



November 12, 2020

Honorable Ashley Moody, Attorney General
Office of the Attorney General
State of Florida
PL-01 The Capitol
Tallahassee, FL 32399-1050

Re: Request for Investigation
Spanish River High School Principal, William Latson
Palm Beach County School District

Dear Attorney General Moody:

As President and Founder of Proclaiming Justice to The Nations, I am requesting that you open an investigation to determine whether Spanish River High School Principal William Latson, and/or the Palm Beach County School District, violated the civil rights of the Jewish students of that district relating to a mid-2019 incident involving Principal Latson and the School Board's response to that incident.

In mid-2019 the parent of a PBCSD student contacted Principal Latson to ask what her child's school was doing to educate the students about the Holocaust. He responded to her, "I can't say the Holocaust is a factual, historical event because I am not in a position to do so as a school district employee." In response to the parent's subsequent complaint, the PBC school board stated that they were going to fire Latson, but instead they placed him on leave without pay. He is now requesting that he be reinstated as principal of a PBC school with back pay and damages.

We submit that your office's investigation determine:

- At the time of this incident did the PBC school board have in place a policy, published or unpublished, that denied its teachers permission to teach their students about the Holocaust as a "factual, historical event?"
- Did Principal Latson's response to the parent, which denied the factual, historical existence of the Holocaust which caused the dehumanization and intentional murder of 6 million Jews and 6 million other civilians by the Nazi apparatus before and during WWII, constitute antisemitism on his part?



- Is Principal Latson's response to the parent legally imputed to the PBC school board?
- Did Principal Latson's response to the parent's inquiry constitute illegal discrimination against the parent and illegal discrimination against the district's Jewish students by Principal Latson on the basis of their ethnicity?
- Did the PBC school board's actions and/or inaction subsequent to Principal Latson's response to the parent's inquiry constitute illegal discrimination against the parent and illegal discrimination against the district's Jewish students by the PBC school board on the basis of their ethnicity?
- Did Principal Latson's response to the parent's inquiry violate her civil rights and the civil rights of the district's Jewish students on the basis of their ethnicity?
- Did the PBC school board's actions and/or inaction subsequent to Principal Latson's response to the parent's inquiry violate her civil rights and the civil rights of the district's Jewish students on the basis of their ethnicity?
- Did Principal Latson's response to the parent's inquiry constitute a violation of Florida statutes and/or federal statutes?
- Did the PBC school board's actions and/or inaction subsequent to Principal Latson's response to the parent's inquiry constitute a violation of Florida statutes and/or federal statutes?

To assist you with your investigation I have provided further information about relevant federal and Florida legislation:

1964 Civil Rights Act

- We've seen a resurgence of antisemitism on campuses by students, school administrators, and faculty.
- Under Title VI of the Civil Rights Act of 1964, students are protected from discrimination based on their race, color, or national origin at federally funded educational institutions.
- That protection was extended to Jewish students in 2004 on the basis of their ethnic or ancestral background. This is because Jewish students are targeted not only



based on their actual religious practices or on tenets of the Jewish religion, but also for their perceived ethnic, racial, or ancestral identity.

- When discrimination occurs, the education institution must promptly and adequately respond.
- A violation of Title VI may be found if discrimination is not adequately addressed, or is ignored by the educational institution's administration.
- The U.S. State Department and the U.S. Commission on Civil Rights adopted the International Working Definition of Anti-Semitism to include incidents like: "Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust."

Presidential Executive Order

- President Donald J. Trump signed an Executive Order December 11, 2019, affirming Title VI of the Civil Rights Act of 1964 and applying it to the federal government.
- All agencies charged with enforcement of Title VI shall consider the International Holocaust Remembrance Alliance definition of Anti-Semitism adopted on May 26, 2016 which states:

"Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities"; and

(ii) the "Contemporary Examples of Anti-Semitism" identified by the IHRA, to the extent that any examples might be useful as evidence of discriminatory intent.

Florida House Bill 741

Governor DeSantis Prioritized the passage of HB 741 into law on May 31, 2019 which provides:

- A definition of Anti-Semitism to address the troubling rise of anti-Semitic incidents, for purposes of Florida law
- Provide a way for Florida's educational institutions to combat anti-Semitism
- HB 741 permits regulation to combat anti-Semitism within the realm of government institutions - such as an institution's anti-Semitic hiring or admissions policies, an instructor's indulgence of bizarre theories or pedagogical perversions, and student behavior that is disruptive or harmful.



Senate Bill SB 1628/House Bill HB 1213

Governor DeSantis signed into law SB 1628/HB 1213 - Requiring the Florida Dept. of Education to develop Holocaust standards and curriculum to include:

- Events of the Holocaust
- The official definition of anti-Semitism
- Every school district must certify compliance
- Naming the second week of November 'Holocaust Education Week'

Please feel free to contact me at any time to clarify any of the points I have raised here, and to call upon PJTN to provide any assistance you may require or find convenient in pursuit of this requested investigation.

Yours truly,

Laurie Cardoza-Moore, Th.D.
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