

**IN THE CIRCUIT COURT FOR ST. LOUIS COUNTY
STATE OF MISSOURI**

LUKE WOHLFAHRT and
L.B.W., by and through Parent,
and Next of Friends, AMANDA
WOHLFAHRT,

Plaintiffs,

V.

LADUE SCHOOL DISTRICT,
Serve at: 9703 Conway Road
Ladue, MO 63124

**SPECIAL SCHOOL DISTRICT OF ST.
LOUIS COUNTY, MISSOURI**
Serve at: 12110 Clayton Road
Town & Country, MO 63131

and

LAUNCH VIRTUAL LEARNING
CENTER
Serve at: 1410 Kansas Expy
Springfield, MO 65807

Defendants.

Case No. 25SL-CC09468

Div. No. 1

JURY TRIAL DEMANDED

AMENDED PETITION

COMES NOW, Plaintiff Luke Wohlfahrt (“***Plaintiff Wohlfahrt***.”) and Plaintiff L.B.W. (“***L.B.W.***”), by and through her mother and next of friend Amanda Wohlfahrt (“***A. Wohlfahrt***”) (collectively “***Plaintiffs***”), who bring their claims pursuant to the Missouri Human Rights Act, Mo. Rev. Stat. § 213.010 (“***MHRA***”), alleging discrimination based on disability by the Defendants: Ladue School District (“***Ladue***”), Special School District of St. Louis County, Missouri (“***SSD***”), and Launch Virtual Learning Center (“***Launch***”). In support of this Petition, Plaintiffs hereby state the following:

PARTIES

1. At the time of the allegations in the Complaint, Plaintiff Wohlfahrt was a minor child with disabilities who resided with his father, Jason Wohlfahrt (“**J. Wohlfahrt**”), and his mother, A. Wohlfahrt (collectively “**Parents**”), in St. Louis County, Missouri.

2. Plaintiff Wohlfahrt is a citizen of Missouri, in St. Louis County.

3. L.B.W. is a minor female child born on June 2, 2010, and is a Missouri citizen. She resides with her parents in St. Louis County, Missouri.

4. A. Wohlfahrt is an adult female parent of Plaintiffs.

5. J. Wohlfahrt is an adult male parent of Plaintiffs.

6. Ladue is a public school district within St. Louis, Missouri, and, as such, qualifies as a place of public accommodation in accordance with Mo. Rev. Stat. § 213.010(16).

7. SSD is a public school district in St. Louis, Missouri, and is, therefore, a place of public accommodation under Mo. Rev. Stat. § 213.010(16).

8. Launch is a virtual school provider for public, private, and charter schools in the State of Missouri, and is, therefore, a place of public accommodation under Mo. Rev. Stat. § 213.010(16).

9. Ladue Middle School is a middle school within the Ladue School District and SSD.

10. Ladue Horton Watkins High School (“**Ladue High School**”) is a high school within the Ladue School District and SSD.

11. Plaintiff Wohlfahrt attended Ladue High School.

12. Beginning in August 2024, Plaintiff Wohlfahrt received virtual education through Launch, a remote school program utilized by Defendants Ladue and SSD.

13. During the 2023-2024 school year, L.B.W. attended Ladue Middle School.
14. During the 2024-2025 school year, L.B.W. attended Ladue High School.
15. L.B.W. currently attends Ladue High School.

VENUE AND PROCEDURAL BACKGROUND

16. Venue in this Court is proper because the allegations that gave rise to this action occurred in St. Louis County, Missouri.

17. On October 3, 2024, A Wohlfahrt and J. Wohlfahrt (“***Parents***”), on behalf of Plaintiff Wohlfahrt, filed a charge of discrimination with the Missouri Commission on Human Rights (“***MCHR***”) against SSD (“***Charge No. P-10/24-05683***”), against Ladue (“***Charge No. P-10/24-05682***”), and against Launch (“***Charge No. P-10/24-05684***”).

18. On May 22, 2025, the MCHR issued the right to sue on Charge Nos. P-10/24-05682, P-10/24-05683, and P-10/24-05684 for Plaintiff Wohlfahrt. See Exhibits 1-3 attached hereto.

19. On October 3, 2024, Parents, on behalf of L.B.W., filed a charge of discrimination with the MCHR against Ladue (“***Charge No. P-10/24-05681***”).

20. On May 22, 2025, MCHR issued the right to sue on Charge No. P-10/24-05681 for L.B.W. See Exhibit 4 attached hereto.

21. Plaintiffs filed this action within two years of the alleged discriminatory conduct and 90 days of receipt of the right-to-sue letter.

22. Plaintiffs complied with the MHRA's administrative exhaustion requirements, as stated in Mo. Rev. Stat. § 213.075.

LEGAL BACKGROUND

23. The MHRA provides that all persons within the state’s jurisdiction are entitled to full and equal use and enjoyment of public accommodations without discrimination. Mo. Rev. Stat. § 213.065.1.

24. Mo. Rev. Stat. § 213.010(5) defines “discrimination” as any unfair treatment based on race, color, religion, national origin, ancestry, sex, age, as it relates to employment, disability, or familial status as it relates to housing.

25. Mo. Rev. Stat. § 213.010(15) defines “places of public accommodation” as all places or businesses offering or holding out to the general public, goods, services, privileges, facilities, advantages, or accommodations for the peace, comfort, health, welfare, and safety of the general public or such public places providing food, shelter, recreation, and amusement.

26. The MHRA provides a non-exclusive list of the types of places, businesses, and establishments the legislature intended to include within this definition. Mo. Rev. Stat. § 213.010(16)(a)-(f).

