

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FENICIA REDMAN (*Pro Se*),

Plaintiff,

v.

THOMAS WESTERMAN WOLF, JOSHUA SHAPIRO, LESLIE PIKE,
PATRICIA DOYLE, JENNIFER ARMSTRONG, DAVID BARRATT,
TRICIA CHASINOFF, STEPHEN DITTMAN, RACHEL GALLEGOS,
DANIEL F. GOFFREDO, SAMANTHA JOUIN, WENDY LITZKE,
NEHA MEHTA, ANDREA RIZZO, CHARLES PETERSON, STEPHEN
O'TOOLE, JOANNA WEXLER, HEIDI CAPETOLA, HENRY MCCLOSKEY,
TRICIA BECK, JENNIFER BLAKE, ANDREA DINMORE, KELSEY BOGAN:

Defendants.

CIVIL ACTION

No. 22-3389

PLAINTIFF'S AMENDED COMPLAINT

1. Plaintiff is a citizen of the United States and natural parent of a minor, also a citizen.
2. On August 24, 2022, six days before her child returned to school, Plaintiff filed a federal complaint with this Court detailing 10 months of appeals to Defendants to remove obscene sexually explicit material available to her son in Great Valley High School's library.
3. Plaintiff's August 24, 2022 complaint exhaustively details her appeals to school officials, law enforcement, the Attorney General (via its ADA), Legislators, and the Governor to remove obscene sexually explicit material made available to her child by the State.
4. Plaintiff, a fit parent, vehemently opposes the State transfer of this material to her child:
 - a. children engaged in oral sex
 - b. normalizing pedophilia, man touching a boy's penis
 - c. heterosexual coaching on all manners of sex
 - d. graphic descriptions of adult masturbation
 - e. woman engaged in oral sex
 - f. graphic descriptions of a female child repeatedly raped by her father
5. On August 29, 2022, this Court denied Plaintiff's August 24, 2022 request for emergency injunctive relief, outlining deficiencies in Plaintiff's complaint, and failure to "*provide any legal basis upon which this Court could order the relief she seeks from these Defendants*".

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

6. Plaintiff asserts Defendants violated her parental rights as recognized by the 14th Amendment Due Process Clause when Defendants,
 - (a) transferred and/or supported obscene sexually explicit material available to her child without her knowledge or consent,
 - (b) violated her right to equal protection of the laws in failing to report, and or enforce violations against 18 U.S.C. 1470 Transfer of obscene materials to minors, and 18 U.S.C. 1466A Obscene visual representations of the sexual abuse of children,
7. Plaintiff asserts Defendant School Directors, Board Secretary, and Superintendent violated her 1st Amendment rights when they restricted her public speech due to content, and then had security remove her from the building.
8. Plaintiff unequivocally asserts material distributed by the State to her child meets the definition of obscene sexually explicit conduct, was/is harmful to her child, and conflicts With the

<https://www.justice.gov/criminal-ceos/citizens-guide-us-federal-law-obscenity>

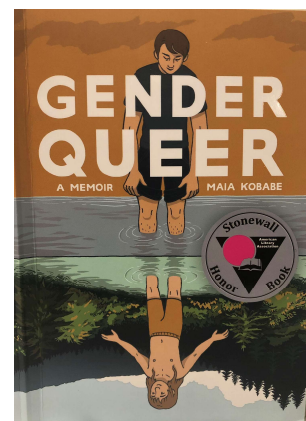
18 U.S. Code § 1466A, Obscene visual representations of the sexual abuse of children

(a) In General. Any person who, in a circumstance described in subsection (d), knowingly produces, distributes, receives, or possesses with intent to distribute, a [visual depiction](#) of any kind, including a drawing, cartoon, sculpture, or painting, that— (1) (A) depicts a minor engaging in [sexually explicit conduct](#); and (B) is obscene; or (2) (A) depicts an image that is, or appears to be, of a minor engaging in [graphic](#) bestiality, sadistic or masochistic abuse, or sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; and (B) lacks serious literary, artistic, political, or scientific value; or attempts or conspires to do so, shall be subject to the penalties provided in section 2252A(b)(1), including the penalties provided for cases involving a prior conviction.

“The standard of what is harmful to minors may differ from the standard applied to Adults. Harmful materials for minors include any communication consisting of nudity, sex or excretion that (i) appeals to the prurient interest of minors, (ii) is patently offensive to prevailing standards in the adult community with respect to what is suitable material for minors, (iii) and lacks serious literarym artistic, political, or scientific value for minors”

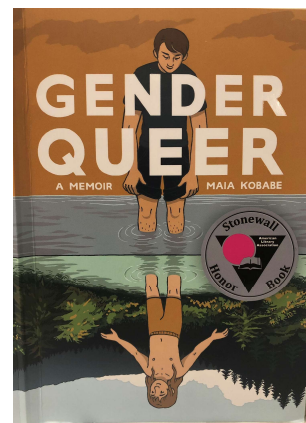
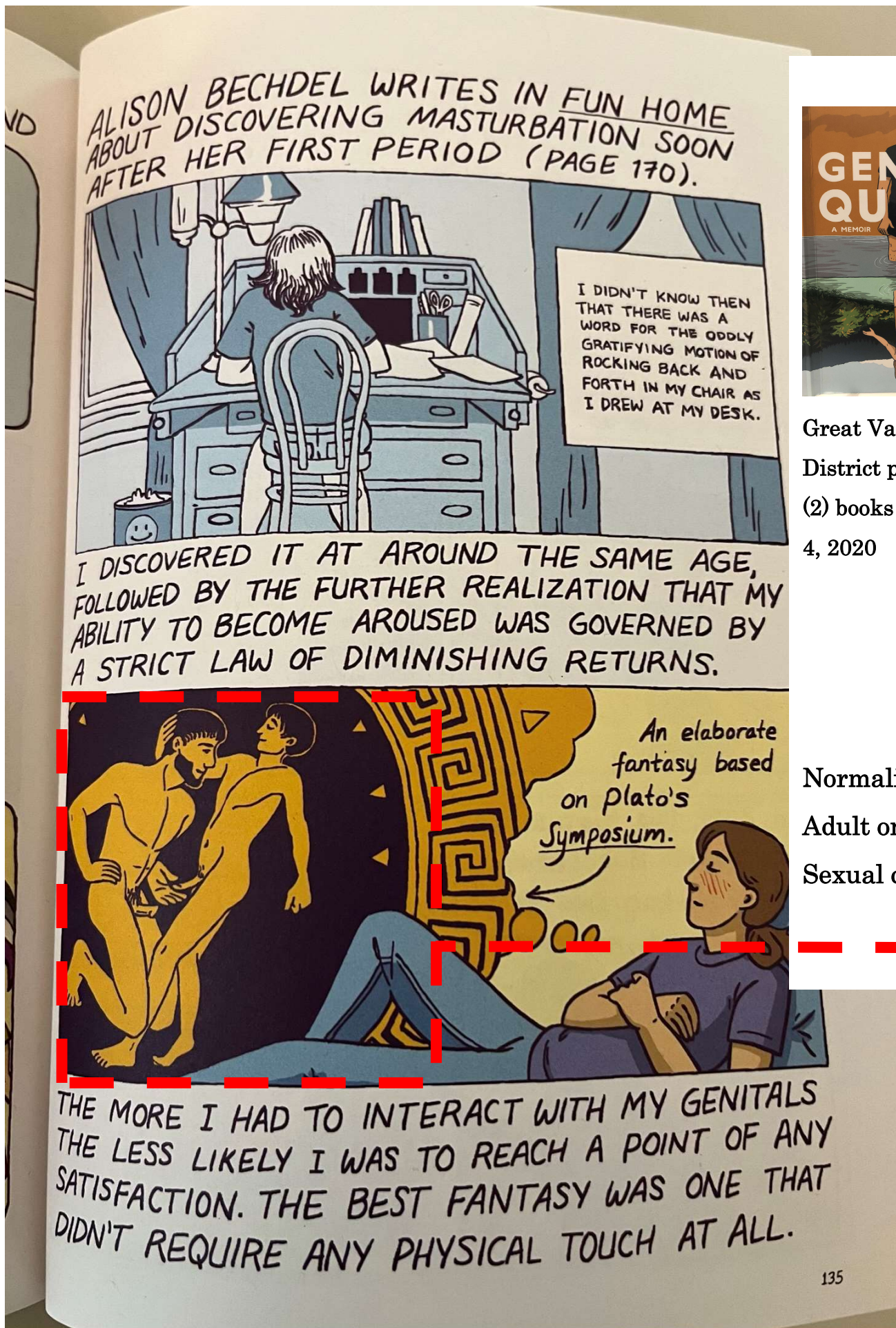
14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

9. Plaintiff's child has been harassed and bullied in school since Plaintiff began appeals to remove sexually explicit material from her child's public school library.
10. On March 14, 2022, Plaintiff spoke at a public school board meeting expressing concern that sexually explicit material was still available to her child in the school library. After the public meeting, Plaintiff was confronted by two women angry over Plaintiff's public comments. One woman mocked the Plaintiff in Spanish, then shoved the Plaintiff out the building door. Plaintiff called 911 and stayed on the phone until Police arrived.
11. On March 21, 2022, the next school board meeting, Plaintiff said and repeats today **"I will not be silenced by violence"**
12. Plaintiff seeks a Temporary Restraining Order by this Court against obscene sexually explicit material available to her child, and in the public interest to protect all children, public schools across the nation.
13. At minimum, this Court can issue a temporary order requiring all public schools to place the material at issue in this complaint in restricted library locations, and distribute only to students 18 years and older.
14. At trial Plaintiff will present expert witnesses who will testify to the effects of sexually explicit material on a child's mental, emotional, and physical health.
15. Plaintiff has been called homophobic, book banner, extremist, and cruel to children. To them I say, Supreme Court Justice Stewart got it right when he wrote in *Jacobellis v. Ohio* 378 US 184 (1964) ***"I know it when I see it."***



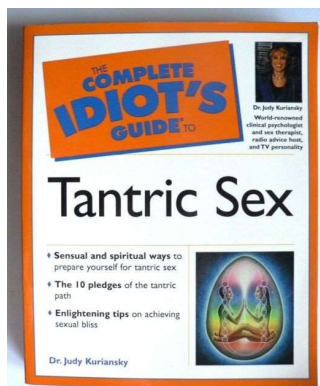
Great Valley School
District purchased
(2) books September
4, 2020

Normalizing
Child on Child
Sex



Great Valley School District purchased (2) books September 4, 2020

Normalizing Adult on Child Sexual contact



Great Valley School District refuses to provide a list of sexually graphic books.

Same book found on Henderson High School online portal

Part 3 ► Making Major Progress on the Path to Ecstasy

Sending love energy from her sex center and his heart into her heart.



- Add oral pleasure. A woman who has gotten over her shame or embarrassment about her genitals can experience tremendous excitement from your lips and mouth on her genitalia. She will feel truly adored and pleased. Be sure to tell her how much you enjoy doing this. Include "polishing the pearl" (a tantric term for oral stimulation of the clitoris), and exploring her sacred cave. Ask her what kind of stimulation she likes.

Sending pleasure by polishing her pearl and pleasing her sacred space into her heart center for total love connection.



The tantra man who can bring a woman to heights of oral pleasure is rightfully pleased with himself. As one man told me, "I'm even happier knowing I can please her than when I get satisfied first. Women think we're all selfish but we're not!"

128

Log In B Reed Henderson Hig...

Medium Genre Smart Search T Tags Temp List

1 Results

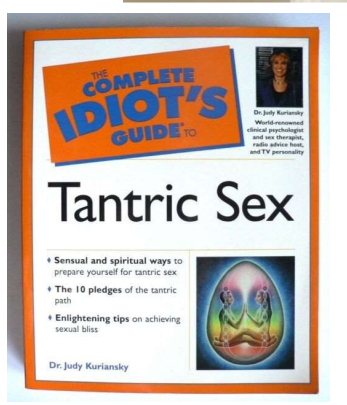
ONLINE 306.7 ★★★★★ (0)

The complete idiot's guide to tantric sex

Kuriansky, Judith.

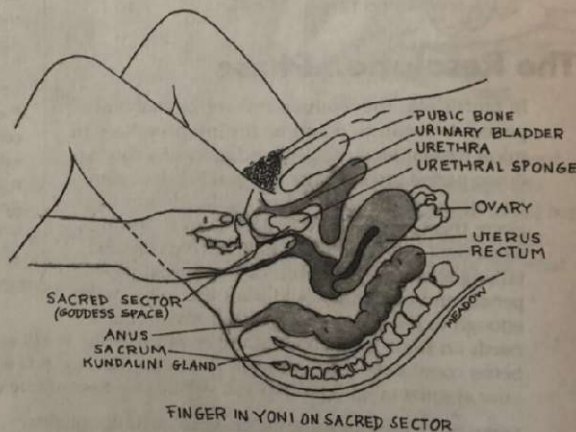
Ebooks EBSCOhost

Ebook (c2002)



permission to pleasure her and to enter her sacred space. Using your finger, enter her yoni gently, guided by her response. Use your middle finger to make a "come hither" motion to stimulate the sacred space on the front wall of the vagina, one third of the way up (commonly called the G spot, but actually an area, also called the goddess space and sacred sector). The tissue might become a little rougher to the feel and expand, yielding more lubrication. If she responds with pleasure, you can become more vigorous. As her excitement mounts, call out encouragement and quicken your motion.

How to pleasure the goddess space.

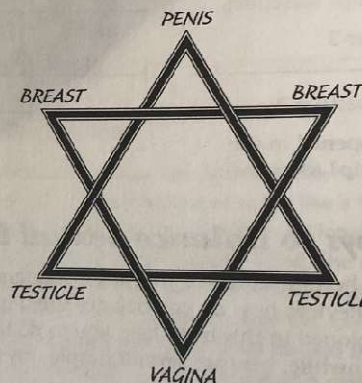


Always wait for her invitation. Do not enter her until she asks you to by words or actions. Then enter slowly, feeling each exquisite sensation. Move to her rhythm. Keep reminding her to breathe. Keep reassuring her that you are enjoying yourself, that she has all the time she needs, and that you appreciate her.

Remember to avoid having expectations about how she will respond. Some men feel challenged to "make" a woman have a female ejaculation. Take the pressure off her, just as you don't want any pressure to perform! While any woman can ejaculate, not all do, partly because the sensation immediately before often feels like the urge to urinate, which confuses women and makes them stop what they are doing.

- **Use different sounds** Chant "om" to stimulate more male energy; chant "ah" for more female energy. Then chant the two sounds alternately for several minutes until you feel the sounds are merging.
- **Focus on symbols of male or female** The Star of David, commonly identified as a symbol of the Jewish religion, is actually a mediation design, with the two intersecting triangles symbolizing the male and female, mind and body. The points on the Star of David also symbolize the sex organs, with the penis and vagina at the upper and lower tips, the breasts at either end of the top line, and the testicles at either end of the lower line.

The Star of David.



Chapter 11 ▶ *Giving Him the Best Nights Ever*

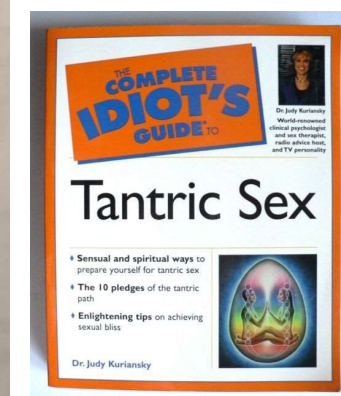


Loving the lingam by holding the base and caressing the tip.

Pleasing His God Spots

In popular jargon the woman has the infamous G spot—that spot inside the vagina that is super-sensitive. Similarly, the man has sensitive G spots, hot spots or *god areas*. On night 2—focus on his two external hot spots:

- ▶ The frenulum, which is the knob-like protrusion on the underside of the penis



Part 3 ▶ *Making Major Progress on the Path to Ecstasy*

Using massage to draw his sex energy into his heart.

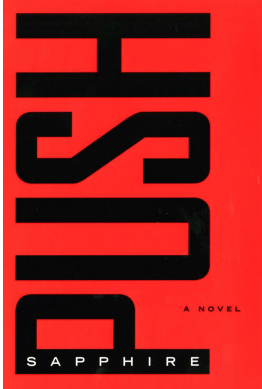


Languishing Over His Lingam

After you have massaged his entire body, you are ready to begin concentrating on his lingam. Most men delight in being touched there. After a body massage, he might be so excited when you touch his lingam that he feels the urge to ejaculate. In that case, use the stop-start technique (see Chapter 12, "Make Lovemaking Last ... and Last ... and Last") and transmute the energy, so he gets a chance to dwell in the pleasure of this part of the massage.

At this point reassurance is very important; reassure him he doesn't need to

P U S H



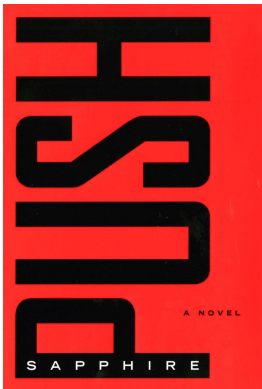
Great Valley
School District
refuses to
provide a list of
sexually graphic
books.

Whistleblower
student saw book
on library shelf.

This time I know Mama know. Umm hmmm, she know. She bring him to me. I ain' crazy, that stinky hoe give me to him. Probably thas' what he require to fuck her, some of me. Got to where he jus' come in my room any ole time, not jus' night. He climb on me. Shut up! he say. He slap my ass, You wide as the Mississippi, don't tell me a little bit of dick hurt you heifer. Git usta it, he laff, you is usta it. I fall back on bed, he fall right on top of me. Then I change stations, change *bodies*, I be dancing in videos! In movies! I be breaking, *fly*, jus' a dancing! Umm hmm heating up the stage at the Apollo for Doug E. Fresh or Al B. Shure. They love me! Say I'm one of the best dancers ain' no doubt of or about that!

"I'm gonna marry you," he be saying. Hurry up, nigger, shut up! He mess up dream talkin' 'n gruntin'. First he mess up my life fucking me, then he mess up the fucking talkin'. I wanna scream, Oh shut up! Nigger, how you gonna marry me and you is my daddy. I'm your daughter, fucking me illegal. But I keep my mouf shut so's the fucking don't turn into a beating. I start to feel good; stop being a video dancer and start coming. I try to go back to video but coming now, rocking under Carl now, my twat jumping juicy, it feel good. I feel shamed. "See, see," he slap my thigh like cowboys do horses on TV, then he squeeze my nipple, bite down on it. I come some more. "See, you LIKE it! You jus' like your mama—you die for it!" He pull his dick out, the white cum stuff pour out my hole wet up the sheets.

P U S H



Great Valley School District refuses to provide a list of sexually graphic books.

Whistleblower student saw book on library shelf.

This time I know Mama know. Umm hmmm, she know. She bring him to me. I ain' crazy, that stinky hoe give me to him. Probably thas' what he require to fuck her, some of me. Got to where he jus' come in my room any ole time, not jus' night. He climb on me. Shut up! he say. He slap my ass, You wide as the Mississippi, don't tell me a little bit of dick hurt you heifer. Git usta it, he laff, you is usta it. I fall back on bed, he fall right on top of me. Then I change stations, change *bodies*, I be dancing in videos! In movies! I be breaking, *fly*, jus' a dancing! Umm hmm heating up the stage at the Apollo for Doug E. Fresh or Al B. Shure. They love me! Say I'm one of the best dancers ain' no doubt of or about that!

