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

YAIR LEV, *individually and as parent and natural guardian of his children*; ELEANOR STANFORD, *individually and as parent and natural guardian of her minor child* JOAQUIN IMAIZUMI; ERIN AMINI and MICHAEL AMINI, *individually and as parents and natural guardians of their children*; MEREDITH BRISCO-BACIK and BRADLEY BACIK, *individually and as parents and natural guardians of their children*; BERTHA ESCOBEDO BARRONDO, *individually and as parent and natural guardian of her children*; JAMES HAUSMAN, *individually and as parent and natural guardian of his child*; and SARA MOYN, *individually and as parent and natural guardian of her children*; *Plaintiffs* v. LOWER MERION SCHOOL DISTRICT; FRANK RANELLI, *individually and as Superintendent, Lower Merion School District*; KERRY SAUTNER, *individually and as Board President, Lower Merion School District*; TODD RIDKY, *individually and as Vice President, Lower Merion School District*; JASON HERMAN, *individually and as Board Member, Lower Merion School District*; SHAYNA KALISH, *individually and as Board Member, Lower Merion School District*; JUANITA KERBER, *individually and as Board Member, Lower Merion School Distric*t; JEN RIVERA, *individually and as Board Member, Lower Merion School District*; and ANNA SHURAK, *individually and as Board Member, Lower Merion School District*, *Defendants*.	§	**COMPLAINT** Case No.:

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A-10	Singer, Natasha. "Google Turns On Gemini A.I. for Students Using Its Classroom App." New York Times. August 14, 2026.
A-11	Zhou, April. "New ChromeOS tools support classroom collaboration."
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** Leading letters correspond to the subsection of the Factual Allegations in which the exhibit appears.*

INTRODUCTION

1. Frank Ranelli, the Superintendent of Lower Merion School District, Dr. Kerry Sautner, the Board President, and the named members of the school board have presided over a digital free-for-all in which the children in their care are given unlimited, unstructured, unsupervised access to the open internet, both at school and at home, through computers that the District requires students to use to access the public education they are legally entitled to.

2. Through those devices, students of all ages can and do access online pornography, violent videos, gambling sites, and video games, including one in which the player's goal is to escape from sex criminal Jeffrey Epstein's private island. Instead of paying attention in class, students consume an endless stream of short-form videos, browse social media, and shop. They chat with strangers and bully each other. They frequently interact with AI chatbots, which not only help them cheat on their assignments and diminish what they have already learned, but have also sent grown adults into delusional spirals and have coached other young people to take their own lives. Lower Merion students do this and more at all hours of the day: on the bus, in class, at lunch, and during breaks, and also at home, late into the night, when their parents think they are doing homework.

3. At the same time, the purportedly educational applications that the District requires students to use are little different than video games and employ the same design techniques that make social media platforms harmful to young people's well-being. Students find these programs infantile, demotivating, and inferior to reading books and completing assignments by hand. Parents report that their children's handwriting and eyesight are getting worse, and their children complain of headaches and eye strain from excessive time in front of a screen. Meanwhile, these and other District-mandated platforms collect vast amounts of private information from students without their parents' informed consent, use what they take for the providers' commercial gain, and expose that information to hackers through careless data practices.

4. Over the past decade, the predatory practices of technology companies have been exposed in news articles, whistleblower reports, and litigation. Expert opinion has coalesced around the

harms to children's health, safety, and privacy associated with overuse of screens and all-hours access to the internet. Responsible parents are choosing to limit how much time their children spend on screens and what they do online.

5. Young people themselves are stepping back, reclaiming the vitality of an analog adolescence and choosing a less-online life to protect their minds, bodies, and relationships from the abuses of Big Tech.

6. Despite growing expert and public consensus about the many harms of excessive screen use and time spent online, Defendants insist on exposing students to those harms daily. And they insist there is nothing parents can do about it. But the Constitution says otherwise.

7. The Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing. *See Troxel v. Granville*, 530 U.S. 57, 65–68 (2000); *M.L.B. v. S.L.J.*, 519 U.S. 102, 116 (1996); *Santosky v. Kramer*, 455 U.S. 745, 753 (1982); *Lassiter v. Department of Soc. Servs.*, 452 U.S. 18, 27 (1981); *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972); *Prince v. Massachusetts*, 321 U.S. 158, 166 (1944); *Pierce v. Society of Sisters*, 268 U.S. 510, 534–35 (1925); *Meyer v. Nebraska*, 262 U.S. 390, 399 (1923); *Miller v. Mitchell*, 598 F.3d 139, 150 (3d Cir. 2010); *C.N. v. Ridgewood Board of Education*, 430 F.3d 159 (3d Cir. 2005); *Gruenke v. Seip*, 225 F.3d 290, 305 (3d Cir. 2000).

8. This right is one of the oldest fundamental liberty interests recognized under the Constitution. *Pierce*, 268 U.S. at 534–35; *Meyer*, 262 U.S. at 399. A parent's right to make decisions regarding their children's care includes the right to make decisions to safeguard their health, safety, and privacy. A parent's right to direct their children's education and upbringing includes the right to transmit his or her morals, values, beliefs, and culture to their children.

9. In contravention of their proper role as public educators and leaders of the District, Defendants are violating Plaintiffs' constitutional rights by requiring Plaintiffs' children to use computers that are persistently connected to the internet and that expose them to all manner of online harms and risks to their health, safety, and privacy. Defendants' actions further violate

Plaintiffs' constitutional rights by thwarting Plaintiffs' ability to protect their children from those harms and risks of harm and by undermining Plaintiffs' values, including how much time their children spend on computers and the internet and what they do on screens and online.

10. Consistent with these fundamental constitutional rights, until its repeal and replacement in the summer of 2026, the District had a longstanding policy that permitted parents to decline an internet-connected device for their child. If they did, "the Superintendent or designee [was] responsible for ensuring that the District use[d] its best efforts to make necessary accommodations for the student to ensure that the student's education [wa]s not adversely affected." An administrative regulation required the building principal to make "necessary accommodations for the student to ensure that the student's education [wa]s not adversely affected."

11. By the 2025–26 school year, the number and severity of the harms students suffered as a result of device use had grown intolerable to many parents. A community movement calling itself Pencils Over Pixels, of which Plaintiffs are members, formed to advocate for reforms to the District's technology policies.

12. When parents attempted to decline devices for their children *en masse*, Superintendent Ranelli repeatedly insisted at public meetings that they had no right to do so, the plain language of the then-effective policy notwithstanding. Out of the public eye, Ranelli, Sautner, and other members of the school board contrived to change the policy to formally eliminate families' ability to decline internet-connected devices, instructed building principals not to accommodate those who declined, and punished at least one principal for attempting to follow the policy.

13. In a private meeting, Ranelli told one of the Plaintiffs that parents who objected to the District's approach to technology should send their children to private school. And indeed, owing to the harms to their children and disruptions to family life caused by their school devices, three Plaintiff families withdrew their children from District schools in the spring and summer of 2026, though they strongly would have preferred their children remain enrolled there.

14. Throughout the spring of 2026, Board President Sautner presided over a series of meetings where the board made a show of receiving public comment regarding proposed policy changes,

when in fact she and Ranelli had already made the decision to formally eliminate parents' ability to decline District-issued devices.

15. On June 15, 2026, the seven named school board members voted to repeal the former policy that allowed parents to decline an internet-connected device for their children and required the superintendent to make the necessary accommodations to ensure their children's education was not adversely affected.

16. On August 17, 2026, the same seven school board members voted to enact a new policy in which declining a device is no longer an option.

17. Plaintiffs are professors of medicine, pediatricians and other medical doctors, and clinical psychologists. Given their training and experience, Plaintiffs are more familiar than most with the harms the digital world poses to children, and they make their parenting decisions accordingly.

18. This case is not about curriculum. Without prejudicing their rights under other District policies and applicable state law, the Plaintiffs do not seek to usurp the District's role in adopting and promulgating curriculum, nor do they seek to exercise veto power over the academic content taught to their children.

19. Rather, Plaintiffs seek only to safeguard their children's health, safety, and privacy, help them learn and develop skills, and ensure that what their children do all day at school does not undermine their family values.

20. While schools and teachers serve an *in loco parentis* function while a child is at school, "[p]ublic schools must not forget that '*in loco parentis*' does not mean 'displace parents.'" *Gruenke*, 225 F.3d at 307.

21. Accordingly, among other relief, Plaintiffs ask the Court to preserve the *status quo ante* and continue to permit parents to decline internet-connected devices for their children and require the Superintendent to ensure that the District uses its best efforts to accommodate those who do.

I. THE PARTIES

22. Plaintiff Yair Lev is a resident of the Eastern District of Pennsylvania and LMSD and the father of two children who attend school in LMSD. He brings this case on his own behalf and as parent and natural guardian of his children.

23. Plaintiff Eleanor Stanford is a resident of the Eastern District of Pennsylvania and LMSD and the mother of her son, Joaquin Imaizumi, who attended school in LMSD until August 2026 and who is eligible to attend school in LMSD in the 2026–27 school year. She brings this case on her own behalf and as parent and natural guardian of her son.

24. Plaintiffs Erin Amini and Michael Amini are residents of the Eastern District of Pennsylvania and LMSD and parents of four children who attend school in LMSD. They bring this case on their own behalf and as parents and natural guardians of their children.

25. Meredith Brisco-Bacik and Bradley Bacik are residents of the Eastern District of Pennsylvania and LMSD and parents of three children who attend school in LMSD. They bring this case on their own behalf and as parents and natural guardians of their children.

26. Bertha Escobedo Barrondo is a resident of the Eastern District of Pennsylvania and LMSD and the parent of two children who are eligible to attend school in LMSD in the 2026–27 school year. She brings this case on her own behalf and as parent and natural guardian of her children.

27. James Hausman is a resident of the Eastern District of Pennsylvania and LMSD and the father of a child who attended school in LMSD until June 2026. His child is eligible to attend school in LMSD in the 2026–27 school year. He brings this case on his own behalf and as parent and natural guardian of his child.

28. Sara Moyn is a resident of the Eastern District of Pennsylvania and LMSD and the mother of two children who attended school in LMSD until June 2026. Her two children are eligible to attend school in LMSD in the 2026–27 school year. She brings this case on her own behalf and as parent and natural guardian of her children.

29. Defendant Lower Merion School District ("LMSD" or "District") is a public school district serving approximately 8,600 students in kindergarten through 12th grade who reside in Lower

Merion Township and the Borough of Narberth. It is organized under Pennsylvania law and operates six elementary schools, three middle schools, and two high schools. The District is governed by a Board of School Directors, a nine-member elected body that sets policy for the administration of the District to its Superintendent of Schools, who oversees a number of lower-level administrators.

30. Defendant Dr. Frank Ranelli is the current Superintendent of LMSD and is sued in his individual and official capacity.

31. Dr. Kerry Sautner is the Board President of LMSD and is sued in her individual and official capacity.

32. Dr. Todd Ridky is the Vice President of LMSD and is sued in his individual and official capacity.

33. Jason Herman is a Board Member of LMSD and is sued in his individual and official capacity.

34. Shayna Kalish is a Board Member of LMSD and is sued in her individual and official capacity.

35. Juanita Kerber is a Board Member of LMSD and is sued in her individual and official capacity.

36. Jen Rivera is a Board Member of LMSD and is sued in her individual and official capacity. On August 24, 2026, Rivera was charged with four counts of Theft by Deception, Receiving Stolen Property, and Access Device Fraud, all third-degree felonies. To Plaintiffs' knowledge, as of the date of this complaint Defendant Rivera remains a Board Member.

37. Anna Shurak is a Board Member of LMSD and is sued in her individual and official capacity.

38. Collectively Defendants Sautner, Ridky, Herman, Kalish, Kerber, Rivera, and Shurak are herein referred to the "School Board Defendants."

39. At all times relevant to the events described herein, Defendant Ranelli acted within the scope of his employment as an employee, agent, and representative of LMSD and under color of state law.

40. In creating, overseeing, and perpetuating an environment that exposes students to harms and risks of harms to their health, safety, and privacy through their internet-connected devices, and that undermines parents' ability to make decisions regarding their care and direct their education and upbringing; refusing to enforce the former policies that allowed parents to decline an internet-connected device for their child and required him to ensure that the District to use their best efforts to ensure that the child's education was not adversely affected; interfering with the enforcement and implementation of former policies that allowed parents to decline an internet-connected device for their child; and enforcing and implementing new policies to prevent parents from declining an internet-connected device for their child, Defendant Ranelli himself violated and oversaw and permitted the violations of Plaintiffs' constitutional rights and did so with the consent, encouragement, knowledge, and ratification of the School Board Defendants, and continues to do so; under the School Board Defendants' authority, control, and supervision; and with the actual or apparent authority of the School Board Defendants. Upon information and belief, Defendant Ranelli has final policymaking authority for LMSD in circumstances not otherwise provided for in the School District Bylaws, Policies, Administrative Regulations, and Addendums thereto.

41. At all times relevant to the events described herein, the School Board Defendants acted in their individual and official capacities as representatives of LMSD and under color of state law.

42. In creating, overseeing, and perpetuating an environment that exposes students to harms and risks of harms to their health, safety, and privacy through their internet-connected devices, and that undermines parents' ability to make decisions regarding their care and direct their education and upbringing; voting to repeal the former policies that allowed parents to decline an internet-connected device for their child and, if they did, required Defendant Ranelli and the District to use their best efforts to ensure that the child's education was not adversely affected; failing to adequately supervise and oversee Defendant Ranelli to ensure that the former policies permitting

parents to decline a device and accommodating the children of those who did were consistently enforced; voting to adopt new policies depriving parents of the ability to decline an internet-connected device for their child; and in empowering Defendant Ranelli to enforce the new policies to prevent parents from declining an internet-connected device for their child, the School Board Defendants themselves violated and oversaw and permitted the violations of Plaintiffs' constitutional rights.

43. There is a special relationship between Ranelli and the School Board Defendants and all children in the District, including Plaintiffs' children. Ranelli and the School Board Defendants created the dangers that deprive Plaintiffs of their right to substantive due process. Ranelli and the School Board Defendants made Plaintiffs' children more vulnerable to dangers that the Defendants themselves did not create.

44. Ranelli and the School Board Defendants knew or reasonably should have known that the actions they took within the sphere of their official responsibility would violate Plaintiffs' constitutional rights. Ranelli and the School Board Defendants took action with the malicious intention to cause a deprivation of Plaintiffs' constitutional rights.

45. Ranelli and the School Board Defendants owe a duty of care to all children enrolled or eligible for enrollment in the District, including Plaintiffs' children. Ranelli and the School Board Defendants owe a duty of care to all parents of children enrolled or eligible for enrollment in the District, including Plaintiffs.

46. For the sake of concision, acts attributed to "the District" are collectively the acts of the School Board Defendants and Defendant Ranelli; acts that occur or requirements that are imposed "under District policies" are references to acts occurring or requirements imposed "under written and *de facto* policies that are implemented and enforced by the Defendants"; "parents" means "parents and guardians"; and "school devices" or "school computers" shall mean "District-mandated internet-connected Apple iPads, Google Chromebooks, and/or Apple MacBooks," whether or not they are individually assigned to a student, and which may be used at home or at school.

II. SUBJECT MATTER JURISDICTION AND VENUE

47. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.

48. The Court has authority to enter a declaratory judgment and provide preliminary and permanent injunctive relief pursuant to Federal Rules of Civil Procedure 57 and 65 and 28 U.S.C. §§ 2201 and 2202.

49. Under 28 U.S.C. § 1391(b), *inter alia*, venue is proper in the Eastern District of Pennsylvania because the alleged conduct occurred in this District.

III. FACTUAL ALLEGATIONS

A. Today's internet is unhealthy, dangerous, and extractive.

50. Written and *de facto* policies implemented, enforced, and overseen by the Defendants have long required students to use District-issued tablet and laptop computers to access their education. These devices provide students with persistent access to the open internet and are not designed to protect their health, keep them safe, or respect their privacy.

51. New Policy 141 discussed *infra*, perpetuates this requirement.

52. Parents are denied the ability to control, or even know, what their children are doing on their school devices and on the internet, including whether their children are remaining on task, communicating with strangers, accessing harmful content, or purporting to consent to invasions of their privacy.

53. The internet of 2026 is not a neutral repository of information. Instead, over the last three decades, the internet has been profoundly transformed by the commercial imperatives of the attention economy, whereby technology companies make money by attracting or commanding human attention to their platforms, personalizing the delivery of information based on troves of information collected about individual users, and maximizing user engagement—that is, the total amount of time a person spends interacting with their platform.

54. To capture user attention, many websites and web applications, including social-media sites and games marketed to children, include features designed to exploit human psychology in order

to encourage habitual, compulsive, or addictive patterns of use. This discipline is known as "persuasive design" and was first developed in the casino gambling industry before migrating to Silicon Valley.

55. Owing to the design of the internet-connected devices the Defendants make them use and the manipulative practices that have become commonplace across popular internet platforms, students cannot remain on task through willpower alone. Indeed, today's tech platforms are now intentionally designed to override the intentions and conscious decision-making abilities of even fully developed adults.

56. Not only is the internet irresistible, it is also unhealthy, unsafe, and invades children's privacy, as detailed below.

i. Leading technology executives sharply limit the time their children spend on computers and the internet and have done so for years.

57. For more than a decade, leading figures in the technology industry—who attended or had the opportunity to attend elite universities, who are viewed as successful by certain measures, and who have undoubtedly grown wealthy thanks to their careers in technology—have sharply limited the amount of time their children and young relatives spend on computers, using the internet, or engaging with AI chatbots.

58. These men have done more to create today's internet than anyone else on Earth, and their parenting choices are informed by their intimate knowledge of what they have built.

59. Mark Zuckerberg, the founder and CEO of Meta, formerly Facebook, has stated, "I don't generally want my kids to be sitting in front of a TV or computer for a long period of time. [Interacting with people is good, but] "just going from video to video [is not associated with] the same positive benefits." *See* Ex. A-01, Streitfeld, David. "Silicon Valley Executives Are Tech Fans. Just Not for Their Own Kids." *New York Times*. August 18, 2026.

60. Peter Thiel, the first outside investor in Facebook and a longtime board member, has said that he limited his children, at the time 3 1/2 and 5 years' old, to "an hour and a half a week" of

screen time, or about 12 minutes a day. "There are probably a lot of people in tech who do something quite similar for their own families," Thiel said. Implicitly acknowledging how harmful and dangerous computers and the internet are to young people, he said, "There's some questions that that might lead you to ask." *See id*.

61. Bill Gates, co-founder of Microsoft, has said "We didn't give our kids cellphones until they were 14." *See id*.

62. Sundar Pichai, the CEO of Google and its parent company Alphabet, said that his 11-year-old son "still doesn't have a phone" and noted that "our television is not easily accessible." *See id*.

63. Tim Cook, the CEO of Apple and who does not have children, said that he would not let his nephew on a social network. *See id*.

64. Steve Chen, the co-founder of YouTube who sold the company to Google twenty years ago, recently told students at Stanford University that he was worried that his children would end up unable to watch anything longer than 15 minutes. "The modern digital environment trains kids to expect everything to be summarized into a 280-character tweet or short-form video clip." His goal is to make sure his children "know how to do things the slow, hard way." *See id*.

65. When asked for his thoughts, Chen's 16-year-old son responded, "Please tell them that I read books and watch movies and that I dislike AI." *See id*.

66. Sam Altman, the CEO of OpenAI, the maker of ChatGPT, recently became a father, which he said has changed his views on technology and children. "A thing that has changed hugely is how I feel about algorithmic feeds and iPads in small children's hands. I don't know when I would let [my son] talk to AI, but I'd rather be on the late end of what's reasonable there, not the early end." *See id*.

ii. In 2023 and 2026, the Surgeon General issued warnings that the internet and social media risk harming children and teens' health and safety.

67. In 2023, the United States Surgeon General, Dr. Vivek Murthy, issued an advisory, *Social Media and Youth Mental Health*, "call[ing] the American people's attention" to "the growing concerns about the effects of social media on youth mental health." *See* Ex. A-02, available at https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf (last accessed Aug. 17, 2026) ("the 2023 Advisory").

68. While specifically addressing social media, the 2023 Advisory broadly applies to other online products, including gaming, gamified learning platforms, and online video services, which incorporate many of the same problematic design features that social-media platforms do.

69. The 2023 Advisory details the many potential harms of social-media use among children and adolescents, including increased risks of poor mental health outcomes including depression and anxiety; cyberbullying and cyberbullying-related depression; body-image issues, low self-esteem, and disordered-eating behaviors; poor sleep quality; exposure to harmful content, including that which promotes self-harm, partial asphyxiation, or cutting; and interactions with malicious actors, including those who target children for financial extortion, sexual gratification, distribution of intimate images of children, or to sell them illicitly manufactured fentanyl.

70. As further explained in the 2023 Advisory, excessive and problematic use of social media and other online platforms can cause harm and risk of harm by disrupting important healthy behaviors. The 2023 Advisory states that because the platforms are designed to maximize user engagement, they have the potential to encourage excessive use and behavioral dysregulation. By overstimulating the reward center in the brain through design features including push notifications, autoplay, infinite scroll, quantifying and displaying popularity, and algorithms that leverage user data to serve content recommendations, these platforms can trigger mental pathways comparable to addiction, including substance use or gambling addictions.

71. The 2023 Advisory further notes that problematic social-media use has also been linked to self-reported and diagnosed attention-deficit/hyperactivity disorder (ADHD).

72. As further stated in the 2023 Advisory, "[t]o date, the burden of protecting youth has fallen predominantly on children, adolescents, and their families[,]" and "[n]early 70% of parents say parenting is now more difficult than it was 20 years ago, with technology and social media as the top two cited reasons."

73. Among many other recommendations, the 2023 Advisory suggests that parents and caregivers "[c]reate tech-free zones and encourage children to foster in-person friendships" and work with others "to help establish shared norms and practices . . . [that] facilitate collective action and [ ] make it easier to set and implement boundaries on social media use for children."

74. The 2023 Advisory also recommends that children and adolescents "[c]reate boundaries to help balance online and offline activities," including "[l]imit[ing] the use of phones, tablets, and computers for at least 1 hour before bedtime and through the night to enable sufficient and quality sleep," and keeping "in-person gatherings device-free to help build social bonds and engage in two-way conversations with others." The advisory also recommends that children and adolescents "[n]uture [their] in-person relationships by connecting with others and making unplugged interactions a daily priority."

75. In 2026, the Office of the U.S. Surgeon General issued another advisory, *Surgeon General's Warning on the Harms of Screen Use*, under the auspices of officials at the U.S. Department of Health and Human Services who collaborated on the new advisory, as there was no confirmed surgeon general as of the date of the report. *See* Ex. A-03, available at https://www.hhs.gov/sites/default/files/us-surgeon-generals-advisory-warning-on-the-harms-of-screen-use.pdf (last accessed Aug. 17, 2026) ("the 2026 Advisory").

76. The 2026 Advisory expands on the 2023 Advisory and details the risks of screen use—including but not limited to social media—to children's overall mental and physical health. In addition to harms deriving from social media use, the 2026 Advisory warned that "the entire digital ecosystem of apps, smartphones, tablets, chatbots, and other screen-associated devices and interfaces" places children in harm's way.