27. The Missouri Constitution mandates the establishment and maintenance of “free public schools for the gratuitous instruction of all persons in this state within ages not in excess of twenty-one as prescribed by law.” Mo. Const. art. IX, §1(a).

28. As Defendants provide a public education to students in their district, Defendants are facilities that provide gratuitous instruction to minor Missouri citizens. That access to the school is subject to state law, and the enrollment restrictions do not defeat the public character of the school, as it serves a subset of the public. *See Doe v. Kan. City*, 372 S.W.3d 43, 49-50 (Mo. App. W.D. 2012).

FACTUAL ALLEGATIONS

29. Plaintiffs hereby incorporate the abovementioned paragraphs.

30. At the time of the allegations, Plaintiff Wohlfahrt was a minor child.

31. Plaintiff Wohlfahrt is an individual with disabilities.

32. Specifically, Plaintiff Wohlfahrt has been diagnosed with Attention Deficit Hyperactivity Disorder (“**ADHD**”), Asperger’s Syndrome, and anxiety.

33. Plaintiff Wohlfahrt’s disabilities affect his daily life, particularly at school, due to his disabilities causing distractions, focus and memory issues, and challenges in understanding, social interactions, and task management, as well as difficulties in demonstrating skills, interpreting nonliteral statements, synthesizing information, and using working memory.

34. Plaintiff Wohlfahrt’s disabilities are mental impairments that substantially limit one or more major life activities, such as learning, thinking, reading, concentrating, communicating, and working.

35. Due to the symptoms associated with Plaintiff Wohlfahrt’s disabilities, Plaintiff Wohlfahrt is unable to engage in virtual learning.

36. At all times herein, Defendants knew or should have known about Plaintiff Wohlfahrt’s disabilities.

37. At all times herein, Defendants knew or should have known that L.B.W. was associated with an individual with disabilities, namely her brother, Plaintiff Wohlfahrt.

38. On June 6, 2023, Plaintiff Wohlfahrt underwent evaluations conducted by both his pediatrician and a clinical neuropsychologist.

39. Parents submitted the evaluation to Ladue to request a reasonable accommodation for Plaintiff Wohlfahrt.

40. On November 9, 2023, Ladue convened a meeting and concluded that Plaintiff Wohlfahrt was eligible for reasonable accommodation, including but not limited to:

- a. A note card for steps/procedures/formulas
- b. Frequent check-ins
- c. Chunking of assignments
- d. Teacher notes
- e. Extended time for tests

41. The reasonable accommodations were reasonable and necessary for Plaintiff Wohlfahrt to access his education and did not impose an undue hardship on Defendants.

42. Despite agreeing to provide the reasonable accommodations, Defendants failed to provide these accommodations to Plaintiff Wohlfahrt.

43. For instance, Plaintiff Wohlfahrt's math teacher discarded the note card that he had brought for an assessment, despite having previously agreed to provide the reasonable accommodation of a note card for steps, procedures, and formulas.

44. On April 7, 2024, Plaintiff Wohlfahrt's classmate, C.G., messaged L.B.W. on social media, asking if she wanted to see his print.

45. Without L.B.W.'s consent, C.G. sent her a social media picture and begged her to open the picture.

46. C.G. sent L.B.W. another social media picture and begged her to open the picture.

47. L.B.W. opened at least one picture and noticed it was a picture of C.G. in his underwear, so that L.B.W. could see an outline of his genitals.

48. L.B.W. blocked C.G. from social media.

49. That evening, L.B.W. informed Plaintiff Wohlfahrt and Parents that C.G. sent her

pornographic pictures.

50. On Monday, April 9, 2024, Plaintiff Wohlfahrt confronted C.G., and the altercation became physical.

51. Following the altercation, C.G. submitted a written statement to Ladue stating that he does not understand why Plaintiff Wohlfahrt believed he had sent something inappropriate to L.B.W., as he is “not that type of person.”

52. C.G. then claimed that L.B.W. has a reputation for things like this and wrongly asserted that L.B.W. sent C.G. a “nude” [picture].

53. C.G. claimed he sent a picture of himself in his boxer briefs in response to L.B.W.’s photo.

54. C.G. threatened to break “every bone” in Plaintiff Wohlfahrt’s “body” and threatened a plot with his “cousins,” who “begged” C.G. to “let them shoot” Plaintiff Wohlfahrt.

55. Ladue never interviewed L.B.W. nor did it request her perspective.

56. On April 9, 2024, Ladue reported to the administration that the submission of social media photographs was a “mutual situation.”

57. On April 13, 2024, Ladue asserted or at least implied that L.B.W. was the one who “initiated” the picture exchange with C.G.

58. On April 17, 2024, the Ladue School Resource Officer (“**SRO**”) conducted a 46-minute telephone conversation with A. Wohlfahrt, during which the SRO asserted that L.B.W. consented to viewing C.G.’s pornographic images.

59. During that conversation, the SRO acknowledged that he had not personally communicated with L.B.W. nor examined L.B.W.’s cell phone.

60. Between April 9, 2024, and April 19, 2024, Ladue informed Parents that its policy

regarding minor student solicitation, exchange, or distribution of nude or inappropriate photographs was to disregard the issue, as long as the minor Ladue students involved are within two or three years of age of each other and are not using school property for the photos.

61. As a result of the incident that occurred on April 8, 2024, Ladue suspended Plaintiff Wohlfahrt, but did not suspend C.G., despite being aware that C.G. had transmitted inappropriate or pornographic images to L.B.W.

