

Case Brief: *Ricketts v. Wake County Public School System**

INTRODUCTION

When sophomore Davina Ricketts ran for student council at Wake County’s William G. Enloe High School (“Enloe”),¹ her goal was to increase the diversity in her school’s student leadership.² Unfortunately, her efforts resulted in severe racial harassment from other students.³ When Davina turned to the school for recourse, she was met with indifference by the school district and administrators who did little to intervene and at times even seemed to contribute to the hardship she faced.⁴ Davina brought suit in the United States District Court for the Eastern District of North Carolina, alleging Title VI claims against the Wake County Public School System, the Wake County Board of Education, and various school administrators.⁵ The district court dismissed Davina’s complaint for failure to state a claim, leading her to appeal to the Fourth Circuit, which ultimately reversed.⁶ In holding that Davina sufficiently alleged deliberate indifference, retaliation, and equal protection claims, *Ricketts v. Wake County Public School System*⁷ marked the first time the Fourth Circuit recognized Title VI claims for student-on-student racial harassment.⁸ *Ricketts* thus opened the door for more comprehensive recourse when students face invidious discrimination in the very spaces designed to foster their growth, sense of belonging, and potential to succeed.

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1. The Wake County public school system serves central North Carolina, with its county seat located in the state capital of Raleigh. *Wake County Public School System, North Carolina*, BALLOTPEDIA, https://ballotpedia.org/Wake_County_Public_School_System,_North_Carolina [<https://perma.cc/VVE6-HNS2>]. More than 161,000 students across 203 schools attended Wake County public schools during the 2025–2026 school year, making it the largest school district in North Carolina. *District Facts*, WAKE CNTY. PUB. SCH. SYS., <https://www.wcpss.net/domain/22671> [<https://perma.cc/YD63-JPKP>]; T. Keung Hui, *Could Lawmakers Break Up Wake, CMS? Bill Would Study NC’s 5 Largest School Districts*, NEWS & OBSERVER (Feb. 12, 2025, at 17:15 ET), <https://www.newsobserver.com/news/politics-government/article300077249.html> [<https://perma.cc/FSJ3-JGTV> (staff-uploaded archive)].

2. See *Ricketts v. Wake Cnty. Pub. Sch. Sys.*, 125 F.4th 507, 514 (4th Cir. 2025). Because this case was decided at the motion-to-dismiss stage, all facts Davina pled in her Second Amended Complaint were taken as true for purposes of determining whether she stated a claim for relief. To avoid repetitive phrasing in this Case Brief, I present the facts as Davina asserted them in her complaint without continuously noting that they remain unproven and have not been adjudicated as true.

3. *Id.*

4. *Id.*

5. *Id.*

6. *Id.*

7. 125 F.4th 507 (4th Cir. 2025).

8. *Id.* at 520–21.

FACTS OF THE CASE

In February 2016, sophomore Davina Ricketts submitted her application to serve as junior class vice president for the following year, joining over one hundred fellow Enloe⁹ students running for student council—only three of whom were Black.¹⁰ Mistakenly, Davina indicated on her application that she was running for the sophomore class election, a technical blunder she quickly sought to correct by emailing the Student Council Vice President.¹¹ The election staff subsequently exchanged emails confirming that the error in her candidacy application had been corrected¹²—an assurance that later proved hollow.

During the March campaign period, social media accounts run by current student council members purporting to represent Enloe put out various interactive polls and promotional posts for the student council candidates.¹³ Conspicuously absent from any of them were Davina and the three other Black sophomore candidates.¹⁴ While the accounts were eventually taken down after Davina and the other excluded students spoke out about them, this was only the