77. The 2026 Advisory warns that "[s]creen use may be harmful when a child loses control over use[,] and warning signs of such compulsive behavior may manifest as: [s]pending too much time on screens or constantly thinking about them; [r]epeatedly asking to use screens, often while whining, crying, or sulking; [u]sing screens to feel better and becoming upset or moody when screen time ends; [h]iding or lying about their overall screen use; [g]etting defensive when asked about their screen use; [t]rying unsuccessfully to reduce screen use; [s]howing symptoms like emotional withdrawal when screens are not accessible; [n]ot fulfilling their responsibilities by prioritizing screen time; [n]ot engaging in in-person interactions or activities; [and] [c]ontinuing use despite negative consequences."

78. As further noted in the 2026 Advisory, "[w]hen screen use is associated with poorer sleep, decreased academic functioning, diminished physical activity, and impairments in daily responsibilities or in-person relationships, those patterns may resemble core features, such as diminished control and persistence despite adverse consequences, described in formally recognized behavioral addictions."

79. The 2026 Advisory further summarizes key research findings during important developmental stages. For young children, "[e]arly exposure to screens carries developmental and cognitive risks[,]" and "[s]creen use in early life is linked to poorer language outcomes."

80. For young, school-aged children, "[e]xcessive screen time is linked to poor educational and health outcomes" and is "associated with sleep problems and other physical health risks, including poor dietary habits."

81. For teenagers, "there are additional mental health and behavioral concerns," with higher screen time linked to "anxiety, depression, low self-esteem, and body image concerns." In addition, higher screen time has been observed to correlate with "[h]igher levels of family conflict, aggression, poor peer relationships, and tobacco, alcohol, and marijuana use behaviors[.]"

82. As further noted in the 2026 Advisory, up to one in twenty children experiences sextortion—extortion related to the release of intimate images of the child—before adulthood. In

addition, "engaging in gambling-like features in video games and other platforms is associated with a greater risk for problem gambling."

83. The 2026 Advisory further warns that at all ages, screen exposure has the potential to disrupt sleep. Sleep disruptions negatively affect learning, mood, behavior, physical health, and overall development.

84. In an additional warning, the 2026 Advisory states that increased screen use is associated with the likelihood of being overweight and obese; a higher risk of myopia (nearsightedness); increased sedentary behavior; worse cardiovascular health; unhealthy dietary patterns, higher caloric intake, and greater consumption of ultra-processed foods; and musculoskeletal discomfort, including neck, back, and shoulder pain, as well as poor posture.

85. Students in the District can use their school devices to access the platforms and products that are the subject of the 2023 and 2026 Advisories.

86. District policies implemented, enforced, and overseen by the Defendants do not make any provision for eliminating or mitigating any of the health harms or risks thereof identified in the 2023 and 2026 Advisories.

iii. In 2023 and 2026, the FBI warned that violent groups infiltrate youth digital spaces and coerce them into filming acts of self-harm, sex, and suicide.

87. In 2023, the Federal Bureau of Investigation issued a public service announcement, *Violent Online Groups Extort Minors to Self-Harm and Produce Child Sexual Abuse Material*. *See* Ex. A-04, available at https://www.ic3.gov/PSA/2023/PSA230912 (last accessed Aug. 18, 2026) ("2023 FBI Alert").

88. The 2023 FBI Alert warned the public of "violent online groups deliberately targeting minor victims on publicly available messaging platforms to extort them into recording or live-streaming acts of self-harm and producing child sexual abuse material (CSAM)," which is visual evidence of sexual abuse of a child. The alert details how these groups "use threats, blackmail, and manipulation to control the victims into recording or live-streaming self-harm, sexually explicit

acts, and/or suicide; the footage is then circulated among members to extort victims further and exert control over them."

89. According to the 2023 FBI Alert, these groups "target minors between the ages of 8 and 17 years old, especially LGBTQ+ youth, racial minorities, and those who struggle with a variety of mental health issues, such as depression and suicidal ideation."

90. Among other recommendations, the 2023 FBI Alert advises the public to "[m]onitor children's online activity and discuss risks associated with sharing personal content" and "[u]se discretion when posting images, videos, and personal content online, particularly those that include children or their information."

91. In 2025, the FBI issued another public service announcement, *Violent Online Networks Target Vulnerable and Underage Populations Across the United States and Around the Globe*. *See* Ex. A-05, https://www.fbi.gov/investigate/cyber/alerts/2025/violent-online-networks-target-vulnerable-and-underage-populations-across-the-united-states-and-around-the-globe (last accessed Aug. 18, 2026) ("2025 FBI Alert").

92. The 2025 FBI Alert "warns the public of a sharp increase in the activity of '764' and other violent online networks, which operate within the United States and around the globe [and which] methodically target and exploit minors and other vulnerable individuals[.]"

93. According to the 2025 FBI Alert, "[t]hese networks exist on publicly available online platforms, such as social media sites, gaming platforms, and mobile applications commonly used by young people. Many threat actors systematically target underage females, but anyone—juveniles, adults, males, and females—can be targeted. Victims are typically between the ages of 10 and 17 years old, but the FBI has seen some victims as young as 9 years old."

94. The 2025 FBI Alert reiterated the importance of "[m]onitor[ing] children's and other vulnerable individuals' online activity and discuss[ing] risks associated with sharing personal information" and "[using] discretion when posting images, videos, and personal content online, particularly those that include children or their information."

95. Students in the District can use their school computers to access social media sites, gaming platforms, and mobile applications commonly used by young people that were the subject of the 2023 and 2025 FBI Alerts.

iv. Online platforms face scores of lawsuits for the harm they have caused children and have been held liable for their design defects and creating a public nuisance.

96. Tech companies that operate on the internet are now defending lawsuits in which they are accused of knowingly creating products that addict children, encourage them to harm themselves and others, expose them to sexual predators, allow them to buy drugs, harm their mental health, encourage eating disorders, allow them to create nude imagery of their peers, encourage them to gamble, and violate their privacy. *See, e.g.*, *In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Civ No. MDL-0347 (N.D. Cal.); *In re: Roblox Corporation Child Sexual Exploitation and Assault Litigation*, Civ. No. MDL-3166 (N.D. Cal.); *In re: Apple Inc. App Store Simulated Casino-Style Games Litigation*, Civ. No. MDL-2985 (N.D. Cal.); *In re: Google Play Store Simulated Casino-Style Games Litigation*, Civ. No. MDL-3001 (N.D. Cal.); *In re: TikTok, Inc., Minor Privacy Litigation*, Civ. No. MDL-3144 (C.D. Cal.).

97. These companies and others use so-called persuasive design techniques to encourage habitual, compulsive, or addictive patterns of use, which are capable of overriding the intentions and conscious decision-making abilities of even fully developed adults.

98. In March 2026, a California jury found that Meta and Google each designed products, including Meta's Instagram and Facebook products and Google's YouTube product, that were as addictive as cigarettes or digital casinos and that led to the young user suffering anxiety and depression. *See P.F., et al. (KGM) v. Meta Platforms, Inc.*, Civ. No. 23-SMCV- 3371 (Cal. Sup. Ct. – Los Angeles). Snap and TikTok settled out of court for millions of dollars.

99. Also in March 2026, a New Mexico jury found that Meta misled users about the safety of its platforms and enabled the sexual exploitation of young users, awarding $375 million in civil penalties. *See New Mexico v. Meta Platforms Inc. et al.*, Civ. No. D-101-CV-2023-02838 (N.M. –

1st Judicial District Court). In a subsequent ruling in that case issued on August 5, 2026, Chief District Court Judge Bryan Biedscheid found that Meta had created a public nuisance, writing that "just as noxious pollution produced by the factory can harm the common public right to reasonably clean air, the harmful effects of Meta's platforms on children do not stay contained by its platforms and, instead, migrate to the internet as a whole and, perhaps most concerning, to the real world and create a common, societal burden on and harm to the affected children and their families and schools, as well as hospitals and law enforcement." As a result, Judge Biedscheid ordered Meta to pay an additional $567 million into a teen mental health fund.

100. The platforms and websites that are the subject of these lawsuits are accessible to students in the District through their school computers.

v. AI chatbots are unacceptably dangerous for young people, erode students' cognitive capacity, disproportionately hurt lower-income users and users of color, are fueled by stolen text and illegal images, and harm the environment.

101. Popular so-called "artificial intelligence" chatbots, such as OpenAI's ChatGPT and Google's Gemini, are the subject of news reports and lawsuits alleging that they have sent their users into delusional spirals, encouraged them to harm themselves or others, helped them plan their suicides, discouraged them from telling their loved ones about their emotional distress, and encouraged them to conceal their plans and materials they used to take their own lives. *See, e.g.*, *ChatGPT Product Liability Cases*, JCCP No. 5431 (Cal. Sup. Ct. – San Francisco). Several of those cases have settled.

102. AI chatbots are designed to optimize for user engagement. To that end, companies intentionally employ numerous features designed to keep users interacting with them. For example, chatbots are designed to behave like a trusted human by mimicking human conversational patterns, contextual memory, problem-solving, and emotional responses.

103. Companies also design chatbots to engage in flattery, affirmation, and other user-validating behaviors known in the industry as "sycophancy" to keep users engaged with them. These sycophantic tendencies are understood to be responsible, at least in part, for a user's transition

from occasional, productivity-related uses to frequent, compulsive use in all areas of life that lead to harm.

104. Chatbots are also designed to eliminate conversational friction or stopping cues. Because short, blunt, or dead-end answers would cause users stop interacting, chatbots are engineered to provide follow-up questions, suggest next steps, and maintain an open-ended dialogue. They also retain a chat history across sessions so that, even if a user closes the application or webpage, the conversation can pick up where it ended in subsequent sessions.

105. Frequently, the users harmed by AI chatbots initially used them for benign productivity purposes, including help with homework. Over time, owing to the design choices of the companies that created the AI chatbots, these users began using them as companions, therapists, and confessors.

106. Non-profit, non-partisan, independent public policy organizations have identified a number of acute harms that may result from the use of so-called artificial intelligence programs by students and young people, including those that are available by default on students' computers in the District.

107. AI chatbots can harm students' learning and diminish their cognitive capacity. In March 2024, the National Education Policy Center (NEPC) published a policy brief examining the many potential harms stemming from the use of AI in schools. *See* Ex. A-06, Williamson, B., Molnar, A., & Boninger, F. (2024). *Time for a Pause: Without Effective Public Oversight, AI in Schools Will Do More Harm Than Good*. Boulder, CO: National Education Policy Center. Retrieved August 18, 2026 from http://nepc.colorado.edu/publication/ai.

108. The NEPC, a university research center housed at the University of Colorado Boulder School of Education, sponsors research, produces policy briefs, and publishes expert third-party reviews of think-tank reports. NEPC publications are written in accessible language and are intended for a broad audience that includes academic experts, policymakers, the media, and the general public. NEPC's mission is to provide high-quality information in support of democratic deliberation about education policy.

109. The NEPC warns that "[t]he weight of the available evidence suggests that the current wholesale adoption of unregulated AI applications in schools poses a grave danger to democratic civil society and to individual freedom and liberty." Among other dangers, the NEPC warns that AI programs can impose a rigid mechanistic model of instruction, corrupt curriculum with misinformation, and bias consequential decisions about student performance; that untested, opaque AI models and applications will become enmeshed in routine school processes; and that the adoption of largely unregulated AI systems and applications forces students and teachers to become involuntary test subjects in a giant experiment in automated instruction and administration that is rife with unintended consequences and potentially negative effects.

110. In January 2026, a report from the Brookings Institute, *A new direction for students in an AI world: Prosper, prepare, protect*, concluded that the risks of using generative AI in children's education overshadow its benefits. See Ex. A-12, available at https://www.brookings.edu/articles/a-new-direction-for-students-in-an-ai-world-prosper-prepare-protect/ (accessed August 26, 2026). The authors held interviews, focus groups, and consultations with over 500 students, teachers, parents, education leaders, and technologists across 50 countries, closely reviewed over 400 studies, and held a Delphi panel. They concluded that the risks outweigh the benefits because the risks of AI differ in nature from its benefits—that is, these risks undermine children's foundational development—and may prevent the benefits from being realized.

111. AI chatbots impede learning and cognitive development by removing the necessary effort. Children learn through a process known as productive struggle, in which they apply perseverance and creativity to solve problems. *See,* Ex. A-07, University of San Diego Professional and Continuing Education, *What is Productive Struggle? [+Strategies for Teachers]*, available at https://pce.sandiego.edu/productive-struggle-in-the-classroom/ (accessed August 19, 2026). The process of productive struggle alters children's brain structures, producing myelin—the protective covering surrounding nerve cells that control thinking and muscles—which helps with retaining new skills. Students who learn how to productively struggle will know how to plan strategies, set

goals, understand that success comes from effort rather than solely from innate abilities, and know how and when to ask for help.

112. The ready availability of AI chatbots on students' school devices disrupts the process of productive struggle by giving students a source that will provide the immediate answer, eliminating opportunities for perseverance and creativity. This in turn prevents children's brains from developing as they otherwise would, decreasing their capacity to retain new skills.

113. AI chatbots also contribute to the erosion of knowledge and loss of skills students have already learned through a process known as "cognitive offloading." *See, e.g.*, Nataliya Kosmyna, Eugene Hauptmann, Ye Tong Yuan, Jessica Situ, Xian-Hao Liao, Ashly Vivian Beresnitzky, Iris Braunstein, and Pattie Maes. "Your brain on chatgpt: Accumulation of cognitive debt when using an ai assistant for essay writing task.", available at https://www.media.mit.edu/publications/your-brain-on-chatgpt/ (accessed August 19, 2026); *AI chatbots could be making you stupider*, available at https://www.bbc.com/future/article/20260417-ai-chatbots-could-be-making-you-stupider (accessed August 19, 2026).

114. Offloading tasks to a chatbot instead of performing those tasks themselves was shown to significantly reduce users' brain activity in the areas of creativity and information processing and rendered them less able to retain and recall information.

115. Relying on AI chatbots requires little cognitive effort, but cognitive effort is essential for a healthy brain. Long term, people whose brains exert little cognitive effort are at greater risk of Alzheimer's and dementia.

116. AI chatbots that will be available by default on District computers in the upcoming 2026–27 school year have been found to be unacceptably dangerous for young people. In a July 14, 2026 report, the Common Sense Media Youth AI Safety Institute gave Google's AI Overview and AI Mode their lowest possible rating: Unacceptable Risk. *See* Ex. A-08, *Google Search: AI Overview & AI Mode*, available at https://institute.commonsensemedia.org/risk-assessments/google-search (accessed August 19, 2026). Google's AI Overview and AI Mode are available by default in Google Search and cannot be removed or disabled. According to the Youth AI Safety Institute:

> Google Search's AI Overview and AI Mode earn our lowest rating because they create unacceptable risks for kids and teens. They performed poorly on seven of our eight established AI Principles, and specifically failed all of our tested severe-harm Red Lines. What makes Google Search different from other chatbots or AI apps is that it is ubiquitous on children's personal and school-issued devices, its AI features can't be turned off, and its AI-generated answers often fail in ways that young users may not be able to detect.
>
> Our tests found that both AI Overview and AI Mode failed kids in crisis, including missing clear signs of suicidal ideation, reinforcing signs of psychosis and mania, validating disordered eating including purging, and celebrating cannabis use. They also provide information that could facilitate bullying by handing over step-by-step instructions for making deepfakes. Of the two features, AI Mode performed better at detecting some kinds of crisis, suggesting Google already has safer technology it could deploy.
>
> For young learners, AI Mode completed 100% of the homework assignments we gave it—doing the work that students are supposed to do themselves. And both AI features also proved to be unreliable and inaccurate: They answered the same question differently from one search to the next and presented right and wrong answers with the same confidence. And they treated forums and social posts that have no editorial accountability as equal in authority to medical institutions and peer-reviewed research. Children are still developing media literacy skills, and Google puts the onus of evaluating sources on them.

117. The report concluded that "Google's AI answers are not safe enough to be kids' default answer machine."

118. In March 2026, Google was sued by the family of a 36-year-old man who killed himself after extensively interacting with Gemini. The lawsuit alleges that, over the span of six weeks, the man grew increasingly emotionally dependent on Gemini, which the man began referring to as his "wife," and became entangled in an elaborate conspiracy that eventually "drove him" to suicide. *See Gavalas v. Google LLC*, Civ. No. 5:26-cv-01849 (N.D. Cal).

119. Other harms are harder to perceive but are no less profound for being so. AI chatbots distort young people's information environments and hold them captive to invisible, pervasive corporate influence, with the burdens borne most acutely by racial minorities and the poor. In June 2026, the Center for Digital Democracy (CDD) released a report documenting the harms that AI poses across children's lives. *See* Ex. A-09, Kopp, K. (2026). *The Persuasion Pipeline: How Commercial AI Targets, Shapes, and Sells to a Generation of California's Children and Teens*. Washington, D.C.:

Center for Digital Democracy. Retrieved August 18, 2026 from https://democraticmedia.org/reports/the-persuasion-pipeline.

120. The CDD is recognized as one of the leading digital rights, consumer protection, and privacy organizations in the United States. For nearly two decades, CDD has been at the forefront of research, public education, and advocacy on behalf of citizens, consumers, communities, and youth.

121. Acknowledging the better-known harms of privacy violations, addictive design, cyberbullying, exposure to harmful content, discriminatory treatment, and the dangers of AI companion chatbots to young people, *The Persuasion Pipeline* examines how generative AI and other commercial AI tools are being used to influence users, producing a structural transformation in young people's online lives that powerful companies relentlessly advance through their advertising-supported business model.

122. *The Persuasion Pipeline* goes on to identify how the harms of AI companions occur not at the edges of children's lives, but at the center of them, and that the harms stem from a single capacity that AI systems have acquired: the inferential capacity to read a person, sort them, predict how they will respond, and treat them accordingly.

123. The AI-driven commercial pipeline reaches children regardless of the policy constraints that may be imposed and allows the commercial targeting of youth and children under 13. This disproportionately burdens youth of color and lower-income families: they are exposed to "higher rates of data collection driven by more intensive platform use; profiling systems that sort users along racial and socioeconomic lines through behavioral proxies; optimization that steers unhealthy product advertising toward Black and Hispanic audiences; and AI-generated creative that embeds raciolinguistic stereotypes, and measurement systems that compound these biases with each cycle."

124. These AI systems do not simply reach children but rather treat the vulnerabilities of childhood as resources to exploit. "Adolescent impulsivity and reward sensitivity, the use of AI companions for emotional support and intimate interaction, and young consumers' developing

self-brand connections can all become commercially legible signals in AI-optimized advertising systems: engagement, disclosure, emotional response, identity fit, and predicted conversion."

125. *The Persuasion Pipeline* concludes that today's AI systems have two severe consequences for young people and society more broadly:

> The first is the erosion of autonomous choice: when signal extraction is continuous, profiling models susceptibility, influence arrives before children articulate what they want, persuasion is optimized through feedback loops, and the line between commercial and organic content has dissolved, young people are no longer making decisions in an open marketplace but moving through environments designed to steer them.
>
> The second is the transfer of decision-making to a small number of companies whose systems increasingly determine what young people see, want, and buy, with minimal human oversight.

126. Finally, AI chatbots operate unlawfully and immorally. The most popular and well-known AI chatbots are trained on data corpuses that include vast amounts of text, images, and videos that were scraped from the internet, almost always without compensation to their creators. *See* Hao, Karen. *Empire of AI: Dreams and Nightmares in Sam Altman's Open AI.* Penguin Press. (2025).

127. Corpuses undergirding popular AI chatbots were trained on millions of copyrighted works that were stolen from their authors and used without compensation. *See id*.

128. Many AI chatbots also train on user-inputted text and images, including text and images provided by minors without parent consent or compensation to the minors, and thus were unlawfully obtained by the AI companies. *See id*.

129. Aside from material that has been taken and used unlawfully, these corpuses of training data include illegal material, including child sexual abuse material (CSAM), as well as obscene material that is unlawful to provide to children, including pornography and extremely violent images and videos. *See id*.

130. In an attempt to prevent these images from being generated in response to user search queries, AI companies rely on human reviewers, most often in the global south, who earn poverty wages training the chatbots not to show these images. These workers spend hours a day being

exposed to some of the most horrific images imaginable, resulting in post-traumatic stress disorder. *See id*.

131. In addition to the human cost, data centers that power AI chatbots contribute to air pollution and noise pollution, deplete water resources, and require vast amounts of electricity to operate. These data centers are most often built in low-income neighborhoods, and their effects are felt most acutely by the poor. *See id*.

132. Students in the District have access to the AI chatbots that are the subject of these briefs and reports, including ChatGPT, Google Gemini, and other Google AI programs.

133. Google is hastily and aggressively pushing its generative AI technologies into K-12 Chromebooks for use by students as young as five. That effort far exceeds merely providing students access to the Gemini app by default. Google has pushed and continues to push updates to devices that are injecting Google's AI into every layer of the Chromebook ecosystem—from the Chrome operating system and Chrome browser, on up through the app layer and web search. Thus, every student who uses a Chromebook for school will not only have ready access to generative AI and chatbots, but will be unable to avoid interacting with those inherently dangerous technologies. *See, e.g.*, Ex. A-10, Singer, Natasha. "Google Turns On Gemini A.I. for Students Using Its Classroom App." *New York Times*. August 14, 2026. a*vailable at* https://www.nytimes.com/2026/08/14/business/google-gemini-ai-schools.html (accessed August 25, 2026). ; Ex. A-11, Zhou, April. "New ChromeOS tools support classroom collaboration." *available at* https://blog.google/products-and-platforms/products/education/chromeos-chromebooks-bett-2026/ (accessed August 24, 2026).

134. Every middle school student in the District is issued and required to use a Chromebook. Students at that age are uniquely and profoundly vulnerable to the dangers posed by chatbots. This is a critical period for brain development and one marked by weak impulse control and a craving for validation. While adolescents intellectually understand that a chatbot is not human, because chatbots are intentionally and expertly designed to mimic humans and simulate empathy so convincingly, adolescents can easily form intense, unhealthy emotional attachments to them.

vi. In the absence of informed parent consent, online services pervasively violate the privacy rights of underage users.

135. Companies that operate on the internet, whether through applications, websites, browsers, or otherwise, offer their services for free or at a sharply reduced cost by collecting and monetizing vast amounts of information about their users. Without the informed consent from an adult user or the parent of a minor user, these practices would constitute actionable privacy violations.

136. To avoid liability, companies apply a notice-and-consent framework under which the company posts or links to a contract that sets forth the terms under which the company agrees to provide its services to a user. These terms usually allow the company to collect user information and use it for commercial purposes. A user is deemed to accept these terms by clicking a button (a "clickwrap" agreement) or continuing to use the service (a "browsewrap" agreement).

137. Under the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §6501 *et seq.* and 16 C.F.R. Part 312, children under 13 and their parents enjoy additional privacy protections and information access rights that are not available to older users of websites or online services. COPPA imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.

138. Specifically, to avoid the burden of complying with COPPA, companies often include language in their terms stipulating that their services are not knowingly directed to children under 13 or that any user of its services must be older than 13.