62. On April 9, 2024, Ladue recommended suspending Plaintiff Wohlfahrt “through the end of the 23-24 school year.”

63. On April 19, 2024, Ladue held a disciplinary hearing regarding Plaintiff Wohlfahrt’s out-of-school suspension.

64. Ladue promised to produce its investigatory materials with appropriate redactions before the disciplinary hearing on April 19, 2024.

65. Despite the assurances, Ladue did not produce any investigatory materials to Plaintiffs before the hearing, not even a copy of Plaintiff Wohlfahrt’s written statement from April 8, 2024.

66. On April 19, 2024, L.B.W. attended Plaintiff Wohlfahrt’s disciplinary hearing to defend and restore her character and reputation against false accusations by C.G. and Ladue that she initiated and agreed to receive C.G.’s pornographic images.

67. L.B.W. also attended the disciplinary hearing on April 19, 2024, to advocate for her disabled brother, who was facing a prolonged suspension due to his confrontation with C.G. on April 8, 2024, regarding C.G. sending L.B.W. pornographic images.

68. At the disciplinary hearing, Plaintiffs notified Ladue that C.G. directly messaged L.B.W. through social media on September 6, 2024, and violently threatened to damage Plaintiff

Wohlfahrt's vehicle, threatened to break "every bone" in Plaintiff Wohlfahrt's "body," and threatened "my cousins begged me to let them shoot u" or a plot to shoot Plaintiff Wohlfahrt.

69. Despite Ladue receiving both verbal and written notifications that C.G. violently threatened Plaintiff Wohlfahrt with physical violence, including a scheme to shoot him, Ladue failed to take any action to investigate the matter or to protect Plaintiff Wohlfahrt, who has a disability.¹

70. Despite Plaintiffs' assertions during the disciplinary hearing on April 19, 2024, that C.G. transmitted inappropriate images to L.B.W., Ladue took no measures to protect L.B.W. during school or to investigate C.G.'s conduct following the hearing on April 19, 2024.

71. On April 20, 2024, Ladue sent a formal letter informing Plaintiffs that it would extend Plaintiff Wohlfahrt's out-of-school suspension by an additional 170 days, totaling 180 days. A Ladue Assistant Superintendent and the Ladue Superintendent signed the letter. The letter noted that the Ladue Superintendent did not attend the disciplinary hearing but signed it as if all its contents were accurate.

72. Subsequently, on August 20 and 21, 2024, during the disciplinary hearing appeal before the Ladue School Board, Ladue administrators argued that it extended Plaintiff Wohlfahrt's suspension to 180 days based on the incorrect premise that Plaintiff Wohlfahrt exhibited no remorse and/or contrition during the disciplinary hearing held on April 19, 2024.

73. On the letter dated April 20, 2024, Ladue asserted in part, "During the hearing, we found no material dispute of fact, and due process was provided to Plaintiff Wohlfahrt," even though Plaintiffs disputed almost every material fact that Ladue asserted regarding the April 8, 2024, incident.

¹ Ladue, the Ladue Special Resources Office, and the Ladue Police Department do not have any records for any investigation involving a plot or threat by C.G. to shoot Plaintiff Wohlfahrt, a disabled individual.

74. Ladue did not suspend C.G. from school even though Ladue knew C.G. had sent pornographic photos of himself to L.B.W.

75. Ladue did not suspend C.G. despite knowing that C.G. threatened to break “every bone” in Plaintiff Wohlfahrt’s “body” and threatened a plot with his “cousins,” who “begged” C.G. to “let them shoot” Plaintiff Wohlfahrt.

76. Ladue failed to provide Plaintiff Wohlfahrt with any accommodation while suspended from school.

77. Ladue initially placed Plaintiff Wohlfahrt in virtual school through Edgenuity during his suspension.

78. At the time, Defendants knew Plaintiff Wohlfahrt could not access virtual education because of his disabilities.

79. Defendants possessed the psychologist’s report, an opinion from Plaintiff Wohlfahrt’s pediatrician, and statements directly from Plaintiff Wohlfahrt and his Parents, indicating that Plaintiff Wohlfahrt was unable to learn virtually due to his disabilities.

80. Parents informed Ladue that Plaintiff Wohlfahrt was not receiving his reasonable accommodation and that he was unable to learn online due to his disabilities.

81. Instead of accommodating Plaintiff Wohlfahrt, Ladue threatened to expel Plaintiff Wohlfahrt in May 2024, over “new allegations” by another Ladue female student.

82. Ladue informed Plaintiffs that it would withdraw its attempt to expel Plaintiff Wohlfahrt if Plaintiffs dropped their legitimate disciplinary appeal to the Ladue School Board for the 180-day suspension.²

83. Ladue requested that Plaintiff Wohlfahrt and his Parents drop a legitimate

² Ultimately, the Ladue School Board overturned the Ladue Administration's 180-day suspension and returned Plaintiff Wohlfahrt to school on September 3, 2024, without any contingencies.

disciplinary appeal to the Ladue School Board without ever advising the Plaintiffs of any of the specifics involving the new allegations.

84. Ladue demanded that Plaintiff Wohlfahrt provide a written statement regarding the “new allegations” without informing Plaintiffs of the specific allegations.

85. Despite not having the specifics for the alleged new allegations, Plaintiff Wohlfahrt responded to the alleged new allegations on July 1, 2024, and July 16, 2024, by providing his own written statement, statements from other students, and pictures provided to Ladue.

86. On July 22, 2024, and August 9, 2024, Parents notified Ladue that Plaintiff Wohlfahrt filed a complaint for disability discrimination with the U.S. Department of Education, Office of Civil Rights (“**OCR**”).