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VEERING TOWARD SCYLLA SEEMED MUCH THE SAFER ROUTE. AND AFTER NAVIGATING THE PASSAGE, I SOON WASHED UP, A BIT STUNNED, ON A NEW SHORE.



IN TRUE HEROIC FASHION, I MOVED TOWARD THE THING I FEARED.



YET WHILE ODYSSEUS SCHEMED DESPERATELY TO ESCAPE POLYPHEMUS'S CAVE, I FOUND THAT I WAS QUITE CONTENT TO STAY HERE FOREVER.



214



Great Valley School District

(3) copies

Follett Destiny Great Valley High School
Catalog

Library Search > Search Results > "Fun home"

Library Search
Destiny Discover
Resource Lists

How
Title Details
Review

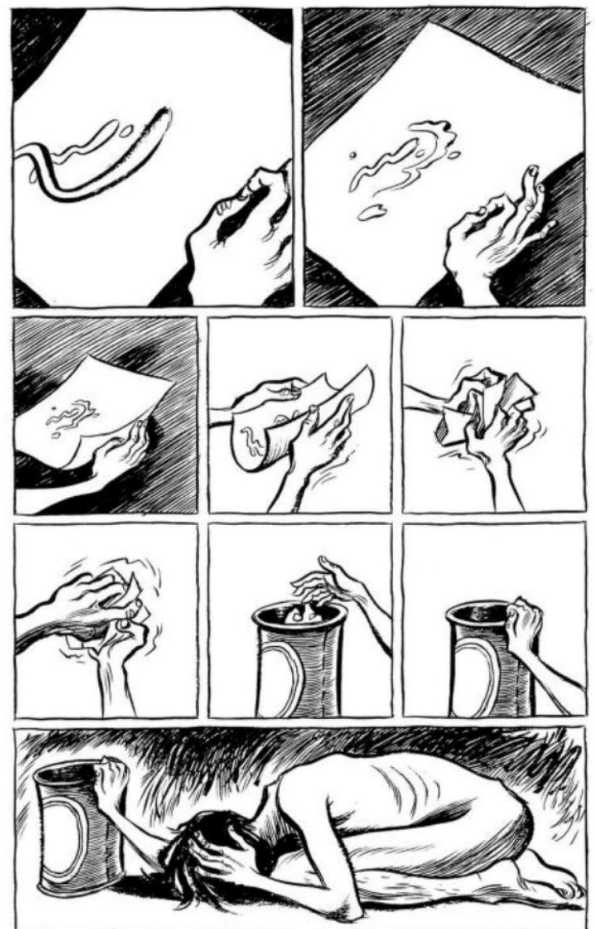
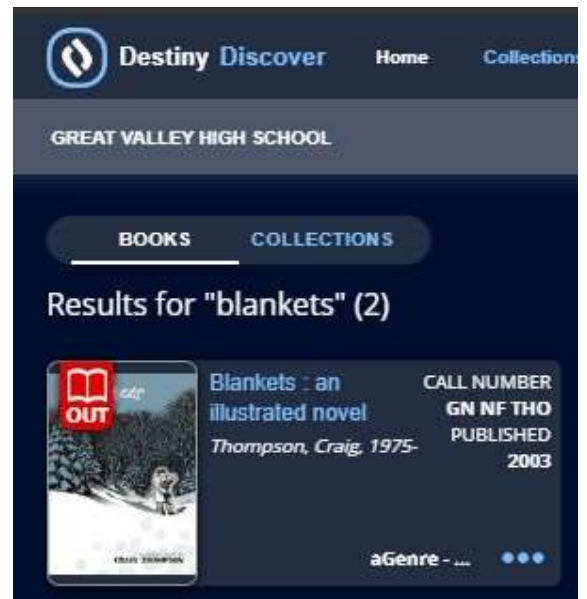
Fun home : a family tragicomic
Alison Bechdel.

Call #: GN 4F BEC	Local copies available 3 of 3
Sublocation: aGerm Graphic Novels Section	There are no off-site copies of this title. See all...

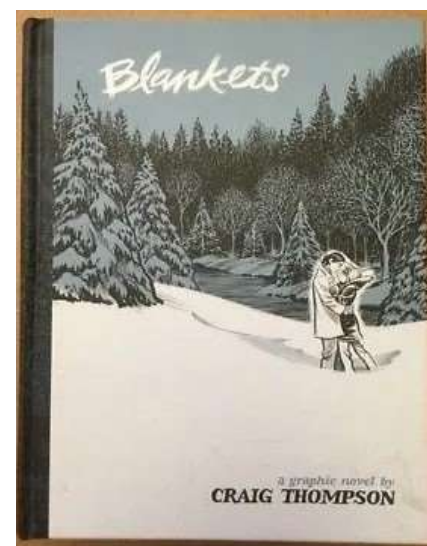
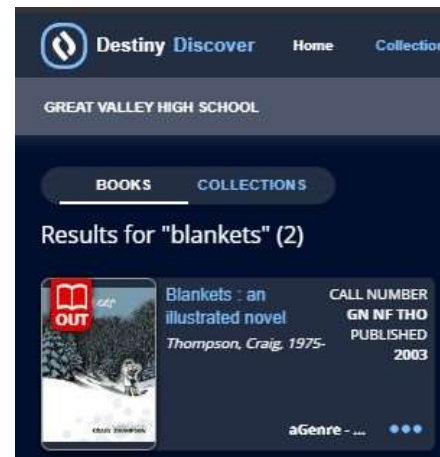
A graphic memoir about growing up with a remote dad who managed a funeral home while hiding his homosexuality. Includes adult content.

"Includes adult content"

Newly discovered material: Blankets by Craig Thompson, masturbation



Newly discovered material: Blankets by Craig Thompson, masturbation



Newly discovered material: Blankets by Craig Thompson



423




Destiny Discover Home Collection

GREAT VALLEY HIGH SCHOOL

BOOKS COLLECTIONS

Results for "blankets" (2)

 **Blankets : an illustrated novel**
Thompson, Craig, 1975-
CALL NUMBER
GN NF THO
PUBLISHED
2003
aGenre - ...

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Settled law: The Right of Parents

16. In defense of Plaintiff's rights to protect her child from the States harmful actions, Plaintiff looks no further than the Supreme Court of the United States, *Troxel v. Granville*, 530 US 57 (2000).

530 U.S. 57 (2000)

TROXEL et virv. GRANVILLE

No. 99-138.

Argued January 12, 2000.

Decided June 5, 2000. CERTIORARI TO THE SUPREME COURT OF WASHINGTON

Justice O'Connor announced the judgment of the Court and delivered an opinion, in which The Chief Justice, Justice Ginsburg, and Justice Breyer join:

The Fourteenth Amendment provides that no State shall "deprive any person of life, liberty, or property, without due process of law." We have long recognized that the Amendment's Due Process Clause, like its Fifth Amendment counterpart, "guarantees more than fair process." *Washington v. Glucksberg*, 521 U. S. 702, 719 (1997). The Clause also includes a substantive component that "provides heightened protection against government interference with certain fundamental rights and liberty interests." *Id.*, at 720; see also *Reno v. Flores*, 507 U. S. 292, 301-302 (1993).

The liberty interest at issue in this case—the interest of parents in the care, custody, and control of their children—is perhaps the oldest of the fundamental liberty interests recognized by this Court. More than 75 years ago, in *Meyer v. Nebraska*, 262 U.S. 390, 399, 401 (1923) we held that the "liberty" protected by the Due Process Clause includes the right of parents to "establish a home and bring up children" and "to control the education of their own." Two years later, in *Pierce v. Society of Sisters*, 268 U. S. 510, 534-535 (1925), we again held that the "liberty of parents and guardians" includes the right "to direct the upbringing and education of children under their control." We explained in *Pierce* that "[t]he child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations." *Id.*, at 535. We returned to the subject in *Prince v. Massachusetts*, 321 U. S. 158 (1944), and again confirmed that there is a constitutional dimension to the right of parents to direct the upbringing of their children. "It is cardinal with us that the custody, care and nurture of the child reside first in the parents, whose primary *66 function and freedom include preparation for obligations the state can neither supply nor hinder." *Id.*, at 166.

In subsequent cases also, we have recognized the fundamental right of parents to make decisions concerning the care, custody, and control of their children. See, e.g., *Stanley v. Illinois*, 405 U. S. 645, 651 (1972) ("It is plain that the interest of a parent in the companionship, care, custody, and management of his or her children 'come[s] to this Court with a momentum for respect lacking when appeal is made to liberties which derive merely from shifting economic arrangements' " (citation mitted)); *Wisconsin v. Yoder*, 406 U. S. 205, 232 (1972) ("The history and culture of Western civilization reflect a strong tradition of parental concern for the nurture and upbringing of their children. This primary role of the parents in the upbringing of their children is now established beyond debate as an enduring American tradition"); *Quilloin v. Walcott*, 434 U. S. 246, 255 (1978) ("We have recognized on numerous occasions that the relationship between parent and child is constitutionally protected");

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM**Settled law: The Right of Parents****530 U.S. 57 (2000)****TROXEL et virv. GRANVILLE**

Parham v. J. R., 442 U. S. 584, 602 (1979) ("Our jurisprudence historically has reflected Western civilization concepts of the family as a unit with broad parental authority over minor children. Our cases have consistently followed that course");

Santosky v. Kramer, 455 U. S. 745, 753 (1982) (discussing "[t]he fundamental liberty interest of natural parents in the care, custody, and management of their child");

Glucksberg, supra, at 720 ("In a long line of cases, we have held that, in addition to the specific freedoms protected by the Bill of Rights, the 'liberty' specially protected by the Due Process Clause includes the right . . . to direct the education and upbringing of one's children" (citing *Meyer* and *Pierce*). In light of this extensive precedent, it cannot now be doubted that the Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions concerning the care, custody, and control of their children.

First, the Troxels did not allege, and no court has found, that Granville was an unfit parent. That aspect of the case is important, for there is a presumption that fit parents act in the best interests of their children. As this Court explained in *Parham*:

"[O]ur constitutional system long ago rejected any notion that a child is the mere creature of the State and, on the contrary, asserted that parents generally have the right, coupled with the high duty, to recognize and prepare [their children] for additional obligations. . . . The law's concept of the family rests on a presumption that parents possess what a child lacks in maturity, experience, and capacity for judgment required for making life's difficult decisions. More important, historically it has recognized that natural bonds of affection lead parents to act in the best interests of their children." 442 U. S., at 602

Justice Souter, concurring in the judgment:

We have long recognized that a parent's interests in the nurture, upbringing, companionship, care, and custody of children are generally protected by the Due Process Clause of the Fourteenth Amendment. See, e. g., Meyer v. Nebraska, 262 U. S. 390, 399, 401 (1923); Pierce v. Society of Sisters, 268 U. S. 510, 535 (1925); Stanley v. Illinois, 405 U. S. 645, 651 (1972); Wisconsin v. Yoder, 406 U. S. 205, 232 (1972); Quilloin v. Walcott, 434 U. S. 246, 255 (1978); Parham v. J. R., 442 U. S. 584, 602 (1979); Santosky v. Kramer, 455 U. S. 745, 753 (1982);

Washington v. Glucksberg, 521 U. S. 702, 720 (1997). As we first acknowledged in *Meyer*, the right of parents to "bring up children," 262 U. S., at 399, and "to control the education of their own" is protected by the Constitution, *id.*, at 401. See also Glucksberg, supra, at 761

Our cases, it is true, have not set out exact metes and bounds to the protected interest of a parent in the relationship with his child, but *Meyer*'s repeatedly recognized right of upbringing would be a sham if it failed to encompass the right to be free of judicially compelled visitation by "any party" at "any time" a judge believed he "could make a 'better' decision"[3] than the objecting parent had done. The strength of a parent's interest in controlling a child's associates is as obvious as the influence of personal associations on the development of the child's social and moral character. Whether for good or for ill, adults not only influence but may indoctrinate children, and a choice about a child's social companions is not essentially different from the designation of the adults who will influence the child in school. Even a State's considered judgment about the preferable political and religious character of schoolteachers is not entitled

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM**Settled law: The Right of Parents****530 U.S. 57 (2000)****TROXEL et virv. GRANVILLE**

*79 to prevail over a parent's choice of private school. *Pierce, supra*, at 535 ("The fundamental theory of liberty upon which all governments in this Union repose excludes any general power of the State to standardize its children by forcing them to accept instruction from public teachers only. The child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations"). It would be anomalous, then, to subject a parent to any individual judge's choice of a child's associates from out of the general population merely because the judge might think himself more enlightened than the child's parent.[4] To say the least (and as the Court implied in *Pierce*), parental choice in such matters is not merely a default rule in the absence of either governmental choice or the government's designation of an official with the power to choose for whatever reason and in whatever circumstances."

Justice Thomas, concurring in the judgment:

"... I agree with the plurality that this Court's recognition of a fundamental right of parents to direct the upbringing of their children resolves this case. Our decision in *Pierce v. Society of Sisters*, 268U. S. 510 (1925), holds that parents have a fundamental constitutional right to rear their children, including the right to determine who shall educate and socialize them. The opinions of the plurality, Justice Kennedy, and Justice Souter recognize such a right, but curiously none of them articulates the appropriate standard of review. I would apply strict scrutiny to infringements of fundamental rights. Here, the State of Washington lacks even a legitimate governmental interest—to say nothing of a compelling one—in second-guessing a fit parent's decision regarding visitation with third parties. On this basis, I would affirm the judgment below."

17. The Justices affirm Plaintiffs right to protect her child from State sponsored harm:

- a. The Fourteenth Amendment provides that no State shall "deprive any person of life, liberty, or property, without due process of law."
- b. The Clause also includes a substantive component that "provides heightened protection against government interference with certain fundamental rights and liberty interests."
- c. The liberty interest at issue in this case — the interest of parents in the care, custody, and control of their children — is perhaps the oldest of the fundamental liberty interests recognized by this Court.
- d. More than 75 years ago, we held that the "liberty" protected by the Due Process Clause includes the right of parents to "establish a home and bring up children" and "to control the education of their own."
- e. we again held that the "liberty of parents and guardians" includes the right "to direct the upbringing and education of children under their control." "It is cardinal with us that the custody, care and nurture of the child reside first in the parents, whose primary function and freedom include preparation for obligations the state can neither supply nor hinder."

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Settled law: The Right of Parents

530 U.S. 57 (2000)

TROXEL et virv. GRANVILLE

- f. "The history and culture of Western civilization reflect a strong tradition of parental concern for the nurture and upbringing of their children. This primary role of the parents in the upbringing of their children is now established beyond debate as an enduring American tradition"
- g. "We have recognized on numerous occasions that the relationship between parent and child is constitutionally protected"
- h. "Our jurisprudence historically has reflected Western civilization concepts of the family as a unit with broad parental authority over minor children. Our cases have consistently followed that course"
- i. "In a long line of cases, we have held that, in addition to the specific freedoms protected by the Bill of Rights, the 'liberty' specially protected by the Due Process Clause includes the righ[t] . . . to direct the education and upbringing of one's children"
- j. "In light of this extensive precedent, it cannot now be doubted that the Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions concerning the care, custody, and control of their children."
- k. The law's concept of the family rests on a presumption that parents possess what a child lacks in maturity, experience, and capacity for judgment required for making life's difficult decisions. More important, historically it has recognized that natural bonds of affection lead parents to act in the best interests of their children."
- l. the right of parents to "bring up children, and "to control the education of their own" is protected by the Constitution
- m. holds that parents have a fundamental constitutional right to rear their children, including the right to determine who shall educate and socialize them. I would apply strict scrutiny to infringements of fundamental rights.

18. Reasonable persons attempted compromise with this obscene material, yet failed. As detailed on pages 35-40 of Plaintiff's August 24, 2022 complaint, Follett, the nation's largest vendor of public school library management software, reversed a plan to give parents an "opt out" from explicit material. Reason? Activist pressure.

19. The State's top law enforcement actor and Defendant claims he's "entitled to immunity", then repeatedly mocks Plaintiff's appeals to protect her child:

"Give me a break, right? It's not freedom to tell our school children what books they're allowed to read". Listen for yourself: <https://vimeo.com/775330067>

20. Plaintiff does not need a lawyer to spell out the obvious: the State has no interest in the best interest of Plaintiff's child, children of this Commonwealth, Federal Law aimed at protecting children from sexual exploitation.

21. Plaintiff's complaint demands strict scrutiny and immediate remedy.

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Miller Obscenity Test: Adult community Standards

Miller v. California, 413 U.S. 15, 24-25 (1973).

1. Whether the average person, applying contemporary adult community standards, finds that the matter, taken as a whole, appeals to prurient interests (*i.e.*, an erotic, lascivious, abnormal, unhealthy, degrading, shameful, or morbid interest in nudity, sex, or excretion);
 2. Whether the average person, applying contemporary adult community standards, finds that the matter depicts or describes sexual conduct in a patently offensive way (*i.e.*, ultimate sexual acts, normal or perverted, actual or simulated, masturbation, excretory functions, lewd exhibition of the genitals, or sado-masochistic sexual abuse); and
 3. Whether a reasonable person finds that the matter, taken as a whole, lacks serious literary, artistic, political, or scientific value.
22. On October 18, 2022, Plaintiff testified before the Pennsylvania Senate Government Committee to raise awareness of obscene sexually explicit material in public schools, and in support of Senate Bill 996, a Parental Bill of Rights.

Unedited video: <https://vimeo.com/763213453>

23. Plaintiff showed the same obscene images referenced in her August 24, 2022 complaint.

Material: Gender Queer, child on child oral sex



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Miller Obscenity Test: Adult community Standards

24. October 18, 2022, Plaintiff's testimony before the PA Senate Government Committee.

Unedited video: <https://vimeo.com/763213453>

Material: Gender Queer, pedophilia



25. Material: Fun Home, cartoons of adult women engaged in vaginal oral sex



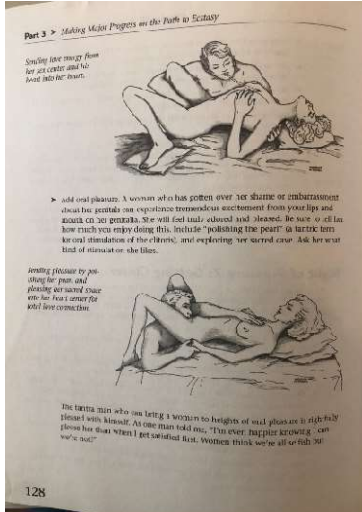
14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Miller Obscenity Test: Adult community Standards

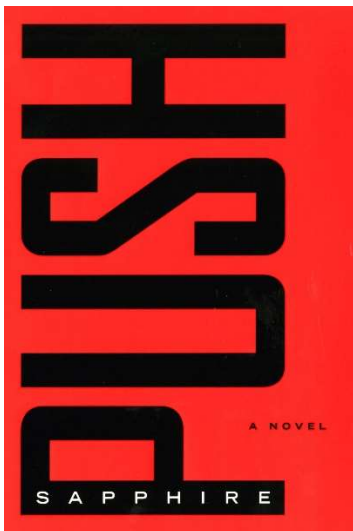
26. October 18, 2022, Plaintiff's testimony before the PA Senate Government Committee.

Unedited video: <https://vimeo.com/763213453>

Material: Tantric Sex, coaching oral sex, anal sex, vaginal and penis stimulation



27. Material: PUSH, graphic detail of a female child repeatedly raped by her father



Page 32: Daddy put his pee-pee smelling thing in my mouth, my pussy, but never hold me. I see me, first grade, pink dress dirty sperm stuffs on it. No one comb my hair.


