

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JANE DOE, a minor child,)	
by and through her next friends,)	
MARY DOE and JOHN DOE;)	
)	Civil Action No. 6:23-cv-00566-ADA-DNM
Plaintiff,)	
)	
v.)	
)	
LORENA INDEPENDENT SCHOOL)	
DISTRICT, and APRIL JEWELL;)	
)	
Defendants,)	

**PLAINTIFF JANE DOE’S RESPONSE IN OPPOSITION TO DEFENDANT
APRIL JEWELL’S MOTION TO QUASH AND FOR PROTECTIVE ORDER**

April Jewell was the Principal of Lorena Primary School (“LPS”) during the 2020-2021 academic year when Nicolas Crenshaw sexually abused Jane Doe and three other children. Just after Crenshaw started his job, Jewell learned Crenshaw had touched a student under her shirt. School employees subsequently told Jewell that Crenshaw was lying under a cover with Jane at nap time, placing her on his lap, dressing her in his clothing, holding her hand, and was obsessed with her. Jewell chose to not supervise Crenshaw or meaningfully investigate or discipline him. Instead, she retaliated against employees who expressed concerns about Crenshaw, eliminated their ability to protect Jane, and permitted Crenshaw to isolate Jane behind a locked classroom door, with no other adult present. Jewell was “willfully blind as a child’s innocence [was] destroyed at the hands of a pedophile,” in a “shocking betrayal of public trust.”¹

The Texas Education Agency (“TEA”) investigated Jewell in connection with Crenshaw’s abuse of students and initiated a proceeding against her educator certificate. In that

¹ *Doe v. Jewell*, 151 F. 4th 236, 251-52 (5th Cir. 2025) (Ho, J., concurring).

matter, Jewell publicly filed names and addresses of children who were abused by Crenshaw. It was only because Plaintiff insisted Jewell correct that specific filing that the administrative record became sealed. Plaintiff understands the impetus for the Protective Order and sealing order in that proceeding is to protect students' identities and educational records.²

Plaintiff issued a subpoena to TEA for non-privileged complaints, reports, investigations, and proceedings concerning Jewell. Jewell moved to quash or modify the subpoena, or to modify the existing Protective Order so all information and documents produced by TEA, regardless of content, are designated "Attorney's Eyes Only." Jewell's motion to quash or modify the subpoena fails because she lacks standing, has no federally recognized privilege in the requested materials, conflates confidentiality with privilege, and identifies no aspect of her due process rights that will be upended by TEA's response to the subpoena. Jewell's motion for a modified protective order must also be denied because a robust Protective Order already exists in this lawsuit, which Plaintiff (unlike Defendants) has never violated. Jane will be unfairly prejudiced if she is hamstrung in proving her claims due to an overly restrictive confidentiality designation. Jewell cannot prevent disclosure of relevant evidence based on a seal order that resulted from her own failure to comply with a protective order.

BACKGROUND

I. Jane Doe's Claims

Plaintiff's Complaint was filed on August 3, 2023, pleading facts then known regarding Crenshaw's sexual abuse of Jane and Student A. Plaintiff asserted 42 U.S.C. § 1983 claims

² While Jewell selectively quotes from and makes representations about the Administrative Law Judge's ("ALJ") orders, she withholds them and makes it impossible for the Court and Plaintiff to fully assess her arguments. At the very least, Jewell should provide the Agreed Protective Order, her motion causing sealing, the sealing order, order closing the hearing, and any other pertinent documents to the Court for *in camera* review.

against Jewell for lack of supervision and conscience shocking executive action, and Title IX and § 1983 failure to train and absence of policy claims against Lorena Independent School District (“LISD”). This Court denied Defendants’ motions to dismiss. (Doc. 32.) Jewell appealed based on qualified immunity, which the Fifth Circuit soundly rejected on August 15, 2025. *Jewell*, 151 F. 4th at 241-52. On October 24, 2025, the First Amended Complaint was filed. (Doc. 56.) Plaintiff pleaded the same causes of action and newly discovered facts concerning an October 2020 report to Jewell that Crenshaw touched Student B under her shirt.³ (*Id.* at 2, 6.)