87. On July 23, 2024, Ladue notified Plaintiff Wohlfahrt that Ladue was “not pursuing any additional discipline” for Plaintiff Wohlfahrt concerning the alleged new allegations that emerged after the initial suspension on April 8, 2024, and the subsequent escalation on April 20, 2024.

88. Despite being aware that Plaintiff Wohlfahrt could not learn through virtual means, Ladue enrolled Plaintiff Wohlfahrt in the virtual school program operated by Launch, a virtual institution utilized by Ladue.

89. On or around August 19, 2024, a Launch instructor informed A. Wohlfahrt that they could not meet with Plaintiff Wohlfahrt during “regular school hours” and had “all semester” to complete his work.

90. On August 19, 2024, a teacher at Launch, responsible for instructing Plaintiff Wohlfahrt and serving students in special education, informed A. Wohlfahrt that she did not

possess Plaintiff Wohlfahrt's accommodations from Ladue and could only meet with Plaintiff Wohlfahrt during the evenings.

91. On August 19, 2024, L.B.W. commenced her enrollment at Ladue High School, where C.G. is also a student.

92. When she started high school, Ladue never took any measures to safeguard L.B.W. from C.G.

93. Starting on the late afternoon of August 20, 2024, and continuing into the early morning hours of August 21, 2024, Ladue's District Board conducted a disciplinary appeal hearing concerning Plaintiff Wohlfahrt's appeal of the 180-day out-of-school suspension.

94. On August 21, 2024, in the early morning hours, L.B.W. provided testimony before the Ladue School Board regarding her brother's appeal of his 180-day suspension. L.B.W. appeared to protect and rehabilitate her character and reputation and also testified to advocate for her brother, Plaintiff Wohlfahrt, a disabled individual, whom L.B.W. believed was facing discrimination by the Ladue School District.

95. At the hearing on August 21, 2024, L.B.W. provided testimony that:

- a. C.G. accessed her social media account by adding himself without her consent the week before April 7, 2024.
- b. On April 7, 2024, C.G. transmitted a photograph to L.B.W. via social media and earnestly requested L.B.W. to view it.
- c. Subsequently, C.G. sent a second photograph to L.B.W. on the same platform and again implored L.B.W. to open it.
- d. L.B.W. opened at least one of C.G.'s pictures and saw C.G.'s genitals through his underwear.

e. L.B.W. adamantly denied consenting to soliciting C.G. for these types of pictures.

f. L.B.W. testified that C.G. sent inappropriate pictures to other female students without their consent.

96. Ladue did not call C.G., who did not testify at the Ladue School Board disciplinary appeal hearing.

97. Seven Ladue officials testified and strongly defended upholding Plaintiff Wohlfahrt's 180-day out-of-school suspension during the Ladue School Board disciplinary appeal hearing. However, Ladue did not call the Assistant Superintendent who ran the April 19, 2024, disciplinary hearing and co-authored the April 20, 2024, letter to testify.

98. On August 26, 2024, Ladue notified Plaintiff Wohlfahrt that he could return to Ladue High School starting September 3, 2024, demonstrating a valid appeal and repealing the 180-day suspension.

99. Ladue's School Board did not impose any contingencies on Plaintiff Wohlfahrt's return to school in their Board of Education Findings of Fact, Conclusions of Law, and Decision issued on September 25, 2024, by the Ladue School Board President.

100. Despite the Ladue School Board's Decision, Ladue required Plaintiff Wohlfahrt to sign a Student "Safety" Plan before returning to school.³

101. Plaintiff Wohlfahrt's Student "Safety" Plan maligned Plaintiff Wohlfahrt's character, including information from the alleged "new allegations" that Ladue initially used to potentially expel Plaintiff Wohlfahrt. It referenced C.G. but did not include C.G.'s threats.

102. Plaintiff Wohlfahrt objected to his Student "Safety" Plan because Ladue attempted

³ There is no requirement in the Ladue School Board Policies or the Ladue Student Handbook for a student to sign a Student "Safety" Plan to be able to return to the educational institution after an out-of-school suspension.

to malign his character.

103. Plaintiff Wohlfahrt's Student "Safety" Plan was retaliatory because the Ladue School Board, Policies, and Student Handbook did not require it for Plaintiff Wohlfahrt's return to school, Ladue School Board Policies and Student Handbook did not require this for Plaintiff Wohlfahrt's return to school and because Plaintiff Wohlfahrt's Student "Safety Plan did not indicate C.G.'s violent threats toward Plaintiff Wohlfahrt or that the alleged new allegations Ladue dropped.

104. Despite this, Ladue distributed Plaintiff Wohlfahrt's Student "Safety" Plan to all of Plaintiff Wohlfahrt's new Ladue instructors before they initially met with him.

105. Ladue refused to provide Plaintiff Wohlfahrt with any of the previously agreed-upon reasonable accommodations upon his return to in-person learning.

106. Following the April 19, 2024, disciplinary hearing and the disciplinary hearing appeal of August 20 and 21, 2024, Ladue did not take measures to safeguard L.B.W. from C.G., nor did it investigate C.G.'s actions despite becoming aware that L.B.W. was not C.G.'s sole victim and knowing that C.G. knew L.B.W. was in the Ladue Middle School in April and May 2024 and that L.B.W. and C.G. were by August 2024 in the same Ladue school building.