139. Likewise, because minors are not competent to enter into contractual agreements, online service providers typically require users under age 18 to represent that they have their parents' permission to use the service, that they read the terms of service with their parents, or both.

140. These include the terms of service that are frequently accessed by students in the District through their school devices, almost all of whom are under age 18, and which include:

a. YouTube, https://www.youtube.com/static?template=terms (accessed August 18, 2026) ("You must be at least 13 years old to use the Service[.] . . . If you are under 18, you represent that you have your parent or guardian's permission to use the Service. Please have them read this Agreement with you.");

b. ChatGPT and OpenAI, https://openai.com/policies/row-terms-of-use/ (accessed August 18, 2026) ("You must be at least 13 years old or the minimum age required in your country to consent to use the Services. If you are under 18 you must have your parent or legal guardian's permission to use the Services.");

c. Claude and Anthropic, https://www.anthropic.com/legal/consumer-terms (accessed August 18, 2026) ("You must be at least 18 years old or the minimum age required to consent to use the Services in your location, whichever is higher.");

d. Instagram, https://help.instagram.com/581066165581870/ (accessed August 18, 2026) ("We want our Service to be as open and inclusive as possible, but we also want it to be safe, secure, and in accordance with the law. So, we need you to commit to a few restrictions in order to be part of the Instagram community. You must be at least 13 years old.");

e. TikTok, https://www.tiktok.com/legal/page/us/terms-of-service/en (accessed August 18, 2026) ("If you are under 13 years of age, or under 14 years of age in Florida, you may not use the Platform[.] . . . If you are under 18 years of age, you must review these Terms (and our Privacy Policy) with your parent or guardian, and obtain their permission before you use the Platform. If you are the parent or guardian of such a user, you accept and agree to these Terms on their behalf and further agree that you are responsible for their use of the Platform.");

f. Pinterest, https://policy.pinterest.com/en/terms-of-service (accessed August 18, 2026) ("Any use or access to Pinterest by anyone under the age of 13 is not allowed. If you are older than 13, you can use Pinterest if you are over the minimum age of consent in your country. If you are 13 to 18, you may only use the Service with the

permission of your parent or legal guardian. Please be sure your parent or legal guardian has reviewed and discussed these Terms with you."); and

g. Balatro, https://www.playbalatro.com/terms-and-conditions (accessed August 18, 2026) ("You must be 18 or over to accept these Terms and set up an account with us unless a lower age requirement has been specifically set out by us. Please review the information in your appstore which sets out the minimum operating requirements for our apps.").

141. Education technology or "edtech" companies that provide online services to students of K-12 schools in the context of their mandatory education collect vast troves of personal information about students, no different than commercial providers of online services for adult consumers.

142. Typically, edtech companies do not purport to obtain consent from the parents or guardians of minor students or from students themselves who are over 18. Instead, edtech companies apply fabricated interpretations of laws intended to protect the privacy of students and children, like FERPA and COPPA, to assert that companies are not required to obtain consent from parents, guardians, or adult students before collecting, using, or sharing the information collected from students who are made to use companies' services in the context of compulsory education. *See, e.g.*, The Family Educational Rights and Privacy Act of 1974 (20 U.S.C. § 1232g; 34 CFR Part 99) (FERPA); The Children's Online Privacy Protection Act of 1998 (15 U.S.C. 6501; 16 CFR Part 312) (COPPA); *see also*, Jones, M. L., Beam, M. (forthcoming 2026). *Edtech and the Administrative State: How a Federal Agency Webpage Eroded Congressional Privacy Protections for Children and Paved the Way for Big Tech in Schools.*

143. Under policies that are implemented, enforced, and overseen by the Defendants, the District requires its students to use, or makes available for its students to use, dozens of edtech services that collect and commercialize private information from students without informed parent consent in violation of COPPA.

144. Several edtech companies that provide online services to the District have been the subject of lawsuits alleging that their practices violate student privacy rights, including Curriculum Associates, LLC; Google LLC; IXL Learning, Inc.; and PowerSchool Holdings, Inc.

145. One company, PowerSchool Holdings, Inc., was hacked in late 2024, exposing the personal information of over 62 million students and teachers, including students in the District.

B. Defendants have created an environment that is unhealthy, unsafe, and invasive for students, and prevent Plaintiff parents from making decisions about the care of their children and from directing their upbringing and education.

146. The District first assigned students individual, internet-connected computers beginning in 2007.

147. For over 15 years, under written and *de facto* policies implemented, enforced, and overseen by the Defendants, students in the District have been required to use internet-connected devices to access their education.

148. Defendants have never been able to ensure that District-issued devices were healthy, safe, and private for students to use, and that they use those devices solely to access approved curriculum and solely for educational purposes.

149. On the contrary, since at least 2021, in each school in the District, the Defendants have created, overseen, and perpetuated a physical and digital environment that is unhealthy, unsafe, and invasive for students, and that prevents parents from directing their upbringing and education.

150. These problems have been apparent to teachers, building principals, and other District staff for many years, but a pervasive climate of fear and well-founded concerns about retaliation have stopped them from speaking publicly. Plaintiffs have communicated directly and indirectly with teachers, educators, principals, social workers, and other District employees who are unable to express their opinions freely and who fear retaliation or professional consequences if they speak openly about what they are seeing in classrooms.

151. Throughout at least the 2025–26 school year, parents and students, including Plaintiffs, have repeatedly brought their concerns to the Defendants' attention.

152. Defendants are responsible for the District's approach to internet-connected devices, which negatively affects nearly every dimension of student life and school functioning.

153. The District's approach to internet-connected devices contributes to distraction; cyberbullying; exposure to obscene, inappropriate, and violent content; inconsistent classroom standards; AI-assisted cheating; compulsive and addictive behavior; overstimulation; reduced parent control; unnecessary financial cost; and greater inequity for the students least able to protect themselves.

154. At the same time, the District's device program weakens academic foundations, including reading, writing, handwriting, grammar, math fluency, stamina, persistence, and the ability to think, compose, and solve problems independently.

155. Beyond academics, the District's device program has had serious effects on students' emotional regulation, attention, impulsivity, oppositional behavior, classroom conduct, peer relationships, communication, discipline, sleep, and overall social development.

156. The District's device program also hampers students' physical development, leading to weaker fine motor skills, hand strength, and core strength. It also leads to fewer opportunities for the kinds of real-world activities that build coordination and readiness to learn.

157. The District's device program has led not only to students using computers too much and being online too long, but also to the reshaping of childhood, classroom culture, and the daily experience of teaching and learning in ways that are developmentally inappropriate, dangerous, and dehumanizing.

158. These conditions, described in more detail below, are not unknown or unknowable to the Defendants, and the Defendants have been, or should have been, well aware of the chaotic environment they have created, overseen, and perpetuated.

i. Students must use internet-connected devices to access the public education to which they are legally entitled.

159. Children in the Commonwealth of Pennsylvania are entitled to a public education.

160. Article III, Section 14 of the Pennsylvania Constitution provides that the General Assembly shall provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth. *See* Const. Art 3, § 14.

161. Every child of compulsory school age having a legal residence in the Commonwealth is required to attend a day school in which the subjects and activities prescribed by the standards of the State Board of Education are taught in the English language. 24 P.S. § 13-1327.

162. District policies that are implemented, enforced, and overseen by the Defendants require that students use Apple iPads, Google Chromebooks, and Apple MacBooks that are connected to the internet to access instructional materials.

163. District officials, including Defendants, as well as District employees, parents, and students, variously refer to this requirement as the "one-to-one electronic device initiative," "1:1 device program," "1-to-1 policy," "one-to-one program," or similar, emphasizing the District's policy of requiring each student to have their own computer to access and participate in their education.

164. Students in kindergarten, first grade, and second grade are assigned their own Apple iPad. Students in these grades may, but typically do not, bring their iPads home each day.

165. Students in third through seventh grade are assigned their own Google Chromebook. Students in third and fourth grade may, but typically do not, take their Chromebooks home each day. Students in fifth through seventh grade typically bring their Chromebooks home each day for homework.

166. Students in eighth through twelfth grade are assigned their own Apple MacBook. Students in these grades typically bring their MacBooks home each day for homework.

167. Each school device is equipped with a camera and microphone and runs software capable of logging a student's every interaction with the device.

ii. Students spend excessive amounts of time on their internet-connected computers at school and at home, which parents are unable to limit or supervise.

168. In the many years since the District began providing internet-connected computers to students, ever more instruction and communication has moved to the computer.

169. Under District policies implemented, enforced, and overseen by the Defendants, school computers accompany students throughout their entire day, placing students within arms' reach of the internet for hours at a time.

170. There are no limits on the amount of time students spend on their school computers during the school day, and District personnel under the supervision of the Defendants encourage frequent non-academic, non-curricular, entertainment uses of the devices while students are at school.

171. Students may log into their school computers at home before the school day starts, where they are able to watch videos, play games, browse the internet, and otherwise engage in other non-academic, non-curricular, entertainment activities and access non-academic, non-curricular, entertainment content.

172. Once students arrive at school, students may use their school computers to engage in other non-academic, non-curricular, entertainment activities and access non-academic, non-curricular, entertainment content during the homeroom period, the first period of the day.

173. Students are allowed to use their school computers during free time to engage in other non-academic, non-curricular, entertainment activities and access non-academic, non-curricular, entertainment content.

174. Students are allowed to use their school computers during lunch and passing periods to engage in other non-academic, non-curricular, entertainment activities and access non-academic, non-curricular, entertainment content.

175. Students are allowed to use their school computers during after-school programs and clubs that have nothing to do with computers, technology, or the internet.

176. Students are permitted or encouraged to use their school computers instead of socializing with peers, playing outside, or exercising.

177. Students are not provided an ergonomically safe environment in which to use their computers, instead forcing them to use their devices in ways that harm and risk harming their eyesight, neck, and spine.

178. Students are not provided ergonomic and adjustable chairs, ergonomic keyboards, ergonomic mice, adjustable monitors, or other equipment designed to reduce injuries and risks of harm to their health.

179. Under District policies implemented, enforced, and overseen by the Defendants, teachers are allowed to reward students with extra free time on their school computer for good behavior or for completing assignments early.

180. Teachers are allowed to pacify difficult or dysregulated students by allowing them free time on their school computer.

181. Teachers are allowed to encourage students to use their school computer to browse the internet rather than read, draw, study, do homework, or engage with their classmates.

182. Under District policies implemented and enforced by the Defendants, parents are not informed of how much time their children spend on non-academic, non-curricular, entertainment uses of their school computers while they are at school.

183. Parents are not given tools to supervise or limit their children's use of their school computers, whether at school or at home.

184. Parents are unable to remotely monitor what their children do on their school computers. Nor are they able to access a recorded log of their children's use of their device or their internet activity.

185. Parents are not given tools to limit or prohibit their children's use of their school computers for non-academic, non-curricular, entertainment purposes.

186. Parents are prevented from placing their own parental restrictions on their children's school computers, whether at school or at home.

187. Accordingly, when students take their computers home, they spend time that they should be spending doing homework using them for non-academic, non-curricular, entertainment purposes.

188. Parents are forced to directly supervise their children's use of their school computers at home to ensure that their children are on task.

189. Not every parent has the time, resources, or availability to directly supervise their children's use of their school computers at home.

190. District policies fail to limit the time of day that students may use their school computers. Accordingly, many students stay awake later than their parents desire and get fewer hours of sleep than is developmentally appropriate because they are using their school computers for non-academic, non-curricular, entertainment purposes.

191. Likewise, parents are unable to limit the overall amount of time their children spend using their internet-connected computers each day, even when doing so could minimize harms and risks of harm to the children's mental health, attention, neck and spine, and eyesight.

192. Further, parents of children under 13 are not given an opportunity to provide their verifiable consent to the terms of operators of websites or online services that collect personal information about their children and which their children access through their school devices, resulting in widespread violations of COPPA.

193. In addition, students are permitted to use their school computers to access online services whose terms expressly forbid underage users, resulting in widespread violations of those sites' terms and infringement of students' privacy rights.

iii. Students are routinely exposed to inappropriate, dangerous, or illegal content and activities through their school devices.

194. Under District policies implemented and enforced by the Defendants, school devices are not designed and implemented to ensure that students are only able to access District-approved curricular content and activities or school-sponsored speech.

195. The filters, blocks, and classroom monitoring software used by the District have been inadequate and easily circumvented since at least 2021.

196. During the school day and at home, students encounter pornography, violent images, and violent or disturbing video games through their school devices. For example, students in elementary school have been exposed to video games like Five Nights at Epstein's, a survival horror game with the object of enduring five nights trapped in the island compound of notorious child rapist and sex trafficker Jeffrey Epstein.

197. During the school day, students in middle school routinely access and use gambling and gambling-like websites from their school devices, including digital-card games where players earn in-game currency by playing poker.

198. Using their school computers, students regularly access the social media platforms Instagram, Facebook, TikTok, YouTube, and Snapchat, and the gaming platforms Roblox, Fortnite, and Minecraft.

199. Students do not decide what appears on their school computers in response to their search queries. Searches are now powered by personalized algorithms that deliver results based on who is doing the searching and when and where they are doing so. Companies are incentivized to and do present results that increase user engagement at the expense of providing all users the same result to the same query and ensuring that results are age-appropriate for every user and the school environment.

200. As a result, a student who uses their school device to search for age-appropriate health information or information about their changing bodies may instead be served links to more "engaging" content, such as pornography, dating sites, or online sex shops.

201. From March to June 2026, in private meetings and in public comments during Board meetings, Defendant Ranelli and the School Board Defendants have acknowledged that they do not adequately control, and indeed cannot control, what students access through their District-mandated internet-connected computers, likening it to "Whac-A-Mole."

iv. Students can access AI chatbots that are dangerous, impede learning, and encourage cheating, and which operate unlawfully and immorally.

202. Under District policies implemented and enforced by the Defendants, school computers permit students to access AI chatbots that are dangerous, impede learning, and encourage cheating, and which operate unlawfully and immorally.

203. Students must actively reject AI help that is constantly available to them within their educational programs at school rather than completing work independently without that temptation.

204. Students are automatically served AI-generated summaries, search results, and other outside help that they can, and often do, present as their own work.

205. When these AI chatbots are ubiquitously available and the District actively or tacitly encourages their use, students struggle to resist using them, especially when there is the perception that others are doing so and when grades, college admissions, and broader opportunities are at stake.

206. Google Search's AI Overview and AI Mode is available by default on every school device.

207. Reportedly, Google recently changed its policies such that its Gemini chatbot will also be made available by default for K-12 users of its education services, including on District devices.

v. Students routinely exhibit behavioral issues when using their school devices.

208. District policies hold children responsible for managing their own use of inherently unsafe school computers.

209. As discussed above, internet products popular among young people—including the social media platforms Instagram, Facebook, TikTok, YouTube, and Snapchat, and the gaming platforms Roblox, Fortnite, and Minecraft—are the subject of lawsuits that allege they intentionally addict their users using the discipline of persuasive design.

210. Persuasive-design techniques are also implemented in products that are nominally for education, including so-called "gamified learning" applications that purport to teach math and

language skills. Many educational applications now look and feel like video games, which may engage students briefly but make it harder for them to tolerate slower, deeper, non-gamified learning.

211. The persuasive design techniques that these companies and others implement in their products exploit human psychology and act directly on the human brain, producing a chemical response that can result in habitual or addictive patterns of use.

212. Repeated exposure to these mental stimuli can lead to emotional and behavioral dysregulation. When children are made to stop using a program to which they have become habituated or addicted, they often explode in rage, scream, cry, curse, hit, kick, bite, or make threats.

213. The environment in many classrooms in the District has become like a casino. Students sometimes sit and repeatedly hit keys or the spacebar while playing repetitive online games, creating a classroom environment that is loud, chaotic, and overstimulating.

214. Students in the District have far less stamina for attending to instruction, persisting through difficulty, and sustaining focus. Their attention is increasingly shaped by scrolling, fast switching, and short-form content.

215. Students in the District have become more agitated, impulsive, and demanding than students of the past, are less able to tolerate frustration, and are less able to wait even briefly for help or instruction.

216. Students in the District engage in more impulsive physical behavior as well, including play hitting, slapping at each other or at devices, rough joking, and general poor impulse control.

217. There has also been a major increase in oppositional behavior by District students as well. This includes both students who have a formal oppositional diagnosis and students who became far more oppositional, defiant, and resistant than teachers observed prior to widespread device use.

218. There is a growing consensus among long-serving teachers at all levels that student behavior overall is substantially worse than in previous years. Among their observations are that

students have less grit, less capacity to tolerate frustration, less ability to be held accountable, and more difficulty sitting, listening, taking in directions, and functioning in a grade-appropriate way.

vi. School computers prevent students from developing crucial skills, interfere with students' social development, and pollute the civic environment at school.

219. Under District policies implemented and enforced by the Defendants, school devices impair students' ability to develop crucial skills that have been traditionally learned at school.

220. For younger students, school computers have displaced activities that build foundational motor development, including squeezing and shaping Play Doh, gripping pencils, painting while standing at an easel, and practicing movements that cross the midline. These basic developmental activities support writing, regulation, and learning as students get older.

221. Students are no longer engaging in those activities. Instead of doing physical, hands-on work that develops the body and brain together, young students increasingly use their school computers to drag shapes or objects around on a screen, hampering their development.

222. Older students in the District spend less time on basic reading, writing, grammar, and arithmetic and are performing worse in those subjects than students in the past.

223. Students receive grammar and writing instruction through their school computers by clicking and selecting items on screens rather than writing by hand. Students do not learn how to write, punctuate, or edit in a durable way. In addition, student handwriting has deteriorated dramatically and is less developed, less readable, and less practiced than in prior years.

224. Basic compositional writing quality has also deteriorated as a result of the overuse of school computers. Students are encouraged to treat writing as searching, copying, and pasting rather than thinking and composing, and students are failing to develop spelling, grammar, punctuation, and other essential writing skills.

225. As students spend more time on their school computers, they also have less time to practice and develop important social skills. Accordingly, students today struggle more with eye contact, communicating with their teachers, and conversing with their peers.

226. This has polluted the civic environment at school.

227. As early as elementary school, students use messaging tools and digital communication platforms accessible through their school devices to communicate with each other continuously throughout the school day.

228. This ongoing communication is distracting, harms learning, and creates conflict. Students send inappropriate material to large groups of classmates through school email, including spam-style messages to the whole class or large student groups.

229. Students use their school computers to contact each other when they are not at school, which contributes to cyberbullying, harassment, hate speech, and other social conflict.

230. The District does not provide students robust, effective instruction in digital civics or the civics of technology.

231. Despite giving the students in its care access to the internet as early as kindergarten, the District does not teach them how to be safe online, how to treat peers, what information not to share, what makes a source trustworthy or untrustworthy, how to address unwanted contact from peers, how to handle contact from strangers, or how to navigate other risks associated with the open internet.

C. Former Policy 137 allowed parents to decline an internet-connected computer for their child.

232. Until June 15, 2026, District Policy 137 contemplated that parents could decline an internet-connected computer for their children, and required that the District use its best efforts to accommodate those who did; though as described in more detail below, Defendants failed to ensure that District Policy 137 was consistently enforced.

233. On June 15, 2026, the School Board Defendants Sautner, Ridky, Herman, Kalish, Kerber, Rivera, and Shurak voted to repeal that policy, eliminating the ability of parents to decline an internet connected computer for their child.

i. Former Policy 137 allowed parents to work with their child's teacher and principal for analog alternatives to computer-based learning.

234. District Policy 137, "District-Issued Electronic Devices: Students Use, Rights and Responsibilities," ("Former Policy 137") was first adopted on April 25, 2011, and prior to its repeal on June 15, 2026, was most recently revised on December 19, 2022. *See* Ex. C-01 Former Policy 137 "recognize[d] the need to establish policy [*sic*] for student use of District-Issued Electronic Devices consistent with the educational mission of the District."

235. Former Policy 137 required that the Superintendent provide written notification to parents about the District's internet-connected devices, specifically that "[t]he Superintendent or designee shall provide formal written notification to District parents and guardians whose child is eligible to be issued an Electronic Device before the beginning of the school year containing information relating to the One-to-One Electronic Device Initiative and how it works, as well as information relating to other District policies regarding Electronic Device distribution and use. The form of notification shall be attached to the Administrative Regulation accompanying this Policy."

236. Former Policy 137 required parents and older students to sign an agreement about the terms and conditions associated with student use of the District's internet-connected devices, specifically that "[e]ach student in grades 5-12 and the student's parent or guardian of students in grades K-12 must sign an agreement for Electronic Device use setting forth the terms and conditions set forth in this and other policies and acknowledge receipt of guidelines for use of the Electronic Device. The agreement and guidelines shall be attached to the Administrative Regulation accompanying this Policy."

237. For parents and students who refused to sign the agreement and thereby declined an internet-connected device, Former Policy 137 obligated the District to accommodate them, specifically stating that "[if] the parent/guardian or student refuses to sign the required agreement for Electronic Device use, *the Superintendent or designee shall be responsible for ensuring that the District uses its best efforts to make necessary accommodations for the student to ensure that the student's education is not adversely affected*." (emphasis added).

238. Former Policy 137 stated that "[t]he restrictions set forth in [Former] Board Policy No. 134 (District-Provided Technology Resources), specifically those in the section of [Former] Policy 134 titled "Restrictions on Use of LMSD-Net and other District Provided Technology Resources" apply in their entirety to District-issued Electronic Devices, regardless of whether the student is connected to LMSD-Net."

239. District Policy 134, "District Provided Technology Resources: Students Use, Rights and Responsibilities" ("Former Policy 134"), was first adopted on July 15, 1996, and prior to its repeal on June 15, 2026, was most recently revised on January 25, 2021. *See* Ex. C-02. The purpose of Former Policy 134 was to "establish regulations for student use of District provided technology resources consistent with the educational mission of the District." Section III of Former Policy 134, "Student Responsibilities for Use of District Provided Technology Resources," provided, *inter alia*, that students were required to use District technology in accordance with the District's rules and policies and complete certain training; that they were responsible for their own behavior; and that they, their parents, their guardians, and District employees were jointly responsible for ensuring the educational value of the information and resources accessed through District-issued technology. Former Policy 134 provided that "[s]tudents ha[d] no expectation of privacy in any material or information stored on, created on, accessed through or transmitted through" the District's computer networks or District-issued technology.

240. Former Administrative Regulation 137, "District-Issued Electronic Devices: Students [*sic*] Use, Rights and Responsibilities," ("Former AR 137") was first adopted on April 25, 2011, and prior to its repeal on June 15, 2026, was most recently revised on October 6, 2023. *See* Ex. C-03.

241. Attachment D to Former AR 137 provided "Information for Parents/Guardians and Students Opting Out of Electronic Device Initiative."

242. Attachment D was "the approved notification to be issued to parents, guardians and students who refuse to sign Agreement for Electronic Device Use."

243. The attachment stated: "The One-to-One Electronic Device Initiative is designed to provide students with 21st Century learning environments *both at home and in school*, and to give all

students access to technology resources. Lower Merion School District seeks to create a learning environment . . . supported by *continuous access to digital technologies*. The One-to-One Electronic Device Initiative provides students with the ability to work on projects and research *both at school and at home* by providing *24/7 access* to the software that they use in school." (emphases added).