II. This Court’s Confidentiality and Protective Order

On October 28, 2025, this Court entered a Confidentiality and Protective Order, and it protects the following information from public disclosure or use in another matter:

Plaintiff Jane Doe’s true name and personally identifiable information, Mary and John Does’ true names and personally identifiable information, personally identifiable information of minors, education records or school student records, personal identity information (including social security numbers, birth dates, home addresses, and telephone numbers), medical information concerning any individual, trade secrets, confidential or proprietary financial information, operational data, business plans, and competitive analyses, personnel files, personal information that is protected by law, and other sensitive information that, if not restricted as set forth in this order, may subject the producing or disclosing person to competitive or financial injury or potential legal liability to third parties.

(Doc. 57 at 4.)

III. TEA’s Administrative Proceeding against Jewell

On December 30 and 31, 2025, Mary and John Doe, respectively, were personally served at their home with subpoenas in a matter captioned *TEA v. April Jewell*, SOAH Docket No. 701-26-05239. Before then, neither the Does nor their attorneys were aware of the matter, and the subpoenas did not identify who – TEA or Jewell – was the subpoenaing party. It turned out that

³ Plaintiff has since learned that law enforcement informed LISD of a fourth child (Student C) sexually abused by Crenshaw at school.

Jewell's attorneys, the same lawyers representing her in this litigation, requested the subpoenas and had them personally served on Jane Doe's parents over the New Year holidays.⁴

At that time, the administrative record was public. Plaintiff's counsel reviewed it and learned Jewell had filed a motion needlessly revealing the names, parents' names, and home addresses of Crenshaw's victims. On January 12, 2026, Plaintiff's counsel demanded Jewell correct her filing. (Ex. 1.) Jewell's counsel responded, "[w]e filed a motion today to request that the Administrative Law Judge mark the filings as confidential to address the filing error." (*Id.* at 2.) It was only because Plaintiff insisted Jewell remedy her filing that the record was sealed. It stands to reason the ALJ did so out of an abundance of caution to prevent public disclosure of children's and victim's identifying information, not to hide the entire matter from the public.

III. Plaintiff's Subpoena to TEA

On April 13, 2026, Plaintiff provided notice to all parties of her subpoena to TEA. The subpoena was served on April 15. Relevant to Jewell's motion are the following requests:

1. All non-privileged documents, correspondence, and communications concerning any [TEA] investigation of or proceeding against [LISD] and/or any of its employees, staff, or volunteers, from January 1, 2010 to April 17, 2026. This includes, but is not limited to:
 - d. Any investigation or proceeding concerning April Jewell; [and]
 - e. Any investigation or proceeding concerning [SOAH] Docket No. 701-26-05239, Texas Education Agency v. April Jewell.
2. All complaints or reports received by the TEA concerning [LISD] and/or any of its employees, staff, or volunteers from January 1, 2010 to April 17, 2026.

Plaintiff enclosed a copy of this Court's Protective Order with the subpoena. (*Id.* at 4.) Plaintiff understands, based on previously publicly available pleadings, there is substantial overlap between the TEA matter and this litigation in terms of witnesses and factual allegations. The remaining requests, for any investigation or proceeding concerning Jewell, and complaints and

⁴ Jewell ultimately withdrew the subpoenas.

reports regarding her, were purposefully worded in that manner because Plaintiff has seen, through discovery in this case, that Defendants, including in correspondence to TEA, couch relevant issues as not involving sexual harassment or Title IX. Defendants regard reports of Crenshaw’s actions with Jane as drama between staff members, but not as grooming or sexual harassment of a child. A report a teacher isolated a student at school and propositioned her was an “inappropriate conversation,” and never regarded by Defendants as a Title IX matter.

