PROTECT *the* PUBLIC'S TRUST

Submitted via email September 22, 2025

U.S. Department of Education
Office for Civil Rights (OCR)
400 Maryland Ave., SW
Washington, DC 20202
Email: OCR@ed.gov

U.S. Department of Health and Human Services
Office for Civil Rights
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
Email: OCRPrivacy@hhs.gov

U.S. Department of Justice
Civil Rights Division
Attention: Title IX Legal Manual Coordinator
P.O. Box 66560
Washington, D.C. 20035-6560
Email: COR.CRT@USDOJ.GOV

Re: Title IX Complaint Against Reading, Ohio High School

To Whom it May Concern,

I write to you to alert you of an effort by at least one official from Reading High School in Ohio, to continue the practice of imposing transgender ideology—particularly allowing males to compete in sports and populate female privacy spaces— on their students, despite Ohio banning those practices. The school's counselor, Jennifer Leone, told an undercover reporter how those practices may continue. Transgender ideology is inherently discriminatory and runs afoul of Title IX of the Civil Rights Act. Accordingly, we request that you promptly investigate the school's violations.

I. Who We Are

Protect the Public's Trust (PPT) is a nonpartisan organization dedicated to promoting ethics in government and restoring the public's trust in government officials. It is imperative in light of severe social challenges America has suffered in the last several years that institutions, especially educational institutions, maintain their credibility with the American people. Educational institutions should be held accountable to ensure that their primary purpose, education, is

maintained. There is no place in education for inherently discriminatory curriculum, decision-making, admissions, or campus access.

II. Background

Transgender ideology, when put into practice, is inherently discriminatory versus women. The ideology teaches that "trans women are women."[1] But, even with surgery, the genetic makeup of a person cannot be changed, even if one identifies as the opposite sex.[2] Therefore, when so-called transgender girls—who are biologically male—are permitted to compete in girls' sports, that policy decision disadvantages biological girls. One study's abstract, for example, concluded that:

> Biological sex is a primary determinant of athletic performance because of fundamental sex differences in anatomy and physiology dictated by sex chromosomes and sex hormones. Adult men are typically stronger, more powerful, and faster than women of similar age and training status. Thus, for athletic events and sports relying on endurance, muscle strength, speed, and power, males typically outperform females by 10%-30% depending on the requirements of the event.[3]

Indeed, by letting biological males compete in girls' sports, by default, girls are missing opportunities such as being included or winning events.

Transgender ideology would also dictate that privacy spaces like locker rooms and bathrooms would have to be opened up to someone of the opposite sex. However, this too is problematic. Forcing girls to view male genitalia and to be viewed by a male is sexually harassing. While this is problematic for male privacy spaces too, it is particularly problematic in girls' privacy spaces because of the power imbalance between males and females. Additionally, it likely leads at least some girls choosing not to participate in athletics, or not access privacy facilities, due to the fear of sharing that space with a male.

Even more problematic is that in transgender ideology's worldview, the idea of "gender" is entirely based upon an individual's self-identification. Under these conditions, there is absolutely nothing to prevent a sexual predator from merely claiming to identify as a female for the purpose of gaining access to female privacy spaces.

---

[1] "5 Things to Know to Make Your Feminism Trans-Inclusive," Human Rights Campaign," accessed August 27, 2025, https://www.hrc.org/resources/5-things-to-know-to-make-your-feminism-trans-inclusive.
[2] "Is a Transgender Woman Still Genetically Male After Surgery?" The Tech Interactive, March 18, 2020, https://www.thetech.org/ask-a-geneticist/articles/2020/transgender-genetics/.
[3] Sandra K. Hunter et. al., "The biological Basis of Sex Differences in Athletic Performance: Consensus Statement for the American College of Sports Medicine," *Medicine & Science in Sports & Exercise*, https://pubmed.ncbi.nlm.nih.gov/37772882/.

For these reasons, and perhaps others, states like Ohio have banned transgender students from using school bathrooms and locker rooms of the opposite sex.[4] And, for this reason, the Trump administration issued Executive Order 14201, which directs executive agencies to withhold funding to schools who permit biological males to deprive girls of opportunities in athletics or do not protect girls in locker rooms.[5]

Within this context, a non-profit called Accuracy in Media filmed an official from Reading High School in Ohio talking about openly violating Ohio law and the principles communicated in Title IX and EO 14201. School counselor Jennifer Leone was caught on camera coaching a prospective parent on how to have a biological boy participate in girls' sports and gain access to girls' locker rooms.[6]

Leone said "absolutely" when asked whether a prospective "daughter" could use girls' restrooms. She said it would be fine for him to play girls' sports and even advised on how to circumvent the fact that the child's birth certificate reflects that the child is a male.

III. Analysis

The Education Amendments of 1972, known as Title IX, states that "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance." Title IX also protects students from sexual harassment, whether it be a deliberate indifference of sexual harassment by school leadership[7] or harassment of a student by another student.[8] Thus, it violates federal statute when a school knowingly prioritizes the desires of males to the detriment of females.

Here, it is unquestionable that any policy that permits a male to compete in female athletics will come to the detriment of a female. For team sports, if the biologically advantaged male makes a team, then that is one less spot for the female athlete. If the biologically advantaged male were to find success, whether it be individual or team sports, that means the female will not find that success. This may even lead to losing scholarships or university level opportunities. It is undeniable that some females will be "excluded from participation in" sports or be denied the benefits of success (i.e. awards and future scholarships).

---

[4] Ohio General Assembly, 2023, *House Bill 183, 135th General Assembly*, https://www.legislature.ohio.gov/legislation/135/hb183.
[5] The Federal Register, "Keeping Men Out of Women's Sports," National Archives, February 5, 2025, https://www.federalregister.gov/documents/2025/02/11/2025-02513/keeping-men-out-of-womens-sports
[6] AIM Staff, "Hidden Camera: Ohio Counselor Coaches Parent to Hide Trans Status, Use Birth Certificate Loophole," Accuracy in Media, August 25, 2025, https://aim.org/2025/08/25/hidden-camera-ohio-counselor-coaches-parents-to-hide-trans-status-use-birth-certificate-loophole/.
[7] *Gebser v. Lago Vista Independent School Dist.*, 524 U.S. 274, 290-91 (1998).
[8] *Davis v. Monroe County Bd. Of Ed.*, 526 U.S. 629, 642 (1999).

Similarly, exposing one's genitals to another,[9] or conditioning participation upon exposing oneself to someone of the opposite sex, is unquestionably sexually harassing for the female students. This is especially true if the harassment leads to lost athletic opportunity or fear of participation due to feeling unsafe on the playing field or locker room.

Here, having a school counselor or guidance counselor strategize to allow a male to compete in female sports and access privacy facilities violates Title IX and should be investigated.

For the record, I give OCR my consent to disclose my name or other personal information contained in this Title IX complaint to others for OCR's investigation of, and enforcement activities related to, the complaint. I am not interested in participating in early mediation. I do not have an attorney representing me in this matter. I have not complained about these allegations to my school, the State of Ohio or any other state or federal agency.

Sincerely,

Michael Chamberlain
Director
Protect the Public's Trust

[9] *See e.g. McWilliams v. Fairfax County Bd. of Supervisors*, 72 F.3d 1191 (4th Cir. 1996); Hall v. Gus Const. Co., 842 F.2d 1010 (8th Cir. 1988).