107. Ladue did not subject C.G. to any disciplinary action for his conduct towards Plaintiff Wohlfahrt, including the September 6, 2024 threats to damage Plaintiff Wohlfahrt's car, which he parked in his assigned parking spot during the school day, "break every bone" in Plaintiff Wohlfahrt's "body," and for a plot with C.G. and his cousins to shoot Plaintiff Wohlfahrt, or for C.G. sending pornographic photos to a minor Ladue student, L.B.W.

108. Instead of concentrating on C.G. and his inappropriate conduct, on August 29, 2024, Ladue informed Plaintiff Wohlfahrt that he was required to sign a Student "Safety" Plan to

regain access to the educational institution.

109. Instead of concentrating on C.G. and his inappropriate conduct, on August 29, 2024, Ladue informed L.B.W. that she was required to sign a Student “Safety” Plan to regain access to the educational institution.

110. The Student “Safety” Plan for L.B.W. indicated, in part, that it was the “result of a report of inappropriate communications by another student toward [L.B.W.]”

111. L.B.W.’s Student “Safety” Plan did not specify that L.B.W. was a victim of C.G.’s unsolicited pornographic photographs.

112. Additionally, the Student “Safety” Plan imposed on L.B.W. the obligation to “remove herself” from any school event attended by C.G.

113. L.B.W. objected to and did not sign her Student “Safety” Plan because it did not accurately state C.G.’s actions, it did not accurately portray L.B.W. as the victim of C.G.’s actions, because it felt retaliatory, and because the Ladue School Board, Ladue Board Policies, or the Ladue Student Handbook did not require this.

114. L.B.W.’s Student “Safety” Plan required her to remove herself from school events if C.G. was in attendance, even though she had not done anything wrong and was a victim of C.G.’s actions.

115. Ladue had zero desire to protect L.B.W. from when L.B.W. first reported the unsolicited pornographic pictures in April 2024 to August 2024.

116. The request for L.B.W. to execute a Student “Safety” Plan and assertion that Ladue would implement it was after the April 19, 2024 disciplinary hearing that L.R.B. attended to rehabilitate her credibility, days after L.B.W. testified before the School Board to rehabilitate her credibility and only after Ladue school administrators learned the Ladue School Board had

overruled them about her brother's 180-day out of school suspension which is suspiciously timed for example there had been no communication, before the Ladue School Board overturned Plaintiff Wohlfahrt's suspension, for L.B.W. to sign a Student "Safety" Plan even though Ladue knew that L.B.W and C.G. were back in school in the same Ladue school building.

117. On September 5, 2024, Ladue informed L.B.W. that she would still be permitted to attend school if she refused to sign her Student "Safety" Plan.

118. Despite Plaintiffs' objections and refusals to execute their Student "Safety" Plans, Ladue implemented them by distributing them to all their Ladue teachers.

119. Plaintiffs experienced humiliation and embarrassment due to disseminating inaccurate Plans and felt ashamed multiple times because of Ladue's actions.

**COUNT I: DISABILITY DISCRIMINATION AGAINST PLAINTIFF
WOHLFAHRT IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT**

120. Plaintiffs hereby incorporate the facts noted above.

121. At all relevant times, Defendants were places of public accommodation under Mo. Rev. Stat. § 213.010(16).

122. Plaintiff Wohlfahrt's disabilities significantly impact his major life activities.

123. Plaintiff Wohlfahrt is disabled under the MHRA, Mo. Rev. Stat. § 213.010.

124. At all relevant times, as described in more detail above, Defendants discriminated against Plaintiff Wohlfahrt due to his disabilities.

125. Defendants suspended Plaintiff Wohlfahrt due to his disability.

126. Defendants punished Plaintiff Wohlfahrt while not punishing similarly situated non-disabled students who engaged in more severe and dangerous behaviors.

127. Defendants extended the punishment on Plaintiff Wohlfahrt due to his disabilities.

128. Defendants refused to provide a reasonable accommodation that would have allowed Plaintiff Wohlfahrt to access his education due to his disabilities.

129. These reasonable accommodations did not and would not impose an undue hardship on Defendants.

130. Even after becoming aware that Plaintiff Wohlfahrt did not receive reasonable accommodation, Defendants refused to provide reasonable accommodation.

131. Based on the foregoing, Ladue suspended Plaintiff Wohlfahrt because of his disability, which is a form of discrimination on the basis of disability within the meaning of the MHRA.

132. Because of Plaintiff Wohlfahrt's disabilities, Ladue punished him more severely than it would have punished similarly situated students who did not have disabilities.

133. Based on the foregoing, Defendants Ladue, SSD, and Launch did not adequately provide instructional education and services to Plaintiff Wohlfahrt by failing to provide the previously agreed-upon reasonable accommodations.

134. Based on the foregoing, Defendants Ladue, SSD, and Launch did not adequately provide instructional education and services to Plaintiff Wohlfahrt during his suspension due to his disability.

135. Based on the foregoing, Ladue, SSD, and LAUNCH excluded Plaintiff Wohlfahrt from academic instruction because of his disability.

136. Defendants' actions were undertaken maliciously or in reckless disregard for Plaintiff Wohlfahrt's right to be free from discrimination.

137. As a direct and proximate result of the above-described acts, Plaintiff Wohlfahrt has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical

manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Ladue's actions have and continue to prevent Plaintiff Wohlfahrt from performing daily activities and obtaining the full enjoyment of life. Plaintiff Wohlfahrt has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

138. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiff Wohlfahrt seeks actual damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

139. At the time of Defendants' misconduct, Defendants knew their actions were outrageous, unlawful, and were undertaken maliciously and/or in reckless disregard for Plaintiff Wohlfahrt's right to be free from discrimination and retaliation. Plaintiff Wohlfahrt will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. § 510.261.