ARGUMENT

I. Jewell’s Motion to Quash Should Be Denied in Its Entirety

A. Jewell Lacks Standing to Quash Based on Relevance, Breadth, or Burden

For a party to have standing to quash a non-party subpoena, it must have a personal right or privilege in the subject matter of the subpoena. *Brown v. Braddick*, 595 F.2d 961, 967 (5th Cir. 1979); *Deitz v. Performance Food Grp., Inc.*, No. 6:20-CV-00153-ADA-JCM, 2021 U.S. Dist. LEXIS 125395, at *3 (W.D. Tex. Apr. 21, 2021). “A party challenging a subpoena issued to a non-party may not object on the grounds that it ‘violates another person’s privacy rights . . . that the subpoena is overly broad, or that the subpoena seeks information that is irrelevant because only the responding third party can object and seek to quash a Rule 45 subpoena on those grounds.’” *Deitz*, 202 U.S. Dist. LEXIS 125395, at *3 (citation omitted).

Here, Jewell lacks standing to quash or modify Plaintiff’s subpoena based on relevance, breadth, or burden. Notably, that is the entire basis for Jewell’s motion to modify the subpoena, and it must be denied.

B. Jewell Has No Federally Recognized Privilege at Stake

Federal courts apply federal common law, not state law or statutes, in determining the existence and scope of an asserted privilege. *American Civil Liberties Union, Inc. v. Finch*, 638

F.2d 1336, 1342-43 (5th Cir. 1981); Fed. R. Evid. 501. In federal litigation, “privileges are not lightly created,” and courts do not “infer one where Congress has not clearly manifested an intent to create one.” *In re Grand Jury Proceedings*, 148 F.3d 487, 492 (5th Cir. 1998) (citing *United States v. Nixon*, 418 U.S. 683, 710 (1974)). Well-recognized federal privileges include those “between priest and penitent, attorney and client, and physician and patient.” *Trammel v. United States*, 445 U.S. 40, 51 (1980). The Fifth Circuit has repeatedly rejected the notion that a state-recognized privilege or confidentiality requirement, alone, justifies quashing a federal subpoena. *See Finch*, 638 F.2d at 1343-44; *Fears v. Burriss Mfg. Co.*, 436 F.2d 1357, 1360-61 (5th Cir. 1971); *Carr v. Monroe Mfg. Co.*, 431 F.2d 384 (5th Cir. 1970). This is particularly true where, as here, a plaintiff asserts § 1983 claims. *Finch*, 638 F.2d at 1343-44. Moreover, the Fifth Circuit disfavors sealing. *Binh Hoa Le v. Exeter Fin. Corp.*, 990 F.3d 410, 419 (5th Cir. 2021). The Court recently rejected the argument that materials in the appellate record should be sealed solely because they were sealed by a district court; a party still must establish that “interests favoring nondisclosure” outweigh “the public’s common law right of access.” *United States v. Cabello*, No. 25-40482, 2025 U.S. App. LEXIS 25120, at *4 (5th Cir. Sept. 23, 2025) (citation omitted).⁵

Jewell’s argument is fatally flawed because she does not identify any federally recognized privilege *she* has in the documents requested by Plaintiff’s subpoena. Instead, Jewell mistakenly conflates “confidentiality” with “privilege.” But by Jewell’s own admissions, the Protective Order in the TEA matter governs “confidential” information, and the ALJ’s rulings go to “documents’ confidentiality.” (Doc. 74 at 4-5.) The Fifth Circuit holds designation of a

⁵ Cases cited by Jewell – *Connors v. Pohlman*, No. 15-101 Section “J” (2), 2021 U.S. Dist. LEXIS 180348 (E.D. La. June 23, 2021) and *Ford Motor Co. v. Versata Software, Inc.*, 316 F. Supp. 3d 925 (N.D. Tex. 2017) – are easily distinguished, as they involve one federal court observing another federal court’s seal or protective order. That is not the case here, where a federal court presiding over § 1983 claims is asked to blindly adopt an ALJ sealing order.