244. For parents and students who wished to decline "continuous access to digital technologies" and "24/7 access to the software they use[d] at school," and who did not agree to surrender their reasonable expectation of privacy, the attachment provided that the building principal was responsible for making the necessary accommodations "to ensure that the student's education [wa]s not adversely affected." The accommodations could include "access to printed resources and access to building based electronic devices in areas such as Libraries and Help Centers."

245. Per Attachment D, "All accommodations will be made on an individualized basis. The District does not guarantee that all accommodations will be provided to all students who do not participate in the One-to-One Electronic Device Initiative," and advised parents and students to "contact your building principal with any questions."

ii. Former Policy 137 respected parents' fundamental rights.

246. Former Policy 137 properly recognized that parents and students may not be willing or able to abide by the District's requirements regarding the use of District-mandated internet-connected devices, and that they may be unwilling to entirely surrender students' reasonable expectation of privacy in devices that, per the District, accompany them "24/7." *See* Ex. C-04, One to One, https://www.lmsd.org/academics/instructional-tech/one-to-one (accessed Aug. 19, 2026).

247. If a student is not developmentally ready to use an internet-connected device or has a condition or disability that makes it more difficult for her to do so, her parent, in exercising the parent's fundamental right to make decisions regarding her care and direct her education and upbringing, could decline a device as provided in Attachment D to Former Policy 137 and work with the student's building principal to make appropriate accommodations.

248. Likewise, if the student's use of her device caused her to be exposed to violence, pornography, gambling, sex predators, and other content and persons from whom her parent has a legal duty to protect her, her parent, in exercising the parent's fundamental right to make decisions regarding her care and direct her education and upbringing, could decline a device as provided in Attachment D to Former Policy 137 and work with the student's building principal to make appropriate accommodations.

249. Further, if a parent of a child under 13 does not consent to an online service's terms of service or privacy policy that collect more information about the child than her parent finds acceptable, her parent, in exercising the parent's fundamental right to make decisions regarding her care and direct her education and upbringing, as well as rights under COPPA, could decline a device as provided in Attachment D to Former Policy 137 and work with the student's building principal to make appropriate accommodations.

D. When parents and students tried to decline school devices on a widespread, coordinated basis, Defendants contrived to repeal and replace Former Policy 137.

250. As parents and students in the District became more aware of the harms of computers and the internet as described above in Section III.A., and as the District's approach to school devices began to negatively affect the education and family life of a critical mass of community members as described above in Section III.B., the community began to organize.

251. District policies had long contemplated that parents may refuse a computer for their children, and that if they did, the Superintendent was obligated to ensure that the District use its best efforts to accommodate them, as described above in Section III.C.

252. Only when parents began to actually invoke these policies and attempt to decline devices on a widespread, coordinated basis did Defendant Ranelli, the Superintendent; Defendant Sautner, the Board President; and the other School Board Defendants interfere with the enforcement of those policies, and then contrive to repeal them and eliminate parents' ability to decline a computer for their children.

i. Plaintiffs are members of a grassroots community group, Pencils Over Pixels, that advocates for evidence-based reforms to District policies.

253. Throughout late 2025 and early 2026, Plaintiff parents, Plaintiff Imaizumi, and other community members in the District sought to change the District's technology policies.

254. The grassroots group of parents, students, and educators organized themselves as a group, Pencils Over Pixels. They formed the group to champion student health, data privacy, pen-and-paper learning, and teacher-led instruction in the District. *See* https://pencilsoverpixels.org/ (accessed August 19, 2026).

255. The Pencils Over Pixels group, of which each Plaintiff parent and Plaintiff Imaizumi are members, made five recommendations to the Defendants:

> (1) that the Defendants publicly release all vendor contracts, privacy agreements, and aggregate screen-use data by grade and school; inform parents which apps are used, what data is collected, and who receives it; and form an independent committee of students, parents, teachers, and board members to assess tech-use policies;
>
> (2) that the Defendants ban personal cell phones, tablets, smartwatches, and similar devices for the entire school day in order to foster learning, focus, and authentic socialization;
>
> (3) that the Defendants implement stronger content filtering under an approved-only model in which students may access only authorized educational sites, and that generative AI, YouTube, social media, streaming, shopping, gaming, and messaging are made unavailable unless a teacher authorizes them for a clear educational purpose;
>
> (4) that the Defendants support teacher-led instruction, whereby the core subjects of math, reading, writing, science, and social studies are delivered primarily through paper materials and face-to-face teaching, and technology skills should be taught only in computer labs or with shared devices, and that full assistive-technology support for students with disabilities continue under applicable laws; and
>
> (5) that the Defendants adopt opt-in consent for devices and applications, requiring explicit, revocable parental consent before issuing students a school device or enrolling them in digital

> programs, as COPPA requires for students under 13, and providing families who decline must receive comparable instruction via books, paper, and face-to-face learning with no penalty.

256. The group assembled extensive peer-reviewed studies in support of their recommendations and requests, which are supported by each Plaintiff parent.

257. Plaintiff parents desire that their children write by hand instead of typing, because writing by hand helps young children learn to read, and for all children, connects the body's motor system to its visual-recognition system and better aids long-term memory consolidation by integrating motor skill, language, and visual memory simultaneously. *See* https://pencilsoverpixels.org/handwriting (accessed August 19, 2026) (citing Marano et al. (2025). *Handwriting vs. Typewriting: A Neuroimaging Review.* Life (Basel). PMC11943480; Van der Meer & Van der Weel (2023). Handwriting but not typewriting leads to widespread brain connectivity. Frontiers in Psychology. DOI: 10.3389/fpsyg.2023.1219945; Askvik, Van der Weel & Van der Meer (2020). *The Importance of Cursive Handwriting Over Typewriting*. Frontiers in Psychology. DOI: 10.3389/fpsyg.2020.01810; James & Engelhardt (2012). *The effects of handwriting experience on functional brain development*. Trends in Neuroscience and Education. PMC4274624; Longcamp, Zerbato-Poudou & Velay (2005). *The influence of writing practice on letter recognition*. Acta Psychologica, 119(1), 67–79; Longcamp, Hlushchuk & Hari (2008). *Motor and Visual Influences on Letter Perception*. Journal of Cognitive Neuroscience, 20(5), 802–815; Mueller & Oppenheimer (2014). *The Pen Is Mightier Than the Keyboard*. Psychological Science, 25(6), 1159–1168; Ibaibarriaga, Acha & Perea (2025). *Handwriting vs. typing: Effects on word learning in pre-readers*. Journal of Experimental Child Psychology).

258. Plaintiff parents desire that their children not engage in extended, uninterrupted, poorly-timed use of their District-mandated devices or any other devices, because such use contributes to childhood myopia, neck and spine disease, worse sleep, and childhood obesity, and has correlative links to harms to attention, behavior, and mood. *See* https://pencilsoverpixels.org/screen-time (accessed August 19, 2026) (citing Hansraj (2014). *Assessment of stresses in the cervical spine caused by posture and position of the head*. Surgical Technology International, 25; Lança et al.

(2022). *Near work, screen time, outdoor time and myopia in schoolchildren* — Sunflower Myopia AEEC Consortium. Acta Ophthalmologica. PubMed 34142457; *Daily Physical Activity and Screen Time, but Not Other Sedentary Activities, Are Associated with Measures of Obesity during Childhood* (2015). PMC4306854; Hale & Guan (2015). *Screen time and sleep among school-aged children and adolescents: a systematic literature review*. Sleep Medicine Reviews, 21, 50–58. PubMed 25193149; *Afternoon to early evening bright light exposure reduces later melatonin production in adolescents* (2025). npj *Biological Timing and Sleep*. nature.com; Ophir, Nass & Wagner (2009). *Cognitive control in media multitaskers*. PNAS, 106(37), 15583–15587. pnas.org; *The associations between screen time and mental health in adolescents: a systematic review* (2023). BMC Psychology. PMC10117262; American Academy of Pediatrics. *Digital media and screen time guidance*. aap.org).

259. Plaintiff parents desire that their children are educated in an environment that appropriately accommodates all children with autism, attention deficit hyperactivity disorder, and other forms of neurodivergence—and Plaintiff parents of children with these diagnoses desire that their children are appropriately accommodated—with technological tools that are individualized to the child, rather than being given to every student in the same way. District policies, which result in unstructured, high-volume screen time and exposure to fast-paced media, risk harming students with ADHD diagnoses by worsening their attention and executive function. District policies risk harming students with autism spectrum diagnoses because they lack augmentative and alternative communication capabilities, discouraging speech attempts and increasing anxiety associated with communicating verbally on demand. *See* https://pencilsoverpixels.org/special-needs (accessed Aug. 19, 2026) (citing CDC (2025). *Prevalence and Early Identification of Autism Spectrum Disorder Among Children Aged 4 and 8 Years* — ADDM Network. MMWR Surveillance Summary; CDC (2022 data). *Data and Statistics on ADHD*. cdc.gov/adhd/data; National Center for Education Statistics (2022–23). Students With Disabilities. nces.ed.gov; Ganz (2016). *The role of augmentative and alternative communication for children with autism*. Neuropsychiatric Disease and Treatment. PMC5036660; Frontiers in Psychiatry (2024). *Relationships between*

screen time and childhood ADHD: a Mendelian randomization study. PMC11457377; Scientific Reports (2023). *Screen time, impulsivity, neuropsychological functions, and adolescent ADHD symptoms*. nature.com; IRIS Center, Vanderbilt University. Universal Design for Learning. iris.peabody.vanderbilt.edu).

260. Plaintiff parents desire that their children are educated in an environment that appropriately accommodates children with dyslexia, dysgraphia, and other learning disabilities—and Plaintiff parents of children with these diagnoses desire that their children are appropriately accommodated—with technological tools that are individualized to the child, rather than one-size-fits-all tools that are given to every student in the same way. Text-to-speech and speech-to-text programs are appropriate interventions for students with dyslexia and dysgraphia, respectively, because they bypass specific neurological or physical bottlenecks without removing the students' ability to think. District policies, which result in read-aloud tools and autocorrect text tools being made available to every student, risk harming students without learning disabilities by depriving them of the opportunity for productive struggle needed to learn, while also risking harm to students with dysgraphia or dyslexia by failing to provide them with individualized, assistive technologies tailored to their disability. *See* https://pencilsoverpixels.org/learning-disabilities (accessed Aug. 19, 2026) (citing International Dyslexia Association. *Dyslexia prevalence and basics*. dyslexiaida.org; National Center for Learning Disabilities / Understood.org. *Learning disabilities by the numbers: IEPs vs. 504 plans*. understood.org; PMC (2017). *Does Use of Text-to-Speech and Related Read-Aloud Tools Improve Reading Comprehension for Students with Reading Disabilities? A Meta-Analysis*. PMC5494021; Bonifacci (2022). *Text-to-speech applications to reduce mind wandering in students with dyslexia*. Journal of Computer Assisted Learning. DOI: 10.1111/jcal.12624; *Impact of text-to-speech features on reading comprehension of children with reading and language difficulties* (2023). PubMed 37119436; *Dyslexic students' experiences using assistive technology: a five-year follow-up* (2022). Disability and Rehabilitation: Assistive Technology. tandfonline.com; *Effects of assistive technology for students with reading and writing*

disabilities (2019). tandfonline.com; *Reading Rockets. Dictation (speech-to-text) technology: what it is and how it works*. readingrockets.org).

261. Beginning in March 2026, Plaintiffs and other members of the Pencils Over Pixels group regularly attended school board meetings where they spoke in support of their recommendations. They also regularly emailed Defendants to advocate for their positions.

262. By April 2026, pursuant to Former Policy 137 that was then in effect, over twenty families at Cynwyd Elementary School had begun to work with their building principal to discuss implementing a class without mandatory internet-connected devices. These families included those of Plaintiff Lev, Plaintiff Erin Amini, and Plaintiff Michael Amini.

263. Approximately fifty families at Cynwyd Elementary School expressed interest in declining a device for their children pursuant to Former Policy 137.

264. Approximately fifty families each at Belmont Hills Elementary School, Gladwyne Elementary School, Merion Elementary School, Penn Valley Elementary School, Penn Wynne Elementary School, Bala Cynwyd Middle School, Black Rock Middle School, and Harriton High School similarly expressed interest in declining a device for their children pursuant to Former Policy 137.

265. On April 20, 2026, Defendants were presented with a petition by 430 signatories who live or work in the District reflecting their deep and growing concerns about the District's approach to digital technology and its harmful effects on students. *See* Ex. D-01, LMSD_RTK_0055–56.

266. The petition included comments from the signatories confirming that the District's policies, as implemented, enforced, and overseen by Defendants, have led to widespread, unstructured, uncontrolled device use and internet access by children of all ages at all schools in the District. *See* Ex. D-01, LMSD_RTK_0057–82.

ii. As early as March 2026, Defendant Ranelli decided to repeal Former Policy 137, and Defendant Sautner pressured the other Board members behind the scenes.

267. The public school system of the Commonwealth is administered by a board of school directors. 24 P.S. § 3-301.

268. School board members have a duty to appoint and manage the conduct and deportment of district superintendents. 24 P.S. §§ 5-508, 510

269. However, Defendant Ranelli, the Superintendent, does not operate under the supervision and management of the School Board Defendants.

270. Rather, Defendant Ranelli decides what District policies should be and the School Board Defendants enact them at his behest.

271. Prior to its repeal, Former Policy 137 obligated Defendant Ranelli to ensure that the District "use[d] its best efforts" to accommodate students who declined to participate in the District's mandatory-device program. *See* Former Policy 137 ("[If] the parent/guardian or student refuses to sign the required agreement for Electronic Device use, *the Superintendent or designee shall be responsible for ensuring that the District uses its best efforts to make necessary accommodations for the student to ensure that the student's education is not adversely affected*.") (emphasis added).

272. Former Policy 137 expressly provided that the building principal, and no other school official, was responsible for making the necessary accommodations for students whose parents opted out. *See* Attachment D to Former AR 137 ("In the event that the parent/guardian of a student, or the student themselves if the student is over 18, decline to participate in the One-to-One Electronic Device Initiative by refusing to sign an Agreement for Electronic Device Use, *the building principal shall be responsible for making necessary accommodations for the student to ensure that the student's education is not adversely affected*. Such accommodations may include access to printed resources and access to building based electronic devices in areas such as Libraries and Help Centers.") (emphasis added).

273. As the Pencils Over Pixels movement gained momentum, parents began to make coordinated efforts to withdraw whatever consent they had purportedly provided to participate the District's electronic device program, decline a computer for their children going forward, and seek accommodations to ensure that their children's education was not adversely affected.

274. Defendant Ranelli decided at least as early as March 2026, and no later than April 10, 2026, that Former Policy 137 would be repealed, and that parents would no longer be able to decline a device for their children.

275. During this time, Defendant Sautner, the Board President, pressured other Board members to disregard the desires of the community and move ahead with eliminating parents' ability to decline an internet-connected device for their children.

276. Defendant Sautner engaged in this conduct out of view of the public and in order to accomplish Defendant Ranelli's objective that all children be required to use an internet-connected computer to access their public education.

277. Despite the plain language of Former Policy 137 and Former AR 137 contemplating that parents may refuse an electronic device and obligating the District to use its best efforts to accommodate their children if they did so, Defendant Ranelli falsely stated at a public meeting on March 22, 2026, that parents did not have the right to opt out of the District's electronic device initiative.

278. Later, on April 9, 2026, Defendant Ranelli emailed Defendant Sautner as follows: "We also want to make sure (as we did the Policy chairs) that the Board sees the vision in not allowing parents to totally 'opt out' of getting a device and having to use it for part of our curriculum." *See* Ex. D-01, LMSD_RTK_0004.

279. Defendant Sautner responded, "Got it," on April 10, 2026. *See id*.

280. Thus, no later than April 10, 2026, Defendant Ranelli and Defendant Sautner made the decision to repeal Former Policy 137 and eliminate parents' ability to decline an internet-connected device for their children.

281. At the April 13, 2026 Policy Committee Meeting, Defendant Ranelli again repeated the false statement that parents had no ability to decline an internet-connected device for their children. *Available at* https://www.youtube.com/watch?v=LtZ7pSsRg04 (discussion at 0:58:00 – 1:30:20; Defendant Ranelli's remarks at 0:59:37 "Is there an opportunity for my kids to opt out? We do not have an opportunity for you to do that.").

iii. Prior to the adoption of the New Policies, Defendant Ranelli instructed District principals to refuse to accommodate families in violation of Former Policy 137 then in effect.

282. Despite the plain language of Former Policy 137, which required Defendant Ranelli to ensure that the District used its best efforts to accommodate parents who declined an internet-connected computer for their children, and Former AR 137, which left to the building principal the responsibility for making the necessary accommodations, Defendant Ranelli refused to accommodate those families and instructed the principals of each elementary school in the District not to cooperate with families who opted out.

283. On April 27, 2026, the Director of School and Community Relations sent the principals an email attaching a form letter that included "language [they could] use to reply to parents and guardians who may be requesting to opt their students out of device usage." *See* EX. D-01, LMSD_RTK_0097–98.

284. The email and form letter were sent at Defendant Ranelli's behest, and he was copied on the email.

285. The form letter stated: "Although Policy 137 speaks to an opt-out option, LMSD will not be changing course in April to provide alternative curriculum delivery [*sic*]. District administrators continue to review how online resources are being used across grades and classrooms, as well which [*sic*] sites and platforms are allowed, and which are blocked[.]"

286. The letter also stated that Defendant Ranelli and another District official "[we]re exploring tools that could be used to provide parents and guardians with more insight into what their children are accessing each day" and that "[a]ny changes in Policy and practices involving the use of

technology in our schools will originate at the District level; therefore, as a principal, I cannot designate that a particular student or classroom will not be using technology resources at this time. The District will direct the schools if there will be changes in curriculum delivery [*sic*] for the upcoming school year." *See* Ex. D-01, LMSD_RTK_0098.

287. Thereafter, parents who attempted to invoke Former Policy 137 and work with their building principal to receive accommodations for their child received a version of the April 27, 2026 form letter. *See, e.g.*, Ex. D-01, LMSD_RTK_0435–440.

288. The characterization in the form letter of digital devices as being a means of "curriculum delivery," as opposed to the curriculum itself, appears to be designed to avoid District policies and state laws that provide parents greater rights to review and object to the curriculum. *See, e.g.,* 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024).

289. A later attestation by Kenneth A. Roos, Solicitor for the District, submitted in connection with the District's response to a Right to Know Request, emphasizes the District's position that digital devices are not part of the curriculum. *See* Ex. D-02, Attestation of Kenneth A. Roos, Esq., at ¶ 7 ("[T]he purpose of Policy/AR 108 . . . is to provide a process for objections based on the *substance* of curriculum and instructional materials, and not the platform, instructional tool, or device used to deliver them, as that was neither the intent nor scope of the policy.").

iv. When Plaintiff Lev raised concerns with Defendant Ranelli, Defendant Ranelli advised Plaintiff Lev and other concerned parents to send their children to private school.

290. Plaintiff Lev has been an active member and organizer of the Pencils Over Pixels group since the beginning.

291. Plaintiff Lev has organized meetings of parents and other community members, arranged for national experts to speak to the community, and sent numerous emails to the Defendants and other District officials.

292. During the winter and spring of 2026, Defendant Ranelli met with Plaintiff Lev on several occasions.

293. At one of those meetings, on April 22, 2026, Defendant Ranelli met with Plaintiff Lev to discuss parents' concerns with the dangerous and distracting digital environment in the District and parents' right to opt out under Former Policy 137 that was then in effect.

294. During that meeting, Defendant Ranelli admitted that the District was unable to ensure a safe and appropriate digital environment for all students.

295. Defendant Ranelli compared the District's efforts to protect students to "Whac-a-Mole," acknowledging that students will always find a way around any filters used by the District.

296. Defendant Ranelli acknowledged that students can access pornography and sexually-explicit video games through their school devices, yet he refused to agree that this was unacceptable, refused to agree that even one elementary school student who could access this material at school was too many, and instead challenged Plaintiff Lev to name one school in the country that did not have this problem.

297. Defendant Ranelli told Plaintiff Lev that Lower Merion School District was not for everybody, and that if parents disagreed with how the District was delivering education, they could send their children to private school instead.

v. Defendant Ranelli transferred the principal of Cynwyd Elementary School, who was working with families pursuant to Former Policy 137 then in effect, to another school.

298. Parents from Cynwyd Elementary School were among the most active and organized members of the Pencils Over Pixels group.

299. In March 2026, consistent with Former Policy 137, more than 20 families began conversations with the principal of Cynwyd Elementary School to decline internet-connected devices for their children, discuss implementation of a class without those devices, and develop solutions for students to use computers as an intentional complementary tool to traditional teacher-led, pen-and-paper learning. *See* Ex. D-01, LMSD_RTK_0006.

300. Former Policy 137 expressly provided, *inter alia*, that parents could refuse to sign the required agreement for electronic device use and decline an internet-connected device for their children. *See* Former Policy 137.

301. If they did so, Former Policy 137 required Defendant Ranelli or his designee to ensure that the District use its best efforts to "make necessary accommodations for the student to ensure that the student's education is not adversely affected." *See* Former Policy 137.

302. Former Policy 137 expressly provided that the building principal, and no other school official, was responsible for making the necessary accommodations for students whose parents declined a device. *See* Attachment D to Former AR 137.

303. The more than 20 families at Cynwyd Elementary School were working with their building principal as contemplated by Former Policy 137 that was then in effect.

304. The Cynwyd Elementary School principal was beloved by parents and students in the community and had served in that role for many years. Despite his service, and despite his faithful compliance with District policies, Defendant Ranelli transferred the principal to another school at the end of the school year.

305. On information and belief, this was a retaliatory action: Defendant Ranelli transferred the principal because he was perceived to be too closely aligned with the parents in the Pencils Over Pixels group and too accommodating of their requests.

306. Plaintiffs reasonably fear the former principal will continue to face retaliation by Defendant Ranelli.

307. Plaintiffs reasonably fear that Defendant Ranelli will take or threaten to take retaliatory action against principals, teachers, and other subordinates whom he perceives to be sympathetic to or cooperative with the Plaintiffs or other members of the Pencils Over Pixel group.

E. The District's New Policies eliminate parents' ability to decline an internet-connected computer for their children and relieve the Superintendent of the obligation to accommodate them.

308. On June 15, 2026, the School Board Defendants voted to repeal Former Policy 137. *See* Ex. E-01, June 15, 2026 Meeting Minutes; June 15, 2026 Regular Business Board Meeting, https://www.youtube.com/watch?v=V-AKF6kJY2E (discussion and vote at 2:25:13–2:38:52).

309. On August 17, 2026, Defendant Ranelli and the School Board Defendants voted to enact new policies. *See* Ex. E-02, August 17, 2026, Lower Merion School Board Meeting Agenda; *see* August 17, 2026, Regular Business Board Meeting, https://www.youtube.com/watch?v=g1BaHhUeztw (discussion and vote at 1:28:00–1:54:41).