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Miller Obscenity Test: Adult community Standards, Pennsylvania Senate

28. After the hearing, the Senate Democrat Communications Department refused to post the hearing until they edited sexually explicit images and words shared during the Plaintiffs' testimony.
29. One week later, the Senate posted the hearing with a "Mature Content Warning".
30. **WHERE IS EQUAL PROTECTION OF THE LAWS FOR OUR CHILDREN?**

Edited Senate hearing: <https://stategovernment.pasenategop.com/sg-101822/>





**Mature Content Warning-The following
webpage contains blurred images of
sexually explicit content.**

You must be 18 years of age or older to view this page.

Are you 18 years of age or older?

**Yes, I am at least 18
years of age** **No, I am not at least 18
years of age**

☐ Remember me

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **Pennsylvania Senate**

31. October 18, 2022, Plaintiff's testimony before the Pennsylvania Senate.

Material: Gender Queer, child on child oral sex

Unedited testimony: <https://vimeo.com/763213453>



Public edited testimony: <https://stategovernment.pasenategop.com/sg-101822/>



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **Pennsylvania Senate**

32. October 18, 2022, Plaintiff's testimony before the Pennsylvania Senate.

Material: Gender Queer, pedophilia

Unedited testimony: <https://vimeo.com/763213453>



Public edited testimony: <https://stategovernment.pasenategop.com/sg-101822/>



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **Pennsylvania Senate**

33. October 18, 2022, Plaintiff's testimony before the Pennsylvania Senate.

Material: Fun Home, cartoons of adult women engaged in vaginal oral sex

Unedited testimony: <https://vimeo.com/763213453>



Public edited testimony: <https://stategovernment.pasenategop.com/sg-101822/>



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **Pennsylvania Senate**

34. October 18, 2022, Plaintiff's testimony before the Pennsylvania Senate.

Material: Fun Home, cartoons of adult women engaged in vaginal oral sex

Unedited testimony: <https://vimeo.com/763213453>



Public edited testimony: <https://stategovernment.pasenategop.com/sg-101822/>



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, GoFundMe

35. October 31, 2022, GoFundMe sent the Plaintiff an email alerting her they removed (6) “sensitive images” from her campaign page, images on the Plaintiffs page since June 2022.
36. A second entity protecting “all audiences”, yet the materials are still available to minors in public schools without restriction.
37. **WHERE IS EQUAL PROTECTION OF THE LAWS FOR OUR CHILDREN?**

From: The GoFundMe team (GoFundMe) <support@gofundme.com>
Sent: Monday, October 31, 2022 11:35 AM
To: Fenicia Redman
Subject: Important Message From GoFundMe [Ticket #10886766]

Dear Fenicia,

We're sending you this message to tell you that we have removed a sensitive image you posted on your fundraiser. Please know, we have to make sure that images used on GoFundMe are suitable for all audiences. For this reason, we ask that you add a new photo by following these instructions:

1. Sign in to GoFundMe by following this [link](#).
2. Click *Your fundraisers*, then choose the fundraiser you would like to edit.
3. On the left side of the screen, click *Edit & Settings*, then click the *Photo* tab.
4. Click the *Change* button, then click *Upload photo*.
5. Choose your image, then click *Save*.

We appreciate you updating your image and thank you for your understanding.

Best regards,

The GoFundMe team

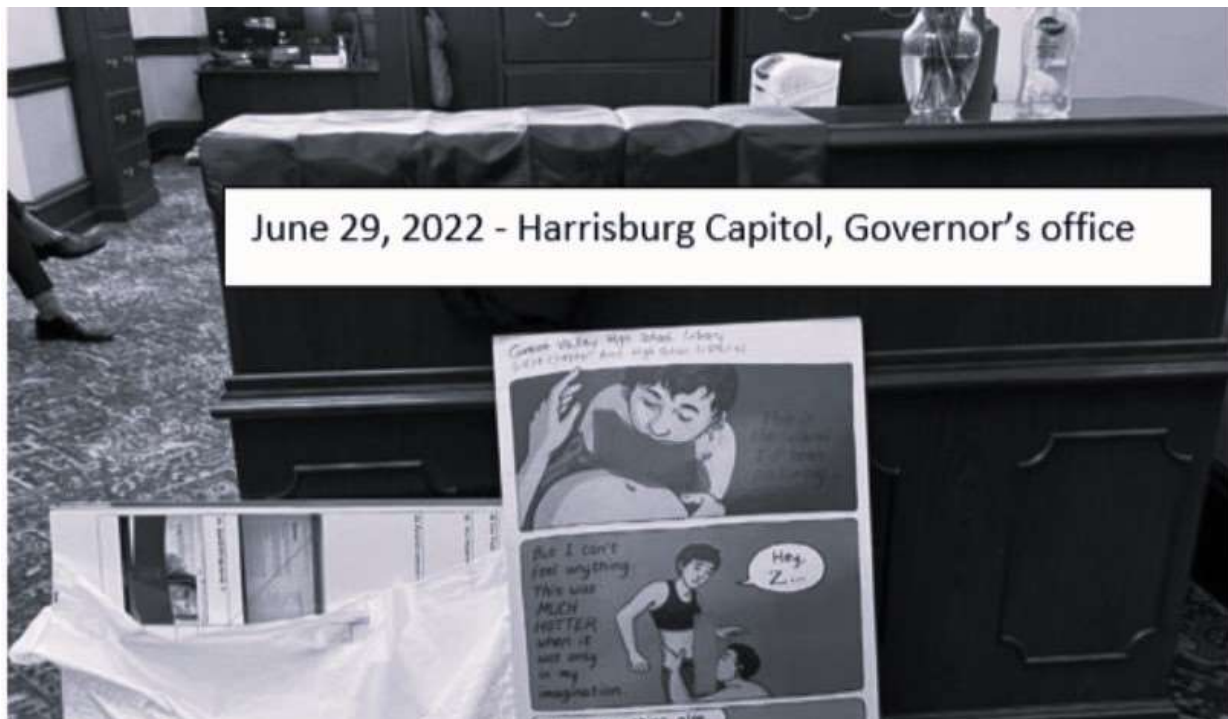
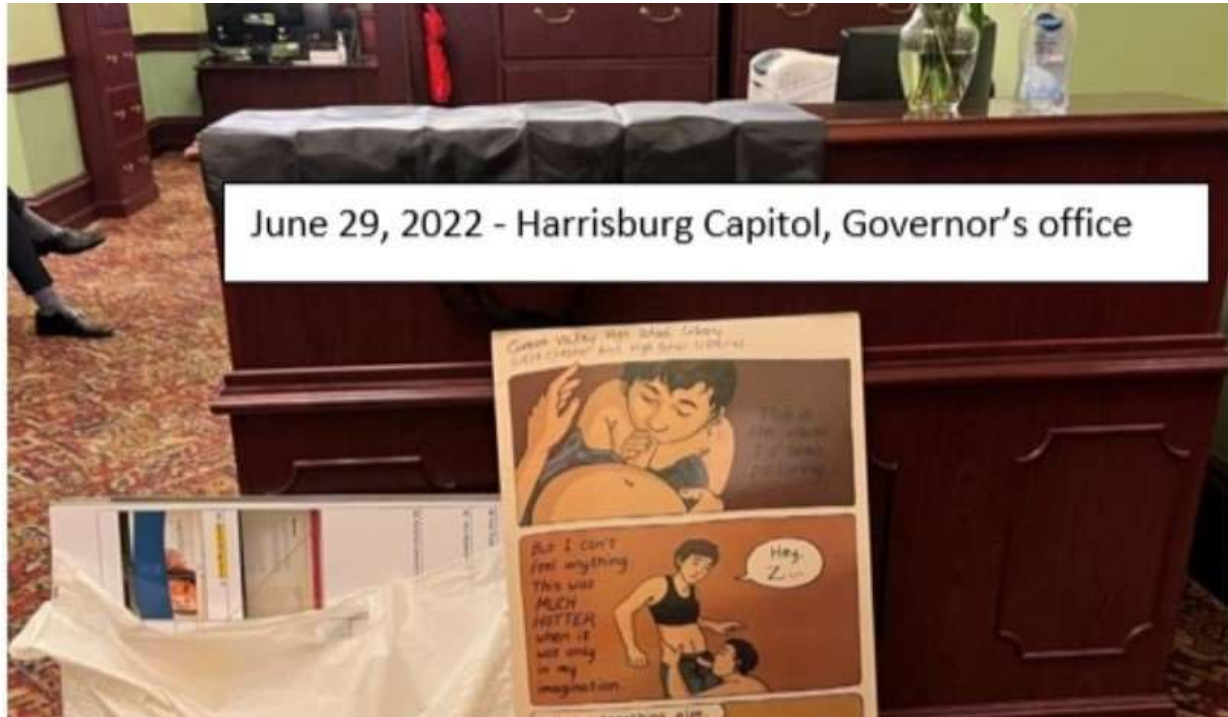
Visit our terms: <https://www.gofundme.com/terms>

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, GoFundMe

38. October 31, 2022, Plaintiff made additional edits to (6) images GoFundMe removed.

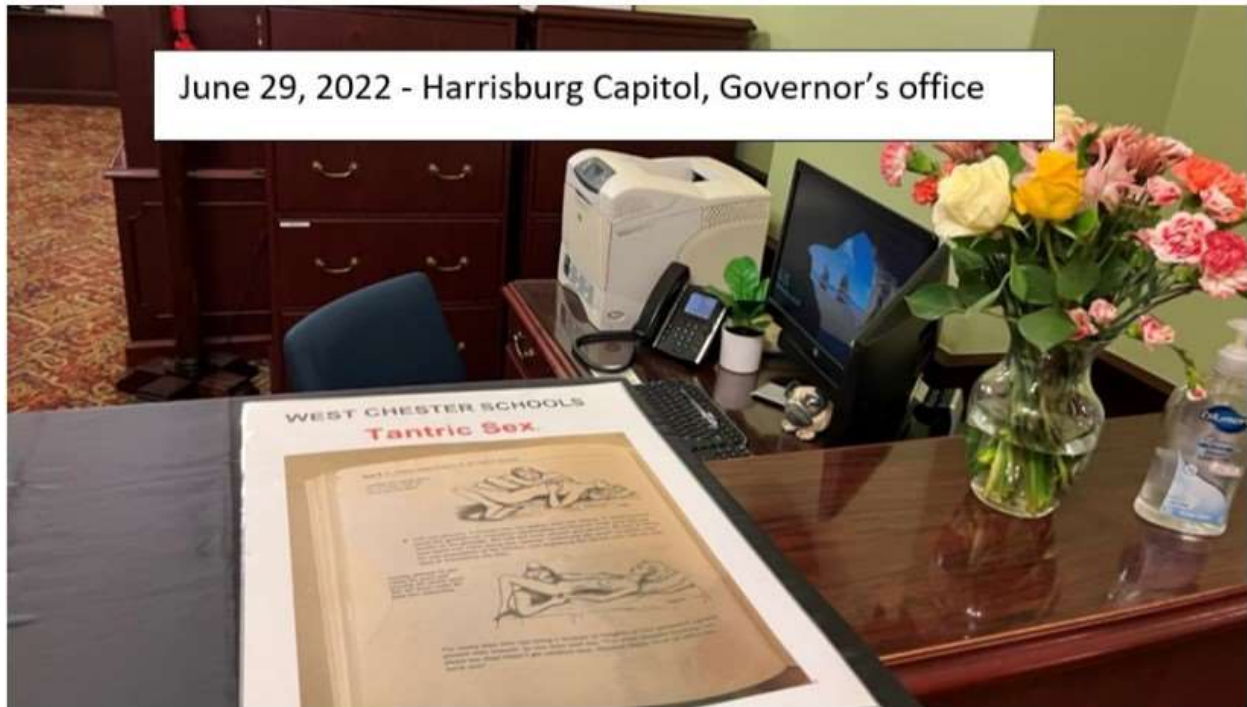
39. Plaintiff then reposted the images in black and white. GoFundMe accepted the edits.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

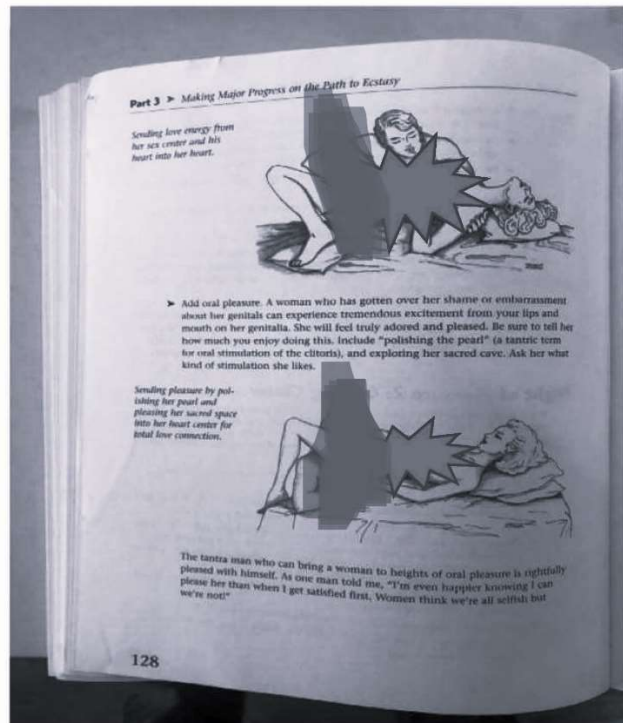
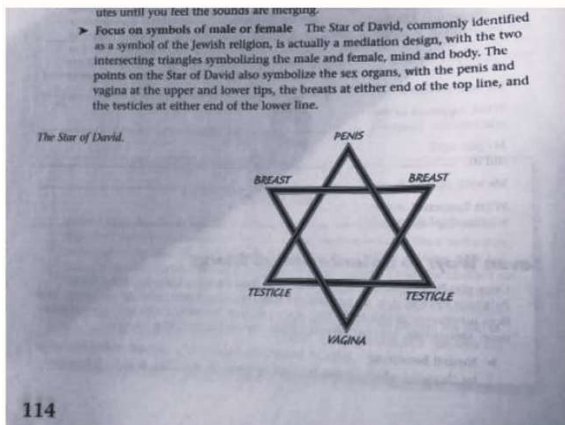
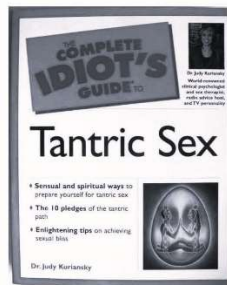
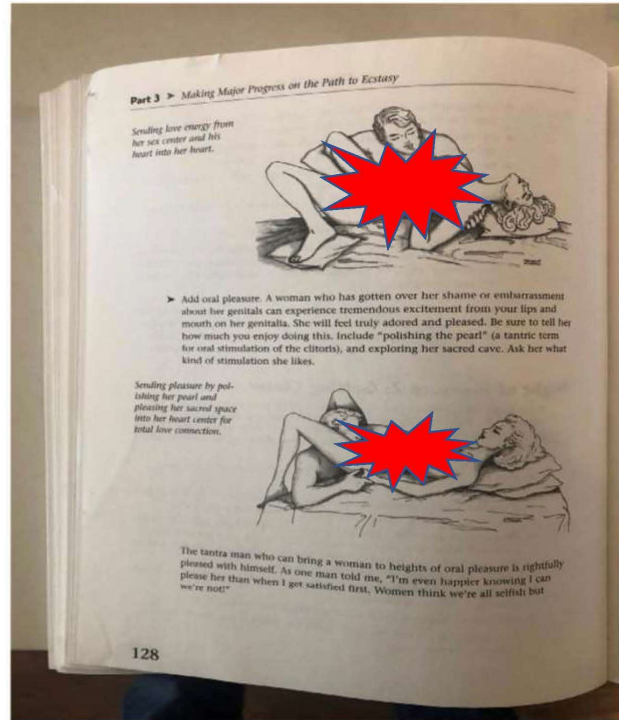
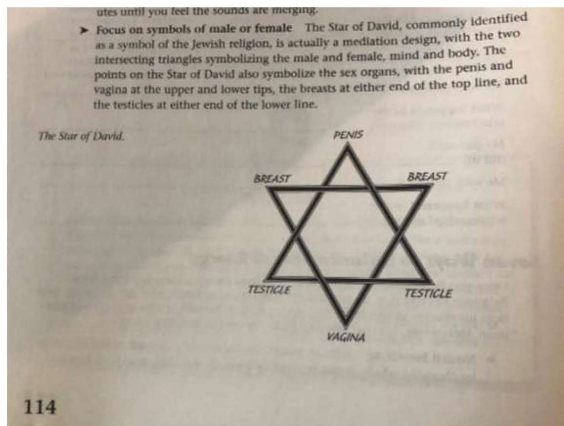
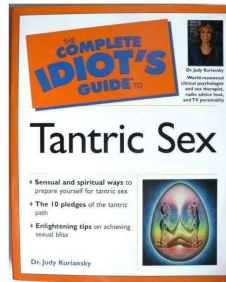
Obscenity Test: Adult community Standards, **GoFundMe**

40. October 31, 2022, Tantric Sex image removed by GoFundMe. Plaintiff edited and reposted.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIMObscenity Test: Adult community Standards, **GoFundMe**