document or information as “confidential” in an administrative proceeding does not equate to it being “privileged” in federal court. *In re Grand Jury Proceedings*, 148 F.3d at 492. Also, State Office of Administrative Hearings (“SOAH”) Rule of Procedure § 155.103(e) states:

Designation of a document as confidential in a SOAH proceeding is not determinative of whether that document would be subject to disclosure under Tex. Gov’t Code Chapter 552 or other applicable law.⁶

SOAH’s *own rules* constrain the effect of an administrative designation of confidentiality, and it certainly does not create a privilege that immunizes a document from production in a § 1983 federal lawsuit. Moreover, Plaintiff understands, and Jewell should verify, that “confidentiality” in the TEA matter is a designation intended to protect students’ education records and identities. The Protective Order in this litigation protects that very same information, and more.

Finally, the only federally recognized privilege implicated by Plaintiff’s subpoena is TEA’s, and Jewell does not have standing to quash based on a privilege that is not hers.⁷ *See Cunningham v. Concentrix Solutions Corp.*, No. 4:20-cv-00661, 2021 U.S. Dist. LEXIS 22990, at *6 (E.D. Tex. Feb. 8, 2021). Plaintiff explicitly limited her subpoena to non-privileged documents, making any concern about TEA’s privileges moot.

C. Jewell’s Due Process Rights in the TEA Matter Are Not Implicated

Jewell baldly contends her right to due process in the TEA matter warrants quashing Plaintiff’s subpoena. Fundamental requirements for procedural due process are notice,

⁶ If documents deemed “confidential” in a proceeding before the SOAH are not immune to a Public Records request, governed by Texas Government Code Chapter 552, then surely they cannot be immune from discovery here.

⁷ Jewell’s reliance on an Attorney General letter ruling on a Public Records request does not help her cause, as it was specifically limited to the facts and request before it. Also, federal law, not state law, governs attorney work-product as it pertains to Plaintiff’s subpoena, and “[t]he federal interest in not allowing a blanket assertion of state privilege to impede production is ‘particularly strong’ in § 1983 cases.” *Hansard v. Zamora*, PE:23-CV-00041-DC-DF, 2026 U.S. Dist. LEXIS 29353, at *14 (W.D. Tex. Feb. 11, 2026) (quoting *Finch*, 638 F.2d at 1343-44).

opportunity for a hearing, and an impartial hearing officer. *See Cleveland Bd. of Educ. v. Loudermill*, 470 U.S. 532, 542 (1985); *Cueller v. Texas Emp. Comm'n*, 825 F.2d 930, 934 (5th Cir. 1987); *Meza v. Massanari*, 199 F.R.D. 573, 577 (S.D. Tex. 2001). Jewell's substantive due process rights would be violated only if public officials acted arbitrarily or capriciously in the administrative matter. *See Fowler v. Smith*, 68 F.3d 124, 128 (5th Cir. 1995).

Jewell offers platitudes about "integrity," "prejudice," and "improper influence," but fails to specify how her due process rights in the administrative matter would be violated by TEA's response to Plaintiff's subpoena. Instead, she complains about a news report that included a copy of TEA's Petition, a *pleading* that was public for *two months*.⁸ The disclosure of TEA's claims against Jewell cannot possibly violate her due process rights in the administrative matter because, after all, the ALJ knows about the petition and its allegations, as will the SBEC and any appellate body. (*See* Doc. 74 at 4 n.15) Nor does Jewell specify how an innocuous remark that Plaintiff's counsel was "pleased and heartened that the TEA is taking the disturbing allegations against Jewell seriously" could interfere with the proceeding. The ALJ already knows the allegations are disturbing, and TEA takes them seriously. It is bewildering how the feelings of Plaintiff's counsel on TEA's action could possibly impact Jewell's right to a fair proceeding.