310. These policies include Policy 141, entitled "K-12 Technology Use" ("New Policy 141"), *see* Ex. E-03; an accompanying new Administrative Regulation R141, entitled "K-12 Technology Use" ("New AR 141") *see* Ex. E-04, and Addendum to New AR 141 (New AR 141 Addendum"), *see* Ex. E-05; new Policy 142, entitled "K-12 Technology: Safety, Monitoring and Privacy" ("New Policy 142"), *see* Ex. E-06; and an accompanying new Administrative Regulation R142, entitled "K-12 Technology: Safety, Monitoring and Privacy" ("New AR 142"), *see* Ex. E-07, and addendum to New AR 142 ("New AR 142 Addendum"), *see* Ex. E-08, (collectively, the "New Policies").

311. New Policy 141 eliminates the language from Former Policy 137 that allowed parents to decline an internet-connected device for their child and requiring that the Superintendent ensure that the District use its best efforts to ensure that the education of any student that declined to participate was not adversely affected.

312. In its place, New Policy 141 states that students shall have "supervised" access to technology devices, despite that the Defendants have always had a responsibility to ensure that students' use of technology was adequately supervised. *See* New Policy 141, section III. As Defendant Ranelli admitted, Defendants have never been able to ensure this.

313. New AR 141 requires students to use "responsible digital habits" and engage in "acceptable use." But it fails to acknowledge that much of the digital world is designed to be predatory, extractive, addictive by design, and able to override even adult users' intentions and hook them in cycles of compulsive use. It also fails to acknowledge that students lack the cognitive development to resist temptation, especially temptations posed by the very products and services that the District requires them to use. *See* New AR 141, section III, VI.

314. New AR 141 also shifts the responsibility to parents of reinforcing the responsible use of technology, supporting balanced screen time at home, and filtering and restricting device use at home in a way that reinforces individual family preferences. But it ignores that many families, including Plaintiffs, achieve these ends by preventing their children from using internet-connected devices at all. *See* New AR 141, section III.

315. For students requiring accommodations, New AR 141 states that nothing in the regulation "shall limit student access to approved assistive technologies, including audiobooks, speech-to-text, adaptive programs, communication tools, or other supports required by a student's IEP, Section 504 Plan, or other documented need." *See* New AR 141, section IX. However, the New Policies make no provisions for students whose documented attentional conditions, neurological conditions, behavioral conditions, eye conditions, or other needs require that they limit or eliminate their use of internet-connected devices. *See generally,* New Policies.

316. The New Policies make no provision whatsoever for students' physical health and do not purport to provide ergonomic equipment like adjustable chairs, monitors, keyboards, and computer mice to ensure that students do not injure their necks, spines, wrists, or eyes while using school devices for extended periods. *See generally,* New Policies.

317. Likewise, the New Policies make no provisions for student or parent privacy. Quite the opposite: New AR 141 states that "Users shall have no expectation of privacy when using District technology resources." *See* New AR 141, section II. Likewise, New AR 142 states, *inter alia*, that "Privacy rights in connection with service providers will be determined by the End User Licensing Agreement with that service provider," but makes no provision for obtaining informed parent

consent to any online service providers' terms of service. *See* New AR 142, section III.F; Addendum to AR 142.

318. In sum, the New Policies do not begin to approach the minimum standard for health, safety, and privacy that the Defendants should have ensured for the nearly two decades the District has required students to use computers, and has consistently failed to ensure.

319. During the August 17, 2026 meeting, two Defendants acknowledged that the New Policies were insufficient to adequately protect students and keep them on task, but voted for them anyway.

320. Defendant Herman acknowledged that the New Policies were "works in progress" and that the Board would need to "identify areas of improvement as we move along." *See* August 17, 2026 LMSD Board Meeting, available at https://www.youtube.com/watch?v=g1BaHhUeztw at 1:42:14–1:43:29 ("I think we have to keep in mind that this Policy and AR is a huge step forward from what we previously had. It incorporates parents' concerns, it reduces technology in the classroom, provides guidance and structure for teachers and staff. It's also important to note that this policy, like all policies, are works in progress, and as the AR notes, we will continue to review and revise this policy and AR and identify areas of improvement as we move along.").

321. Likewise, Defendant Rivera emphasized that the implementation and enforcement of the New Policies "is a marathon, not a sprint," and that it "is not going to be perfect." *See id*. at 1:40:22–1:40:54 ("We cannot act without policy. So to Dr. Ranelli, administrators, teachers: thank you for your patience while we're going through this process. It's not going to be easy. This is a marathon, not a sprint. This is not going to be perfect. So I ask for the community's patience. I ask for the parents' patience. We all care about our students, we all want to implement change, see change in our schools, but I want to remind you, this is a marathon, not a sprint. Things aren't going to get perfect, right? We're asking a lot of our District, of our teachers and administration. So let's come together, work together, and work on respecting one another.").

F. In making decisions about the care of their children, and in directing their upbringing and education, Plaintiffs limit the amount of time their children spend on computers and the internet, and supervise their children's use.

322. Contrary to Defendant Rivera, children develop at the pace of a sprint, not a marathon. The digital world runs at the speed of light, and in no time at all, internet-connected computers can alter the course of a child's life.

323. Some online harms are instant and irreversible: in the blink of an eye, an online predator posing as a peer can entice or threaten a young person into sending nude images of themselves, which are then used to extort or terrorize them; a viral "Blackout Challenge" video can encourage a child to accidentally asphyxiate themselves to death; an AI chatbot can encourage a teen to take their own life and help them do it without their parents noticing. Over the course of only a few weeks, middle-schoolers can develop debilitating dependencies on short-form video, social media, and online gaming. In a semester or two, high schoolers can use readily available AI chatbots to pantomime the entire learning process, thus failing to acquire the skills and knowledge needed to progress through school and succeed in life.

324. Plaintiffs should not be forced to continue to put their children in harm's way, or to have their children's education degraded and their family values undermined, while the Defendants attempt to make marginal improvements to the technological environment they created and have been demonstrably unable to control.

325. In making decisions about the care of their children and in directing their upbringing and education, Plaintiffs limit the amount of time their children spend on screens.

326. Plaintiffs' decisions relating to their children's care include decisions made to protect their health, safety, and privacy.

327. To protect their children's health, safety, and privacy, and to direct their upbringing and education, Plaintiffs have limited their children's access to smartphones, tablets, laptops, and video game consoles, as well as their children's access to the internet; strictly supervise such access; or have forbidden any such access entirely.

328. As described below in the family-specific allegations, certain of Plaintiffs' children have suffered harms owing to the District's internet-connected device initiative and refusal to grant necessary accommodations. These harms will continue under the new policy that denies parents the ability to decline an internet-connected device for their children.

329. Each Plaintiff is aware of the harms and risks of harm described above in Section III. A. Each Plaintiff desires to protect their child or children from these harms, which pose risks to their health, safety, and privacy, and which undermine how each Plaintiff wishes to bring up their child or children and direct their education.

330. Each Plaintiff is aware of the conditions in the District described above in Section III. B. Each Plaintiff desires to protect their child or children from these conditions, which pose risks to their health, safety, and privacy, and which undermine how each Plaintiff wishes to bring up their child or children and direct their education.

331. Allegations specific to each family follow.

i. Plaintiff Lev, MC1 Lev, and MC2 Lev

332. Plaintiff Yair Lev has two children, MC1 Lev and MC2 Lev.

333. Plaintiff Lev is an associate professor in the Division of Cardiology, Department of Medicine, at Thomas Jefferson University in Philadelphia, Pennsylvania, where he directs the inpatient cardiology unit, and as such, works with and teaches medical students, residents, and cardiology fellows every day.

334. As part of his work, Plaintiff Lev leads and directs the adoption of machine learning for the Division of Cardiology and consults with startup companies developing machine learning and cardiology products. Specifically, Plaintiff Lev leads AI efforts for cardiovascular medicine across 33 hospitals and continuously works with AI and technology. His deep familiarity with digital technology and artificial intelligence informs his values about protecting children's opportunity to develop in the real world, form genuine human connections, and be fully present in their surroundings.

335. MC1 Lev will be in third grade at Cynwyd Elementary, an elementary school in the District, in the upcoming 2026–27 school year.

336. MC2 Lev will be in first grade at Cynwyd Elementary in the 2026–27 school year.

337. Plaintiff Lev values free play, boredom, and creativity, and believes that these are important for the healthy development of his children. He desires to raise MC1 Lev and MC2 Lev to be intrinsically motivated to learn, to pursue knowledge for its own sake, and remain endlessly curious about the world.

338. These family values and beliefs inform how Plaintiff Lev brings up and educates his children.

339. Plaintiff Lev cultivates a low-technology household. He does not have a television at home; does not allow his children to access the internet, whether through a web browser or an internet-enabled application; and limits his own phone use while in the presence of his children.

340. Instead, Plaintiff Lev creates a home environment where his children can choose any number of fun and enriching activities, including being read to, reading on their own, playing freely, listening to classical music, playing piano, drawing, and making sculptures. Since birth, Plaintiff Lev has read to his children daily and continues to do so. When the weather is bad, he may read to his children for several hours at a time or play board games with them. When the weather is nice, Plaintiff Lev takes MC1 Lev and MC2 Lev to the park to play outside, or the children play on their own in the yard.

341. Plaintiff Lev does not use so-called "gamified learning" applications—purportedly educational applications that incorporate game mechanics from video games like points, badges, progress tracking, rewards, leaderboards, and storylines—to teach his children.

342. As an example, he is raising his children in a bilingual home and teaching them both English and Hebrew. For a brief time in early 2025, Plaintiff Lev tried teaching his children Hebrew using Duolingo, an application available on a tablet that employs gamified learning techniques but observed that MC1 Lev and MC2 Lev quickly became obsessed with the game features at the expense of the language-learning features. They were interested primarily in the

gamified portions and rewards and quickly lost their connection with Plaintiff Lev during these sessions. After only a few days, Plaintiff Lev decided to eliminate tablets from this aspect of his children's learning. The children have not used them again since. Plaintiff Lev now reads and converses with them in Hebrew and teaches them the Hebrew alphabet by hand. Plaintiff Lev also emphasizes physical activities that are important to his children's development, including aerial yoga, karate, dancing together at home, and outdoor play.

343. Plaintiff Lev objects to gamified learning as inconsistent with his family values because it manipulatively imposes extrinsic rewards as opposed to cultivating intrinsic motivation to learn and because it diminishes the act of learning to a set of objectives to be accomplished as opposed to a lifelong journey of discovery.

344. To Plaintiff Lev, computers, smartphones, tablets, and unnecessary digital technology are thieves of precious time. Beyond his well-founded concerns about health, safety, privacy, and education, he believes these devices rob children of time playing, imagining, reading, talking, being outside, interacting with other people, and simply experiencing the real world.

345. Plaintiff Lev is also a teacher himself, and these values inform his instruction to medical students, residents, and cardiology fellows. He generally disallows the use of computers and phones while he is teaching and requests that his students put away their devices during discussions because he has observed and believes that meaningful learning may be achieved only through attention, conversation, questions, reasoning, and a genuine connection with the teacher.

346. The District's former policies, if enforced as written, would have respected Plaintiff Lev's right to make decisions regarding his children's care and to direct their education and upbringing in the 2025–26 school year.

347. The District's new policies will interfere with Plaintiff Lev's ability to make decisions regarding his children's care and to direct their education and upbringing in the 2026–27 school year.

348. MC2 Lev was in kindergarten during the 2025–26 school year. At the beginning of the year, MC2 Lev was assigned his own Apple iPad to use during the school day, which he used for a few weeks in September 2025.

349. Plaintiff Lev was uncomfortable with MC2 Lev being on an iPad at such a young age, so on October 3, 2025, he invoked his rights under Former Policy 137 and declined the iPad for the rest of the school year.

350. MC2 Lev's teacher and building principal supported Plaintiff Lev's decision and adapted MC2 Lev's instruction so that he did not have to use the iPad. After several months of not having an iPad while his classmates did, MC2 Lev told his parents that the time that he was not on the iPad was his favorite part of the day because he was given complicated math problems to do by hand, and he was able to do projects with a fellow classmate whose parents had also opted her out of the District's internet-connected device initiative.

351. MC2 Lev observed that his classmates were preoccupied and continuously engaged with their individual iPads, that they did not respond to anything around them while they were using them, and that they tended to become frustrated or upset when the iPad was taken away from them. When he was only five years old, MC2 Lev told his parents that he felt very lucky not to have one.

352. MC1 Lev was in second grade during the 2025–2026 school year and was assigned an internet-connected Google Chromebook, like other second-grade students in the District.

353. MC1 Lev was also enrolled in one of two second-grade classes selected to participate in a pilot program evaluating the Curriculum Associates i-Ready platform before the District made its decision to adopt the platform district-wide. Throughout the year, she frequently complained about having to use i-Ready and did not enjoy the program.

354. Before and during the time that MC1 Lev was made to use i-Ready, Plaintiff Lev raised privacy concerns about the platform with the Defendants and provided them with information about a federal lawsuit against the company and corroborating news reports. Defendants did not provide Plaintiff Lev or any other parents in the District information about what information i-Ready collected about students, how that information was used, and with whom it was shared.

355. Throughout the year, MC1 Lev used dozens of applications on her Chromebook, purportedly for educational purposes, and often told her parents how much she did not like it. MC1 Lev was frustrated at having to log in to so many applications, remember so many passwords, and use poorly designed applications that were condescending and did not allow her to proceed at her own pace.

356. MC1 Lev would also frequently complain of headaches at night during the school week. Plaintiff Lev observed that MC1 Lev complained of headaches rarely, if at all, on the weekends and during the summer, times when she was not using a device.

357. Plaintiff Lev noticed that MC1 Lev's love of learning and reading on her own was being diminished, which he and his daughter attribute to MC1 Lev's use of the Chromebook. MC1 Lev would repeatedly express frustration that she was required to read books on her Chromebook when her classroom and library were full of the physical books that she strongly preferred.

358. MC1 Lev's experience with her Chromebook caused her frustration, stress, and anxiety.

359. On May 12, 2026, Plaintiff Lev asked MC1 Lev's teacher to send MC1 Lev's Chromebook home so that he could review the programs MC1 Lev was using. The teacher informed Plaintiff Lev that second graders did not take home their Chromebooks except for snow days.

360. Plaintiff Lev then asked MC1 Lev's principal to send MC1 Lev's Chromebook home, who again affirmed that District policies would not allow it.

361. Early on May 18, 2026, Plaintiff Lev then emailed Defendant Ranelli, copying MC1 Lev's teacher and principal, explaining that he was concerned about MC1 Lev's reports about the i-Ready platform and the other applications she was using at school. Plaintiff Lev indicated that he wanted to understand what she was seeing, how she was being asked to engage with the platforms, and what platforms she was using. He asked for an exception to any District policies that may forbid MC1 Lev and MC2 Lev from taking their devices home.

362. Shortly after Plaintiff Lev sent his request, he received an email from the building principal stating that the principal had spoken with District leadership and that he would send both devices home that day.

363. With MC1 Lev's Chromebook at home for the first time during the 2025–26 school year, Plaintiff Lev sat with MC1 Lev and extensively reviewed the software applications she used in her second-grade class.

364. The applications were mostly games with little or no educational value and offended Plaintiff Lev's parenting values, which prize cultivating intrinsic motivation and reject gamified education. Plaintiff Lev became upset and saddened upon discovering how much of MC1 Lev's time spent on her Chromebook was given over to low-value, non-educational, gaming activities.

365. The next day, on May 19, 2026, Plaintiff Lev contacted MC1 Lev's principal and, consistent with Former Policy 137, requested that MC1 Lev be opted out from using her Chromebook for the remainder of the year. MC1 Lev's principal agreed, and MC1 Lev's teacher was supportive of Plaintiff Lev's request.

366. Also that day, Plaintiff Lev emailed Defendant Ranelli, copying MC1 Lev's building principal and teacher. In the email, he outlined his concerns about MC1 Lev's diminishing communication skills correlated with her increased device use. He also specified how the use of gamified learning applications undermined his family values and how he wishes to direct MC1 Lev's education and upbringing.

367. For the remainder of the 2025–26 school year, MC1 Lev was not required to use her Chromebook.

368. Once relieved of having to use her Chromebook at school, MC1 Lev was much happier and more fulfilled and complained of headaches less frequently. The frustration, stress, and anxiety she suffered while using her Chromebook evaporated. She read books instead of playing games on the computer and completed other projects. Virtually every remaining day of the 2025–26 school year, MC1 Lev asked Plaintiff Lev to make sure that she would not have to use the computer in the 2026–27 school year.

369. Plaintiff Lev desires that MC1 Lev and MC2 Lev learn handwriting skills, including legible printing and cursive skills. The school devices that MC1 Lev and MC2 Lev must use in the upcoming 2026–27 school year will impede their development of these skills.

370. The Defendants have interfered with Plaintiff Lev's ability to make decisions regarding the care of his children and to direct their education and upbringing. They did so by creating an environment in which it is normal for his children, their peers and classmates, and other students in the District to spend excessive, unstructured, unsupervised time using their school devices for non-academic, non-curricular, entertainment purposes, which risks interfering with the social development of his children.

371. The Defendants will continue to interfere with Plaintiff Lev's care, upbringing and education of his children in the 2026–27 school year.

372. Given his negative experiences with MC1 Lev's use of her school device, and his desire to avoid similar experiences for his children in the 2026–27 school year, Plaintiff Lev intended to exercise his rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline devices for each of his children and to work with his children's respective building principal to make necessary accommodations to ensure their education was not adversely affected.

373. His children's unnecessary use of school devices for non-educational, non-curricular, entertainment purposes conflicts with Plaintiff Lev's family values.

374. Without waiving or otherwise prejudicing his rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiff Lev does not object to the academic content of the curriculum that has been adopted by the District.

375. Plaintiff Lev does not object to, and indeed supports, his children receiving intentional, supervised instruction in essential age-appropriate digital skills, including learning how to type, use word-processing software, use spreadsheet software, and write code.

376. Plaintiff Lev objects to MC1 Lev and MC2 Lev being subjected to the dangerous and distracting digital environment the Defendants created and have allowed to persist, as subverting his right and obligation to protect his children and undermining how he wishes to bring them up.

377. Plaintiff Lev objects to the violations of his privacy rights and those of his children, including rights under COPPA, that have occurred and will occur when MC1 Lev and MC2 Lev are able to access online services that collect their personal information without his consent.

378. Plaintiff Lev is one of the parent organizers of the Pencils Over Pixels group.

379. Plaintiff Lev has been outspoken in his opposition to the District's technology policies and practices. During the 2025–26 school year, he regularly attended and spoke at school board meetings, sent emails to parents, Defendants, and other District leaders, and participated in press interviews. He has continued to do so throughout the summer of 2026.

380. In June 2026, Plaintiff Lev became aware of messages sent to his superiors complaining about Plaintiff Lev's use of his work email address to communicate about District technology policy and implicitly threatening his employment.

381. Plaintiff Lev reasonably believes that these messages were sent by or at the behest of one or more Defendants.

382. Plaintiff Lev reasonably fears retaliation by Defendant Ranelli and the School Board Defendants against himself and his children, MC1 Lev and MC2 Lev, for Plaintiff Lev's organizing activity and the family's participation in this lawsuit.

383. Plaintiff Lev submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-01.

ii. Plaintiffs Eleanor Stanford and Joaquin Imaizumi

384. Plaintiff Eleanor Stanford is the mother of Plaintiff Joaquin Imaizumi.

385. Plaintiff Imaizumi will be a senior at Lower Merion High School in the upcoming 2026–27 school year. Despite being a minor, Plaintiff Imaizumi wishes to be identified by name in these proceedings and does so with the consent of Plaintiff Stanford.

386. Plaintiff Stanford has cultivated a low-technology household and a family environment that values in-person presence. Her children did not play video games or computer games at home, rarely watched television, and occasionally watched movies together as a family. Her children were among the last children in their grade to receive a cell phone.

387. Instead, Plaintiff Stanford began reading to her children when they were very young. Throughout their childhoods, she encouraged her children to play sports, usually informally, and

to spend time outside and in person visiting their extended family. When her children were young teenagers, they took jobs doing yard work for their neighbors.

388. Throughout their childhoods, Plaintiff Stanford discussed the harms of social media, smartphones, and the internet with her children, including that devices and online browsers, platforms, and apps can be addictive; cause or contribute to poor mental health, low self-esteem, and body image issues; connect them with strangers who mean them harm; expose their private thoughts and personal images; and displace more meaningful activities, including exercise, sleep, and in-person socialization.

389. Throughout their childhoods, Plaintiff Stanford had discussions with her children pointing out when peers were on their phones or tablets in social settings and spoke with them about how being ignored or snubbed in favor of a device made them feel. She also discussed with them the political, social, and economic implications of internet-connected devices and social media and streaming platforms.

390. She objects to social-media platforms as being extractive, deceptive, and manipulative, exploiting their users and workers and contributing to a polluted information environment and a corroded social sphere.

391. Plaintiff Stanford did not and does not use gamified learning applications to teach her children. She objects to gamified learning as inconsistent with her family values because it manipulatively imposes extrinsic rewards as opposed to cultivating intrinsic motivation to learn and diminishes the act of learning to a set of objectives to be accomplished as opposed to a lifelong journey of discovery.

392. Plaintiff Stanford did not and does not approve of her children using AI chatbots. She objects to AI chatbots as inconsistent with her family values because they are dangerous and encourage children to harm themselves or others and conceal their emotions and mental state from their parents and loved ones and because they are trained on stolen information and illegal material. She also objects to AI chatbots because they impoverish, immiserate, and mentally harm the workers who train the models, often in the global south; contribute to environmental pollution; and

encourage students to cheat, prevent them from learning important material, and degrade their ability to retain information.

393. Plaintiff Imaizumi first received a school computer during the 2020–21 school year when he was in sixth grade, along with nearly all the other students in his grade.

394. That year, Plaintiff Imaizumi was exposed to pornography on his school computer, material that he did not seek out.

395. Over the next six years, Plaintiff Imaizumi was required to use an internet-connected device to access his education.

396. During that time span, he also used the device for non-academic, non-curricular, entertainment uses, both at home and at school. During the 2025–26 school year, Plaintiff Imaizumi used his school device between two and three hours at school each day and an additional hour at home.

397. Plaintiff Imaizumi's classmates also frequently used their school devices for non-academic, non-curricular, entertainment purposes. Defendants created an environment where students are persistently distracted, off-task, and use their computers for non-academic, non-curricular, entertainment purposes.

398. The technology environment fostered by the Defendants has led Plaintiff Imaizumi to experience a diminished love of learning and a decline in academic performance.

399. The ready access to AI chatbots facilitated by the Defendants fosters an environment where nearly every student is using AI to complete their assignments and write essays. This ready access caused Plaintiff Imaizumi to suffer declines in academic performance and attainment. Rather than complete his assignments himself, he relied on AI chatbots or Google search to find the answers. Plaintiff Imaizumi soon largely stopped reading his assignments or thinking about the subject matter of his classes.

400. Plaintiff Imaizumi's academic abilities declined in other ways. His ability to pay attention diminished significantly, and his handwriting worsened.