9. Enloe High School was named after William G. Enloe, a politician who from 1957–1963 served three terms as Mayor of Raleigh, North Carolina. *W.G. Enloe Continues as a Raleigh Mayor*, BOXOFFICE, Apr. 22, 1963, at SE-2; *see also* Trey Hill, *Meet Bill, ENLOE EAGLE'S EYE* (May 5, 2025), <https://enloenews.org/8198/features/meet-bill/> [https://perma.cc/LT2H-8RYR]. During this time, W.G. Enloe criticized Black students who engaged in sit-ins to protest segregation at lunch counters, referring to their efforts as a “regrettable” choice that sought “to change a long-standing custom in a manner that is all but destined to fail.” *Raleigh Sit-Ins*, WORKING CLASS HIST. (July 19, 2022), <https://stories.workingclasshistory.com/article/8190/raleigh-sit-ins> [https://perma.cc/JB6J-JVYN]. Despite his reprehensible comments and general resistance to full racial integration in Raleigh, W.G. Enloe is viewed by many as a “moderate” of his time given that he did not fight back against such efforts with the same force as other North Carolina politicians. *See* Rob Schofield, *The N&O Editorial Page Gets It Right*, NC NEWSLINE: THE PULSE (June 24, 2010, at 10:14 ET), <https://ncnewsline.com/briefs/the-no-editorial-page-gets-it-right-2/> [https://perma.cc/5766-GWXN (staff-uploaded archive)]. In 2010, some of W.G. Enloe’s segregationist history was brought to light by historians and NAACP representatives who provided this context at a school board committee meeting. *See Naming Debate Surrounds Raleigh High School*, WRAL NEWS (June 29, 2010, at 19:31 ET), <https://www.wral.com/story/7877952/> [https://perma.cc/M57Y-LKDH]. The meeting sparked conversation over whether his history warranted changing Enloe High’s name—a heated dialogue that NAACP leadership described as a mischaracterization of its efforts to provide context to the school’s racial history at the meeting and an attempt to pull attention away from the pressing racial issues it was actually trying to address, such as the school board’s decision to get rid of a decades-old bus policy that protected against resegregation. *Id.* Ultimately, an opposition campaign composed of Enloe Students and alumni apparently carried the day, *id.*, seeing as the name has remained the same. This is but one example of the race-related controversies that the school has been involved in over the last two decades. *See, e.g.*, Yonat Shimron & Kinea White Epps, *Students Told To Shun Muslims*, NEWS & OBSERVER (Feb. 22, 2007, at 05:37 ET), <https://web.archive.org/web/20070224130250/http://www.newsobserver.com/146/story/545851.html> [https://perma.cc/Y86M-H25Q (staff-uploaded archive)].

10. *Ricketts*, 125 F.4th at 514.

11. *Id.* at 515.

12. *Id.*

13. *Id.*

14. *Id.*

beginning of the disparate treatment Davina would experience during the 2016 election cycle.¹⁵ At Enloe, the campaign promotional materials of Davina and the other Black sophomore candidates were defaced and destroyed, left strewn across shared areas of the school.¹⁶ Administrators passed by these areas each day, turning a blind eye to the blatant, racially driven bullying occurring right in front of them.¹⁷

Matters worsened on election day when the website used to count student votes apparently stopped working.¹⁸ George Barilich,¹⁹ an English teacher appointed by Enloe's principal, Scott Lyons,²⁰ to oversee the election, informed students that the delay was due to the school's failure to make a required payment to the website.²¹ Barilich ultimately found a different website to host the newly postponed election and directed a student council member to create a new candidate list and ballot.²²

When Davina viewed the new website, she noticed that her name, along with the names of the other three Black sophomore candidates, was excluded from the junior class election ballot.²³ In bringing this apparent discrimination to the attention of Barilich and Monica Sawyer—the assistant vice principal assisting Barilich with the elections—Davina was told that it was because her name was on the sophomore ballot.²⁴ After Davina reminded those running the election that this mistake had already been addressed, Barilich switched the narrative, informing all candidates that in reality, any exclusion issues were attributable to “miscommunication between [the] two websites” and the initial website’s “malfunctioning.”²⁵ However, according to a source from the original website, Enloe had never even contacted the website about this so-called malfunctioning error nor had it utilized the website to create any ballots that year.²⁶

15. *Id.*

16. *Id.*

17. *See id.*

18. *Id.*

19. Barilich continued to teach ninth-grade English at Enloe and was a top-ten finalist for the 2022–23 Wake County Teacher of the Year award. T. Keung Hui, *Meet Wake County's Top 10 Educators. One Will Be Named 2022-23 Teacher of the Year*, NEWS & OBSERVER (May 11, 2022, at 17:15 ET), <https://www.newsobserver.com/news/local/education/article260291280.html> [<https://perma.cc/YQJ8-HAGY> (dark archive)].

20. In 2016, Lyons left Enloe to become the principal at Heritage High School, another Wake County Public School. Briana McDonald, *Meet Our New Principal, Mr. Scott Lyons*, HERITAGE HERALD (Sep. 13, 2016), <https://heritageherald.com/2016/09/13/meet-our-new-principal-mr-scott-lyons/> [<https://perma.cc/UB7Q-ZZ7H>].

