 553-9390 F: (512) 692-2788

September 2, 2022

Via email

Mansfield Independent School District
Attn: Dr. Kimberley Cantu, Superintendent
2400 N. Mansfield Ave.
Southlake, Texas 76092
kimberleycantu@misdmail.org;
loriberney@misdmail.org;

**RE: James Grant Crosslin v. Mansfield Independent School District
NOTICE TO CEASE AND DESIST**

Dear Dr. Cantu,

This law firm represents James Grant Crosslin—a current Mansfield Independent School District (“MISD”) parent. The purpose of this letter is to notify MISD of its ongoing noncompliance with Section 1.004 of the Texas Education (“Section 1.004”). Accordingly, MISD is directed to **CEASE AND DESIST any and all: (1) unlawful display(s) of noncompliant Section 1.004(a) materials; and (2) unlawful refusals to display compliant Section 1.004(a) materials.**

Texas Senate Bill 797 revised Section 1.004 of the Texas Education Code to require schools to conspicuously display a durable poster or framed copy of the United States national motto, “In God We Trust,” in every school building when such displays are donated. The Code requires:

1. The display must contain a representation of the United States Flag centered under the national motto;
2. Must contain a representation of the state flag; and
3. May **not** depict **any** other words or images.

The poster MISD is currently displaying violates Section 1.004 of the Texas Education Code:



MISD’s current sign (shown above) is noncompliant for multiple reasons. It contains no fewer than thirty-one (31) fully or partially visible five-pointed stars, all of which are prohibited by the plain language of the statute. Section 1.004 also *only* permits “a representation of the state flag”, whereas the MISD poster unlawfully depicts multiple state flags. Because the statute forbids any extraneous images or information—including dozens of five-point stars and an extra state flag—the MISD poster is clearly noncompliant. **MISD is accordingly directed to immediately CEASE AND DESIST its ongoing display of the noncompliant MISD poster in all campuses and institutions.**

MISD is unlawfully refusing to display compliant signs:

In an effort to remedy MISD’s ongoing noncompliance, our client has recently attempted to donate several compliant posters for immediate use in all MISD facilities (the “Parent Displays”). The design for the Parent Displays is provided below:



The Parent Displays would immediately bring MISD into proper compliance with state law. Moreover, in accordance with Section 1.004, the schools “must display” the Parent Displays, as they are compliant, donated displays. Nonetheless, MISD has unlawfully refused to accept and display the Parent Displays. **MISD is accordingly directed to immediately CEASE AND DESIST its unlawful refusal to conspicuously post the Parent Displays in its schools.**

Litigation Hold Notice

MISD is put on notice not to alter, conceal, or destroy any documents, records, correspondences, or other materials, whether physically or electronically stored (including metadata and backup data) which concern or in any way relate to:

- (a) any display(s) of materials described by Section 1.004 in any MISD campus(es);
- (b) any decision(s) by MISD or its agents to accept any donations of materials described by Section 1.004;
- (c) any decision(s) by MISD or its agent to reject any donations of materials described by Section 1.004;

- (d) any private donation(s) made available to any MISD school or institution used to purchase any materials described by Section 1.004;
- (e) any current or past rules, protocols, or procedures enforced or maintained by MISD or its constituent institutions concerning materials described by Section 1.004; and
- (f) any other materials which may be relevant in potential litigation.

Please notify MISD legal counsel and direct all correspondence regarding this matter to our office. Additionally, you are hereby directed to submit a copy of this notice to any individuals with custodial responsibility for the materials described above.

Please contact our office no later than the close of business on **Friday, September 9, 2022** to confirm MISD's compliance with this notice. Otherwise, our client will be left with no choice but to seek court intervention to promptly compel such compliance with the law, to include any fees and costs for having to unnecessarily force MISD to comply with the law.

Sincerely,

A handwritten signature in black ink, appearing to read "Trenton Lacy", written in a cursive style.

Trenton Lacy