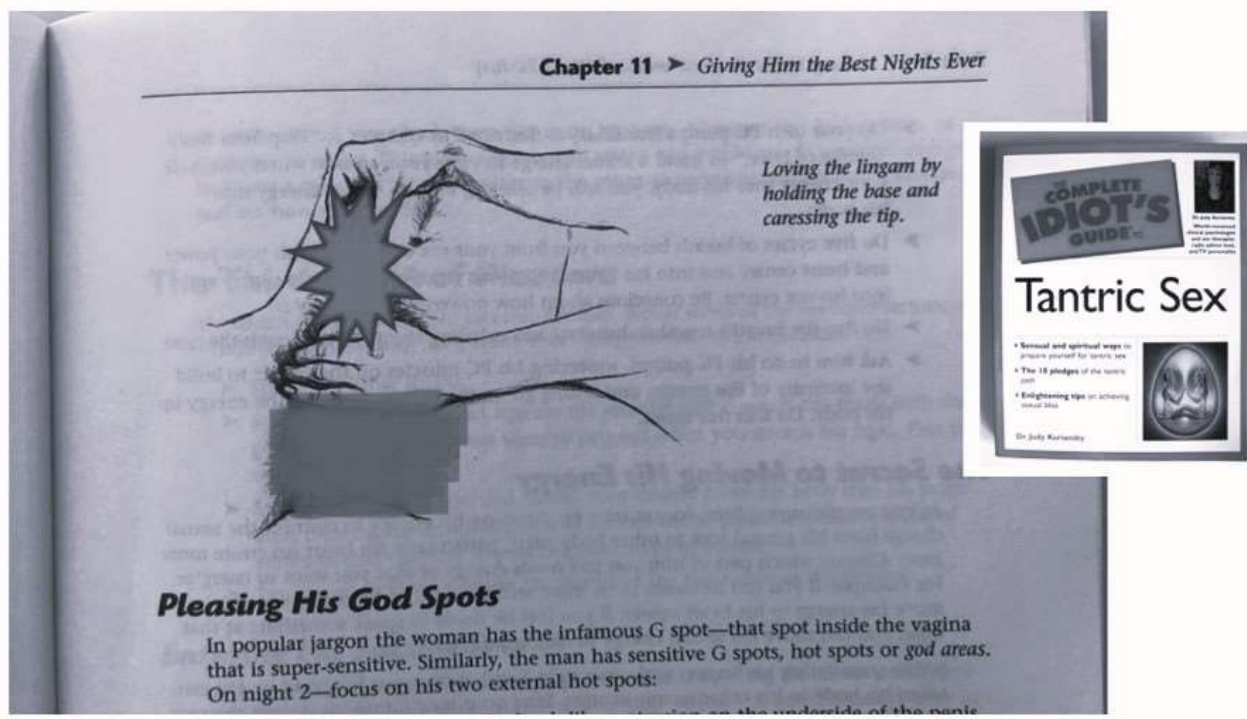
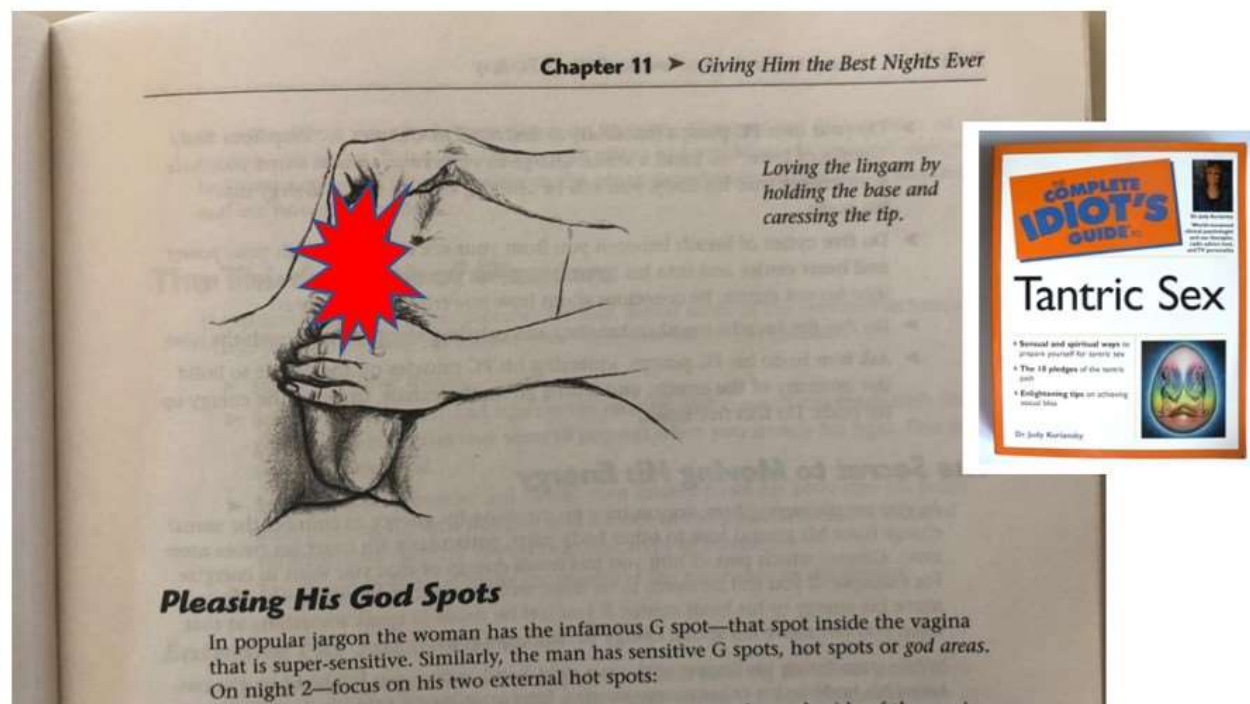
41. October 31, 2022, Tantric Sex image removed by GoFundMe. Plaintiff edited and reposted.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **GoFundMe**

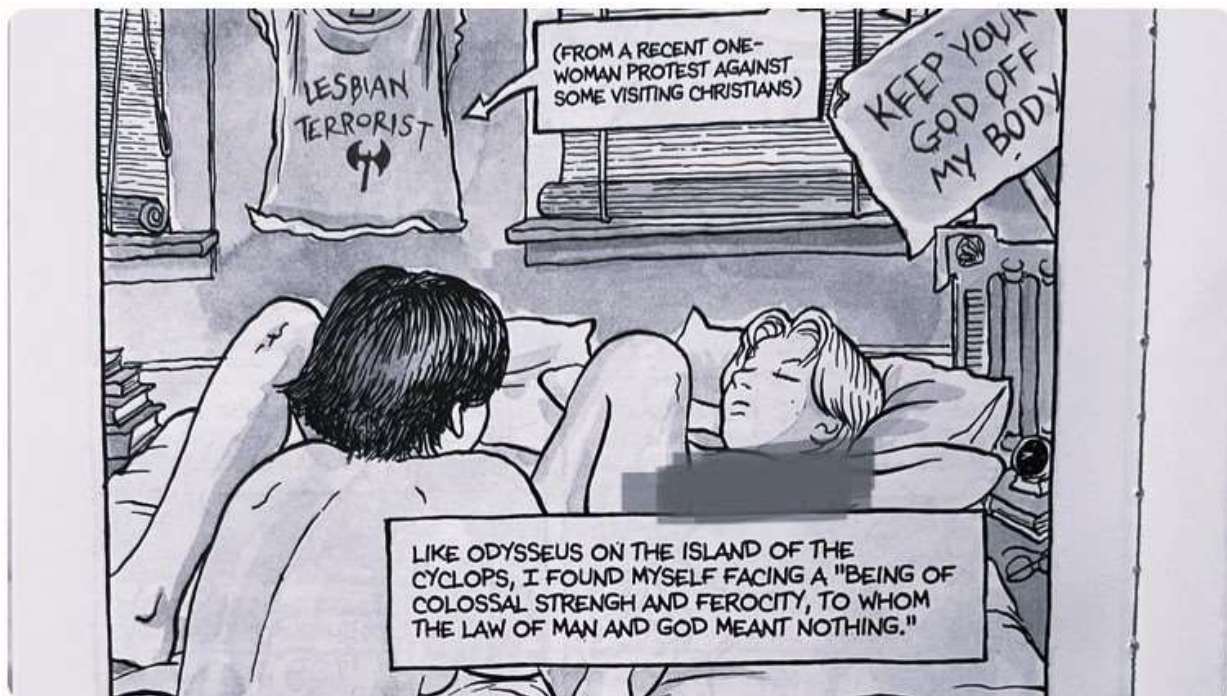
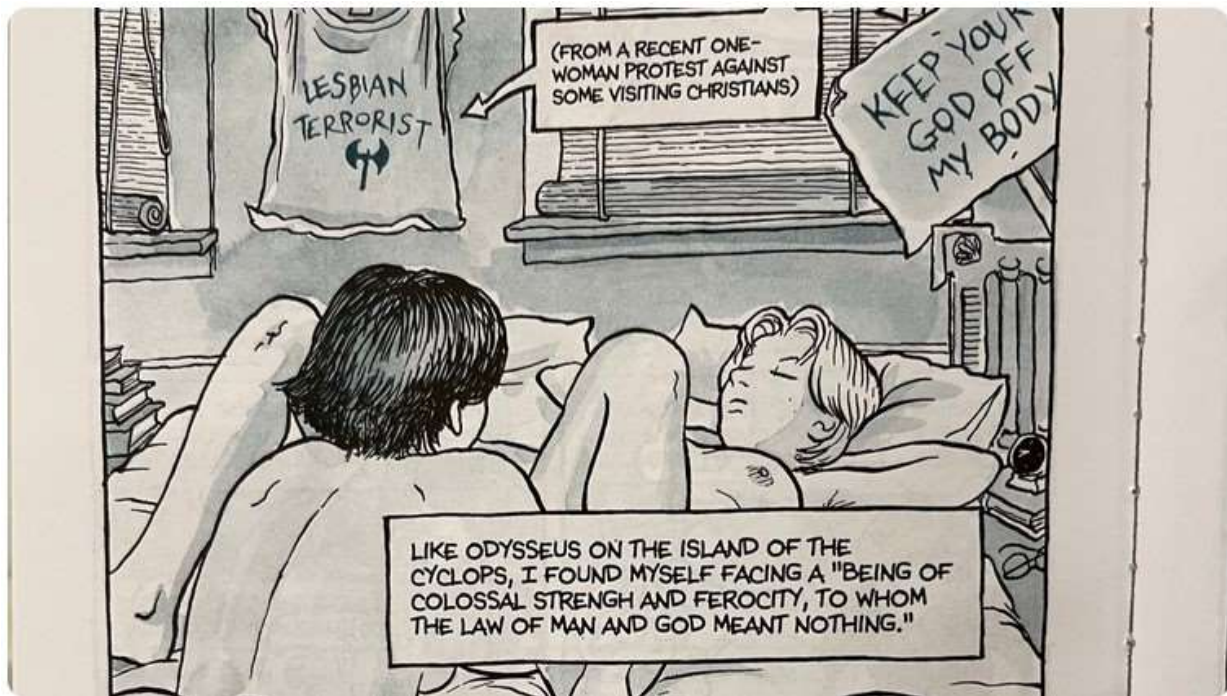
42. October 31, 2022, Tantric Sex image removed by GoFundMe. Plaintiff edited and reposted.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscenity Test: Adult community Standards, **GoFundMe**

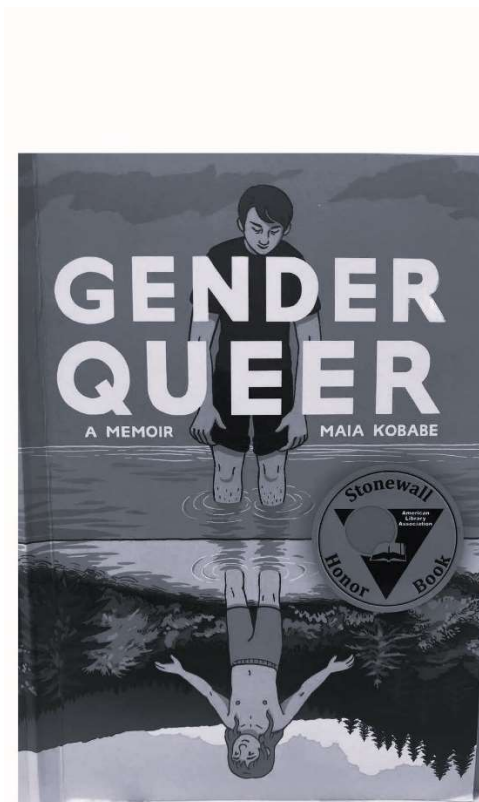
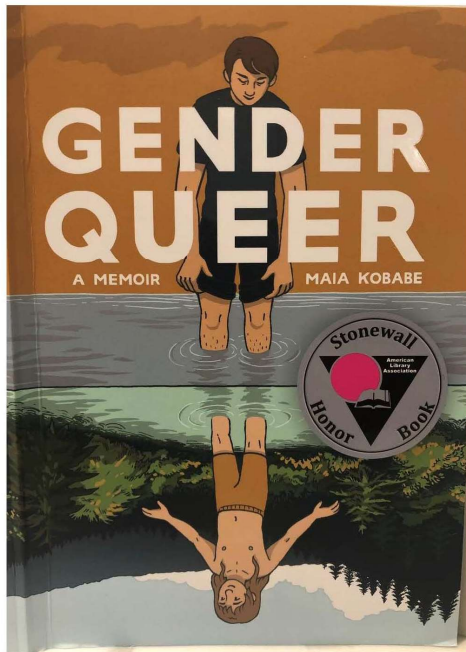
43. October 31, 2022, Fun Home image removed by GoFundMe. Plaintiff edited and reposted.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

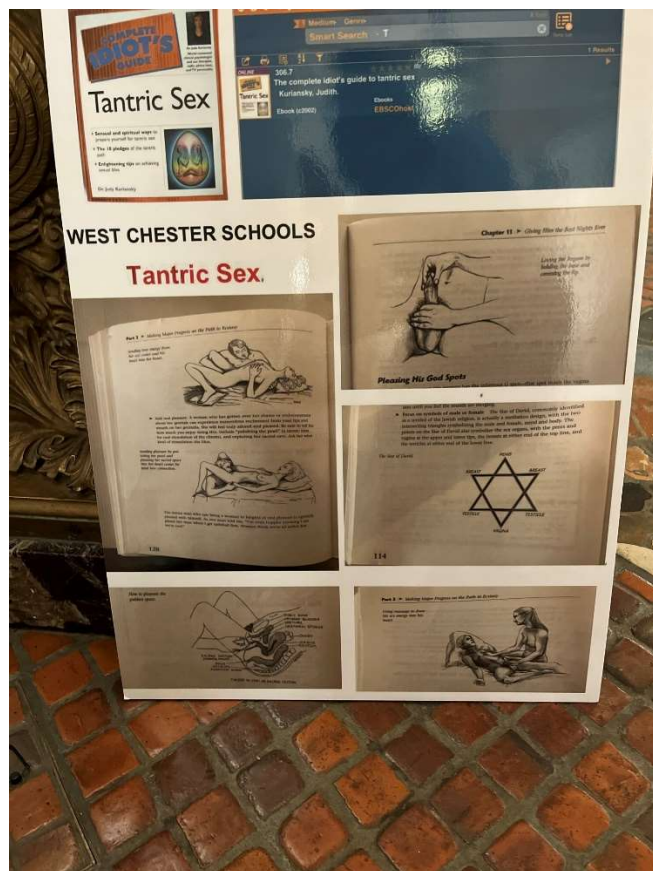
Obscenity Test: Adult community Standards, **GoFundMe**

44. October 31, 2022, Gender Queer image removed by GoFundMe. Plaintiff edited and reposted.



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM**Obscenity Test: Adult community Standards, Harrisburg Capitol Police**

45. June 20, 2022, during a silent protest in the Capitol Rotunda, Capitol Police Lieutenant Devlin demanded I removed two posters from public view because “*there are children walking these halls, get rid of it now!*”
46. These are the two posters Lieutenant Devlin singled out for removal:



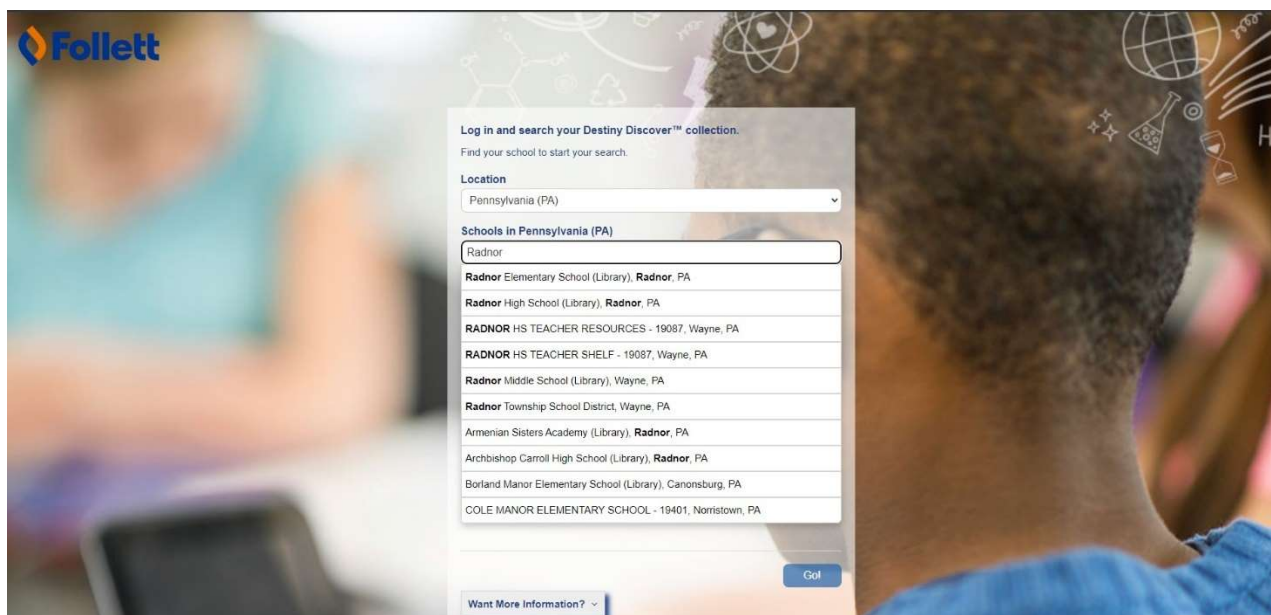
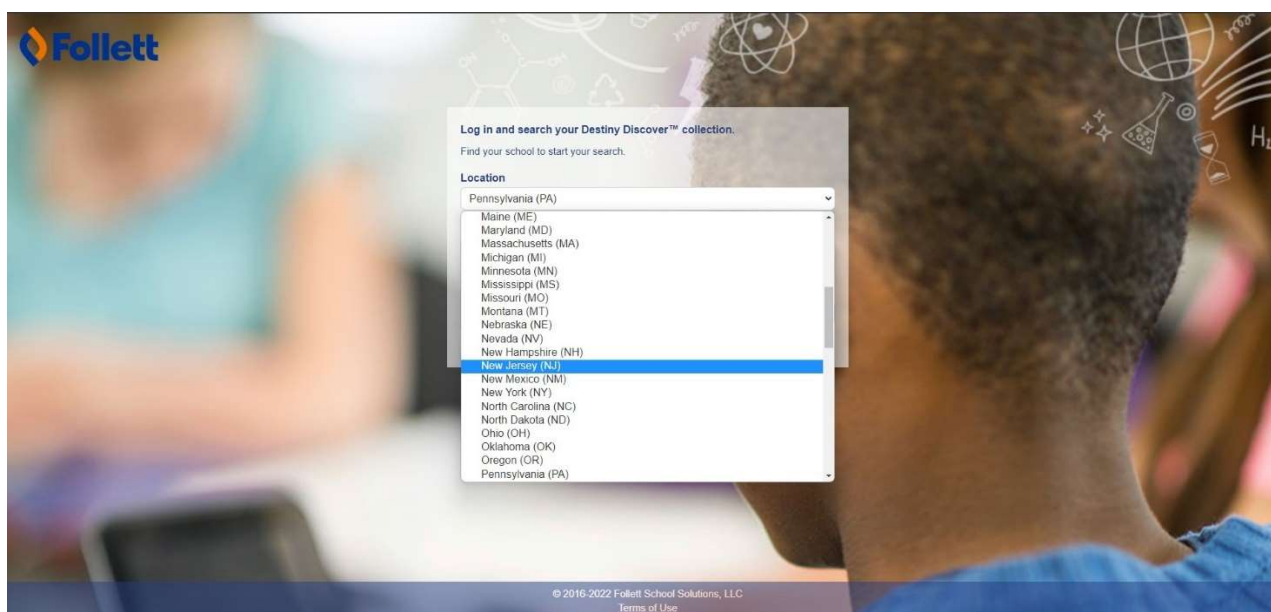
47. Pennsylvania Democrat and Republican Senators, GoFundMe, and Capitol police found this material violates community standards, yet it remains unrestricted in Plaintiff's child's school library, libraries across the State of Pennsylvania, and the Nation.
48. On October 3, 2022, Rasmussen released survey results showing “69% of voters believe books containing explicit sexual depictions of sex acts, including homosexual sex, should not be present in public high school libraries.” For the sake of our children, what additional community outcry is needed?

https://www.rasmussenreports.com/public_content/politics/partner_surveys/voters_against_obscene_books_in_public_schools

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

49. In support of a Temporary Restraining Order against materials at issue in this complaint, Plaintiff offers a sampling of 74 public high schools in Pennsylvania, New Jersey, and Delaware where the same material is available to approximately 103,471 students.
50. Of the 103,471 students, how many minors? How many parents have no knowledge this material is available to their child? How many children have been affected by this material while the State punks around calling Parents extremists?
51. Searching Follett's portal by State, school name, and material title, this Court can confirm the accuracy of Plaintiff's sampling.