Accordingly, Jewell's motion to quash or modify Plaintiff's subpoena should be denied.

II. Jewell's Motion for a Protective Order Should Be Denied

A party seeking a protective order must show good cause and "the necessity of its issuance, which contemplates a particular and specific demonstration of fact as distinguished from stereotyped and conclusory statements." *In re Terra Int'l*, 134 F.3d 302, 206 (5th Cir. 1998); *see Perez v. Bodega Latina Corp.*, EP-19-CV-00360-DCG, 2021 U.S. Dist. LEXIS

⁸ The Petition did not disclose any child's name or other personal identifying information.

142249, at *14-15 (W.D. Tex. July 30, 2021) (movant for Attorneys’ Eyes Only order must “describe the alleged harm it will suffer from any disclosure with a particular and specific demonstration of fact”). If the movant does so, the burden shifts to the opposing party to show the order is not warranted. *Landry v. Air Line Pilots Ass’n*, 901 F.2d 404, 436 (5th Cir. 1990).

Jewell requests modification of the existing Confidentiality and Protective Order to mandate that all materials produced by TEA in response to Plaintiff’s subpoena are designated “Attorney’s Eyes Only.” This is the most restrictive possible protective order, and it would limit dissemination of any document or information produced by TEA, regardless of content, to parties’ counsel and their consultants and experts. This means Mary and John Doe could not review the documents or know of the information to assist Jane Doe’s counsel, and the documents could not be shown to a deponent or used as an exhibit to a pleading or at trial. Jewell has not come close to meeting her heavy burden in showing how, exactly, she will be harmed absent this drastic designation. Instead, Jewell casts aspersions suggesting Plaintiff cannot be trusted to comply with the Protective Order in this lawsuit. However, Plaintiff has never violated that Order. The only parties to have violated it are Defendants.⁹ As such, the existing Order comprehensively addresses all federally protected privacy issues, and Jewell’s motion should be denied. *Cunningham*, 2021 U.S. Dist. LEXIS 22990, at *7 (denying motion for protective order made with motion to quash, as there was already an adequate protective order in the case).

IV. Plaintiff’s “Strategy” Is Litigation and Trial by the Evidence, Rules, and Law

Jewell’s claim that Plaintiff has a “strategy of trial by media” is meritless and pure deflection. Contrary to Jewell’s assertion, it is Defendants who have made statements to the

⁹ LISD filed proofs of service disclosing Jane Doe’s true name, which it withdrew at Plaintiff’s insistence. (Doc. 65, 66, 67.) Jewell used and disclosed the Does’ identities in the TEA matter.

press, community, and State Board of Education (“SBOE”) attacking Jane Doe’s credibility and claims. They publicly issued a 21-page letter, featured in the media, calling Plaintiff’s allegations “fiction” and “unsupported and false claims.”¹⁰ Defendants told the press, “The District responded appropriately to reports regarding Crenshaw when he was employed by the District, reports that differ greatly from the allegations contained in Plaintiff’s civil Complaint that seeks monetary damages against the District.”¹¹ Defendants issued an email blast stating, “It is difficult to read such strong allegations against our District and our administrators; it is even more difficult to read those allegations when some of them are misleading or simply not accurate . . . there are multiple allegations of ‘evidence’ that simply never existed.”¹² Defendants also conducted an email campaign to SBOE Commissioners stating, “Our Board is very informed on the situation and has seen no evidence of wrongdoing by any active district employee.”¹³ LISD’s Board apparently ignore Affidavits, law enforcement records, and other evidence firmly supporting Plaintiff’s claims and assertions.

CONCLUSION

Jewell’s motions should be denied in their entirety.