401. At the same time, District officials failed to teach Plaintiff Imaizumi critical computer skills. District officials did not teach Plaintiff Imaizumi and other students about technology literacy or media literacy as those topics pertain to computers and the internet. Nor did District officials teach Plaintiff Imaizumi and other students about how to stay safe online, other than one occasion in health class in which he was instructed not to send nude photos of himself over the internet. District officials failed even to teach Plaintiff Imaizumi basic typing skills.

402. Likewise, the ready access to internet-based entertainment platforms that are designed to capture user attention, like social media, video games, and streaming video platforms, fosters an environment where students use these services rather than paying attention in class or socializing with one another. Before and during the 2025–26 school year, Plaintiff Imaizumi frequently played video games at school using his school device.

403. The technology environment created by the Defendants has demoralized and disheartened Plaintiff Imaizumi. Frequently during the 2025–26 school year, Plaintiff Imaizumi walked into class and saw his peers cheating on their assignments using AI chatbots or distracted by online-entertainment platforms. He was overcome with existential dread because nobody paid attention to their school assignments or to each other.

404. Despite being a social person who enjoys being with his peers and who easily socializes with family members and older generations outside of school, Plaintiff Imaizumi has regularly struggled to socialize with his peers at school. The technology environment in the District leads other students to continuously use their computers, such that students at his school rarely speak to one another or even make eye contact. This social isolation led Plaintiff Imaizumi to become depressed, emotionally distressed, and emotionally dysregulated.

405. The technology environment in the District led Plaintiff Imaizumi to experience physical pain and discomfort, including headaches, neck pain, and eye strain.

406. Plaintiff Imaizumi is motivated to learn, to succeed academically, and to do so with integrity and without relying on AI chatbots.

407. As he progressed through school, Plaintiff Imaizumi recognized that his school computer as well as his personal smartphone were interfering with these goals.

408. Plaintiff Imaizumi asked his mother, Plaintiff Stanford, to take his personal smartphone each evening around 8:00 p.m. because he recognized that he could not control how much time he spent using it and that it was interfering with his sleep and school performance.

409. Plaintiff Imaizumi sat with Plaintiff Stanford each evening while doing his homework on his school device to help him stay on task. Plaintiff Imaizumi continuously toggled between different web pages, some school-related and many not, and struggled to control this behavior on his own. Plaintiff Stanford frequently reminded Plaintiff Imaizumi to stay on task, but he was unable to do so. Despite his efforts and the presence of his mother, Plaintiff Imaizumi struggled to stay entirely on task while using his school device at home.

410. While at school, Plaintiff Imaizumi was frequently off-task on his school device. Plaintiff Imaizumi estimates that, despite his best efforts to stay on task, 99 percent of the time when he was asked to use his school device, he used it to do something other than what he was asked to do.

411. Recognizing that he was unable to control his use of his school device through his own willpower alone, Plaintiff Imaizumi decided that he would be more successful in achieving his personal and academic goals if he changed his environment to eliminate the persistent distraction that it caused.

412. His mother Plaintiff Stanford supported him in these efforts as consistent with her parenting philosophy and values about directing Plaintiff Imaizumi's upbringing and education.

413. On April 29, 2026, with the support and approval of his mother Plaintiff Stanford, Plaintiff Imaizumi attempted to invoke his rights under Former Policy 137 and wrote to his school principal and Defendant Ranelli informing them that he opted himself out from using his school device for the rest of the school year.

414. Under Former Policy 137 and Former AR 137, Plaintiff Imaizumi's building principal was responsible for making the necessary accommodations to ensure that Plaintiff Imaizumi's education was not adversely affected.

415. Thereafter, Plaintiff Imaizumi returned his computer to his school IT department.

416. On May 4, 2026, Plaintiff Imaizumi received an email ostensibly from his school principal, though authored by or at the request of Defendant Ranelli, informing him that his request was denied.

417. On May 7, 2026, Plaintiff Imaizumi and Plaintiff Stanford responded via email that he had already returned his computer to the IT department and would not be retrieving it. Neither his principal nor Defendant Ranelli responded.

418. Plaintiff Imaizumi completed the 2025–26 school year without his school device.

419. The Defendants have interfered with Plaintiff Stanford's care, upbringing, and education of Plaintiff Imaizumi by preventing her from imposing limits on his device use that are necessary to protect his health, safety, and privacy, and that are consistent with Plaintiff Stanford's desires for Plaintiff Imaizumi's care, education, and upbringing.

420. The Defendants have interfered with Plaintiff Stanford's care, upbringing, and education of Plaintiff Imaizumi by creating an environment in which it is normal for him, his peers and classmates, and other students in the District to spend excessive, unstructured, unsupervised time using their school devices for non-academic, non-curricular, entertainment purposes, which interfered with his social development.

421. The Defendants will continue to interfere with Plaintiff Stanford's care, upbringing, and education of Plaintiff Imaizumi in the 2026–27 school year.

422. Given her family's negative experiences with Plaintiff Imaizumi's use of school device, and seeking to avoid negative effects on his health and behavior, Plaintiff Stanford and Plaintiff Imaizumi intended to exercise their rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline a device for Plaintiff Imaizumi, work with their building principal to make necessary accommodations, and ensure his education was not adversely affected.

423. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiff Imaizumi and Plaintiff Stanford do not object to the academic content of the curriculum that has been adopted by the District.

424. Plaintiff Stanford objects to the dangerous and distracting digital environment that Plaintiff Imaizumi will be subjected to under District policies that are implemented and enforced by the Defendants as subverting her obligations to protect Plaintiff Imaizumi and undermining how she wishes to bring him up.

425. Plaintiff Imaizumi is one of the student organizers with Pencils Over Pixels.

426. Plaintiff Imaizumi has been outspoken in his opposition to the District's technology policies and practices. During the 2025–26 school year, he regularly attended and spoke at school board meetings, sent emails to parents, Defendants, and other District leaders, and participated in press interviews.

427. On August 3, 2026, Plaintiff Imaizumi delivered public remarks at the Policy Committee Meeting, in which he re-raised a question about the conditions at his school that he asked at an earlier meeting but that was not answered. Plaintiff Imaizumi detailed the disheartening incidents he witnessed involving his peers' use of their devices at school each day, including witnessing them routinely cheating on core subjects with AI instead of learning. He also described how disruptive smartphones have been to the social environment at his school. He asked whether it was acceptable to Defendant Ranelli that this was how Plaintiff Imaizumi's final year of high school was to be, and he re-urged his question to Defendant Ranelli. Defendant Ranelli did not answer. Plaintiff Imaizumi was shouted down by Defendant Sautner. Available at https://www.youtube.com/watch?v=bEj7dPkmQ1o (remarks of Plaintiff Imaizumi at 101:25–103:50).

428. Plaintiff Stanford and Plaintiff Imaizumi reasonably fear retaliation by Defendant Ranelli and the School Board Defendants for their organizing activity and their participation in this lawsuit.

429. As a result of the pervasively negative technological environment created by the Defendants and Defendant Ranelli's treatment of Plaintiff Imaizumi at the August 3, 2026, school board meeting, Plaintiff Stanford and Plaintiff Imaizumi made the difficult decision to withdraw Plaintiff Imaizumi from the District for his senior year and switch to homeschool.

430. Plaintiff Stanford and Plaintiff Imaizumi would have strongly preferred that Plaintiff Imaizumi remain enrolled in the District and able to receive an education without being made to use an inherently harmful internet-connected computer.

431. Plaintiff Imaizumi will return to high school in the District if he is protected from retaliation and is able to receive his education without being made to use an internet-connected computer.

432. Plaintiff Stanford submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-02.

iii. Plaintiffs Erin Amini, Michael Amini, MC1 Amini, MC2 Amini, MC3 Amini, and MC4 Amini

433. Plaintiffs Erin and Michael Amini have four children, MC1 Amini, MC2 Amini, MC3 Amini, and MC4 Amini.

434. Plaintiff Erin Amini is a board-certified pediatrician with more than 15 years of clinical experience caring for infants, children, and adolescents. Her professional interests include preventive care, childhood illnesses, and partnering with families to support children's health and development through every stage of childhood.

435. Plaintiff Michael Amini is a board-certified orthopedic surgeon. He has held leadership roles in orthopedic practice, contributed to peer-reviewed research and medical education, and is a member of several national orthopedic organizations.

436. MC1 Amini will be in sixth grade at Bala Cynwyd Middle School, a middle school in the District, in the upcoming 2026–27 school year.

437. MC2 Amini will be in fifth grade at Bala Cynwyd Middle School in the upcoming 2026–27 school year.

438. MC3 Amini will be in third grade at Cynwyd Elementary School in the upcoming 2026–27 school year.

439. MC4 Amini will be in first grade at Cynwyd Elementary School in the upcoming 2026–27 school year.

440. Plaintiffs Erin and Michael Amini have intentionally maintained a low-technology home environment. Their children do not have personal cell phones, tablets, laptops, video game systems, or social media.

441. As physicians, Plaintiffs Erin and Michael Amini prioritize creating an enriching home environment where their children can choose any number of fun activities. At the forefront are reading books, imaginative and sensory play, frequent arts and crafts at the family table, outdoor activities, scavenger hunts, family board games and cards, as well as encouraging teamwork and perseverance through sports.

442. Since moving to Pennsylvania and into the Lower Merion School District for the 2025–26 school year, Plaintiffs' children have received school devices: an iPad for MC4 Amini in kindergarten, and Chromebooks for MC1 Amini, MC2 Amini, and MC3 Amini

443. The Amini children use online applications such as IXL, Dreambox, PebbleGo, and i-Ready that are required by their school, which they access through their school devices. The Amini children find these applications inferior to analog alternatives.

444. Using their school devices, the Amini children also play various games, chat with friends, search for pictures, and play on Canva, an online graphic-design platform.

445. Since the introduction of these devices into their children's lives, Plaintiffs Erin and Michael Amini have taught their children about online safety, privacy, cyberbullying, and other technology risks, such as child exploitation.

446. Defendants and Lower Merion School District staff failed to be transparent with the Aminis and other parents about when, why, or how much technology is required for students to access educational instruction and participate in their own education.

447. This lack of clarity has made it difficult for the Aminis to set consistent boundaries with their oldest child, MC1 Amini.

448. MC1 Amini told her parents that she was required to bring her Chromebook home because it is necessary for schoolwork, and did so for most of the school year. She has difficulty staying on task, uses her computer without her parents' permission to talk to friends, and has been exposed to

explicit videos and games against her parents' wishes. In May 2026, Plaintiff Erin Amini came to understand that MC1 Amini was given the choice about whether to take her Chromebook home. Only when Plaintiff Erin Amini told MC1 Amini that she was not allowed to bring the Chromebook home did it remain at school.

449. These experiences have caused needless conflict between MC1 Amini and her parents, and reinforce Plaintiffs Erin and Michael Amini's concerns about their children's unrestricted access to the internet and online platforms' unnecessary collection of their children's private, personal information.

450. On July 6, 2026, Plaintiff Erin Amini sent an email to the Defendants regarding the new policy and offered her expertise in child development and neuroscience.

451. On July 8, 2026, she received a reply from Defendant Sautner advising her to either submit comments through a dedicated email or join the Defendants at a policy committee or School Board meeting.

452. The Defendants have interfered with Plaintiffs Erin and Michael Amini's care, upbringing, and education of their children by preventing them from imposing limits on their children's device use that are necessary to protect their children's health, safety, and privacy and that are consistent with Plaintiffs Erin and Michael Amini's desires for their children's care, education, and upbringing.

453. The Defendants have interfered with Plaintiffs Erin and Michael Amini's care, upbringing, and education of their children by creating an environment in which it is normal for their children, their peers and classmates, and other students in the District to spend excessive, unstructured, unsupervised time using their school devices for non-academic, non-curricular, entertainment purposes, which has interfered with MC1 Amini's social development and risks interfering with the social development of their other children.

454. The Defendants will continue to interfere with Plaintiffs Erin and Michael Amini's care, upbringing, and education of their children in the 2026–27 school year.

455. Given their negative experiences with MC1 Amini's use of her school device and their desire to avoid similar experiences for her and their other children in the 2026–27 school year, Plaintiffs Erin and Michael Amini intended to exercise their rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline devices for each of their children, work with their children's respective building principals to make necessary accommodations, and ensure that each child's education was not adversely affected.

456. Their children's unnecessary use of devices for non-educational, non-curricular, entertainment purposes conflicts with Plaintiffs Erin and Michael Amini's family values.

457. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs Erin and Michael Amini do not object to the academic content of the curriculum that has been adopted by the District.

458. Plaintiffs Erin and Michael Amini do not object to, and indeed support, their children receiving intentional, supervised instruction in essential age-appropriate digital skills, including learning how to type, use word-processing software, use spreadsheet software, and write code.

459. Plaintiffs Erin and Michael Amini object to the dangerous and distracting digital environment the Defendants have created and that MC1 Amini, MC2 Amini, MC3 Amini, and MC4 Amini will be subjected to as subverting their right and obligation to protect their children and undermining how they wish to bring up their children.

460. Plaintiffs Erin and Michael Amini object to the violations of their privacy rights and those of their children, including rights under COPPA, that have occurred and that will occur when MC1 Amini, MC2 Amini, MC3 Amini, and MC4 Amini are able to access online services that collect the children's personal information without their parents' consent.

461. The District's former policies, if enforced as written, would have respected Plaintiffs Erin and Michael Amini's right to make decisions regarding their children's care and to direct their children's education and upbringing in the 2025–26 school year.

462. The District's new policies will interfere with Plaintiffs Erin and Michael Amini's ability to make decisions regarding their children's care and to direct their education and upbringing in the 2026–27 school year.

463. In May 2026, Plaintiffs Erin and Michael Amini became involved with Pencils Over Pixels. They attended and spoke at school-board meetings about the importance of consent and privacy; how technology hijacks attention and reward centers in the brain; how this conflicts with healthy child development; how tech companies exploit children; and how use of a shared screen is more appropriate for children rather than unfettered access to dangerous content on their individual devices.

464. Plaintiffs Erin and Michael Amini helped establish an expert panel within the parent group to advocate for greater transparency, informed parental consent, student privacy, and developmentally appropriate technology practices in schools. The Aminis have also connected with similar advocacy groups to learn from others' experiences.

465. Plaintiffs Erin and Michael Amini reasonably fear retaliation by Defendant Ranelli and the School Board Defendants against them and their children MC1 Amini, MC2 Amini, MC3 Amini, and MC4 Amini, for their organizing activity and the family's participation in this lawsuit.

466. Plaintiff Erin Amini submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-03A.

467. Plaintiff Michael Amini submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-03B.

iv. Plaintiffs Meredith Brisco-Bacik, Bradley Bacik, MC1 Bacik, MC2 Bacik, and MC3 Bacik

468. Plaintiffs Meredith Brisco-Bacik and Bradley Bacik have three children, MC1 Bacik, MC2 Bacik, and MC3 Bacik.

469. Plaintiff Meredith Brisco-Bacik is an advanced heart failure and cardiac transplant cardiologist by training, with a master's degree in clinical epidemiology. She left clinical practice

several years ago and now works as a Senior Medical Director for Safety and Pharmacovigilance at GSK.

470. Plaintiff Bradley Bacik is a cardiac electrophysiologist and cardiologist at Jefferson Health.

471. MC1 Bacik will be in third grade at Merion Elementary School, an elementary school in the District, in the upcoming 2026–27 school year.

472. MC2 Bacik and MC3 Bacik will be in first grade at Merion Elementary in the upcoming 2026–27 school year.

473. Plaintiffs Brisco-Bacik and Bacik value free play, boredom, and creativity, and believe that these are important for the healthy development of their children. They desire to raise MC1 Bacik, MC2 Bacik, and MC3 Bacik to be intrinsically motivated to learn, to pursue knowledge for its own sake, and remain endlessly curious about the world.

474. These family values and beliefs inform how Plaintiffs Brisco-Bacik and Bacik bring up and educate their children.

475. Plaintiffs Brisco-Bacik and Bacik cultivate a low-technology household. They have one television at home, which the children are allowed to watch once a week with their parents for family movie night during the school year and a few times per week during the summer. They do not allow their children to access the internet, whether through a web browser or an internet-enabled application, and they limit their own phone use while in the presence of their children.

476. MC1 Bacik, MC2 Bacik, and MC3 Bacik do not have their own devices, whether tablets or phones; are not allowed access to the internet or social media; and are not allowed to watch streaming videos except with their parents, which is rare.

477. On the one occasion where MC1 Bacik, MC2 Bacik, and MC3 Bacik were allowed to take a tablet with them on a family vacation to watch downloaded movies, Plaintiffs Brisco-Bacik and Bacik observed that their children became behaviorally dysregulated and fixated on the tablet, which made parenting more difficult and the family's time together less enjoyable. Plaintiffs Brisco-Bacik and Bacik have resolved not to let their children take tablets with them on future trips.

478. Plaintiffs Brisco-Bacik and Bacik object to gamified learning as inconsistent with their family values because it manipulatively imposes extrinsic rewards as opposed to cultivating intrinsic motivation to learn and diminishes the act of learning to a set of objectives to be accomplished as opposed to a lifelong journey of discovery.

479. Plaintiffs Brisco-Bacik and Bacik create a home environment where their children can choose any number of fun and enriching activities, including playing outside, reading books, building with Lego blocks, and playing make believe.

480. Additionally, MC1 Bacik, MC2 Bacik, and MC3 Bacik have each been diagnosed as neurodivergent. In working with their doctors, Plaintiffs Brisco-Bacik and Bacik are aware that neurodivergent children often struggle with technology overuse, can become fixated on digital technologies or video games, and may be more susceptible to online predation than neurotypical children.

481. MC2 Bacik and MC3 Bacik will be starting school in the District for the first time in the upcoming school year.

482. In the 2024–25 school year, when MC1 Bacik was in first grade, MC1 Bacik received an iPad that she used only at school, and the District provided parents with logins to the applications used at school so that students could practice math and other subjects at home. That year, Plaintiff Brisco-Bacik logged in to Dreambox at home using a District-provided login. She observed that rather than practicing math, MC1 Bacik only wanted to play the game portions of the gamified learning application to earn tokens.

483. In the 2025–26 school year, when MC1 Bacik was in second grade, she received a Chromebook that she was required to use to complete assignments on gamified learning applications including Razz Kids and Dreambox.

484. Thereafter, Plaintiffs Brisco-Bacik and Bacik did not allow MC1 Bacik to access Razz Kids at home. In the 2025–26 school year, when they learned that MC1 Bacik was using Razz Kids at school, they sent her to school with physical books, and MC1 Bacik answered comprehension questions from the books by hand.

485. Also during the 2025–26 school year, as MC1 Bacik typed assignments in Google Classroom, the product suggested alternatives to her spelling that MC1 knew to be incorrect. This confused MC1 and contributed to her frustration with her Chromebook.

486. MC1 Bacik told her parents that she does not like doing schoolwork on a computer, hates the programs that she is required to use, and finds them very frustrating.

487. The Defendants have interfered with Plaintiffs Brisco-Bacik and Bacik's care, upbringing, and education of MC1 Bacik by preventing them from imposing limits on MC1 Bacik's device use that are necessary to protect her health, safety, and privacy and that are consistent with Plaintiff Brisco-Bacik and Bacik's desires for MC1 Bacik's care, education, and upbringing.

488. The Defendants have interfered with Plaintiffs Brisco-Bacik and Bacik's care, upbringing, and education of MC1 Bacik by creating an environment in which it is normal for MC1 Bacik, her peers and classmates, and other students in the District to spend excessive, unstructured, unsupervised time using their school devices for non-academic, non-curricular, entertainment purposes, which risks interfering with MC1 Bacik's social development.

489. The Defendants will interfere with Plaintiffs Brisco-Bacik and Bacik's care, upbringing and education of their children in the 2026–27 school year.

490. Given their family's negative experiences with MC1 Bacik's use of her school device, and seeking to avoid negative effects on their children's physical health and behavior, Plaintiffs Brisco-Bacik and Bacik's intended to exercise their rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline devices for their children, work with their building principal to make necessary accommodations, and ensure their education was not adversely affected.

491. District policies implemented and enforced by the Defendants that allow MC1 Bacik, MC2 Bacik, and MC3 Bacik's unnecessary use of school devices for non-educational, non-curricular, entertainment purposes conflict with Plaintiffs Brisco-Bacik and Bacik's values.

492. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs Brisco-Bacik and Bacik do not object to the academic content of the curriculum that has been adopted by the District.

493. Plaintiffs Brisco-Bacik and Bacik are not opposed to intentional use of age-appropriate technology such as learning to type or using a school device that can access only approved curricular materials, preferably a device not connected to the internet.

494. Plaintiffs Brisco-Bacik and Bacik object to the dangerous and distracting digital environment that MC1 Bacik, MC2 Bacik, and MC3 Bacik will be subjected to under District policies that are implemented and enforced by the Defendants as subverting their obligations to protect their children and undermining how they wish to bring them up.

495. Plaintiffs Brisco-Bacik and Bacik object to the violations of their privacy rights and those of their children that have occurred and will occur when MC1 Bacik, MC2 Bacik, and MC3 Bacik are able to access online services that collect their personal information without Plaintiffs Brisco-Bacik and Bacik's consent.

496. The District's former policies, if enforced as written, would have respected Plaintiffs Brisco-Bacik and Bacik's right to make decisions regarding their children's care and to direct their education and upbringing in the 2025–26 school year.

497. The District's new policies will interfere with Plaintiffs Brisco-Bacik and Bacik's ability to make decisions regarding their children's care and to direct their education and upbringing in the 2026–27 school year.

498. Plaintiff Brisco-Bacik is a member of the Pencils Over Pixels group, and in the spring of 2026, regularly spoke at board meetings in opposition to the District's technology policies.

499. Plaintiffs Brisco-Bacik and Bacik reasonably fear retaliation by Defendant Ranelli and the School Board Defendants for their organizing activity and their family's participation in this lawsuit.

500. Plaintiff Meredith Brisco-Bacik submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-04A.

501. Plaintiff Bradley Bacik submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-04B.

v. RESERVED

vi. Bertha Escobedo Barrondo, MC1 Smyth Escobedo, and MC2 Smyth Escobedo

502. Plaintiff Bertha Escobedo Barrondo has two children, MC1 Smyth Escobedo and MC2 Smyth Escobedo.

503. Plaintiff Escobedo Barrondo is a clinical psychologist.

504. MC1 Smyth Escobedo will be in eighth grade in the upcoming 2026–27 school year.

505. MC2 Smyth Escobedo will be in seventh grade in the upcoming 2026–27 school year.

506. Plaintiff Escobedo Barrondo and her children live within the boundaries of the District, and her children are eligible to attend school there. Through the 2025–26 school year, MC1 Smyth Escobedo and MC2 Smyth Escobedo attended a private school.

507. Plaintiff Escobedo Barrondo desires that they attend a public school in the District for the 2026–27 school year. However, she opposes District policies that allow students excessive, unstructured, unsupervised time on school devices without providing parents the ability to opt their children out of the program or adequately supervise their children's use.

508. Prior to August 17, 2026, Plaintiff Escobedo Barrondo has not enrolled MC1 Smyth Escobedo or MC2 Smyth Escobedo in any school due to her concerns about District policies requiring the use of school devices, and the Defendants' inability to ensure a healthy, safe, private, adequate learning environment that does not undermine her family values.