<https://security.follettsoftware.com/aasp/ui/pick/pick>

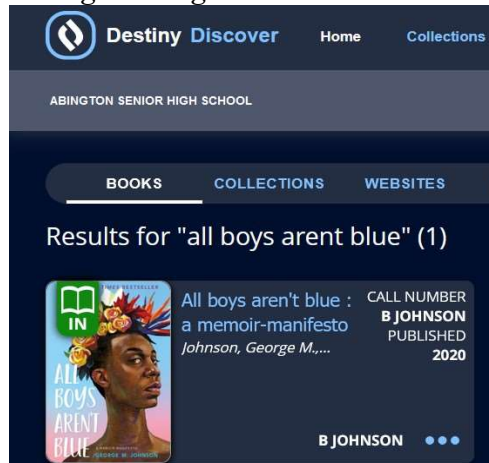


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

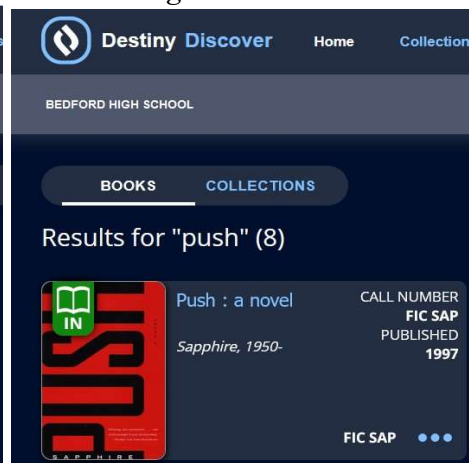
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

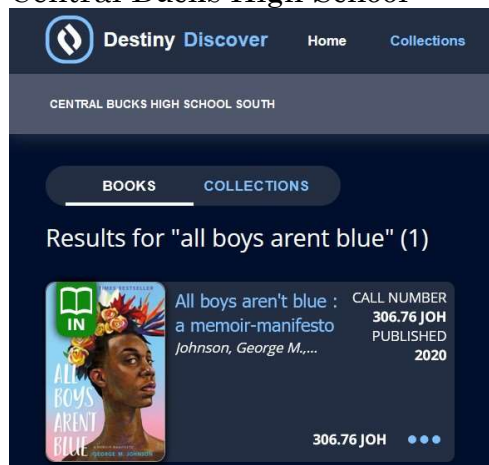
Abington High School



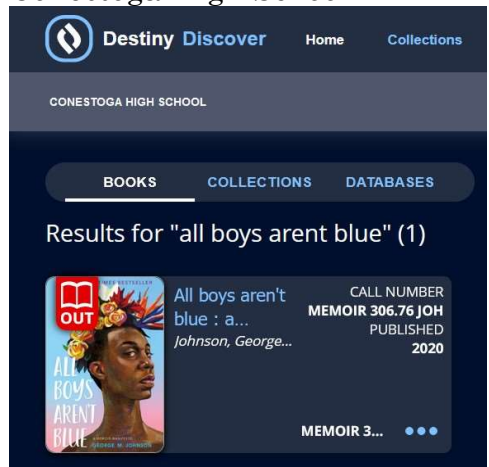
Bedford High School



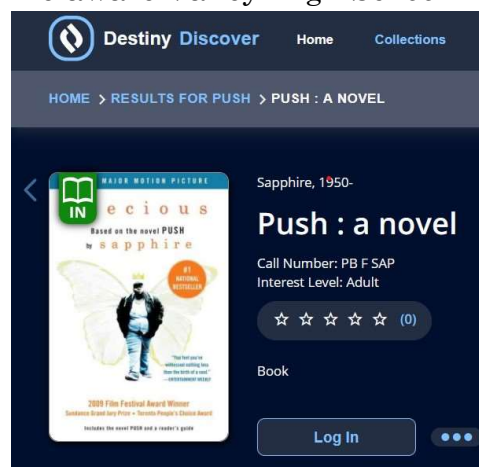
Central Bucks High School



Conestoga High School



Delaware Valley High School

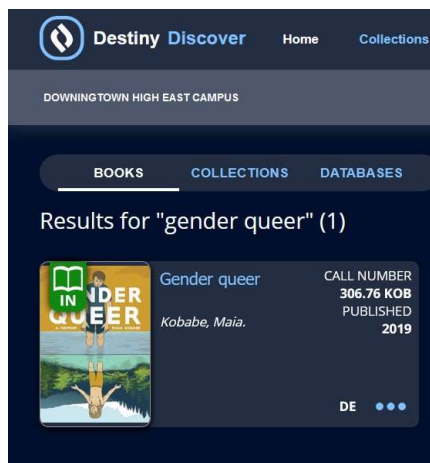
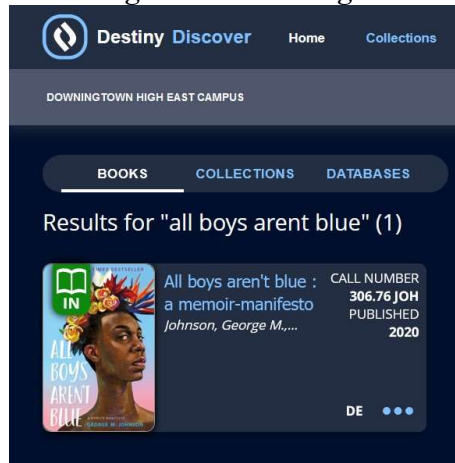


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

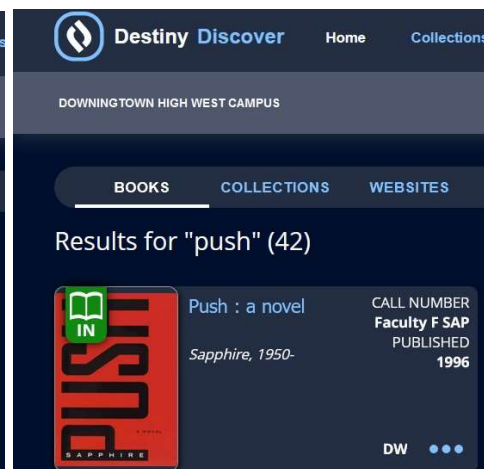
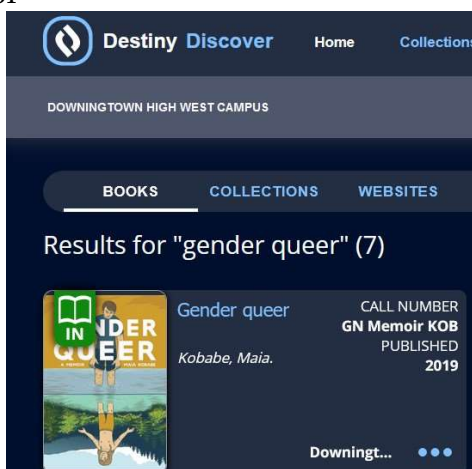
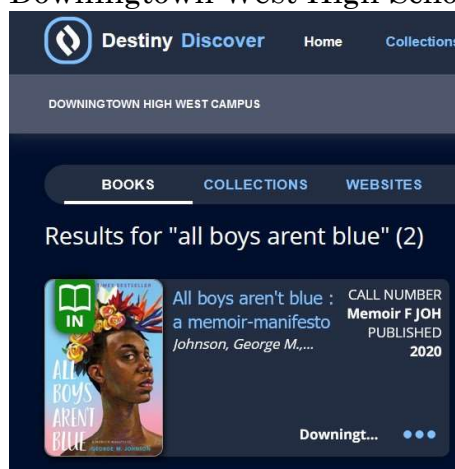
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

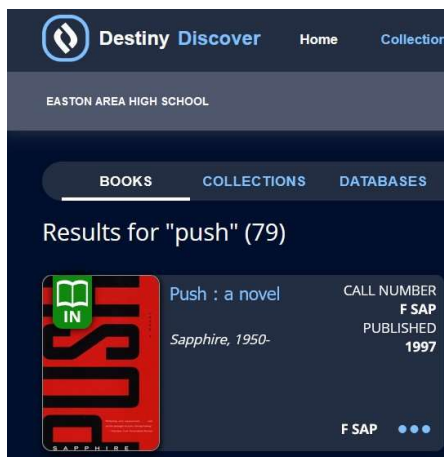
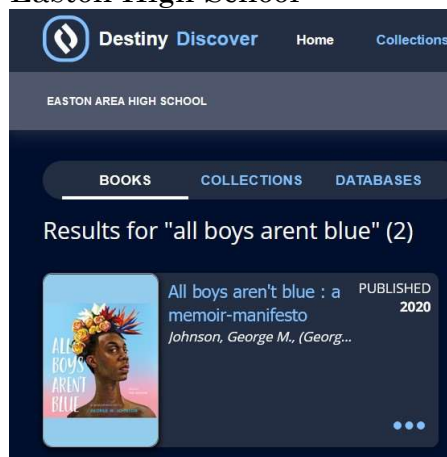
Downingtown East High School



Downingtown West High School



Easton High School

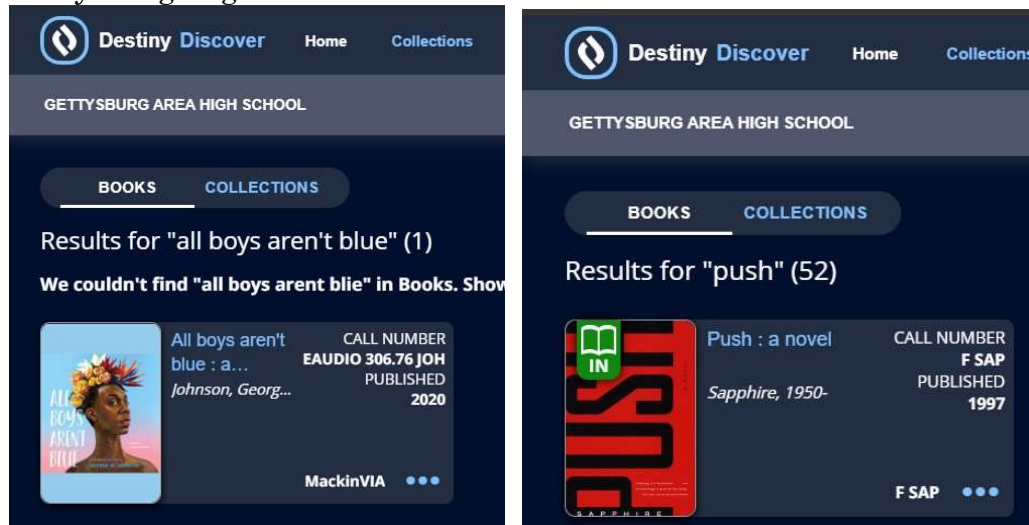


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

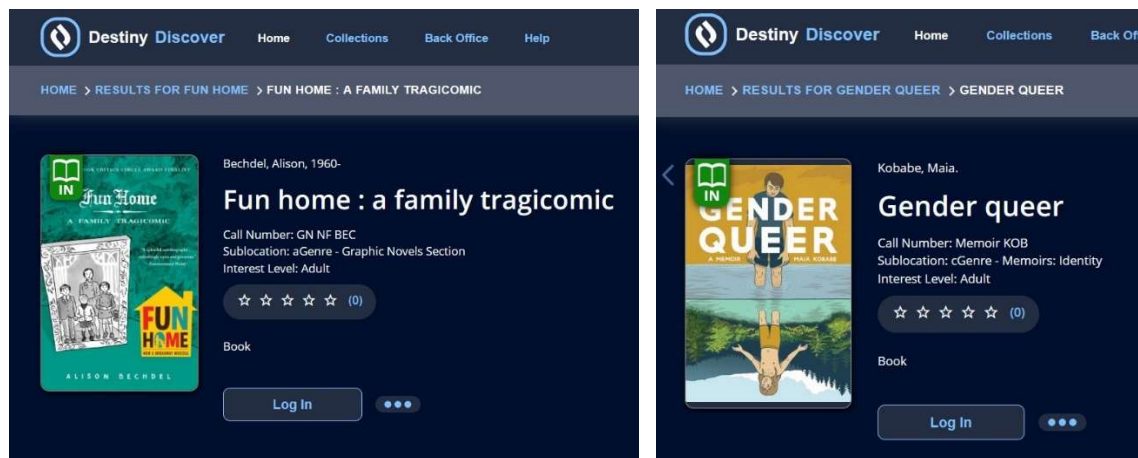
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

Gettysburg High School



Great Valley High School

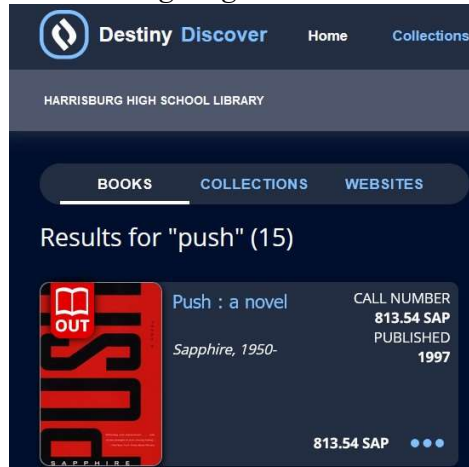


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

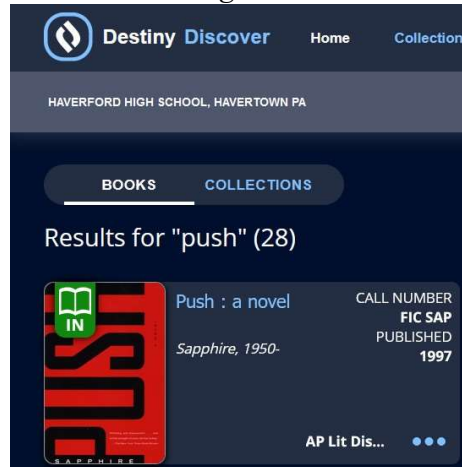
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

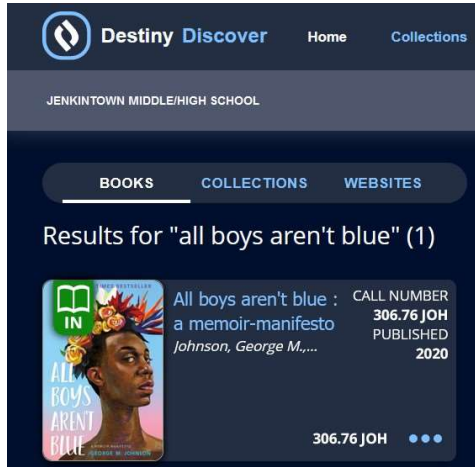
Harrisburg High School



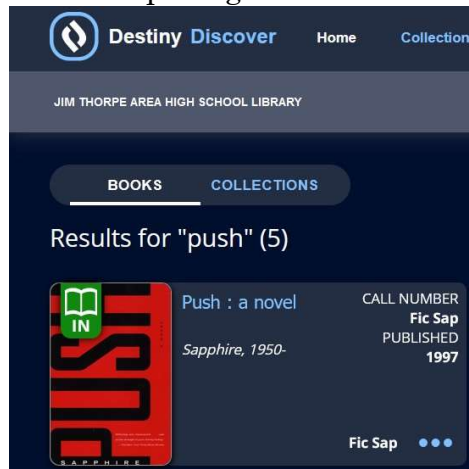
Havertown High School



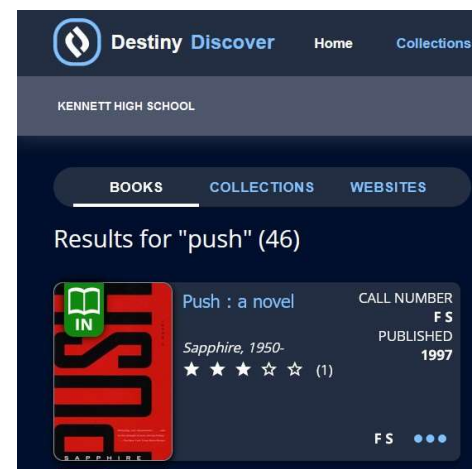
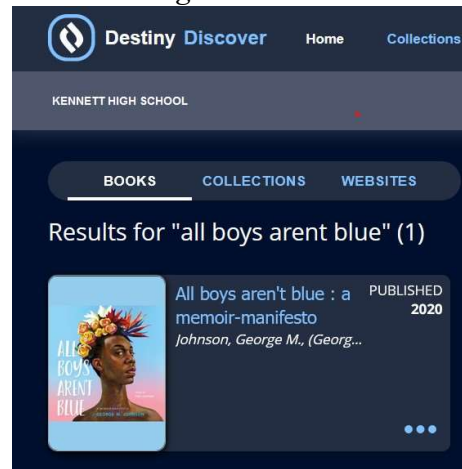
Jenkontown Middle School



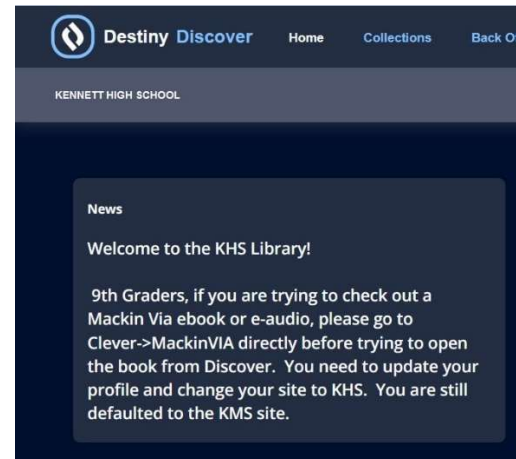
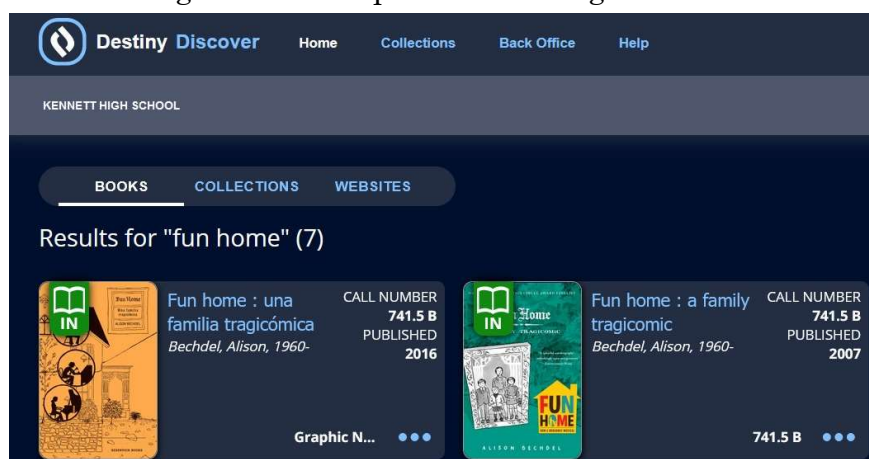
Jim Thorpe High School