21. *Ricketts*, 125 F.4th at 515.

22. *Id.*

23. *Id.*

24. *Id.*

25. *Id.* at 516.

26. *Id.*

As this suspicious behavior picked up, Davina's mother stepped in to bring it to the attention of other school administrators.²⁷ However, neither Principal Lyons nor the Assistant Vice Principal answered or returned her calls, and the District Superintendent refused to meet with her.²⁸ The only result of these attempted contacts was Davina and the other excluded students being summoned to Principal Lyons' office where they were told their exclusion from the ballot was merely a result of website problems and "oversight" issues.²⁹ Principal Lyons then announced that a new election would take place seventeen days later and that all candidates were required to repeat the entire campaign process.³⁰ While Davina redeclared her candidacy, the other three Black students did not.³¹

The school administration's choice to restart the election process rather than simply correct the ballot added fuel to the discriminatory fire already burning at Enloe. For example, one day after the announcement, a frustrated student made a bomb threat at the school that was dismissed by Principal Lyons as a "prank."³² Blamed as the cause of the postponement, Davina and the three other Black sophomore students were inundated by online harassment and cyberbullying.³³ They were met with racist rhetoric and treated by Enloe students and parents as if they had cried discrimination over a mere technical glitch.³⁴ Rumors abounded online and through the school's halls that Black students were barred from running for student council because "their GPAs were too low."³⁵ Davina's campaign materials were once again singled out and destroyed.³⁶ And again, no disciplinary action by the school followed.³⁷ Davina's mother, alongside another excluded Black student's parent, took to the local news to shed light on these issues that remained unaddressed despite their multiple attempts to communicate with county and district officials.³⁸ Unfortunately, this only bred more racist online commentary.³⁹ It was also conveniently followed by receipt of a letter from the school indicating that Davina's absences disqualified her from participating in the student council

27. *Id.*

28. *Id.*

29. *Id.*

30. *Id.*

31. *Id.*

32. *Id.*

33. *Id.*

34. *Id.*

35. *Id.*

36. *Id.*

37. *See id.*

38. *Id.* at 516–17.

39. *Id.*

election—a contention her parents easily negated by showing that these were excused absences with corresponding medical notes.⁴⁰

In another desperate attempt to advocate for her child, Davina’s mother emailed Principal Lyons about the tension, harassment, and clear racism experienced by her daughter and others at Enloe who continued to be ignored by the school.⁴¹ Principal Lyons again denied any knowledge of it and, rather than taking action, simply advised that the students “come see [him] or another administrator to discuss this.”⁴² Davina also experienced adverse treatment by her teachers during this time. Despite her impressive grades, she was denied letters of academic reference by teachers willing to write them for white students.⁴³ She was also ignored by members of the school body and staff who deemed her an “angry Black girl” who “made a big deal out of nothing.”⁴⁴ Word spread of the ballot exclusion incident beyond the four walls of the school, and both a local NAACP leader and another civil rights advocate who caught wind of it stepped in to encourage Enloe to conduct an investigation.⁴⁵ Their requests, too, were ignored.⁴⁶

If the torment Davina experienced firsthand wasn’t enough, the school newspaper—which was edited, overseen, and condoned by an Enloe teacher—exacerbated her suffering by mocking it in its April edition, published during the election period.⁴⁷ The newspaper, in what was veiled as an April Fools’ edition, made multiple derogatory remarks and included a cartoon cockroach named Dee D. Roach (notably, having the same initials as Davina Ricketts) from Southeast Raleigh, a predominantly Black neighborhood, who spoke about increasing representation of “their kind” within student government.⁴⁸ The newspaper also included references to “White History Month,” along with a patently racist parody interview featuring Principal Lyons—here called “DaLyon”—discussing the struggle of surviving Southeast Raleigh “as a white man” receiving “ill-treatment . . . when trying to give out his earlier mixtapes at the nearby Cookout.”⁴⁹

Davina was not elected to student council. But the election’s end merely marked the cessation of one fire, while the deeper blaze of racial harassment

40. *Id.* at 517. A white student who was suspended in 2016 was able to run in the same election without issue. *Id.*

41. *Id.*

42. *Id.* at 517–18.

43. *Id.*

44. *Id.* at 518.