509. After the board vote, on August 20, 2026, she enrolled MC1 Smyth Escobedo and MC2 Smyth Escobedo in a private school.

510. Plaintiff Escobedo Barrondo values free play, boredom, and creativity and believes these are important for the healthy development of her children. She desires MC1 Smyth Escobedo and

MC2 Smyth Escobedo to be intrinsically motivated to learn, pursue knowledge for its own sake, and remain endlessly curious about the world.

511. These family values and beliefs inform how Plaintiff Escobedo Barrondo brings up and educates her children.

512. Plaintiff Escobedo Barrondo cultivates a low-technology household.

513. Plaintiff Escobedo Barrondo does not provide MC1 Smyth Escobedo or MC2 Smyth Escobedo with their own personal computers, does not permit them access to social media, and sets limits on how much time they spend interacting with screen media each day. Her children do not have their own cell phones and are given limited access to a tablet and smartwatches that they use to text and video-call their friends. They have a Nintendo Switch console that they use during trips, sometimes with friends, but there has never been an issue with excessive use at home. Once they are in school, they can spend months without charging it, so they do not use it.

514. Plaintiff Escobedo Barrondo supervises her children's use of technology at home and does not permit them unsupervised access to the internet or excessive use of any screen.

515. Instead of allowing her children to spend excessive time on screens, Plaintiff Escobedo Barrondo encourages her children to regularly exercise, play organized sports, read books, sing, and play music.

516. MC1 Smyth Escobedo and MC2 Smyth Escobedo each participate in organized and recreational sports, including basketball, lacrosse, flag football, volleyball, and swimming.

517. When her children were young, Plaintiff Escobedo Barrondo instilled a love of reading in them by reading to them every night, filling their rooms with books in three different languages, and giving them 30 minutes to read before bed.

518. When they are bored or have downtime, Plaintiff Escobedo Barrondo encourages them to reach for a book, but they usually decide to do that on their own without her encouragement. MC1 Smyth Escobedo and MC2 Smyth Escobedo entered the annual summer reading contest at the local library this summer.

519. In addition to sports and reading, MC1 Smyth Escobedo and MC2 Smyth Escobedo practice the piano, take voice lessons, and create things with their sewing machine.

520. Plaintiff Escobedo Barrondo regularly speaks with MC1 Smyth Escobedo and MC2 Smyth Escobedo about the dangers of the digital world, including instructing them not to talk to strangers online or respond to an unknown text message. She has told them not to send nude photos of themselves with their phone or computer and has explained the reasons why it is dangerous for them to do so.

521. She has also discussed with them many of the growing concerns about tech companies' harmful practices, including harms to cognition, emotional well-being, and socialization; social media companies' liability for addicting children and harming their mental health; and the harms to democracy and individual autonomy that arise from companies' surveillance business model.

522. During the 2025–26 school year, unbeknownst to Plaintiff Escobedo Barrondo, MC1 Smyth Escobedo and MC2 Smyth Escobedo's former school provided them with more unsupervised access to the internet than Plaintiff Escobedo Barrondo approved.

523. Once she learned about this, Plaintiff Escobedo Barrondo asked that officials at her children's former school more strictly supervise MC1 Smyth Escobedo and MC2 Smyth Escobedo's device usage, which they immediately did.

524. The District's new technology policies as implemented and enforced by the Defendants will interfere with Plaintiff Escobedo Barrondo's care, upbringing, and education of her children in the 2026–27 school year.

525. Given her family's negative experiences with MC1 Smyth Escobedo and MC2 Smyth Escobedo's use of computers at their former school and the devices' effects on her children's academic attainment and behavior, in the 2026-27 school year Plaintiff Escobedo Barrondo intended to enroll her children in a school in the District and then exercise her rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline devices for her children, work with their respective building principals to make necessary accommodations, and ensure their education was not adversely affected.

526. District policies that would allow MC1 Smyth Escobedo and MC2 Smyth Escobedo's unnecessary use of technology for non-educational, non-curricular, entertainment purposes conflict with Plaintiff Escobedo Barrondo's values.

527. Without waiving or otherwise prejudicing her rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiff Escobedo Barrondo does not object to the academic content of the curriculum that has been adopted by the District.

528. Plaintiff Escobedo Barrondo is not opposed to her children's intentional use of age-appropriate technology such as learning to type, write code, or use word-processing tools and spreadsheets. She is not opposed to her children using a school device that can access only approved curricular materials, but only on the condition that it can truly access only curriculum and nothing else.

529. Without the ability to opt out, Plaintiff Escobedo Barrondo must choose between protecting her children's health, safety, and privacy and their right to a public education.

530. Plaintiff Escobedo Barrondo objects to the dangerous and distracting digital environment that MC1 Smyth Escobedo and MC2 Smyth Escobedo will be subjected to under District policies implemented and enforced by the Defendants as subverting her obligations to protect her children and undermining how she wishes to bring them up. The persistence of this dangerous environment has prevented Plaintiff Escobedo Barrondo from enrolling her children in a school in the District.

531. Plaintiff Escobedo Barrondo objects to the violations of her privacy rights and those of her children that will occur when MC1 Smyth Escobedo and MC2 Smyth Escobedo are able to access online services that collect their personal information without Plaintiff Escobedo Barrondo's consent. These violations of her rights have prevented Plaintiff Escobedo Barrondo from enrolling her children in a school in the District.

532. The District's new policies have interfered and will interfere with Plaintiff Escobedo Barrondo's ability to make decisions regarding her children's care and to direct their education and upbringing in the 2026–27 school year.

533. Plaintiff Escobedo Barrondo is a member of the Pencils Over Pixels group, and in the spring of 2026, spoke at board meetings at which the District's technology policies were discussed. She also contributed to the Pencils Over Pixels website, including gathering and adding peer-reviewed research papers in support of the group's positions.

534. Plaintiff Escobedo Barrondo, MC1 Smyth Escobedo, and MC2 Smyth Escobedo reasonably fear retaliation by Defendant Ranelli and the School Board Defendants for their family's participation in this lawsuit.

535. Plaintiff Escobedo Barrondo submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-06.

vii. Plaintiff James Hausman and MC1 Hausman.

536. Plaintiff James Hausman has one school-aged child that is the subject of this complaint, MC1 Hausman.

537. MC1 Hausman will be entering seventh grade in the 2026–2027 school year.

538. In the 2025–26 school year, MC1 Hausman was enrolled in Welsh Valley Middle School, a middle school in the District.

539. Owing to the digital environment created by the Defendants, its effects on MC1 Hausman's health, attention, and behavior, and the disruptions to family life, Plaintiff Hausman withdrew MC1 Hausman from Welsh Valley at the end of the 2026 school year and has enrolled him in a private school that does not permit such extensive, unstructured use of internet-connected devices for the 2026–27 school year.

540. Plaintiff Hausman values free play, boredom, and creativity, and believes these are important for the healthy development of his son. He desires to raise MC1 Hausman to be intrinsically motivated to learn, pursue knowledge for its own sake, and remain endlessly curious about the world.

541. These family values and beliefs inform how Plaintiff Hausman brings up and educates his son.

542. Plaintiff Hausman cultivates a low-technology household. His son is not permitted to use social media or access YouTube, does not have a smartphone, has restricted access to television, and is permitted to play two video games on a video-game console.

543. MC1 Hausman has a tablet computer that he uses to play two video games and chat with his friends, make music, take pictures and videos, and video-call his relatives.

544. Plaintiff Hausman encourages MC1 Hausman and his friends to gather in person at his home and encourages MC1 Hausman to go outside, play sports, read books on paper, and build things.

545. Nevertheless, MC1 Hausman's unstructured, uncontrolled access to his school device and the requirement that he use it to access his education has led to MC1 Hausman excessively using it for non-academic, entertainment purposes.

546. MC1 Hausman first received a school device when he entered school in the District in fourth grade, during the 2023–24 school year.

547. Prior to that, owing to the disruptions caused by the COVID-19 pandemic, MC1 Hausman was educated in a Waldorf curriculum-based program that did not permit or require access to technology.

548. Plaintiff Hausman had no way of knowing exactly how much time MC1 Hausman is spending on his school device while he was at school, no ability to limit MC1 Hausman's use of the device to only academic purposes, and no ability to limit how long MC1 Hausman uses his device.

549. Plaintiff Hausman observed negative effects on MC1 Hausman's health, attention, behavior, and educational attainment attributable to the amount of time he is spending using internet-connected devices, including his school device.

550. MC1 Hausman's health, behavioral-regulation, and attention problems began to develop around the time he first received his school computer, and they have worsened over time.

551. During the 2025–26 school year, MC1 Hausman began compulsively playing an online poker game on his school device. On several occasions, Plaintiff Hausman observed

MC1 Hausman exit the school bus and walk down the street playing the online poker game on his school device. MC1 Hausman informed Plaintiff Hausman that all the kids on the bus played the online poker game.

552. In addition to the online poker game, MC1 Hausman has accessed age-inappropriate horror games and violent games through his school device.

553. MC1 Hausman has developed rapidly-progressing myopia, which has required several visits to the doctor and the use of corrective lenses that cost $1,800, and which is caused or worsened by prolonged exposure to screens placed too close to his eyes.

554. MC1 Hausman has developed severe sleep issues, including difficulties falling asleep and staying asleep and sleepwalking.

555. MC1 Hausman prefers to interact with his school friends through screens rather than in person. This is at least partially attributable to the environment created by the Defendants, in which children are able to access addictive, compelling online games and services through their school devices throughout the school day, beginning and ending with the bus ride to and from school, and are denied the opportunity to develop social skills.

556. MC1 Hausman grows bored easily and has a low frustration tolerance.

557. To protect MC1 Hausman's health and safety; improve MC1 Hausman's capacity to pay attention, tolerate frustration, and tolerate boredom; improve his sleep; mitigate the effects of his myopia; and lessen his aggressive outbursts, Plaintiff Hausman has attempted to impose limits on the amount of time MC1 Hausman spends using internet-connected devices and online services.

558. When Plaintiff Hausman attempts to set limits on MC1 Hausman's use of personal devices at home, MC1 Hausman defies him and uses his school device instead, telling Plaintiff Hausman that he is doing homework when in fact he is playing games.

559. When it is time each day for MC1 Hausman to stop using his devices, he usually behaves in an agitated and aggressive manner.

560. The Defendants have interfered with Plaintiff Hausman's care, upbringing, and education of MC1 Hausman by preventing him from imposing limits on MC1 Hausman's device use that are

necessary to protect his health, safety, and privacy and that are consistent with Plaintiff Hausman's desires for MC1 Hausman's care, education, and upbringing.

561. The Defendants have interfered with Plaintiff Hausman's care, upbringing, and education of MC1 Hausman by creating an environment in which it is normal for MC1 Hausman, his peers and classmates, and other students in the District to spend excessive, unstructured, unsupervised time using their school devices for non-academic, non-curricular, entertainment purposes, which has interfered with MC1 Hausman's social development.

562. The District's new technology policies as implemented and enforced by the Defendants will interfere with Plaintiff Hausman's care, education, and upbringing of his son in the 2026–27 school year.

563. Given his family's negative experiences with MC1 Hausman's use of school device, and seeking to avoid negative effects on his health and behavior, Plaintiff Hausman intended to exercise his rights under Former Rule 137 and Former AR 137 prior to the repeal of the policies to decline a device for his son, work with their building principal to make necessary accommodations, and ensure his education was not adversely affected.

564. In the spring of 2026, it became clear to Plaintiff Hausman that Defendants did not intend to sufficiently reform the policies that had led to pervasive, uncontrolled, unsupervised, excessive use of devices and the internet by students during the school day and at home. As a result, he began to search for another school that created a better environment for its students. In April 2026, Plaintiff Hausman began the process of enrolling MC1 Hausman in another school.

565. District policies that are implemented and enforced by the Defendants that allow MC1 Hausman's unnecessary use of technology for non-educational, non-curricular, entertainment purposes conflict with Plaintiff Hausman's values.

566. Without waiving or otherwise prejudicing his rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiff Hausman does not object to the academic content of the curriculum that has been adopted by the District.

567. Plaintiff Hausman is not opposed to intentional use of age-appropriate technology such as learning to type or use word-processing tools or spreadsheets.

568. Plaintiff Hausman objects to the dangerous and distracting digital environment that MC1 Hausman was subjected to under District policies that are implemented and enforced by the Defendants as subverting his obligation to protect his son and undermining how he wishes to bring him up.

569. Plaintiff Hausman objects to the violations of his privacy rights and those of his son that occurred when MC1 Hausman was able to access online services that collect his personal information without Plaintiff Hausman's consent.

570. The District's former policies, if enforced as written, would have respected Plaintiff Hausman's right to make decisions regarding his child's care and to direct his education and upbringing in the 2025–26 school year.

571. The Defendants have interfered and will interfere with Plaintiff Hausman's ability to make decisions regarding his child's care and to direct his education and upbringing in the 2026–27 school year. Plaintiff Hausman would have preferred that MC1 Hausman remain enrolled in the District, but due to the technological environment created by the Defendants and his inability to protect his son from them, he cannot.

572. In September 2025, prior to the formation of the Pencils Over Pixels group, Plaintiff Hausman spoke at a Board meeting to raise concerns about the District's technology policies.

573. Plaintiff Hausman is a member of the Pencils Over Pixels group, and in the spring of 2026, regularly spoke at board meetings in opposition to the District's technology policies.

574. Plaintiff Hausman reasonably fears retaliation by Defendant Ranelli and the School Board Defendants for his organizing activity and his family's participation in this lawsuit.

575. Plaintiff Hausman submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-07.

viii. Plaintiff Sara Moyn, MC1 Moyn, and MC2 Moyn

576. Plaintiff Sara Moyn has two school-aged children, MC1 Moyn and MC2 Moyn.

577. Plaintiff Moyn was formerly employed by the Philadelphia Museum of Art, and she now runs the family household.

578. MC1 Moyn was enrolled in Black Rock Middle School, a middle school in the District, for nine days in March 2026.

579. MC2 Moyn was enrolled in Penn Wynne Elementary School, an elementary school in the District, from November 2025 through June 2026.

580. Owing to the environment created by the Defendants, its effects on MC1 and MC2 Moyn's health, attention, and behavior, and the disruptions to family life, Plaintiff Moyn withdrew MC1 and MC2 from the District and enrolled them in a private school that does not permit such extensive, unstructured use of internet-connected devices.

581. Plaintiff Moyn values free play, boredom, and creativity, and believes that these are important for the healthy development of her children. She values the arts, and she desires to raise MC1 and MC2 Moyn to be intrinsically motivated to learn, pursue knowledge for its own sake, and remain endlessly curious about the world.

582. These family values and beliefs inform how Plaintiff Moyn brings up and educates her children.

583. Plaintiff Moyn believes in a low-technology education. During COVID, she enrolled MC1 Moyn and MC2 Moyn in a school with extremely restricted technology that was centered on the belief that students learn best without the distraction of a school-issued Chromebook. Students at that school brought no phones, laptops, or tablets to school. Families also committed in writing to limiting screen time and certain screen-based activities at home, which made the school's low-tech philosophy a genuine school-family partnership.

584. MC1 Moyn and MC2 Moyn thrived in this low-technology educational environment. Among other things, they learned how to write in cursive, hand-wrote math problems and essays, and read complete books.

585. This reinforced Plaintiff Moyn's values and beliefs of educating her children in a low-technology environment.

586. Plaintiff Moyn also cultivates a low-technology household. MC1 Moyn and MC2 Moyn are not permitted to use social media or access YouTube, do not have a smartphone, rarely watch television, and are not permitted to play video games. MC1 Moyn and MC2 Moyn are permitted to stream shows on a tablet while the family travels and allowed limited access to a laptop under parent supervision.

587. Rather than digital or online activities, Plaintiff Moyn encourages MC1 Moyn and MC2 Moyn to engage in art classes, religious studies, and sports.

588. Plaintiff Moyn is familiar with the 2023 and 2026 Surgeon General's advisories and is particularly concerned about the harms to cognitive development caused by or correlated with prolonged, excessive, or unstructured use of internet-connected devices and online services.

589. MC1 Moyn first received a school computer in March 2026 when they were in sixth grade.

590. MC2 Moyn first received a school computer in November 2025 when they were in fourth grade.

591. On the first day MC1 Moyn received their school computer, they were sent a document containing links that bypassed the District's purported "protections" and that easily accessed twenty-five games.

592. Plaintiff Moyn did not receive any information about which programs and services MC2 Moyn used at school, for how long, and how or whether they were monitored by an adult.

593. Likewise, Plaintiff Moyn was not advised about what information and data the District and the companies that provide online services to the District and its students gather about MC1 Moyn and MC2 Moyn or how long that data was being retained.

594. Plaintiff Moyn later learned that the companies providing online services to the District collect information and data regarding students' online activities, including those of MC1 Moyn and MC2 Moyn, which include: web browsing activity (for example, websites and videos viewed or blocked, time spent on a website, links clicked, web searches, and AI chat questions); social media usage, including social media posts and messaging activity; the contents of emails, blog posts, and messages; and online interactions with teachers including student/teacher chats and virtual raised hands; and geolocation information, including geo-related elements of device information such as IP address to determine a rough estimate of the device's location.

595. Plaintiff Moyn did not give her voluntary, informed consent to any company to collect, process, use, or share any of the personal information identified above.

596. It was also unclear to Plaintiff Moyn what technologies and policies the District had put in place, if any, and whether any policies were actually being enforced to protect against the collection and use of personally identifiable data of Moyn's minor children, including their address, telephone number, email address, date of birth, place of birth, mother's maiden name, grades, social security number (or other governmental identification number), biometric information, and other information that alone or in combination would reasonably allow a person or entity to identify them with reasonable certainty

597. Plaintiff Moyn encourages MC1 Moyn and MC2 Moyn and their friends to gather in person at their home.

598. Plaintiff Moyn encourages MC1 Moyn and MC2 Moyn to read books on paper and handwrite their homework.

599. Plaintiff Moyn had no way of knowing how much time MC1 Moyn and MC2 Moyn spent on their school devices at school, no ability to limit their use of their devices to only academic purposes, and no ability to limit how long they used their device.

600. Based upon her family values and beliefs and desire to bring up and educate her children in a low-tech environment, on May 6, 2026, Plaintiff Moyn sent a written revocation of the

signature and consent to the Agreement for Electronic Devices for MC2, pursuant to Former Policy 137 and Former AR 137, effective immediately.

601. In her written revocation, Plaintiff Moyn raised privacy concerns about educational platforms such as i-Ready, as well as broader concerns about collecting student data, commercial use of that data, and the privacy practices of so-called "educational" apps. She noted there was already a federal lawsuit against i-Ready alleging the company unlawfully collects and shares student data without proper consent.

602. Plaintiff Moyn also cited the growing body of evidence and expert concern that apps, so-called "educational" platforms, and social media are deliberately designed to be addictive to children and adolescents and are associated with an increased risk of depression, anxiety, and psychological distress. She further cited evidence that excessive screen exposure in children is associated with other behavioral, attentional, and cognitive harms.

603. Further, Plaintiff Moyn cited reports of electronic devices being misused during class, including to access and view pornography and expose the content to other students in the classroom.

604. Within hours on that same day, the principal of Penn Wynn School replied with the form response mandated by Defendant Ranelli, stating that "although Policy 137 speaks to an opt-out option . . . as a principal, I cannot designate that a particular student or classroom will not be using technology resources at this time."

605. Plaintiff Moyn believes in a low-technology education. The Defendants have interfered with Plaintiff Moyn's ability to impose limits on device use that are necessary to protect her children's health, safety, and privacy and that are consistent with Plaintiff Moyn's desires for MC1 Moyn and MC2 Moyn's care, education, and upbringing.

606. As a result of the Defendants' actions and inaction, Plaintiff Moyn reenrolled MC1 Moyn and MC2 Moyn in private schools that do not permit such extensive, unstructured use of internet-connected devices.

607. Plaintiff Moyn purposefully moved to the District with the intention of sending her children to public schools, understanding that Lower Merion's taxes are higher than neighboring districts but that the higher taxes are used to support its public schools. Owing to the technology environment at their school created by the Defendants, and lacking any ability to protect her children from it, sending them to public schools was no longer an option.

608. Plaintiff Moyn was required to spend a significant amount of money that had not been budgeted to send her children to private schools.

609. The District's new technology policies as implemented and enforced by the Defendants has forced Plaintiff Moyn to enroll her children in private school, consistent with her family values and beliefs and desire to bring up and educate her children in a low-tech environment.

610. District policies implemented and enforced by the Defendants that allow MC1 and MC2 Moyn unnecessary use of technology for non-educational, non-curricular, entertainment purposes conflict with Plaintiff Moyn's values.

611. Plaintiff Moyn is not opposed to intentional use of age-appropriate technology such as learning to type and use word processing tools or spreadsheets.

612. Plaintiff Moyn objects to the dangerous and distracting digital environment that MC1 Moyn and MC2 Moyn were subjected to under District policies implemented and enforced by the Defendants as subverting her obligation to protect her children and undermining how she wishes to bring them up.

613. Plaintiff Moyn objects to the violations of her privacy rights and those of her children that occurred when MC1 and MC2 Moyn accessed online services that collected their personal information without Plaintiff Moyn's consent.

614. Plaintiff Moyn is a member of the Pencils Over Pixels group, and in the spring of 2026, regularly spoke at board meetings in opposition to the District's technology policies.

615. In March 2026, Plaintiff Moyn spoke at a Board meeting to raise concerns about the District's technology policies, stating:

> *Thank you for convening this meeting.*
>
> *Our family has made a deliberate and well-considered decision to limit and closely monitor our child's screen exposure. This is not a casual preference—it is a core aspect of our parenting, grounded in concerns about attention, learning quality, and overall well-being. A mandatory 1:1 device policy directly conflicts with that responsibility.*
>
> *As daily articles drop in national publications that are backed by research about the dangers of ed tech, we expect the district to offer reasonable, non-digital alternatives for assignments and classroom work so that our children are not required to use a personal device for daily instruction.*
>
> *This request is not about rejecting technology - it is about preserving a parent's role in determining when and how it is used. At the moment, it is too much and not done transparently. Schools should partner with families, not override clearly established parenting decisions.*
>
> *Additionally, other students abusing Chromebooks by cheating with AI, gaming, viewing pornography and just being off task affects our daughters in the classroom.*
>
> *We are asking the district to respect this boundary and to implement an opt-out pathway that does not disadvantage students academically or socially.*
>
> *Thank you for listening.*

616. Plaintiff Moyn reasonably fears retaliation by Defendant Ranelli and the School Board Defendants for her organizing activity and her family's participation in this lawsuit.

617. Plaintiff Moyn submitted a declaration pursuant to 28 U.S.C. § 1746 in support of the above facts, attached as Exhibit F-08.

CAUSES OF ACTION

COUNT I

—

Civil Rights, 42 U.S.C. § 1983
Substantive due process violation of Plaintiffs' parental rights – care (health)

618. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

619. The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing.

620. This right was well-established based on U.S. Supreme Court and Third Circuit precedent at the time of the offending conduct alleged in this complaint.