Respectfully submitted,

April 30, 2026

**THE LAW OFFICE OF
MONICA BECK, PLLC**

THE LAW OFFICE OF JEFF GREEN

¹⁰ Tommy Witherspoon, *Claims vs. Facts: Lorena ISD Superintendent Shares Timeline of Actions District Took in Response to Crenshaw Sex Abuse Case*, KWTX (Aug. 12, 2024), <https://www.kwtx.com/2024/08/12/claims-vs-facts-lorena-isd-superintendent-shares-timeline-actions-district-took-response-crenshaw-sex-abuse-case/>.

¹¹ Tommy Witherspoon, *TEA’s Educator Investigations Division Reviewing Embattled Principal April Jewell’s Texas Educator Certificate*, KWTX (June 18, 2024), <https://www.kwtx.com/2024/06/18/teas-educator-investigations-division-reviewing-april-jewells-texas-educator-certificate/>.

¹² Ex. 2.

¹³ Ex. 3 (emphasis in original). Defendants sent other Commissioners the same accusations.

By: /s/ Monica H. Beck
Monica H. Beck*
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**Admitted pro hac vice*

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2026, the foregoing document was served on all counsel of record via electronic mail.

/s/ Monica H. Beck

EXHIBIT 1

Friday, April 24, 2026 at 09:26:56 Eastern Daylight Time

Subject: Re: April Jewell's Disclosure of Jane Doe and Other Child Sex Abuse Victim's Identifying Information and Subpoenas Issued in Administrative Proceeding
Date: Wednesday, January 14, 2026 at 10:54:15 AM Eastern Standard Time
From: Jeff Green
To: Monica Beck
CC: Andrea L. Mooney, Dennis J. Eichelbaum, Regan G. Wilkins, Meredith Walker, Crystal Hernandez, Meghan Beytebiere, jonathan.crabtree@tea.texas.gov, Jim Dunnam, chad@brazilanddunn.com
Attachments: img-bc62fef9-f975-4700-9a03-080965b8ffe5

Ms Mooney,

We will also need a copy of the order, granting your motion ensuring that the filings have been marked as confidential and sealed. Have you contacted the Judge or his clerk regarding the urgency on having that order entered ASAP given the nature of these improper disclosures?

Jeff Green

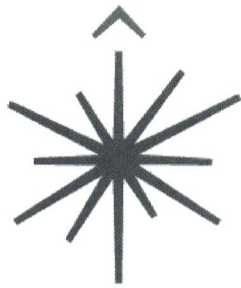
On Wed, Jan 14, 2026 at 9:27AM Monica Beck <monica@lawyerbeck.com> wrote:

Ms. Mooney,

Provide us with the motion you reference below that you state was filed yesterday (June 12, 2026) with the Administrative Law Judge to "mark the filings as confidential." As counsel for the Does, we must ensure that our clients' identities are fully protected, particularly given the astonishing and egregious breadth of your public disclosure of Jane Doe's personal identifying information, which included even her first name and address.

Regards,
Monica

Monica Beck
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THE LAW OFFICE OF

Monica Beck

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From: Andrea L. Mooney <alm@edlaw.com>

Date: Tuesday, January 13, 2026 at 5:58 PM

To: Monica Beck <monica@lawyerbeck.com>

Cc: Dennis J. Eichelbaum <DJE@edlaw.com>, Regan G. Wilkins <rgw@edlaw.com>, Meredith Walker <mwalker@wabsa.com>, Crystal Hernandez <chernandez@wabsa.com>, Meghan Beytebiere <mbeytebiere@wabsa.com>, jonathan.crabtree@tea.texas.gov <jonathan.crabtree@tea.texas.gov>, Jim Dunnam <jimdunnam@dunnamlaw.com>, chad@brazilanddunn.com <chad@brazilanddunn.com>, Jeff Green <jgreen@jeffgreenlaw.com>

Subject: Re: April Jewell's Disclosure of Jane Doe and Other Child Sex Abuse Victim's Identifying Information and Subpoenas Issued in Administrative Proceeding

Monica,

We filed a motion today to request that the Administrative Law Judge mark the filings as confidential to address the filing error. We are not agreeable to withdrawing our subpoenas. As your clients are not parties to this action, we will not be discussing details of the case further.