45. *Id.* at 517.

46. *Id.*

47. *Id.* at 518.

48. *See id.*

49. Opening Brief of Appellant Davina Ricketts at 10–11, *Ricketts*, 125 F.4th at 514 (No. 22-1814), 2024 WL 1698794, at *11.

burned through the remainder of her time at Enloe.⁵⁰ Davina continued to be blamed for the campaign process having to be repeated and for causing unnecessary hardship for the other candidates.⁵¹ Naturally, the prolonged persecution she faced yielded mental, emotional, physical, and academic consequences. Davina experienced multiple fainting incidents leading to a concussion, began to struggle in school, and suffered from severe anxiety, stress, and suicidal thoughts.⁵² She was not reselected for the school's cheerleading team, which she had been a member of for two years prior.⁵³ She was also told that she would not receive her International Baccalaureate diploma because her essay, despite having been reviewed, edited, and approved by multiple teachers and advisors, now fell one point short.⁵⁴

After this incident, an assistant superintendent for equity affairs⁵⁵ was appointed by Principal Lyons, the District's Central Area Superintendent,⁵⁶ and the Chief of Staff for the Wake County Public School System.⁵⁷ Although the Assistant Superintendent was appointed to conduct an internal investigation into the election incident, the investigation yielded no meaningful results.⁵⁸ Moreover, the Assistant Superintendent stopped responding to Davina's mother's correspondence, and no investigative report was ever provided.⁵⁹ When the unsatisfactory resolution of these issues was raised at a meeting of the Wake County Board of Education, some members responded that indifference to discrimination faced by minority students is "just the culture."⁶⁰

In February 2021, Davina filed a pro se suit against the Wake County Board of Education, the Wake County Public School System, and various individuals, asserting claims under Title VI of the Civil Rights Act.⁶¹ The district court granted the defendants' motion to dismiss Davina's complaint for failure to state a claim and gave her thirty days to file a motion for leave to amend her complaint and a proposed amended complaint.⁶² Her proposed amended complaint asserted two claims under Title VI of the Civil Rights Act: a student-on-student harassment claim and a retaliation claim.⁶³ She also raised an equal protection claim against the Wake County Board of Education and

50. *Ricketts*, 125 F.4th at 518.

51. *Id.*

52. *Id.* at 518–19.

53. *Id.*

54. *Id.* at 519.

55. *Id.* (Rodney Trice).

56. *Id.* (Danny Barnes).

57. *Id.* (Marvin Connelly).

58. *Id.*

59. *Id.*

60. *Id.*

61. *Id.* at 519–20.

62. *Id.* at 520.

63. *Id.*

individual faculty and administrators.⁶⁴ Ultimately, the district court denied her motion on futility grounds, giving rise to this Fourth Circuit case.⁶⁵

LEGAL ISSUES AND OUTCOMES

The Fourth Circuit considered the denial of Davina’s motion for leave to amend de novo.⁶⁶ Because her complaint was filed pro se, the court recognized that it needed to be “liberally construed” and ultimately “held to less stringent standards than formal pleadings drafted by lawyers.”⁶⁷

A. *Claim 1: Title VI Deliberate Indifference*

The court first addressed Davina’s Title VI deliberate indifference claim. Under Title VI of the Civil Rights Act of 1964, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”⁶⁸

To successfully state her claim, Davina had to show that (1) she was a student at an educational institution receiving federal funding; (2) she suffered racial harassment so severe, pervasive, and objectively offensive that it deprived her of equal access to the educational opportunities or benefits of the school; (3) the school, through an official with authority to address the alleged harassment and to institute corrective measures, had actual notice or knowledge of the alleged harassment; and (4) the school acted with deliberate indifference to it.⁶⁹ The defendants conceded that the first element was met but contested the rest.⁷⁰

The court found that the second element was met because, collectively, the social media exclusion of the Black candidates, the selective destruction of their campaign materials, the omission of their names from the junior class ballot, the pervasive and racially charged cyberbullying directed at Davina, and the reprehensible cockroach reference in the April edition of the school newspaper were sufficient to allege severe, pervasive, and objectively offensive harassment.⁷¹ These acts resulted in Davina being “denied the benefit of an academic environment free from racial hostility,” and thus deprived her of equal

64. *Id.*

65. *Id.* In other words, the court found the proposed amended complaint still failed to state a claim. *See Ricketts v. Wake Cnty. Bd. of Educ.*, 2022 WL 3053762 at *6 (E.D.N.C. 2022).

