

Petitioner: Samuel S. Peters, Parent of Current Chesterfield County
Public Schools Female Student

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Defendant: Superintendent Mervin Daugherty
Chesterfield County Public Schools

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**Petition to the Circuit Court of Chesterfield
County, Virginia, for an Emergency Injunction
in Response to Chesterfield County Public
Schools now Placing its Female Students
Under Imminent Threat of Sexual Assault**

Chesterfield County Public Schools (CCPS) is about to subject all female students to the very real prospect of imminent and ongoing sexual assault.

In March 2021 the Virginia Department of Education (VDOE) issued the directive entitled “Model Policies for the Treatment of Transgender Students in Virginia’s Public Schools.” Section IX of that directive, entitled “Access to Facilities,” states the following:

Access to facilities such as restrooms and locker rooms that correspond to a student’s gender identity will be available to all students.

In response to this state directive, CCPS has issued “School Board Policy 1015,” which enumerates the same requirements specified in the state directive. What are not specified in Policy 1015, however, are any safeguards to prevent female CCPS students from being sexually assaulted whenever they go to the bathroom. Currently, there are in place no CCPS safeguards to protect girls from being sexually assaulted whenever they go to the bathroom. **This situation defies the moral standards of all civilized societies and can not be tolerated.**

We ask the Court to require that CCPS provide adult female supervision in all girls’ bathrooms to protect our female students from imminent, and ongoing, sexual assault and permanent emotional injury.