140. Plaintiff Wohlfahrt requests a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff Wohlfahrt respectfully requests that this Court enter judgment in their favor and against Defendants, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT II: DISABILITY DISCRIMINATION FOR FAILURE
TO ACCOMMODATE ON BEHALF OF PLAINTIFF WOHLFAHRT**

141. Plaintiffs hereby incorporate the facts noted above.

142. At all relevant times, Defendants were places of public accommodation under Mo. Rev. Stat. § 213.010(16).

143. Plaintiff Wohlfahrt's disabilities significantly impact his major life activities.

144. Plaintiff Wohlfahrt is disabled under the MHRA, Mo. Rev. Stat. § 213.010.

145. Plaintiff Wohlfahrt requested reasonable accommodation for his disability, including allowing a note card for steps/procedures/formulas, frequent check-ins, chunking assignments, having the teachers provide notes, and providing extended test time.

146. Additionally, Plaintiff Wohlfahrt requested a reasonable accommodation for not doing virtual learning.

147. These reasonable accommodations did not impose an undue hardship on Defendants.

148. Despite Plaintiff Wohlfahrt's request for reasonable accommodation, the Defendants often failed to provide any of them, thus denying Plaintiff Wohlfahrt instructional education.

149. Despite Plaintiff Wohlfahrt's explanation, supported by experts, that he could not have virtual learning, Defendants did not provide any reasonable accommodations for Plaintiff Wohlfahrt, thus denying Plaintiff Wohlfahrt instructional education.

150. Upon returning from the out-of-school suspension in September 2024, Ladue and SSD ignored Plaintiff Wohlfahrt's reasonable accommodations.

151. Based on the foregoing, Ladue, SSD, and Launch discriminated against Plaintiff Wohlfahrt because of his disability by denying Plaintiff Wohlfahrt the reasonable accommodations of notecards, frequent check-ins, providing notes, chunked assignments, and no virtual learning.

152. Defendants' actions were undertaken maliciously or in reckless disregard for Plaintiff Wohlfahrt's right to be free from discrimination.

153. As a direct and proximate result of the above-described acts, Plaintiff Wohlfahrt has suffered and will continue to suffer pain of mind and body, PTSD, depression, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff Wohlfahrt has also been and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life. Plaintiff Wohlfahrt also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

154. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiff Wohlfahrt seeks actual damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

155. At the time of Defendants' misconduct, Defendants knew their actions were outrageous, unlawful, and were undertaken maliciously and/or in reckless disregard for Plaintiff Wohlfahrt's right to be free from discrimination and retaliation. Plaintiff Wohlfahrt will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. § 510.261.

156. Plaintiffs request a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff Wohlfahrt respectfully requests that this Court enter judgment in their favor and against Defendants, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT III: RETALIATION IN VIOLATING THE
MISSOURI HUMAN RIGHTS ACT AGAINST
LADUE AND SSD ON BEHALF OF PLAINTIFF WOHLFAHRT**

157. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs as if fully set forth herein.

158. Throughout the events mentioned above, Plaintiff Wohlfahrt, both individually and through his parents, complained to the school that they were punishing Plaintiff Wohlfahrt due to his disabilities and discriminating against Plaintiff Wohlfahrt due to his disabilities.

159. Throughout the events mentioned above, Plaintiff Wohlfahrt, both individually and through his parents, complained to the school that they did not provide reasonable accommodation(s) that allowed him to receive educational instruction.

160. Upon information and belief, Defendant Ladue suspended Plaintiff Wohlfahrt in retaliation for Plaintiff's complaints about the failure to provide reasonable accommodation(s).

161. Defendant Ladue did not suspend similarly situated students who did not complain about discrimination, though the similarly situated students committed more severe infractions.

162. Defendant Ladue suspended Plaintiff Wohlfahrt in retaliation for Plaintiff's complaints about the failure to provide reasonable accommodation(s).

163. Defendant Ladue extended Plaintiff Wohlfahrt's suspension in retaliation for Plaintiff's complaints about disability discrimination.

164. Defendants Ladue and SSD refused to provide Plaintiff Wohlfahrt with reasonable accommodation(s) during Plaintiff Wohlfahrt's suspension in retaliation for Plaintiff's complaints about disability discrimination.

165. Defendants Ladue refused to provide Launch with a copy of Plaintiff Wohlfahrt's reasonable accommodations in retaliation for Plaintiff's complaints about disability

discrimination.

166. Defendant Ladue drafted the preamble of Plaintiff Wohlfahrt's Student Safety Plan in a way that maligned Plaintiff Wohlfahrt's character in retaliation for Plaintiff's complaints about the failure to provide a reasonable accommodation.

167. Defendants Ladue and SSD refused to provide Plaintiff Wohlfahrt with reasonable accommodation(s) upon his return from his unlawful suspension in retaliation for Plaintiff's complaints about disability discrimination.

168. Ladue retaliated against Plaintiff Wohlfahrt by wording the Student Safety Plan's preamble to malign Plaintiff Wohlfahrt's character and including information from the "new allegations" that Ladue did not pursue.

169. Based on the foregoing, Ladue and SSD excluded Plaintiff Wohlfahrt from academic instruction because the Plaintiff complained about discrimination, which is a form of retaliation within the meaning of the MHRA.

170. Defendants' actions were undertaken maliciously or in reckless disregard for Plaintiff Wohlfahrt's right to be free from retaliation.