Kennett High School



Kennett High School – Spanish and English

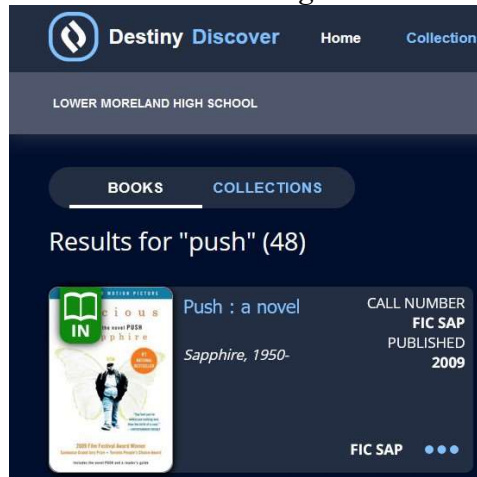


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

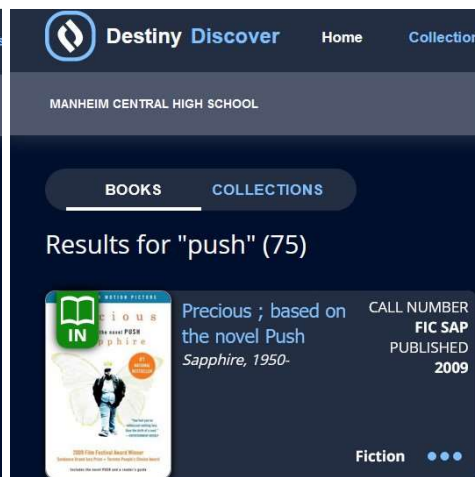
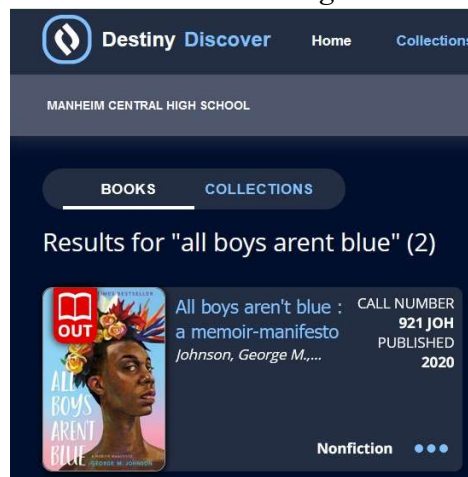
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

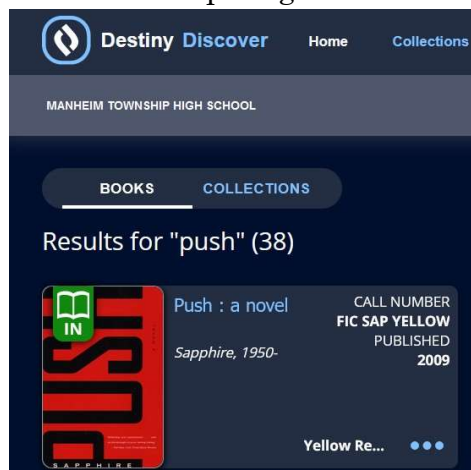
Lower Moreland High School



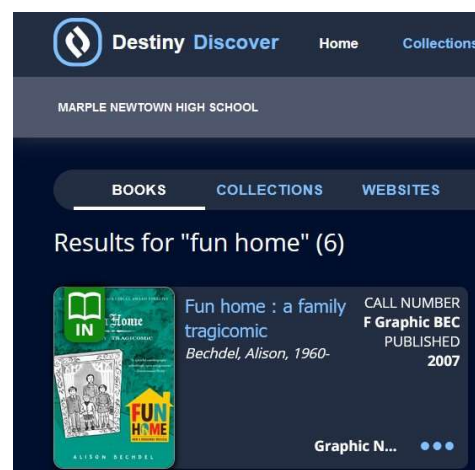
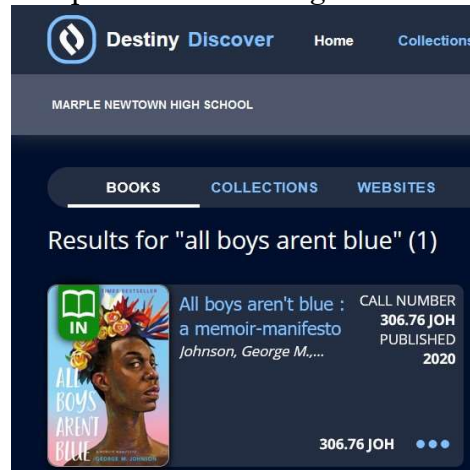
Manheim Central High School



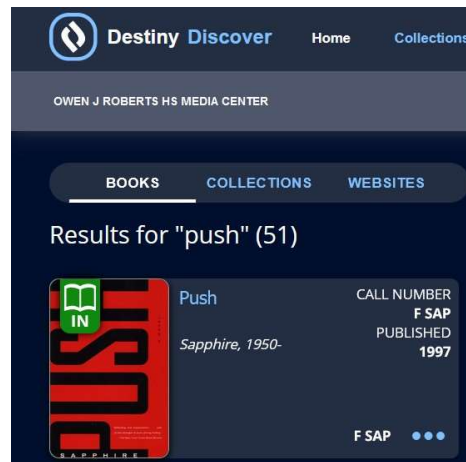
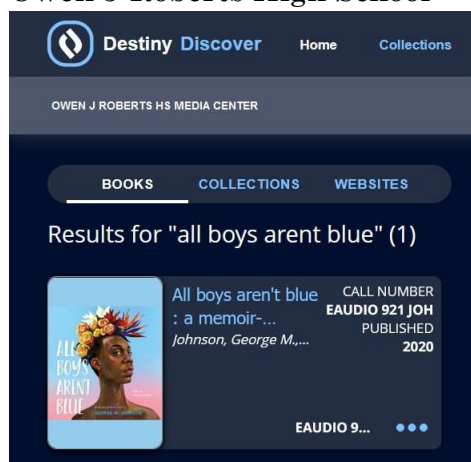
Manheim Twp. High School



Marple Newtown High School



Owen J Roberts High School

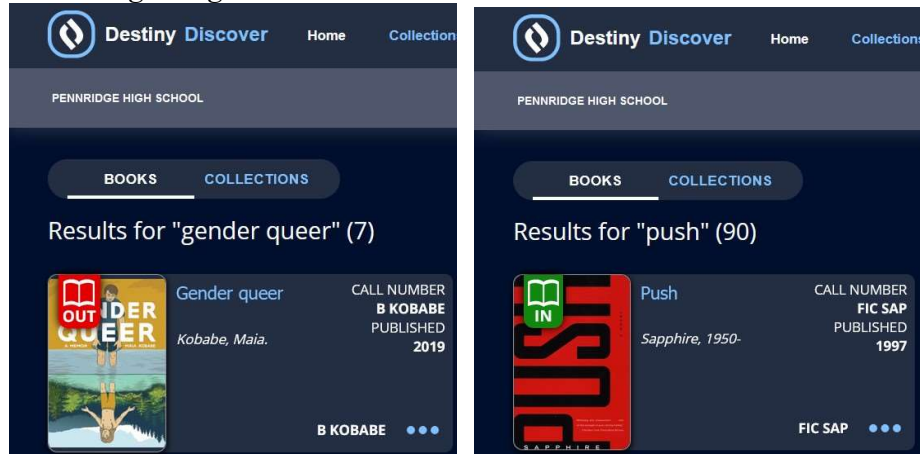


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

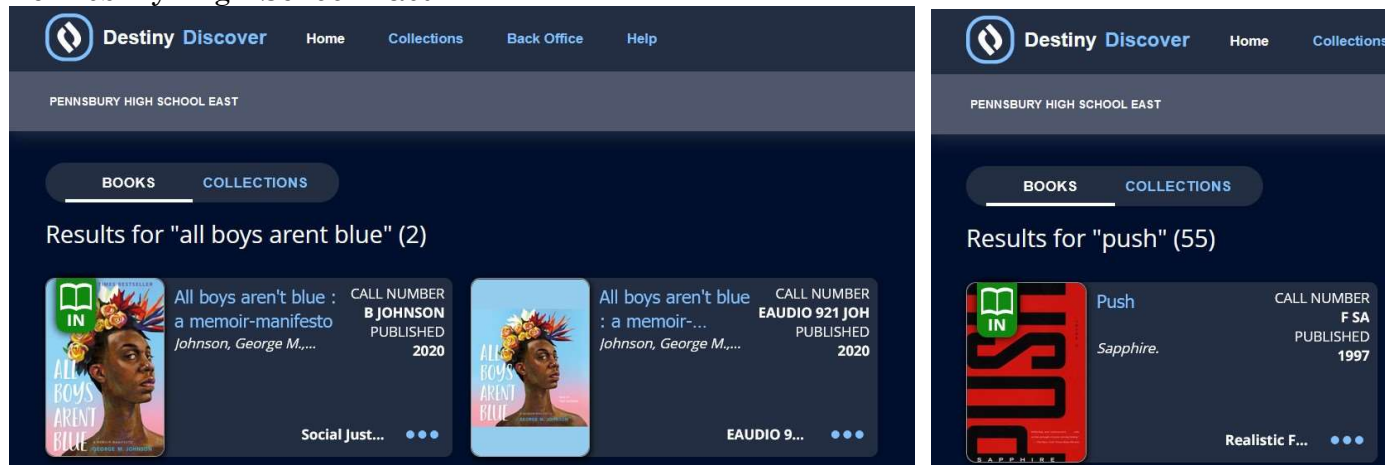
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

Pennridge High School



Pennsbury High School East



Philadelphia High School for Girls



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

Phoenixville High School

Phoenixville Area High School

BOOKS COLLECTIONS

Results for "all boys arent blue" (1)

Image	Title	Author	Call Number	Published	Year
	All boys aren't blue : a memoir-manifesto	Johnson, George M.,...	B JOHNSON	PUBLISHED	2020

B JOHNSON

Phoenixville Area High School

BOOKS COLLECTIONS

Results for "push" (31)

Image	Title	Author	Call Number	Published	Year
	Push : a novel	Sapphire, 1950-	FIC SAP	PUBLISHED	1997
	Push : a novel	Sapphire, 1950-	FIC SAP	PUBLISHED	1996

FIC SAP

Quakertown High School

Quakertown Senior High School

BOOKS COLLECTIONS WEBSITES

Results for "push" (39)

Image	Title	Author	Call Number	Published	Year
	Push : a novel	Sapphire, 1950-	FIC SAP	PUBLISHED	1997

FIC SAP

Radnor High School

Radnor High School

BOOKS COLLECTIONS WEBSITES

Results for "fun home" (12)

Image	Title	Author	Call Number	Published	Year
	Fun home : a family tragicomic	Bechdel, Alison, 1960-	GRA BEC	PUBLISHED	2007

GRA BEC

Radnor High School

BOOKS COLLECTIONS WEBSITES

Results for "gender queer" (13)

Image	Title	Author	Call Number	Published	Year
	Gender queer	Kobabe, Maia.	GRA KOB	PUBLISHED	2019

GRA KOB

Radnor High School

Radnor High School

BOOKS COLLECTIONS WEBSITES DATABASES

Results for "all boys arent blue" (4)

Image	Title	Author	Call Number	Published	Year
	All boys aren't blue : a memoir-manifesto	Johnson, George M.,...	306.76 JOH	PUBLISHED	2020
	All boys aren't blue A memoir-manifesto	Johnson, George M.	ebook audio	PUBLISHED	2020

306.76 JOH

ebook au...

Radnor High School

BOOKS COLLECTIONS WEBSITES

Results for "push" (111)

Image	Title	Author	Call Number	Published	Year
	Push	Sapphire, 1950-	FIC SAP	PUBLISHED	1997

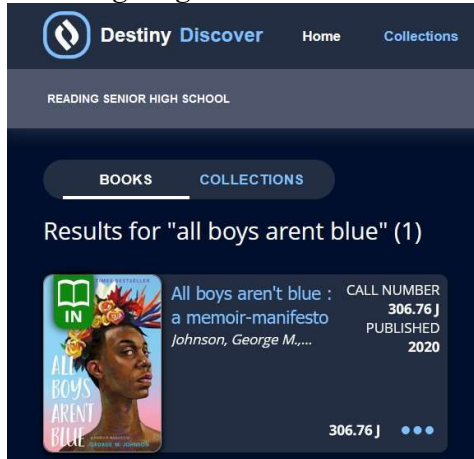
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14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

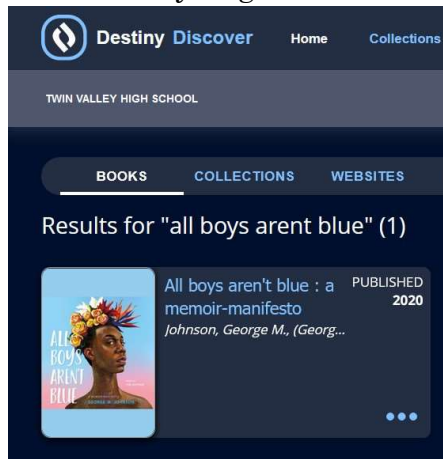
Obscene and Sexually Explicit Material in Public High School Libraries

PENNSYLVANIA 34 schools, 51,043 children

Reading High School



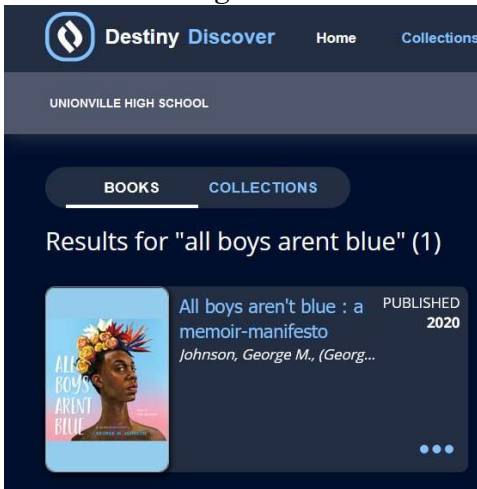
Twin Valley High School



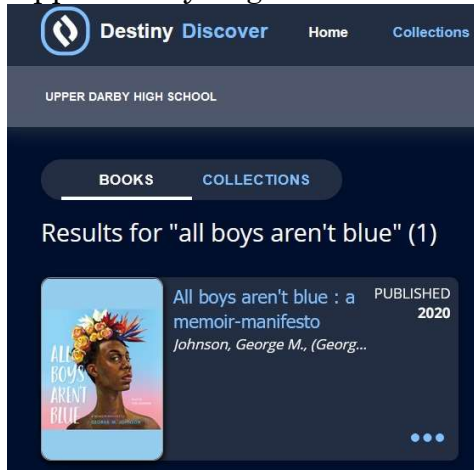
Reading High School



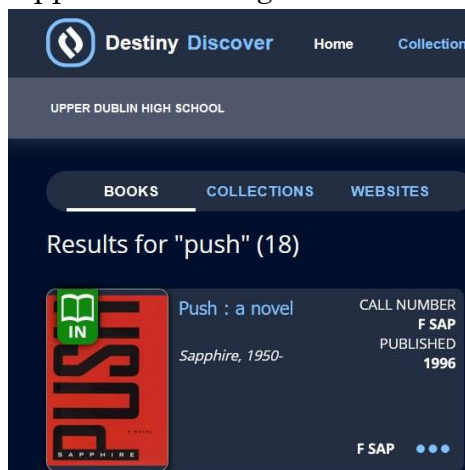
Unionville High School



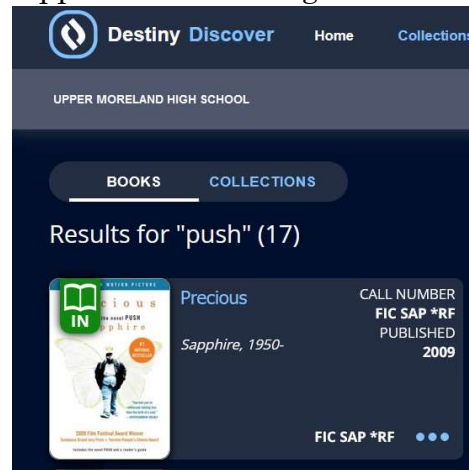
Upper Darby High School



Upper Dublin High School



Upper Moreland High School

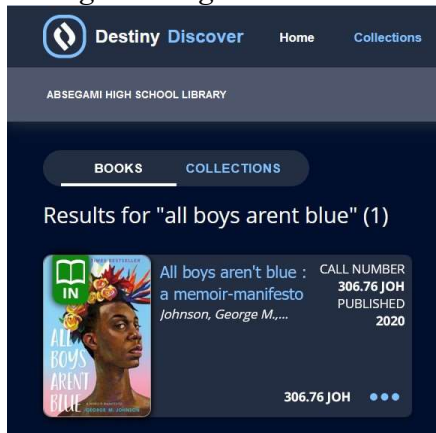


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

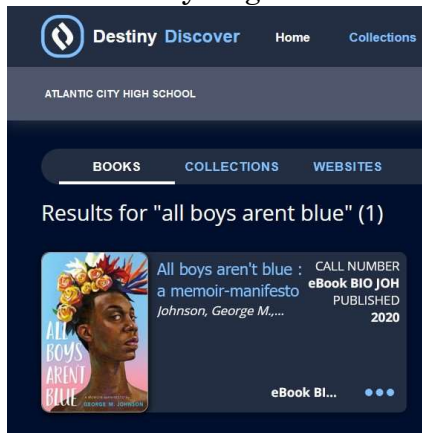
Obscene and Sexually Explicit Material in Public School Libraries