66. *Ricketts*, 125 F.4th at 520.

67. *Id.*

68. 42 U.S.C. § 2000d.

69. *Ricketts*, 125 F.4th at 521. The court explains that Title VI claims are parallel to Title IX claims, so the same standard applies for both. *Id.*

70. *Id.*

71. *Id.* at 521–22. The court noted that these acts together went beyond simple teasing and name-calling that can be expected among school children. *Id.* at 522.

access to the educational opportunities or benefits provided by Enloe.⁷² In reaching this conclusion, the court made note of the deleterious effects such harassment had on Davina's health and academic performance.⁷³

Turning to the third element, the court again found for Davina.⁷⁴ It held that she had sufficiently alleged the school's disciplinary authority by pointing to instances in both 2016 and 2017 where the school district had suspended students for sending videos containing racially derogatory statements.⁷⁵ The evidence of disciplinary action taken in other instances of bullying highlighted in sharp contrast the school district's indifference to Davina and her plight. Moreover, Davina sufficiently alleged that the Enloe officials with this authority had actual notice or knowledge of the harassment because they were aware of the ballot exclusion and campaign material destruction, were contacted numerous times by Davina's mother requesting to meet about these issues, were urged to initiate an investigation on the ballot exclusion by a civil rights advocate and local NAACP leader, and were privy to a local news outlet's coverage of the story.⁷⁶

Finally, the Fourth Circuit found that Davina's allegations satisfied the fourth element by demonstrating that the defendants were deliberately indifferent.⁷⁷ Their refusal to meet about the ballot exclusion incident, inaction in addressing the harassment targeted at Davina, and underwhelming advice to her to "come see" an administrator to discuss the issue all contributed to the court finding that this element was sufficiently pled.⁷⁸ Ultimately, the facts as alleged established that the school administrators did not act in ways "reasonably calculated to end the student-on-student harassment" that took place throughout the campaign and election process.⁷⁹ Moreover, the court emphasized that an administrator indirectly inviting the victim of such severe bullying to come see them without any affirmative outreach is a wholly inadequate response.⁸⁰ Thus, the court concluded that the district court erred in holding that Davina failed to state a Title VI deliberate indifference claim.⁸¹

72. *Id.* at 522.

73. *Id.*

74. *Id.*

75. *Id.*

76. *Id.* at 522–23.

77. *Id.* at 523.

78. *Id.*

79. *Id.*

80. *Id.* Moreover, this response went uncorrected despite Davina's mother specifically informing them of such insufficiency. *Id.*

81. *Id.* at 524.

B. *Claim II: Title VI Retaliation*

To state a claim for Title VI retaliation, Davina was required to show that (1) she engaged in a protected activity; (2) the school took material adverse action against her; and (3) there was a causal connection between the protected activity and the adverse action.⁸² For the first element, Davina just had to show that she “opposed an unlawful . . . practice she reasonably believed had occurred or was occurring.”⁸³ Because she opposed the ballot exclusion based on a reasonable belief that discrimination had occurred or was occurring, the court found that element one was sufficiently alleged.⁸⁴

The court also found that she had sufficiently alleged the second element in two distinct ways.⁸⁵ First, restarting the election process led to harassment from students blaming Davina for overreacting and causing unnecessary delay.⁸⁶ The court ruled that student-on-student retaliatory harassment can meet the level of material adversity needed for a retaliation claim, and thus the school could be held liable for its deliberate indifference notwithstanding the fact that administrators were not *active participants* in such harassment.⁸⁷ Second, the letter sent by school administrators erroneously informing Davina’s parents that her absences disqualified her as a candidate just days after the new campaign period began was materially adverse action because it could “dissuade a reasonable person” from making further discrimination complaints.⁸⁸

Finally, the court found that the close temporal proximity between Davina’s opposition to the ballot exclusion and the school’s adverse actions was sufficient to allege a causal connection between the two occurrences and therefore found for Davina on the third element.⁸⁹ As all three elements were sufficiently alleged, the court found that it was an error to deny Davina leave to file her amended complaint.⁹⁰

C. *Claim III: Equal Protection Violation*

To state an equal protection claim in this context, Davina had to show that (1) she was subject to discriminatory peer harassment; (2) the school administrators responded to it with deliberate indifference; and (3) the deliberate indifference was motivated by discriminatory intent.⁹¹ Because

82. *Id.*

83. *Id.*

84. *Id.*

85. *Id.*

86. *Id.*

87. *Id.*

88. *Id.* at 524–25.