171. Given Defendants' willful and malicious conduct, Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time as outlined by Mo. Rev. Stat. § 510.261.

172. As a direct and proximate result of the above-described acts, Plaintiff Wohlfahrt has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life.

173. Plaintiff requests a trial by jury on all issues triable by jury.

174. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiffs seek actual damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

175. At the time of Defendants' misconduct, Defendants knew their actions were outrageous and unlawful and were undertaken maliciously and/or in reckless disregard for Plaintiffs' right to be free from discrimination and retaliation. Plaintiffs will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. § 510.261.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT IV: GENDER DISCRIMINATION AGAINST
PLAINTIFF L.B.W. IN VIOLATION OF THE
MISSOURI HUMAN RIGHTS ACT AGAINST DEFENDANT LADUE**

176. Plaintiffs hereby incorporate the facts noted above.

177. At all relevant times, Defendant Ladue was a place of public accommodation under Mo. Rev. Stat. § 213.010(16).

178. L.B.W. is a member of a protected class under the MHRA, Mo. Rev. Stat. § 213.010, due to her gender.

179. As described in more detail above, Ladue discriminated against L.B.W. due to her gender at all relevant times.

180. After learning about C.G.'s sexual harassment of L.B.W., Ladue failed to investigate the allegations because of L.B.W.'s gender.

181. After learning about C.G.'s sexual harassment of L.B.W., Ladue only spoke with

C.G., the male student, and refused to speak with L.B.W., a female student.

182. Ladue only spoke with C.G. and not L.B.W. due to L.B.W.'s gender.

183. After learning about C.G.'s sexual harassment of L.B.W., Ladue refused to take steps to protect L.B.W. due to her gender.

184. Ladue allowed the male student, C.G., to disparage the reputation of the female student, L.B.W., due to her gender.

185. Ladue refused to believe the female victim, L.B.W., and instead believed the male student, C.G., when he stated it was a mutual situation and that it was L.B.W. who initiated the pornographic images.

186. Ladue believed C.G. over L.B.W. due to L.B.W.'s gender.

187. Ladue punished the female victim, L.B.W., and not the male student, C.G., even though L.B.W. testified at the hearings on August 20 and 21 and C.G. did not testify.

188. Because of her gender, Ladue punished L.B.W. and not C.G., despite finding it was a "mutual situation."

189. Ladue did not address C.G. and his inappropriate conduct because of his gender.

190. On August 29, 2024, Ladue created a Student "Safety" Plan for L.B.W. to regain access to the educational institution because of L.B.W.'s gender.

191. Ladue imposed on L.B.W. the obligation to "remove herself" from any Ladue school event attended by C.G. because of her gender.

192. Ladue refused to protect L.B.W. despite knowing about C.G.'s sexual harassment because of L.B.W.'s gender.

193. Over L.B.W.'s objections, Ladue proceeded to implement L.B.W.'s Student "Safety" Plan by distributing it to all L.B.W.'s teachers because of L.B.W.'s gender.

194. Based on the foregoing, Ladue's actions are a form of discrimination on the basis of gender within the meaning of the MHRA.

195. Defendants' actions were undertaken maliciously or in reckless disregard for L.B.W.'s right to be free from discrimination.

196. As a direct and proximate result of the above-described acts, Plaintiff L.B.W. has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff L.B.W. has also been and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life. Plaintiff L.B.W. also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

197. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiff L.B.W. seeks actual damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

198. At the time of Defendants' misconduct, Defendants knew their actions were outrageous, unlawful, and were undertaken maliciously and/or in reckless disregard for Plaintiff L.B.W.'s right to be free from discrimination and retaliation. Plaintiff L.B.W. will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. § 510.261.

199. Plaintiff L.B.W. requests a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff L.B.W. respectfully requests that this Court enter judgment in their favor and against Defendant Ladue School District, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as

any other relief this Court deems may be just and proper.

**COUNT V: DISABILITY DISCRIMINATION BASED ON ASSOCIATION
WITH AN INDIVIDUAL WITH DISABILITY FOR PLAINTIFF L.B.W.
IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT AGAINST LADUE**

200. Plaintiffs hereby incorporate the facts noted above.

201. At all relevant times, Defendants were places of public accommodation under Mo. Rev. Stat. § 213.010(16).

202. Plaintiff Wohlfahrt's disabilities significantly impact his major life activities.

203. Plaintiff Wohlfahrt is disabled under the Missouri Human Rights Act, Mo. Rev. Stat. § 213.010.

204. Ladue knew about L.B.W.'s association with an individual with a disability, her brother, Plaintiff Wohlfahrt.

205. At all relevant times, as described in more detail above, Defendant Ladue discriminated against L.B.W. due to her association with an individual with disabilities.

206. At all relevant times, as described in more detail above, Defendants discriminated against L.B.W. due to her association with an individual with a disability.

207. After learning about C.G.'s sexual harassment of L.B.W., Ladue failed to investigate the allegations due to her association with an individual with a disability.

208. After learning about C.G.'s sexual harassment of L.B.W., Ladue refused to speak with L.B.W. regarding the allegations, though it spoke with C.G., due to her association with an individual with a disability.

209. After learning about C.G.'s sexual harassment of L.B.W., Ladue refused to take steps to protect L.B.W. due to her association with an individual with a disability.

210. Instead, Ladue took C.G.'s word when he disparaged L.B.W.'s character and

believed C.G. that it was a mutual situation due to L.B.W.'s association with an individual with a disability.

211. Instead, Ladue took the word of C.G. when he disparaged L.B.W.'s character and believed C.G. that it was L.B.W. who initiated the pornographic images due to her association with an individual with a disability.

