



**KENTUCKY EQUALITY  
FEDERATION**

*Peace. Liberty.  
Equality.*

(877) KEF-5775 | [www.kyequality.org](http://www.kyequality.org)



**OFFICE OF THE PRESIDENT | LEGAL DEPARTMENT  
ATTORNEY JILLIAN HALL, VICE PRESIDENT OF LEGAL**

**December 11, 2012**

Paducah Middle School:  
Tim Huddleston, Principal  
Jerry Walker, Assistant Principal  
Rick Roberts, Assistant Principal  
Chris Krueger, Asst. Principal of Curriculum and Maintenance

Paducah Board of Education:  
Janice Howard  
Danette Humphrey  
Dr. Carl LeBuhn  
William R. Black, Jr.  
Dr. Felix Akojie

**RE: LACK OF COMPLIANCE WITH THE KENTUCKY SCHOOL BULLYING LAWS**

As you are well aware, Kentucky has enacted several Anti-Bullying Laws to protect our children from the emotional and physical trauma of being on the receiving end of bullying. As the leaders of Paducah Middle School, you are both charged with and given the opportunity to provide a safe learning environment for your students, regardless of gender, race, sexual orientation, religious beliefs, or any other defining characteristic.

You are required by Kentucky law to report all school bullying to the County Attorney. The National Bully Police gives the Commonwealth's anti-bullying laws an A+ Rating. House Bill 91 was proposed in 2008 and passed by the Kentucky House of Representatives and the Kentucky Senate and signed into law by The Honorable Steve Beshear, Governor and Commander-in-Chief of the Commonwealth on April 15, 2008.

It has come to the attention of the Kentucky Equality Federation that Kentucky Anti-Bullying Laws, enacted by the Commonwealth's Legislature, have been wholly ignored in your

12/11/12 | Office of the President

Jordan Palmer, President  
Joshua Koch, Vice President of Policy & Public Relations  
Jillian Hall, Esq., Vice President of Legal



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school. We have received numerous, disturbing accounts of both verbal and physical abuse received by your students from their peers, in direct violation of these laws.

The Kentucky Legislative and Judicial branches are not able to be in your school enacting these safeguards, but you, as the adult supervisors are entrusted with the safety of all students within your walls and required by both law and basic human decency to protect our children.

**This is not the first time these violations have been brought to your attention, but we are letting you know that this shall be the last before we are forced by your lack of enforcement to bring legal action on behalf of the children and their parents who are suffering from this bullying in your school.** You are aware of what you need to do in order to provide a safe environment for all students, and if you need additional information or assistance, we will be happy to assist you in bringing you and your staff into compliance.

School officials have failed to forward school bullying reports to the County Attorney. **We strongly recommend that you familiarize yourselves with KRS Chapter 508, KRS 158.444, KRS 158.148, KRS 525.070, and KRS 525.080.**

The principal is the chief administrator of the school, and allowing subordinates to remain ignorant of the laws of this Commonwealth is unacceptable.

The situation has gotten out of control, and, if the school will not protect its students, we shall, with every legal remedy at our disposal. **One student in particular is 14 years old and thinks of committing suicide daily because school officials have failed to act.** **Should any harm come to any child as a result of failure to enforce Kentucky School Bullying Laws, Kentucky Equality Federation is prepared to sue the school and every administrator, including the Board of Education, for gross negligence, outrageous conduct, breach of fiduciary duty, negligence, negligent supervision, and negligent hiring.** You have a fiduciary duty to protect the physical and mental health of students under your care in addition to ensuring their academic success.



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If you would like to speak with me, you can contact me at the Office of the President at (877) KEF-5775 – Ext. 5. We hope that we do not have to take further action, but we are going to do everything within our power to protect the Commonwealth's children as provided by law.

We have assured the parents that Kentucky Equality Federation will defend their legal rights and ensure the school takes their complaints seriously. Kentucky Equality Federation has also offered to be present when official complaints are reported.

Please understand that this is the last time you will be asked to comply.



Jordan Palmer  
*President*

Jillian Hall, Esq.  
*Vice President of Legal*

cc: Rose Law Offices, Legal Representation for Kentucky Equality Federation  
Kentucky Education Cabinet, Office of Secretary Joseph U. Meyer