NEW JERSEY 28 schools, 38,313 children

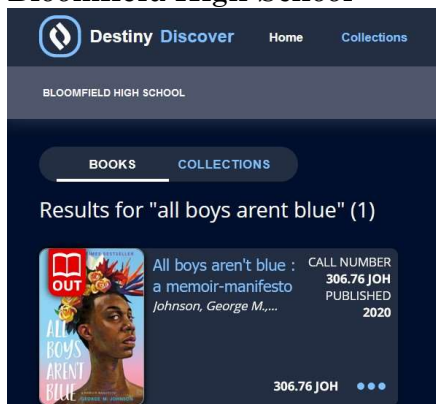
Absegami High School



Atlantic City High School



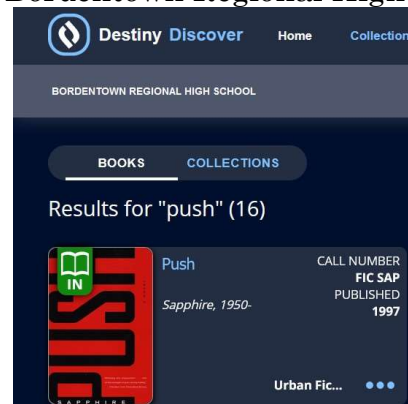
Bloomfield High School



Bordentown Regional High School



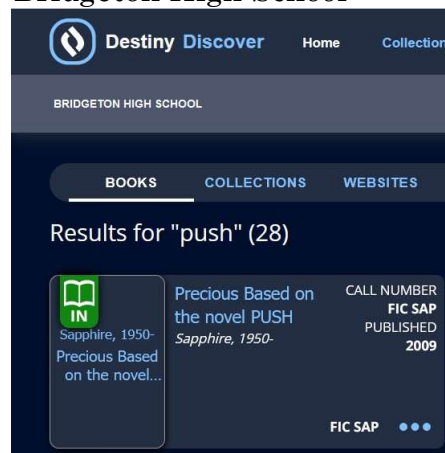
Bordentown Regional High School



Bloomfield High School



Bridgeton High School

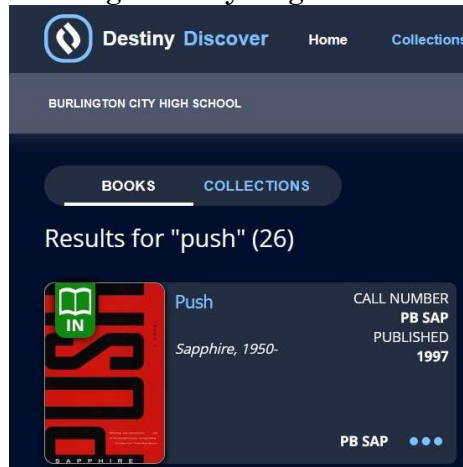


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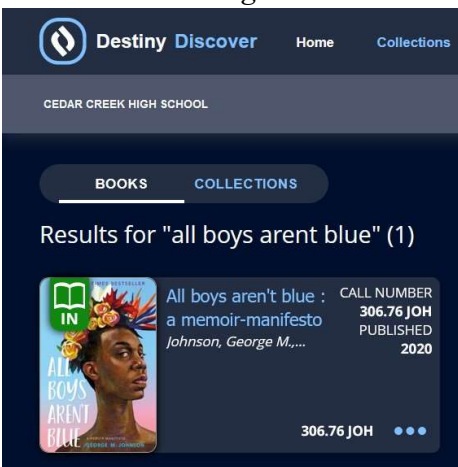
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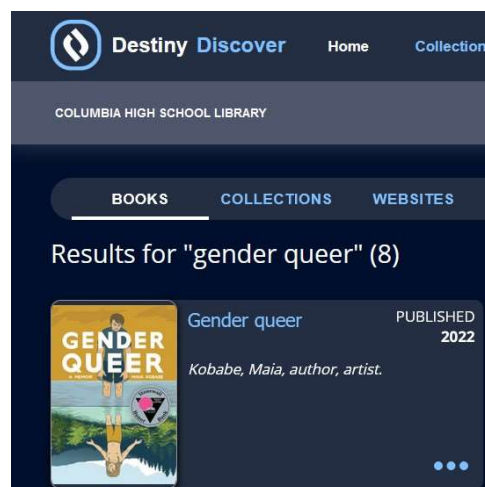
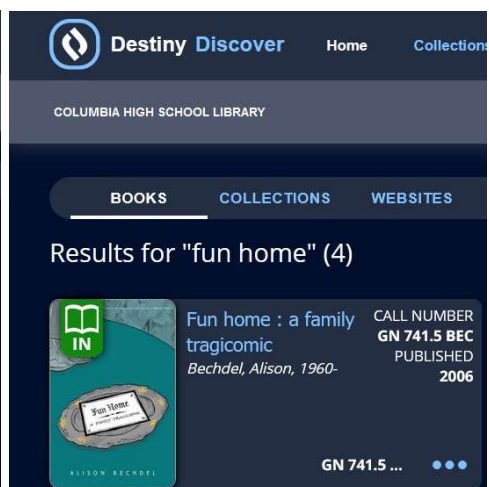
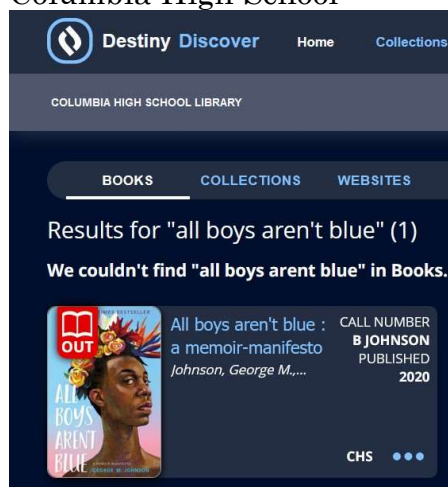
Burlington City High School



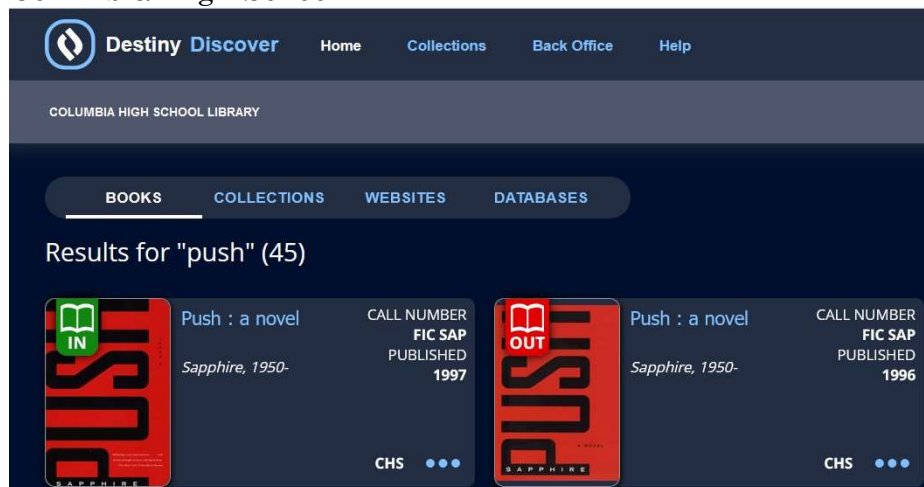
Cedar Creek High School



Columbia High School



Columbia High School

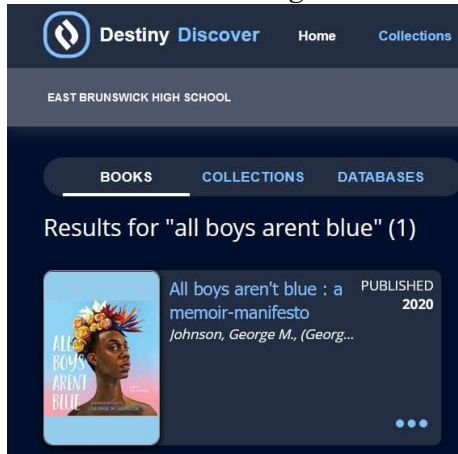


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

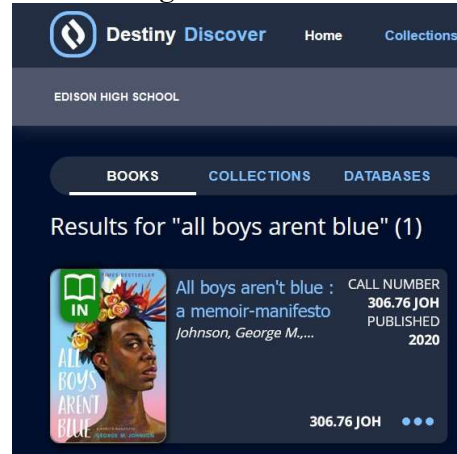
Obscene and Sexually Explicit Material in Public School Libraries

NEW JERSEY 28 schools, 38,313 children

East Brunswick High School



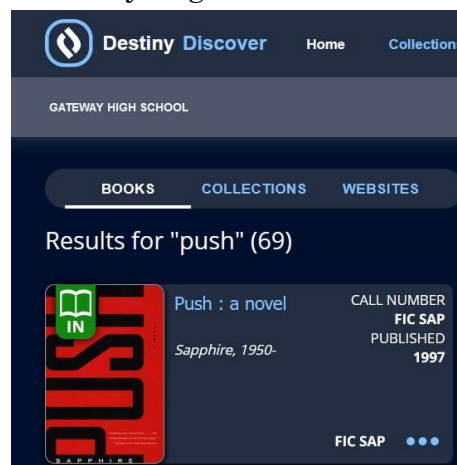
Edison High School



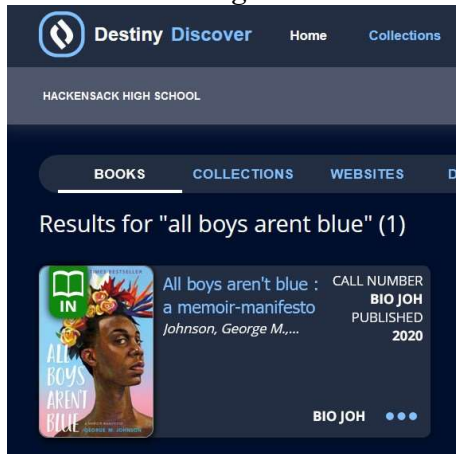
Fort Lee High School



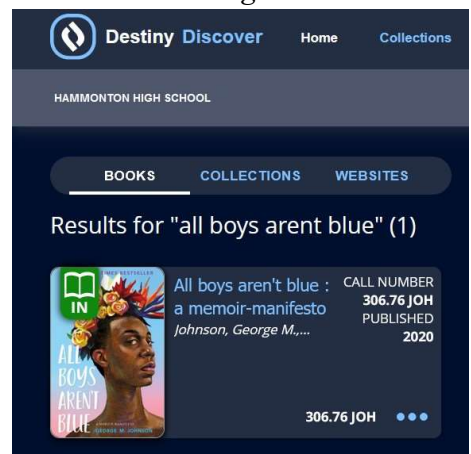
Gateway High School



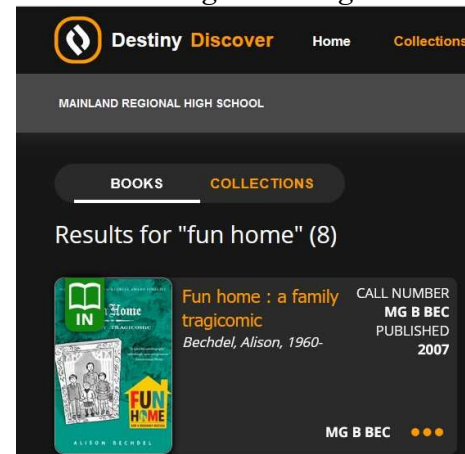
Hackensack High School



Hammononton High School



Mainland Regional High School

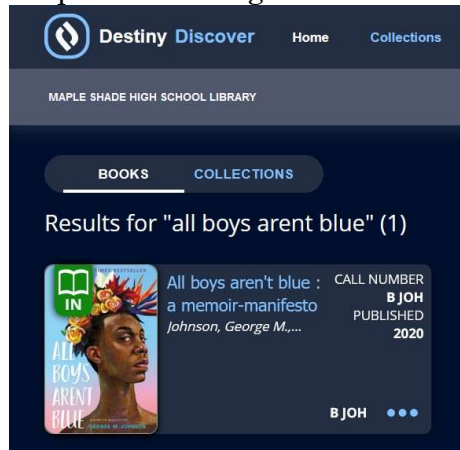


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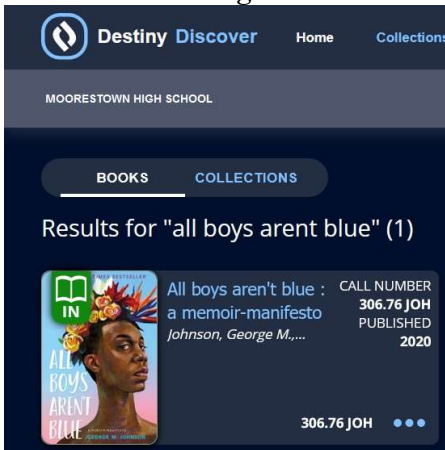
Obscene and Sexually Explicit Material in Public School Libraries

NEW JERSEY 28 schools, 38,313 children

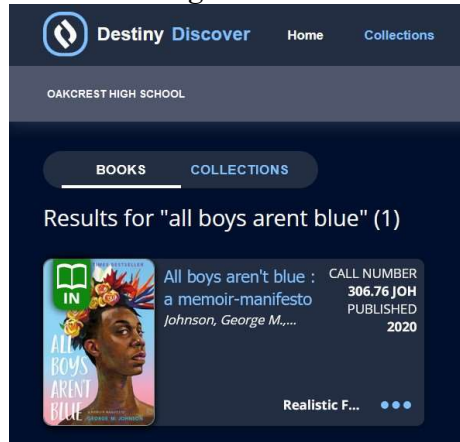
Maple Shade High School



Moorestown High School



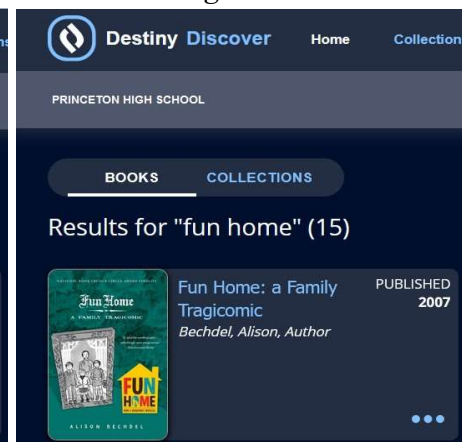
Oakcrest High School



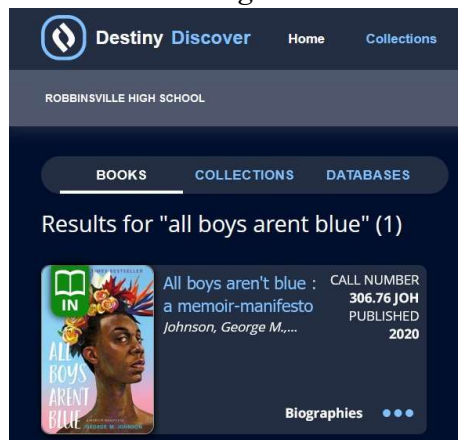
Palmyra High School



Princeton High School



Robbinsville High School



Rutherford High School

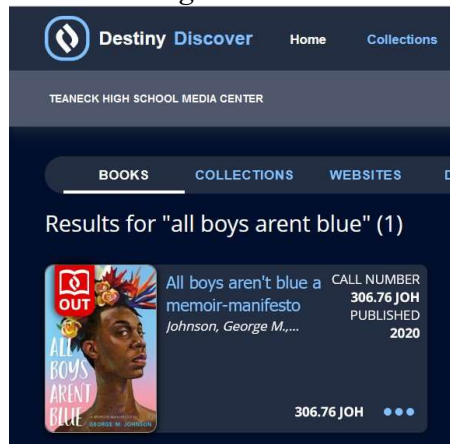


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscene and Sexually Explicit Material in Public School Libraries

NEW JERSEY 28 schools, 38,313 children

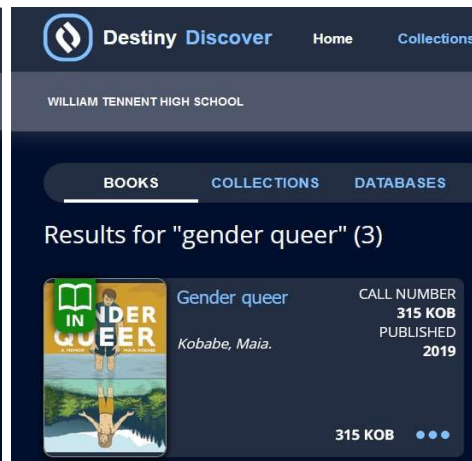
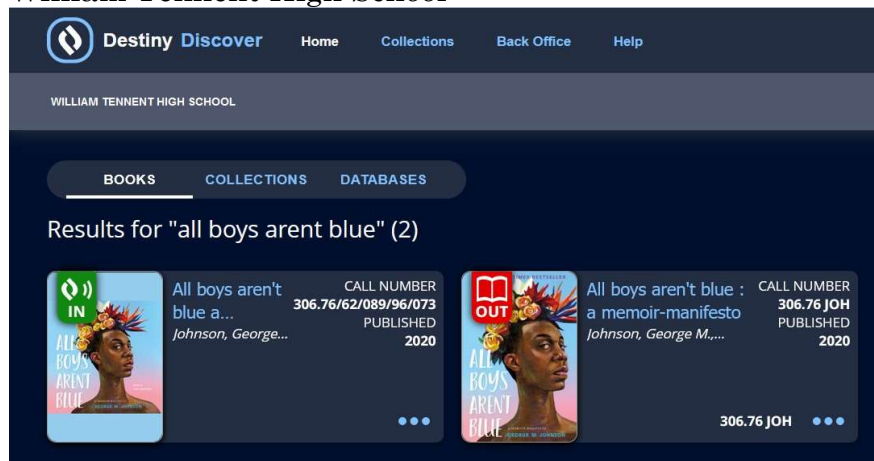
Teaneck High School



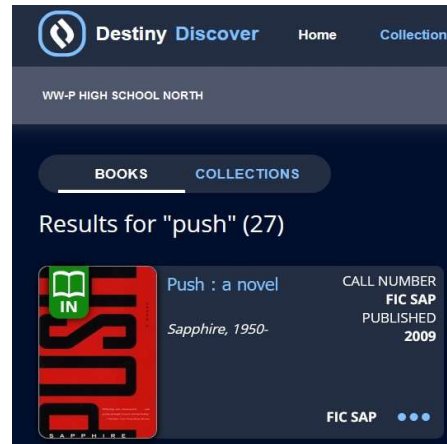
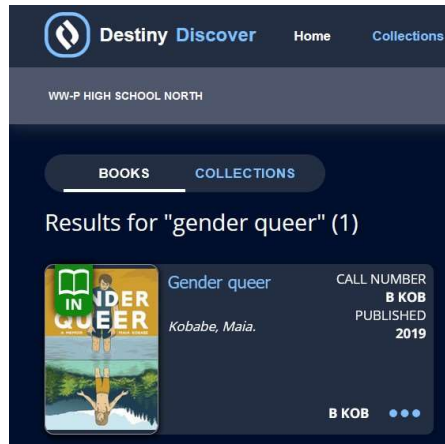
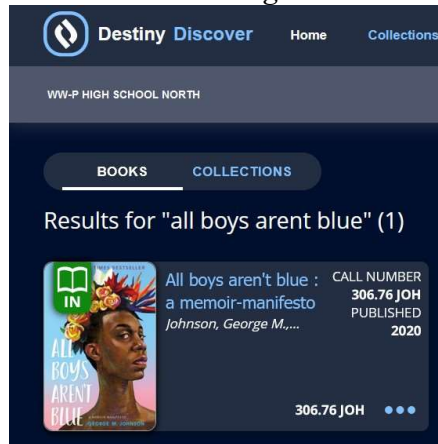
Trenton Central High School



William Tennent High School



Windsor West High School



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

Obscene and Sexually Explicit Material in Public School Libraries

NEW JERSEY 28 schools, 38,313 children

Woodland Hills High School

Destiny Discover Home Collections

WOODLAND HILLS SENIOR HIGH SCHOOL

BOOKS COLLECTIONS

Results for "all boys arent blue" (1)

All boys aren't blue : a memoir-manifesto
Johnson, George M.,....
PUBLISHED 2020
CALL NUMBER 306.76 JOH

Results for "gender queer" (1)

Gender queer
Kobabe, Maia.
PUBLISHED 2019
CALL NUMBER 306.76 KOB

Destiny Discover Home Collections Back Office Help

WOODLAND HILLS SENIOR HIGH SCHOOL

push

BOOKS COLLECTIONS

Results for "push" (36)

CARD VIEW FILTERS

Push
Sapphire, 1950-
PUBLISHED 1997
CALL NUMBER F SAP

Push
Silver, Eve.
Series: Game ; book 2
PUBLISHED 2014
CALL NUMBER F SIL

Push : a novel
Sapphire, 1950-
PUBLISHED 1996
CALL NUMBER F SAP

University High School

Destiny Discover Home Collections

UNIVERSITY HS

BOOKS COLLECTIONS

Results for "push" (8)