Andrea L. Mooney

Shareholder

Eichelbaum Wardell

Hansen Powell & Muñoz, P.C.

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Sent from my iPhone

On Jan 12, 2026, at 6:23PM, Monica Beck <monica@lawyerbeck.com> wrote:

CAUTION: Do not click links or attachments unless you know the content is safe.

See attached. The time by which you must take action is tomorrow, January 13, 2026. Given the blatant and egregious nature of you and your client's actions, you should have corrected the disclosures of minor child sex abuse victims' personal identifying information before now, and certainly without the Does' counsel having to tell you so.

Regards,
Monica

Monica Beck

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From: Andrea L. Mooney <alm@edlaw.com>

Date: Monday, January 12, 2026 at 7:16 PM

To: Monica Beck <monica@lawyerbeck.com>, Dennis J. Eichelbaum <DJE@edlaw.com>, Regan G. Wilkins <rgw@edlaw.com>

Cc: Meredith Walker <mwalker@wabsa.com>, Crystal Hernandez <chernandez@wabsa.com>, Meghan Beytebiere <mbeytebiere@wabsa.com>, Jonathan.Crabtree@tea.texas.gov <jonathan.crabtree@tea.texas.gov>, Jim Dunnam

<jimdunnam@dunnamlaw.com>, chad@brazilanddunn.com
<chad@brazilanddunn.com>, Jeff Green <jgreen@jeffgreenlaw.com>

Subject: RE: April Jewell's Disclosure of Jane Doe and Other Child Sex Abuse Victim's Identifying Information and Subpoenas Issued in Administrative Proceeding

Monica,

Your letter demands we take action by 5:00 (Central) today. It is 6:15. Please clarify.

Andrea L. Mooney

Shareholder

Eichelbaum Wardell

Hansen Powell & Muñoz, P.C.

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From: Monica Beck <monica@lawyerbeck.com>

Sent: Monday, January 12, 2026 6:06 PM

To: Andrea L. Mooney <alm@edlaw.com>; Dennis J. Eichelbaum <DJE@edlaw.com>; Regan G. Wilkins <rgw@edlaw.com>

Cc: Meredith Walker <mwalker@wabsa.com>; Crystal Hernandez <chernandez@wabsa.com>; Meghan Beytebiere <mbeytebiere@wabsa.com>; Jonathan.Crabtree@tea.texas.gov; Jim Dunnam <jimdunnam@dunnamlaw.com>; chad@brazilanddunn.com; Jeff Green <jgreen@jeffgreenlaw.com>

Subject: April Jewell's Disclosure of Jane Doe and Other Child Sex Abuse Victim's Identifying Information and Subpoenas Issued in Administrative Proceeding

CAUTION: Do not click links or attachments unless you know the content is

safe.

Counsel,

Your immediate attention is required in response to the attached correspondence.

Regards,
Monica

Monica Beck

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<image001.png>

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<1.12.26 Letter (Revised).pdf>

EXHIBIT 2

Erika Klockziem

Subject: District Statement

From: Lorena ISD <lisdnews@lorenaisd.net>
Date: August 9, 2023 at 5:30:38 PM CDT
To: [REDACTED]
Subject: District Statement
Reply-To: Lorena ISD <lisdnews@lorenaisd.net>

Good afternoon,

The District has formally received a copy of the civil suit filed by Mary and John Doe on behalf of their child, Jane, that was recently filed in the United States District Court for the Western District of Texas. It is difficult to read such strong allegations against our District and our administrators; it is even more difficult to read those allegations when some of them are misleading or simply not accurate.