212. Ladue accepted C.G.'s statement despite the absence of C.G.'s testimony at the Ladue School Board disciplinary appeal hearing held on August 20 and 21, 2024. Conversely, L.B.W. provided testimony countering C.G.'s allegations and endeavored to restore her reputation. Ladue imposed sanctions on L.B.W. on the grounds of her association with an individual with a disability.

213. Ladue punished L.B.W. and not C.G., despite finding that it was a “mutual situation” due to her association with an individual with a disability.

214. Instead of concentrating on C.G. and his inappropriate conduct, on August 29, 2024, Ladue created and tried to make L.B.W. sign a Student "Safety" Plan to regain access to the educational institution due to her association with an individual with a disability.

215. Ladue imposed on L.B.W. in her Student “Safety” Plan the obligation to "remove herself” from any school event attended by C.G. due to her association with an individual with a disability.

216. Ladue had zero desire to protect L.B.W. from the time she first reported the unsolicited pornographic pictures from C.G. in April 2024 to August 2024 due to her association with an individual with a disability.

217. Despite L.B.W.'s objections and refusal to execute her Student “Safety” Plan, Ladue proceeded to implement it by distributing it to all of L.B.W.'s teachers due to her association

with a disabled individual.

218. Based on the foregoing, Ladue's actions are a form of discrimination based on association with an individual with a disability within the meaning of the MHRA.

219. Defendants' actions were undertaken maliciously or in reckless disregard for L.B.W.'s right to be free from discrimination.

220. Based on the foregoing, Ladue's actions are a form of discrimination based on gender within the meaning of the MHRA.

221. Defendants' actions were undertaken maliciously or in reckless disregard for L.B.W.'s right to be free from discrimination.

222. As a direct and proximate result of the above-described acts, Plaintiff L.B.W. has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff L.B.W. has also been and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life. Plaintiff L.B.W. also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

223. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiff L.B.W. seeks actual damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

224. At the time of Defendants' misconduct, Defendants knew their actions were outrageous, unlawful, and were undertaken maliciously and/or in reckless disregard for Plaintiff L.B.W.'s right to be free from discrimination and retaliation. Plaintiff L.B.W. will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. §

510.261.

225. Plaintiff L.B.W. requests a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff L.B.W. respectfully requests that this Court enter judgment in their favor and against Defendants, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT VI: RETALIATION IN VIOLATION OF THE
MISSOURI HUMAN RIGHTS ACT AGAINST LADUE
ON BEHALF OF PLAINTIFF L.B.W.**

226. Plaintiffs incorporate by reference the allegations in the foregoing paragraphs as if fully set forth herein.

227. Throughout the events mentioned above, Plaintiff L.B.W., both individually and through her Parents, complained to the school that they were discriminating against Plaintiff Wohlfahrt due to his disabilities.

228. Throughout the events mentioned above, Plaintiff L.B.W., both individually and through her parents, complained to the school that they were discriminating against Plaintiff L.B.W. due to her gender.

229. Ladue refused to take steps to protect L.B.W. in retaliation for her complaints about discriminatory conduct.

230. In retaliation for L.B.W.'s complaints about discrimination, Ladue took C.G.'s word when he disparaged L.B.W.'s character and lied about the photographs.

231. Ladue disparaged L.B.W.'s character due to her complaints about discriminatory conduct.

232. Ladue accepted C.G.'s account, even though only L.B.W. testified during the

appeal hearing held on August 20 and 21, 2024. 24.

233. Ladue punished L.B.W. and not C.G., despite finding it was a "mutual situation" because she complained about discriminatory conduct.

234. In retaliation for L.B.W.'s complaints about discrimination, Ladue created a Student "Safety" Plan to allow L.B.W. to regain access to the educational institution.

235. Ladue imposed on L.B.W. the obligation to "remove herself" from any school event attended by C.G. due to her complaints about discriminatory conduct.

236. Ladue failed to protect L.B.W. from when she first reported the unsolicited pictures in April 2024 to August 2024 due to her complaints about discriminatory conduct.

237. Due to L.B.W.'s complaints about discriminatory conduct, Ladue implemented the Student Safety Plan over L.B.W.'s objections by distributing it to all her teachers.

238. Based on the foregoing, Ladue's actions are a form of retaliation within the meaning of the MHRA.

239. Defendants' actions were undertaken maliciously or in reckless disregard for L.B.W.'s right to be free from discrimination.

240. As a direct and proximate result of the above-described acts, Plaintiff L.B.W. has suffered and will continue to suffer pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff L.B.W. has also been and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life. Plaintiff L.B.W. also has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

241. Pursuant to Mo. Rev. Stat. § 213.111(2), Plaintiff L.B.W. seeks actual damages,

including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, other nonpecuniary losses, punitive damages against Defendant, and attorney's fees and costs.

242. At the time of Defendants' misconduct, Defendants knew their actions were outrageous, unlawful, and were undertaken maliciously and/or in reckless disregard for Plaintiff L.B.W.'s right to be free from discrimination and retaliation. Plaintiff L.B.W. will seek leave of Court to file a claim for punitive damages at the appropriate time outlined by Mo. Rev. Stat. § 510.261.

243. Plaintiff L.B.W. requests a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff L.B.W. respectfully requests that this Court enter judgment in their favor and against Defendant Ladue School District, awarding emotional distress damages, compensatory damages, pre-and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

Dated: September 23, 2025

Respectfully submitted,

/s/ Michelle K. Faron

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