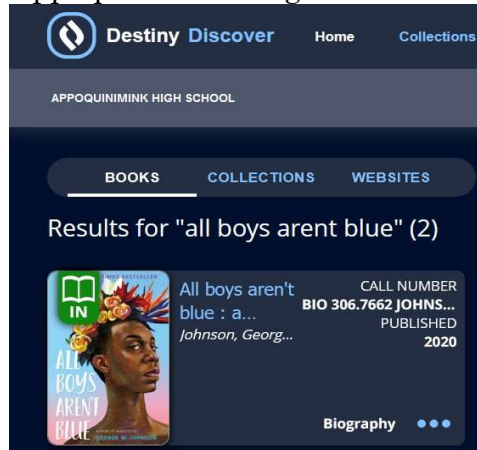
Precious
Sapphire, 1950-
PUBLISHED 2009
CALL NUMBER 813 SAP

14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

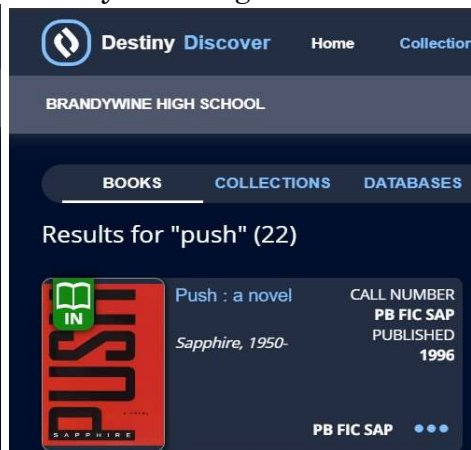
Obscene and Sexually Explicit Material in Public School Libraries

DELAWARE – 12 schools, 14,115 children

Appoquinimink High School



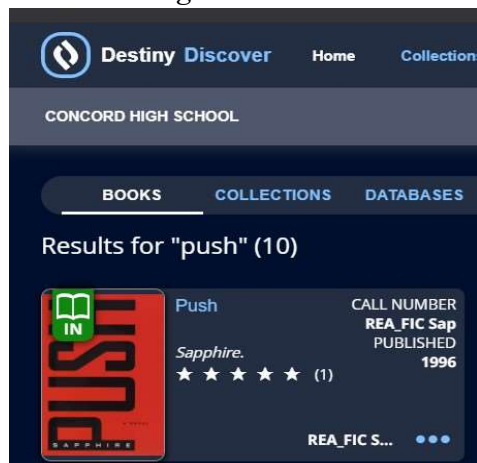
Brandywine High School



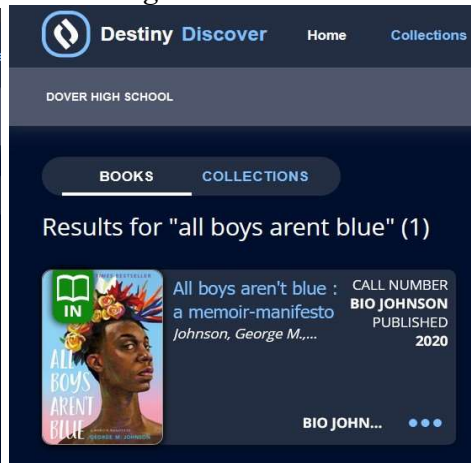
Christiana High School



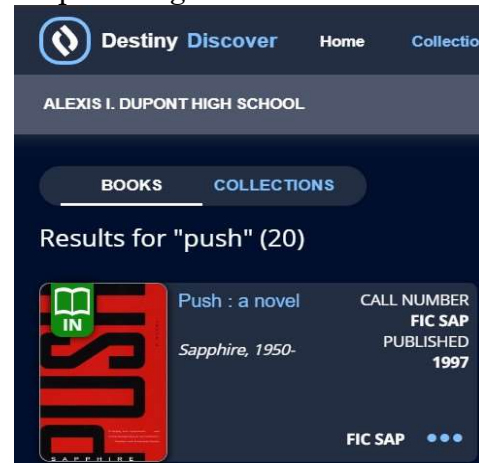
Concord High School



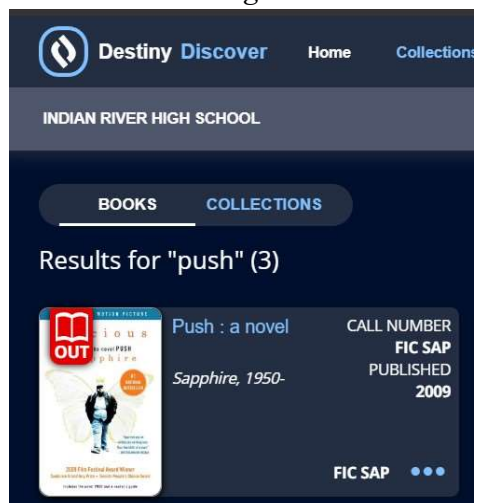
Dover High School



Dupont High School



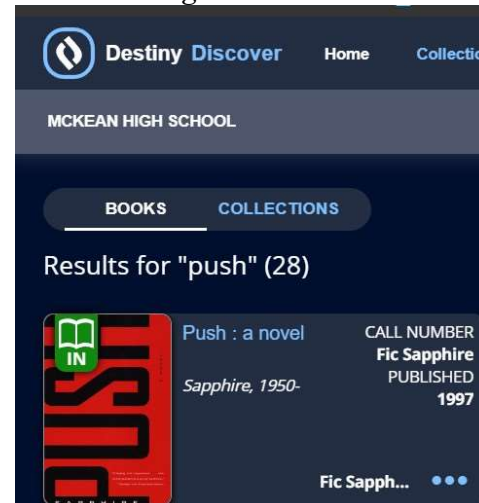
Indian River High School



John Dickinson High School



McKean High School

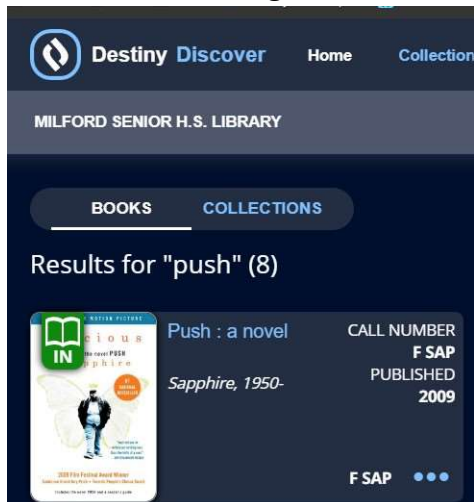


14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

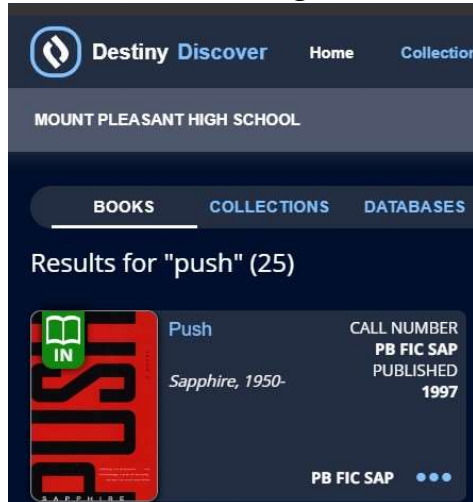
Obscene and Sexually Explicit Material in Public School Libraries

DELAWARE – 12 schools, 14,115 children

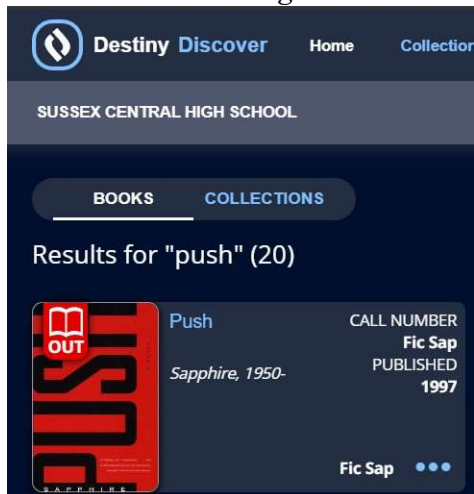
Milford Senior High School



Mount Pleasant High School



Sussex Central High School



14TH AMENDMENT DUE PROCESS CLAUSE CLAIM

52. It pains the Plaintiff to read about child rape, let alone by a father in PUSH. But to deny this Court awareness of what the State sanctions as material children have a right to read is to deny my child, and children across this nation the mental and emotional protections parents never imagined we lost:

Pg. 22 I don't know how many months pregnant I am. I don't wanna stand here 'n hear Mama call me slut. Holler 'n shout on me all day like she the last time. Slut! Nasty ass tramp! ...I jus' standing there 'n pain hit me, then pain go sit down, then pain git up 'n hit me harder! 'N she standing there screaming at me, "Slut! Goddamn Slut! You fuckin' cow! I don't believe this, right under my nose. You been high tailing it round here." Pain hit me again, then she hit me. I'm on the floor groaning, "Mommy please, Mommy please, please Mommy! Mommy! Mommy! MOMMY!" Then she KICK me side of my face! "Whore! Whore!" she screamin'.

Pg. 25 I been knowing a man put his dick in you, gush white stuff in your booty you could get pregnant. I'm twelve now, I been knowing about that since I was five or six, maybe I always known about pussy and dick. I can't remember not knowing. No, I can't remember a time I did not know.

Pg. 37 This is my second baby for my daddy, it gonna be retarded too? ...This time I know Mama know. Umm hmmm, she know. She bring him to me. I ain' crazy, that stinky hoe give me to him. Probably thas' what he require to fuck her, some of me. Got to where he jus' come in my room any ole time, not jus' night. He climb on me. Shut up! He say. He slap my ass, You wide as the Mississippi, don't tell me a little bit of dick hurt you heifer. Git usta it, he laff, you is usta it. I fall back on bed, he fall on top of me. Then I change stations, change bodies... ..."I'm gonna marry you," he be saying. Hurry up, nigger, shut up! He mess up dream talkin' 'n gruntin'. First he mess up my life fucking me, then he mess up the fucking talkin'. I wanna scream, Oh shut up! Nigger, how you gonna marry me and you is my daddy. I'm your daughter, fucking me illegal. But I keep my mouf shut so's the fucking don't turn into a beating. I start to feel goo; stop being a video dancer and start coming. I try to go back to video but coming now, rocking under Carl now, my twat jumping juicy, it feel good. I feel shamed. "See, see," he slap my thigh like cowboys do horses on TV, then he squeeze my nipple, bit down on it. I come some more. "See, you LIKE it! You jus' like your mama- you die for it!" He pull his dick out, the white cum stuff pour out my hole wet up the sheets.

53. On October 18, 20022 during Plaintiffs Senate testimony, Senator Argul asked the Plaintiff to stop reading from page 37.

54. Plaintiff agrees, the PA Senate agrees, GoFundMe agrees, the PA Capital Police agree, this material is disturbing for adults, but what about the impact on our children?

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FENICIA REDMAN (*Pro Se*),

Plaintiff,

v.

THOMAS WESTERMAN WOLF, JOSHUA SHAPIRO, LESLIE PIKE,
PATRICIA DOYLE, JENNIFER ARMSTRONG, DAVID BARRATT,
TRICIA CHASINOFF, STEPHEN DITTMAN, RACHEL GALLEGOS,
DANIEL F. GOFFREDO, SAMANTHA JOUIN, WENDY LITZKE,
NEHA MEHTA, ANDREA RIZZO, CHARLES PETERSON, STEPHEN
O'TOOLE, JOANNA WEXLER, HEIDI CAPETOLA, HENRY MCCLOSKEY,
TRICIA BECK, JENNIFER BLAKE, ANDREA DINMORE, KELSEY BOGAN

Defendants.

CIVIL ACTION

No. 22-3389

MOTION FOR TEMPORARY RESTRAINING ORDER

COMES NOW, Fenicia Redman, Plaintiff, a pro se parent, in the above-captioned cause, who moves this Court for a temporary restraining order, pursuant to Rule 65 restraining and enjoining Defendants, and all public school libraries, during the pendency of the above-entitled action, from transferring All Boys Aren't Blue, Blankets, Gender Queer, Fun Home, PUSH and Tantric Sex to school children under 18 years.

Respectfully submitted,
Fenicia Redman
Dated: November 28, 2022

1st AMENDMENT FREEDOM OF SPEECH CLAIM

“Congress shall make no law ... prohibiting the free exercise thereof; or abridging the freedom of speech, or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

The First Amendment to the U.S. Constitution

1. On April 25, 2022, five months into Plaintiff’s monthly appeals to Great Valley Directors, Board Secretary, and Superintendent, to remove obscene sexually explicit material from the high school library, Plaintiff attended a public school board meeting.
2. The School District did not video record the meeting.
3. Plaintiff used her personal phone to document her public comments.
4. During the 3 minutes allowed for public comment, Plaintiff showed two pages from the book *Gender Queer*, and one image of the book on a Great Valley high school library shelf.



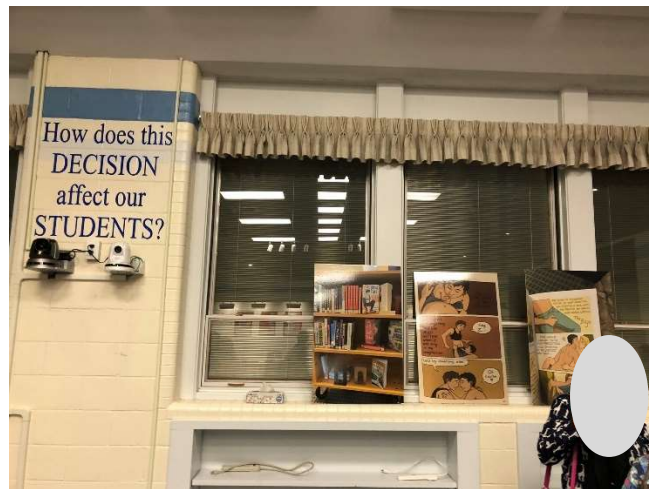
5. Following Plaintiff’s public comments, Great Valley Directors, Board Secretary, and Superintendent asked no questions or offered comment.

1st AMENDMENT FREEDOM OF SPEECH CLAIM

6. After completing her public comment, Plaintiff placed the three images on a window ledge to give school officials an opportunity to inspect the material and discuss Plaintiffs concerns.
7. Security Officer Jason Torres observed with no comment.



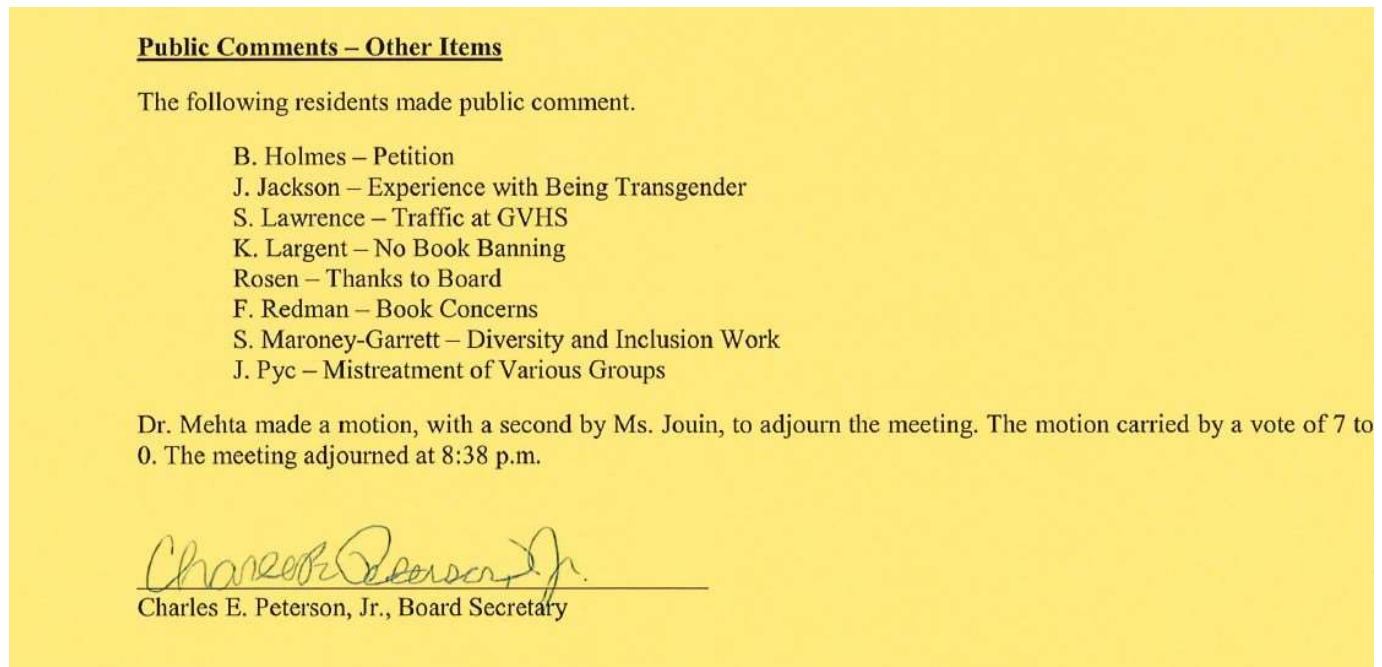
8. No Great Valley Director, Board Secretary, Superintendent, Asst Superintendents, or district staff approached the Plaintiff or parents looking at the material.



9. Plaintiff removed the three images and the left the district building without incident.

1st AMENDMENT FREEDOM OF SPEECH CLAIM

10. Minutes for the April 25, 2022 Public Comments section note Plaintiff's testimony as "Book Concerns"



11. April 26, 2022 Plaintiff filed a complaint with East Whiteland Police Department against Great Valley School District for the transfer of obscene sexually explicit material found in Gender Queer to minors.
12. May 16, 2022, Plaintiff attends a school board meeting in the high school auditorium.
13. During general public comment Plaintiff again raised concern about
- (1) student safety and School Director's judgement in hiring a man whom Judge Gardner said knew that a teacher was a "known risk to students", a sexual assault case, <https://www.paed.uscourts.gov/documents/opinions/14D0255P.pdf>
- and (2) graphic sexually explicit material available to her son in the school library.
14. When Plaintiff began to speak about a new concern, an abortion interview template she found in her son's Honors Government and Economics class, Plaintiff raised an image of the teachers assignment to show the Directors seated at least 50 feet away.
15. Board President David Barratt shouted "ah please, ah, please put the poster down", then turned off Plaintiff's microphone, the video at 1:29 seconds of 3 minutes allotted.

1st AMENDMENT FREEDOM OF SPEECH CLAIM

16. Plaintiff's censored and uncensored public comments are found here:

Censored – https://www.youtube.com/watch?v=W0mhCa_xXQE

Uncensored - <https://www.youtube.com/watch?v=vtV7yjHVAf0>

17. Plaintiff continued to share her concerns while Board Directors exited the auditorium.

18. Security Officer Jason Torres approached the Plaintiff, and said “*the Board wants you to leave*”, and escorted the Plaintiff out the building.



19. Plaintiff did not violate the Public Forum Doctrine, always spoke respectfully, did not disrupt the meeting or incite violence.

20. Defendants imposed content-based restrictions on Plaintiff's when she shared new information and raised an image of the assignment for the Board to see.

21. Twenty-one days earlier, Defendants voiced no objections to Plaintiff showing images of obscene sexually explicit material in the school library.

22. Defendants had no compelling interest to censor the Plaintiff or remove her from the building, save retaliation.

23. Plaintiff seeks strict scrutiny of this complaint, and Constitutional damages.

CERTIFICATE OF SERVICE

I, Fenicia Redman, hereby certify that the foregoing Amended Complaint was filed electronically this 28th of November 2022, and that a true and correct copy was served electronically through the Courts system upon Defendant's Counsel this 28th of November 2022.

Fenicia Redman
Plaintiff

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