Former Lorena ISD substitute Nicolas Crenshaw is currently serving 40 years in prison for committing unspeakable acts against Jane Doe and another pre-kindergarten student during the 2020-2021 school year. Crenshaw went through pre-employment screening, and that screening revealed no previous similar conduct. The District provides training to its teachers and staff on identifying and responding to child abuse. At the first moment that abuse was suspected, the District contacted law enforcement and immediately removed Crenshaw from his employment. At all times the Lorena ISD administration has cooperated fully with law enforcement.

What happened to Jane Doe should not happen to any child. Crenshaw is solely responsible for his own unspeakable conduct. Unfortunately, in the court filing, there are multiple allegations of "evidence" that simply never existed. Our internal investigation, as well as law enforcement's investigation, did not reveal evidence that Lorena ISD's staff (other than Crenshaw himself) ignored or looked the other way.

Our hearts and prayers are with Jane and her family. Lorena ISD will respond, within the litigation, to the charges consistent with the civil process. Please know, however, that Lorena ISD takes every child's safety as its solemn obligation and will continue to do so.

Sincerely,

Joe Kucera

Superintendent

[unsubscribe](#)

EXHIBIT 3

Request to Meet

jasonlavender@lorenaisd.net Jason Lavender

Wednesday, March 5, 2025 at 11:21:44 AM Central Standard Time

To: aaron.kinsey@boe.texas.gov aaron.kinsey@boe.texas.gov

Cc: dennykramer@lorenaisd.net Denny Kramer, joekucera@lorenaisd.net Joe Kucera

Dear Chairman Kinsey,

Congratulations on your re-election to Chairmanship late last year. I appreciate your leadership and willingness to serve our public schools at such a time in education as we find ourselves in. My name is Jason Lavender, and I am a concerned Trustee of the Lorena Independent School District (LISD). I am writing for two reasons. First, to express my deep concern regarding the recent actions taken by one of your colleagues, SBOE District 14 Representative Evelyn Brooks. Second to ask for a date and time that we can meet in person with you.

Ms. Brooks has recently aligned herself with a group of parents who have filed a civil suit against our district concerning an incident that occurred three years ago. She has been actively coaching these parents on how to attack our school and has made public statements to local media outlets about the case. Unfortunately, Ms. Brooks has only one perspective of the story and did not make any attempt to speak with our superintendent or our board before making these public accusations. It was not until we made multiple attempts to meet her that she finally agreed to a meeting with our superintendent. We understand and respect Mrs. Brooks First Amendment right to free speech. The concern and conflict comes when she is acting in her official capacity as a representative for The State Board of Education.

Furthermore, Ms. Brooks has continued her intimidation tactics by attending two of our school board meetings unannounced and signing up to speak during public comment. During these sessions, she has chastised our board and attempted to discredit us. She also came to one of our campuses and initially refused to identify herself. I have evidence of her correspondence with the Texas Education Agency (TEA) and other elected officials, in which she has labeled our staff as guilty, our superintendent as incompetent, and has lobbied the TEA to open a NEW investigation on a case that was previously closed. You may not be surprised to know that TEA followed her directive.

Our Board is very informed on the situation and has seen no evidence of wrongdoing by any active district employee. Neither has Mrs. Brooks. We do not believe in cancel culture and are allowing due process to run its course. We also are not conspiracy theorists, but it is very difficult to trust the process TEA has for us when we are witnessing firsthand the unethical actions of one District 14 SBOE representative acting in the name of TEA.

Not only is Ms. Brooks interfering with an ongoing TEA investigation, in which she is clearly biased, but she is also unlawfully tainting an active civil lawsuit and violating her oath of office. Her actions are causing significant disruption and distress within our district and our community.

The purpose of this email is to request a meeting with you to discuss these actions and to understand what options and resources we have to address and remedy her personal attacks in her official capacity. It is crucial for us to ensure that our district can operate without undue interference and that all parties involved are treated fairly and justly. When can we meet?

Thank you for your attention to this matter.

Jason Lavender

LISD 015399