621. A parent's right to make decisions regarding the care of his or her child includes the right to make decisions in the best interests of their health.

622. The harms and risks of harm to children's health caused by, worsened by, or associated with prolonged, excessive, or unstructured exposure to online platforms and use of internet-connected devices themselves include those to children's physical health, mental health, attention, and behavior.

623. The harms and risks of harm to children's health can be mitigated or eliminated by reducing or eliminating exposure to these platforms and use of these devices.

624. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs do not object to the academic content of the curriculum adopted by the District.

625. Defendants have violated, are violating, and will continue to violate Plaintiffs' fundamental right to make decisions regarding the care of their children, and specifically decisions pertaining to their health, by, *inter alia*, adopting and implementing express or *de facto* policies:

i. Mandating that Plaintiffs' children use internet-connected school computers to access their education;

ii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at school;

iii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at home;

iv. Failing to limit how long, at any one time, Plaintiffs' children may use their school computers;

v. Failing to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vi. Denying Plaintiffs the ability to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vii. Failing to limit during which hours of the day Plaintiffs' children may use their school computers;

viii. Denying Plaintiffs the ability to limit during which hours of the day their children may use their school computers;

ix. Failing to provide ergonomically appropriate equipment with which Plaintiffs' children may use their school computers, including ergonomic and adjustable chairs, ergonomic keyboards, ergonomic mice, and adjustable monitors;

x. Failing to prevent Plaintiffs' children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, poor mental health outcomes for children and adolescents;

xi. Denying Plaintiffs the ability to prevent their children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, poor mental health outcomes for children and adolescents;

xii. Failing to prevent Plaintiffs' children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, attention-deficit/hyperactivity disorder (ADHD) for children and adolescents;

xiii. Denying Plaintiffs the ability to prevent their children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, attention-deficit/hyperactivity disorder (ADHD) for children and adolescents;

xiv. Failing to prevent Plaintiffs' children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, behavioral dysregulation for children and adolescents;

xv. Denying Plaintiffs the ability to prevent their children from accessing online platforms, applications, and services that are known to cause or worsen, or that are correlated with, behavioral dysregulation for children and adolescents; and

xvi. Denying Plaintiffs the ability to choose a teacher-led, non-digital public education for their children without adversely affecting their children's education.

626. Defendants' unconstitutional conduct involves affirmative, coercive, compelled conduct by the Defendants including but not limited to a mandate that Plaintiffs' children use internet-connected devices to access the public education to which they are entitled by law.

627. There is no compelling state interest in exposing students to harms and risks of harm to their physical health, mental health, attention and behavior as a condition of receiving a public education that outweighs the Plaintiffs' Constitutional right to direct the care of their children, and specifically to make decisions in the best interests of their children's health.

628. Defendants have acted and are acting with reckless disregard for Plaintiffs' fundamental parental rights by purposefully and intentionally engaging in the actions alleged herein. In so doing, Defendants are explicitly and intentionally excluding Plaintiffs from significant decision-making directly related to their children's care.

629. Defendants' reckless disregard for Plaintiffs' rights has resulted in, is resulting in, and will continue to result in deprivation of their fundamental Constitutional rights.

630. Defendants' violation of Plaintiffs' fundamental constitutional rights has caused and continues to cause Plaintiffs undue hardship and irreparable harm.

631. Plaintiffs have no adequate remedy at law to correct the continuing and threatened deprivation of their fundamental rights, although they have suffered legal damages as well.

COUNT II

—

Civil Rights, 42 U.S.C. § 1983
Substantive due process violation of Plaintiffs' parental rights – care (safety)

632. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

633. The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing.

634. This right was well-established based on U.S. Supreme Court and Third Circuit precedent at the time of the offending conduct alleged in this complaint.

635. A parent's right to make decisions regarding the care of his or her child includes the right to make decisions about their safety.

636. The harms and risks of harm to children's safety caused by, worsened by, or associated with prolonged, excessive, or unstructured exposure to online platforms and internet-connected devices include exposure to drug dealers, sexual predators, and strangers that encourage children to harm themselves or others; access to sexually explicit material, violent content, and gambling platforms; the ability to record, create, and transmit images of themselves, including sexually explicit images; and access to AI chatbots that have encouraged children and adults to harm or kill themselves or others.

637. The harms and risks of harm to children's safety can be mitigated or eliminated by reducing or eliminating exposure to these platforms and use of these devices.

638. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs do not object to the academic content of the curriculum adopted by the District.

639. Defendants have violated, are violating, and will continue to violate Plaintiffs' fundamental right to make decisions regarding the care of their children, and specifically decisions pertaining to their safety, by, *inter alia*, adopting and implementing express or *de facto* policies:

i. Mandating that Plaintiffs' children use internet-connected school computers to access their education;

ii. Mandating that Plaintiffs' children use internet-connected school computers that include a camera;

iii. Mandating that Plaintiffs' children use internet-connected school computers that include a microphone;

iv. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at school;

v. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at home;

vi. Failing to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers to ensure that they cannot be contacted by strangers;

vii. Failing to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers to ensure that they cannot access sexually explicit material, violent content, and gambling platforms;

viii. Failing to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers to ensure that they cannot access AI chatbots that have encouraged users to harm themselves or others;

ix. Failing to prevent Plaintiffs' children from being able to send photos, videos, and recordings of themselves using their school computers;

x. Denying Plaintiffs the ability to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers;

xi. Denying Plaintiffs the ability to prevent Plaintiffs' children from being able to send photos, videos, and recordings of themselves using their school computers; and

xii. Denying Plaintiffs the right to choose a teacher-led, non-digital public education for their children without adversely affecting their children's education.

640. Defendants' unconstitutional conduct involves affirmative, coercive, compelled conduct by the Defendants including but not limited to a mandate that Plaintiffs' children use internet-connected school computers to access the public education to which they are entitled by law.

641. There is no compelling state interest in exposing students to harms and risks of harm to their safety as a condition of receiving a public education that outweighs the Plaintiffs' Constitutional right to direct the care of their children, and specifically to make decisions in the best interests of their children's safety.

642. Defendants have acted and are acting with reckless disregard for Plaintiffs' fundamental parental rights by purposefully and intentionally engaging in the actions alleged herein. In so doing, Defendants are explicitly and intentionally excluding Plaintiffs from significant decision-making directly related to their children's care.

643. Defendants' reckless disregard for Plaintiffs' rights has resulted in, is resulting in, and will continue to result in deprivation of their fundamental Constitutional rights.

644. Defendants' violation of Plaintiffs' fundamental constitutional rights has caused and continues to cause Plaintiffs undue hardship and irreparable harm.

645. Plaintiffs have no adequate remedy at law to correct the continuing and threatened deprivation of their fundamental rights, although they have suffered legal damages as well.

COUNT III

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Civil Rights, 42 U.S.C. § 1983

Substantive due process violation of Plaintiffs' parental rights – care (privacy)

646. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

647. The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing.

648. This right was well-established based on U.S. Supreme Court and Third Circuit precedent at the time of the offending conduct alleged in this complaint.

649. A parent's right to make decisions regarding the care of his or her child includes the right to make decisions about their privacy.

650. Because minors may not foresee the consequences of their decisions, they may not make an enforceable bargain, including any agreement to use services in exchange for their private information.

651. The harms and risks of harm to children's privacy caused by, worsened by, or associated with the use of online platforms and internet-connected devices without informed, voluntary, actual, parental consent include the collection of vast amounts of sensitive, personal information about them; the use of that information to develop behavioral profiles about them that may be used for commercial or law-enforcement purposes; the use of that information to develop biometric profiles including representations of information about their voice, image, or likeness; and the risk of exposing that information and those profiles to criminal actors.

652. The harms and risks of harm to children's privacy can be mitigated or eliminated by reducing or eliminating exposure to these platforms and use of these devices.

653. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs do not object to the academic content of the curriculum adopted by the District.

654. Plaintiffs have not provided their informed, voluntary consent to any internet-connected device or online service for which use by students is mandated under policies implemented and enforced by the Defendants.

655. Plaintiffs do not consent to their children accessing online services through their school computers, the terms of which require that the children are over 13.

656. Plaintiffs have not reviewed any terms of service of any online service that their minor children may access through their school computers, nor have they provided their permission for their children to use any such online service.

657. Defendants have violated, are violating, and will continue to violate Plaintiffs' fundamental right to make decisions regarding the care of their children, and specifically decisions pertaining to their privacy, by, *inter alia*, adopting and implementing express or *de facto* policies:

i. Mandating that Plaintiffs' children use internet-connected school computers to access their education;

ii. Mandating that Plaintiffs' children use internet-connected school computers that include a camera;

iii. Mandating that Plaintiffs' children use internet-connected school computers that include a microphone;

iv. Mandating that Plaintiffs' children use internet-connected school computers that collect detailed biometric and interaction information;

v. Mandating that, to access their education, Plaintiffs' children use online applications, products, and services that collect sensitive, personal information about them; use that information for other purposes than for the sole benefit of their children's education; transfer that information to others; and expose or risk exposing that information to criminal actors;

vi. Failing to inform Plaintiffs which online applications, products, and services their children must use to access their education; failing to inform Plaintiffs of all information that each mandatory internet-connected device or mandatory online

application, product, or service collects about their child; failing to inform Plaintiffs of how that information may be used, by whom, and for what purposes; and failing to obtain or facilitate the obtaining of voluntary consent from Plaintiffs to the collection and use of information about their children;

vii. Permitting and encouraging Plaintiffs' children to use their school computers to access online services that collect information from the children without their parents' permission;

viii. Permitting and encouraging Plaintiffs' children to use their school computers to access online services that collect information from the children without obtaining effective consent from their parents;

ix. Failing to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers;

x. Denying Plaintiffs the ability to limit which websites, platforms, and applications Plaintiffs' children can access using their school computers; and

xi. Denying Plaintiffs the right to choose a teacher-led, non-digital public education for their children without adversely affecting their children's education.

658. Defendants' unconstitutional conduct involves affirmative, coercive, compelled conduct by the Defendants including but not limited to a mandate that Plaintiffs' children use internet-connected devices to access the public education to which they are entitled by law.

659. There is no compelling state interest in exposing students to harms and risks of harm to their privacy as a condition of receiving a public education that outweighs the Plaintiffs' Constitutional right to direct the care of their children, and specifically to make decisions in the best interests of their children's privacy.

660. Defendants have acted and are acting with reckless disregard for Plaintiffs' fundamental parental rights by purposefully and intentionally engaging in the actions alleged herein. In so doing, Defendants are explicitly and intentionally excluding Plaintiffs from significant decision-making directly related to their children's care.

661. Defendants' reckless disregard for Plaintiffs' rights has resulted in, is resulting in, and will continue to result in deprivation of their fundamental Constitutional rights.

662. Defendants' violation of Plaintiffs' fundamental constitutional rights has caused and continues to cause Plaintiffs undue hardship and irreparable harm.

663. Plaintiffs have no adequate remedy at law to correct the continuing and threatened deprivation of their fundamental rights, although they have suffered legal damages as well.

COUNT IV

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Civil Rights, 42 U.S.C. § 1983
Substantive due process violation of Plaintiffs' parental rights – education

664. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

665. The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing.

666. This right was well-established based on U.S. Supreme Court and Third Circuit precedent at the time of the offending conduct alleged in this complaint.

667. A parent has the right to direct the education of his or her child.

668. An education includes learning how to read and write, consolidating information and skills, developing good study habits, productively struggling in order to learn and master new concepts, practicing paying attention, learning how to eliminate distractions, developing the discipline to ignore distractions that cannot be eliminated, and completing assignments with honesty and integrity.

669. The harms and risks of harm to children's education caused by, worsened by, or associated with the use of online platforms and internet-connected devices include the diminishment or delay of writing ability, the diminishment or delay of reading ability, the imposition of obstacles to the consolidation of information and skills, the elimination of productive struggle due to gamified learning, the imposition of obstacles to developing good study habits, the imposition of obstacles

that make it more difficult to pay attention, the imposition of omnipresent and unavoidable distractions, the impossibility of eliminating distractions, and the availability of omnipresent and unavoidable tools and programs that complete assignments for students and encourage dishonesty and deception.

670. The harms and risks of harm to children's education can be mitigated or eliminated by reducing or eliminating exposure to these platforms and use of these devices.

671. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs do not object to the academic content of the curriculum adopted by the District.

672. Defendants have violated, are violating, and will continue to violate Plaintiffs' fundamental right to direct the education of their children by, *inter alia*, adopting and implementing express or *de facto* policies:

i. Mandating that Plaintiffs' children use internet-connected school computers to access their education;

ii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at school;

iii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at home;

iv. Failing to limit how long, at any one time, Plaintiffs' children may use their school computers;

v. Failing to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vi. Denying Plaintiffs the ability to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vii. Failing to limit during which hours of the day Plaintiffs' children may use their school computers;

viii. Denying Plaintiffs the ability to limit during which hours of the day their children may use their school computers;

ix. Mandating that Plaintiffs' children complete assignments and other school activities using their school computers instead of by hand;

x. Mandating that Plaintiffs' children read assignments and other school-related material using their school computers instead of on paper;

xi. Mandating that Plaintiffs' children complete assignments and other school activities with gamified learning applications that employ persuasive-design techniques, provide external rewards, and use video-game mechanics;

xii. Failing to prevent Plaintiffs' children from accessing online chatbots that can complete or partially complete assignments for them;

xiii. Denying Plaintiffs the ability to prevent their children from accessing online chatbots that can complete or partially complete assignments for them; and

xiv. Denying Plaintiffs the right to choose a teacher-led, non-digital public education for their children without adversely affecting their children's education.

673. Defendants' unconstitutional conduct involves affirmative, coercive, compelled conduct by the Defendants including but not limited to a mandate that Plaintiffs' children use internet-connected devices to access the public education to which they are entitled by law.

674. There is no compelling state interest in exposing students to the harms and risks of harm to their education under the conditions created and imposed by the Defendants that outweighs the Plaintiffs' Constitutional right to direct the education of their children.

675. Defendants have acted and are acting with reckless disregard for Plaintiffs' fundamental parental rights by purposefully and intentionally engaging in the actions alleged herein. In so doing, Defendants are explicitly and intentionally excluding Plaintiffs from directing their children's education.

676. Defendants' reckless disregard for Plaintiffs' rights has resulted in, is resulting in, and will continue to result in deprivation of their fundamental Constitutional rights.

677. Defendants' violation of Plaintiffs' fundamental constitutional rights has caused and continues to cause Plaintiffs undue hardship and irreparable harm.

678. Plaintiffs have no adequate remedy at law to correct the continuing and threatened deprivation of their fundamental rights, although they have suffered legal damages as well.

COUNT V

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Civil Rights, 42 U.S.C. § 1983
Substantive due process violation of Plaintiffs' parental rights – upbringing

679. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

680. The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions regarding the care, custody, and control of their children, and to direct their education and upbringing.

681. This right was well-established based on U.S. Supreme Court and Third Circuit precedent at the time of the offending conduct alleged in this complaint.

682. A parent has the right to direct the upbringing of his or her child.

683. Without waiving or otherwise prejudicing their rights under 22 Pa. Code section 4 or District Policy 108 (last revised May 20, 2024), Plaintiffs do not object to the academic content of the curriculum adopted by the District.

684. Defendants have violated, are violating, and will continue to violate Plaintiffs' fundamental right to make decisions regarding the upbringing of their children by, *inter alia*, adopting and implementing express or *de facto* policies:

i. Mandating that Plaintiffs' children use internet-connected school computers to access their education;

ii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at school;

iii. Permitting and encouraging Plaintiffs' children to use their school computers for non-academic, non-curricular, entertainment purposes at home;

iv. Failing to limit how long, at any one time, Plaintiffs' children may use their school computers;

v. Failing to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vi. Denying Plaintiffs the ability to limit how much time, in any one day, Plaintiffs' children may use their school computers;

vii. Failing to limit during which hours of the day Plaintiffs' children may use their school computers;

viii. Denying Plaintiffs the ability to limit during which hours of the day their children may use their school computers;

ix. Permitting and encouraging Plaintiffs' children to use their school computers instead of reading a book, magazine, or other printed material;

x. Permitting and encouraging Plaintiffs' children to use their school computers instead of socializing with their peers;

xi. Permitting and encouraging Plaintiffs' children to use their school computers instead of playing outside or exercising;

xii. Failing to ensure that Plaintiffs' children are not exposed to pornography on their school computers;

xiii. Denying Plaintiffs the ability to ensure that Plaintiffs' children are not exposed to pornography on their school computers;

xiv. Failing to ensure that Plaintiffs' children are not exposed to violent content on their school computers;

xv. Denying Plaintiffs the ability to ensure that Plaintiffs' children are not exposed to violent content on their school computers;

xvi. Failing to ensure that Plaintiffs' children cannot access gambling applications through their school computers;

xvii. Denying Plaintiffs the ability to ensure that Plaintiffs' children cannot access gambling applications through their school computers;

xviii. Failing to ensure that Plaintiffs' children cannot play video games through their school computers;

xix. Denying Plaintiffs the ability to ensure that Plaintiffs' children cannot play video games through their school computers;

xx. Failing to ensure that Plaintiffs' children cannot access AI chatbots on their school computers;

xxi. Denying Plaintiffs the ability to ensure that Plaintiffs' children cannot access AI chatbots on their school computers;

xxii. Failing to ensure that Plaintiffs' children cannot transmit videos or images of themselves, or recordings of their voice, using their school computers;

xxiii. Denying Plaintiffs the ability to ensure that Plaintiffs' children cannot transmit videos or images of themselves, or recordings of their voice, using their school computers;

xxiv. Failing to ensure that Plaintiffs' children cannot be contacted by strangers on their school computers;

xxv. Denying Plaintiffs the ability to ensure that Plaintiffs' children cannot be contacted by strangers on their school computers;

xxvi. Failing to ensure that Plaintiffs' children do not receive unwanted communications from their peers through their school computers;

xxvii. Denying Plaintiffs the ability to ensure that Plaintiffs' children do not receive unwanted communications from their peers through their school computers; and

xxviii. Denying Plaintiffs the right to choose a teacher-led, non-digital public education for their children without adversely affecting their children's education.

685. Defendants' unconstitutional conduct involves affirmative, coercive, compelled conduct by the Defendants including but not limited to a mandate that Plaintiffs' children use internet-connected devices to access the public education to which they are entitled by law.

686. There is no compelling state interest in violating Plaintiffs' right to direct the upbringing of their children as a condition of receiving a public education that outweighs the Plaintiffs' Constitutional right to direct their children's upbringing.

687. Defendants have acted and are acting with reckless disregard for Plaintiffs' fundamental parental rights by purposefully and intentionally engaging in the actions alleged herein. In so doing, Defendants are explicitly and intentionally excluding Plaintiffs from directing their children's upbringing.

688. Defendants' reckless disregard for Plaintiffs' rights has resulted in, is resulting in, and will continue to result in deprivation of their fundamental Constitutional rights.

689. Defendants' violation of Plaintiffs' fundamental constitutional rights has caused and continues to cause Plaintiffs undue hardship and irreparable harm.

690. Plaintiffs have no adequate remedy at law to correct the continuing and threatened deprivation of their fundamental rights, although they have suffered legal damages as well.

COUNT VI

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Declaratory Judgment

691. Plaintiffs incorporate the preceding allegations by reference as if set forth in full.

692. A real and actual controversy exists, *inter alia*, as to whether the District has a compelling interest in requiring students to use internet-connected devices to access their public education that harm or risk harming their health, safety, and privacy, and that undermine their parents' ability to direct their education and upbringing.

693. A declaratory judgment would be useful in resolving this case or controversy. By clarifying the District's obligations under the U.S. Constitution, a declaratory judgment will guide the parties moving forward and will be effective in settling this case.

694. Accordingly, Plaintiffs respectfully request that the Court enter a Declaratory Judgment, declaring the following:

a. Defendants violated or will violate Plaintiffs' substantive due process rights under the Fourteenth Amendment to make decisions regarding the care of their children, and specifically decisions regarding their health, by requiring their children to use internet-connected devices that harmed or risked harming, or will harm or risk harming, their physical health, mental health, attention, and behavior;

b. Defendants violated or will violate Plaintiffs' substantive due process rights under the Fourteenth Amendment to make decisions regarding the care of their children, and specifically decisions regarding their safety, by requiring their children to use internet-connected devices that exposed or risked exposing, or will expose or risk exposing, them to strangers, criminal actors, and age-inappropriate content;

c. Defendants violated or will violate Plaintiffs' substantive due process rights under the Fourteenth Amendment to make decisions regarding the care of their children, and specifically decisions regarding privacy, by requiring their children to use online services that collect, use, and share their private information without their parents' informed, voluntary consent, and by permitting and encouraging their children to access online services to whose terms of service parents did not consent;

d. Defendants violated or will violate Plaintiffs' substantive due process rights under the Fourteenth Amendment to direct the education of their children by requiring them to use internet-connected devices that inhibit or erode skill development, induce distraction, and encourage cheating; and

e. Defendants violated or will violate Plaintiffs' substantive due process rights under the Fourteenth Amendment to direct the education of their children by requiring them to use internet-connected devices excessively, without supervision, and to engage in activities that Plaintiffs limit or prohibit.

RELIEF REQUESTED

WHEREFORE, Plaintiffs respectfully request the following:

1. Preliminary and permanent injunctive relief restoring the *status quo ante*, as follows:

   a. allowing parents to decline or limit their child's use of an internet-connected device if such use interferes with the parents' ability to make decisions regarding their child's care, upbringing, and education;

   b. permitting any parent who does so to work with their building principal to make necessary accommodations to ensure their child's education is not adversely affected, where such accommodations include a teacher-led education;

   c. ordering that each Defendant shall not interfere with the necessary accommodations provided by the building principal;

   d. ordering that each Defendant shall not take retaliatory action against any Plaintiff in this lawsuit or any child of any Plaintiff;

   e. ordering that each Defendant shall not take retaliatory action against any parent who declines or otherwise limits their child's use of an internet-connected device, or any child of any such parent;

   f. ordering that each Defendant shall not take retaliatory action against any building principal, teacher, counselor, or other District staff who makes or assists with making necessary accommodations for a child whose parent has declined or otherwise limited the child's use of an internet-connected device.

2. In the alternative, preliminary and permanent injunctive relief ordering the District to pay the tuition, fees, and other costs of private education for any child whose parent seeks to decline or limit their child's use of an internet-connected computer, and for whom the Defendants refuse to make necessary accommodations.

3. A Declaratory Judgment as provided for in Count VI, including a declaration stating the following: "To avoid violating Plaintiffs' Constitutional rights in the future, parents may decline

or limit their child's use of an internet-connected device if such use interferes with the parents' ability to make decisions regarding their child's care, upbringing, and education. For those who decline or limit their child's use, the Superintendent shall be responsible for ensuring that the District uses its best efforts to ensure that the child's education is not adversely affected. The student's building principal shall work together with the student's parent or guardian to determine the necessary accommodations."

4. Reasonable attorneys' fees and costs incurred in prosecuting this litigation.

5. Any and all other relief that the Court deems appropriate.

Dated: August 26, 2026

Respectfully submitted,

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