89. *Id.* at 525.

90. *Id.*

91. *Id.*

elements one and two were already established under Davina's Title VI claims, only element three warranted further analysis.⁹²

The court found that Davina sufficiently alleged that the school faculty and administrators, individually and collectively, blatantly ignored or downplayed her harassment despite being aware of it.⁹³ It concluded that this alleged lack of effort to put a stop to the racial harassment was sufficient to satisfy the intent requirement of the third element at this stage and accordingly reversed the district court's ruling on the equal protection claim against the school administrators.⁹⁴

As for her claim against the Wake County Board of Education, Davina had to show that her "harassment was the result of municipal custom, policy, or practice."⁹⁵ The court found that Davina stated a viable equal protection claim here as well, reasoning that the Board's official policy of indifference toward racial harassment can be inferred from the circumstances.⁹⁶ Such circumstances include board members' comments that indifference is "just the culture," as well as public outcry and numerous complaints regarding discrimination against students.⁹⁷

POTENTIAL IMPACT

In large part, the significance of this case lies in its official recognition of Title VI claims for student-on-student harassment. While the Second, Third, Fifth, Tenth, and Eleventh Circuits had all previously acknowledged the existence of Title VI claims against schools for student-on-student racial harassment,⁹⁸ this case marked the beginning of the Fourth Circuit's recognition of such claims.⁹⁹ By joining its sister circuits, the Fourth Circuit took a positive step in the direction of fighting invidious discrimination that, as this case reveals, continues to be alive and well in schools. Davina is far from alone—in 2023, over fifty percent of American high school students of color reported experiencing racism in school.¹⁰⁰

92. *Id.* at 526.

93. *Id.*

94. *Id.*

95. *Id.*

96. *Id.* at 527.

97. *Id.*

98. *See* *Zeno v. Pine Plains Cent. Sch. Dist.*, 702 F.3d 655, 664–65 (2d Cir. 2012); *Blunt v. Lower Merion Sch. Dist.*, 767 F.3d 247, 272 (3d Cir. 2014); *Fennell v. Marion Indep. Sch. Dist.*, 804 F.3d 398, 408 (5th Cir. 2015); *Bryant v. Indep. Sch. Dist. No. I-38*, 334 F.3d 928, 934 (10th Cir. 2003); *Adams v. Demopolis City Sch.*, 80 F.4th 1259, 1273 (11th Cir. 2023). All circuits to have addressed the question have recognized these claims. *Malick v. Croswell-Lexington Dist. Sch.*, 148 F.4th 855, 862 (6th Cir. 2025).

99. *See Ricketts*, 125 F.4th at 521.

100. *See* Izraelle I. McKinnon, Kathleen H. Krause, Nicolas A. Suarez, Tiffany M. Jones, Jorge V. Verlenden, Yolanda Cavalier, Alison L. Cammack, Christine L. Mattson, Rashid Njai, Jennifer Smith-

2025]

RICKETTS V. WAKE CNTY. PUB. SCH. SYS.

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Considering the pervasiveness of this problem and the grave harms it can cause—including poor mental health, suicidal ideation, and substance use¹⁰¹—it is about time the Fourth Circuit opened its doors to the country’s affected youth. To do so not only vindicates students who have suffered but also incentivizes school boards and administrators to step up to protect their students. Davina’s case aptly demonstrates how some North Carolina schools continue to fall short in fulfilling that responsibility. Ultimately, the disturbing facts of this case serve as an unsettling yet necessary revelation of a problem that many today believe is behind us, while simultaneously offering hope that courts will meet the occasion to address it.

MARY ANNELIESE CHILDS**

Grant, Cecily Mbaka & Jonetta J. Mpofu, *Experiences of Racism in School and Associations with Mental Health, Suicide Risk, and Substance Use Among High School Students—Youth Risk Behavior Survey, United States, 2023*, 73 MORBIDITY & MORTALITY WKLY. REP. 31, 31 (2024).

101. See *id.* (“Black and Hispanic or Latino . . . students who reported experiencing racism had a higher prevalence of . . . poor mental health, suicide risk, and substance use.”).

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