U.S. Department of Education, Office for Civil Rights

Discrimination Complaint Form, Consent Form

1. Name of persons filing this complaint:

Last Name: Frampton **First Name**: Henry W. ("Hal"), IV

Address: 15100 N. 90th Street

City: Scottsdale **State**: AZ **Zip Code**: 85260

Primary number: (480) 444-0020

Email Address: hframpton@ADFLegal.org

Filing as attorney for the Complainants listed in #2.

2. Name of person discriminated against (if other than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent, guardian, or other authorized legal representative is required.

Complainant 1 (a minor)

Last Name: Wilson **First Name**: Reagan

Address: 179 Birch Ave **City**: Stoneham **State**: ME **Zip Code**: 04231

Primary number: 260-438-3083

Email Address: veronica.r.wilson@gmail.com

Reagan Wilson is a minor, and her mother, Veronica Wilson, is filing this complaint on her behalf.

Complainant 2 (a minor)

Last Name: Clark **First Name**: Morgan

Address: 135 Trails End **City**: Windham **State**: ME **Zip Code**: 04062

Primary number: 207-329-6373

Email Address: Kclark158@gmail.com

Morgan Clark is a minor, and her father, Kenyon ("Ken") Clark, is filing this complaint on her behalf.

3. OCR investigates discrimination complaints against schools, colleges and universities, institutions, and agencies which receive funds or other forms of financial assistance from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution 1: Maine Department of Education

Address: 23 State House Station (physical address: 111 Sewall St.)

City: Augusta **State**: ME **Zip Code**: 04333-0023

Department/School: Maine Department of Education, Pender Makin, Commissioner of Education; (207) 624-6600

Name of Institution 2: Maine Principals' Association

Address: 50 Industrial Drive

City: Augusta **State**: ME **Zip Code**: 04330

Department/School: Maine Principals' Association, Interscholastic Division (Michael R. Burnham, Executive Director); (207) 622-0217; mpa@mpa.cc

Name of Institution 3: South Portland School Department

Address: 120 Wescott Road

City: South Portland **State**: ME **Zip Code**: 04106

Department/School: South Portland School Department/South Portland High School (Dr. Angela Atkinson Duina, Superintendent); (207) 871-0555

Name of Institution 4: Regional School Unit 14 (RSU 14), also known as the Windham Raymond School District

Address: 228 Windham Center Road

City: Windham **State**: ME **Zip Code**: 04062

Department/School: RSU 14/Windham Raymond School District/Windham High School (Christopher Howell, Superintendent); (207) 892-1800

4. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

See attached letter for details of discrimination.

5. Do you have documents or written information that you think will help us to understand your complaint?

Yes.

If yes, please describe the documents or written information you have.

Attached is a letter detailing the allegations of discrimination on the basis of sex against the Maine Department of Education, the Maine Principals' Association, the South Portland School Department, and Regional School Unit 14 (Windham Raymond School District). The letter cites publicly available materials supporting the allegations, including the Maine Principals' Association 2025–2026 Handbook (including its Gender Identity Participation Policy), the MaxPreps 2025 and 2026 schedules and results for the South Portland High School girls' soccer team, and news reports regarding the Maine Principals' Association's public statement and prior competitions in which male athletes competed in Maine girls' cross country and track and field.

6. What is the most recent date you were discriminated against?

Date: Discrimination is ongoing

7. If this date is more than 180 days ago, you may request a waiver of the filing requirement.

N/A

8. Have you complained about the allegations that you raise in this complaint to your school, institution, or another organization or agency?

Yes. In the Fall of 2026, Ken Clark, on behalf of Morgan Clark, emailed the RSU 14 School Board to voice his concerns about a male athlete competing against his daughter in varsity soccer. The Board implemented no changes to address Ken Clark's concerns.

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

N/A

10. You do not need to have a lawyer to file a complaint with OCR; however, if you do have a lawyer, OCR staff are required to communicate directly with your lawyer. If you have a lawyer representing you in this matter, please provide the lawyer's contact information.

Attorney Name: Henry W. ("Hal") Frampton, IV

Primary number: (480) 444-0020

Email Address: hframpton@ADFLegal.org

Attorney Name: Arie M. Jones

Primary number: (571) 707-4655

Email Address: arjones@ADFLegal.org

11. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information is not required, but it will be helpful to us.

Please contact our lawyers, using the contact information listed in number 10.

12. Option to Participate in OCR's Early Mediation Process

Complainants are not interested in participating in early mediation.

NOTE: You MUST submit a signed Consent Form to OCR if you want to participate in early mediation.

13. What would you like the institution to do as a result of your complaint— what remedy are you seeking?

Please see attached letter for requested action and remedies.

14. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

30/10/2026	Henry Frampton
(Date)	(Signature, Hal Frampton, as attorney for the Complainants)
29/10/2026	Veronica Wilson Veronica Wilson (Oct 29, 2026 13:07:59 EDT)
(Date)	(Signature of Veronica Wilson on behalf of Reagan Wilson)
29/10/2026	Kenyon Clark Kenyon Clark (Oct 29, 2026 12:46:49 EDT)
(Date)	(Signature of Kenyon Clark on behalf of Morgan Clark)

CONSENT FORM - FOR DISCLOSING NAME AND OTHER PERSONAL INFORMATION CONTAINED IN THE DISCRIMINATION COMPLAINT FORM TO OTHERS

(Please print or type except for signature line)

Your Name:

Henry W. ("Hal") Frampton, IV, attorney for the Complainants

Veronica Wilson, on behalf of minor daughter Reagan Wilson

Kenyon ("Ken") Clark, on behalf of minor daughter Morgan Clark

Name of Schools or Other Institutions That You Have Filed This Complaint Against:

1. Maine Department of Education
2. Maine Principals' Association
3. South Portland School Department
4. Regional School Unit 14 (RSU 14), also known as the Windham Raymond School District

- The purpose of this consent form is for the Office for Civil Rights (OCR) to request your consent to disclose your name and other personal information when OCR decides that doing so will assist in investigating and resolving your complaint.
- For example, to decide whether a school discriminated against a person, OCR often needs to reveal that person's name and other personal information to employees at that school to verify facts or get additional information. When OCR does that, OCR informs the employees that all forms of retaliation against that person and other individuals associated with the person are prohibited. OCR may also reveal the person's name and personal information during interviews with witnesses and consultations with experts.
- If you do not consent to OCR disclosing your name or other personal information, OCR may decide to close your complaint if OCR determines it is necessary to disclose such information in order to determine whether the school discriminated against you.

NOTE: If you file a complaint with OCR, OCR can release certain information about your complaint to the press or general public, including the name of the school or institution; the date your complaint was filed; the type of discrimination included in your complaint; the date your complaint was resolved, dismissed or closed; the basic reasons for OCR's decision; or other related information. Any information OCR releases to the press or general public will not include your name or the name of the person on whose behalf you filed the complaint.

NOTE: OCR requires you to respond to its requests for information. Failure to cooperate with OCR's investigation and resolution activities could result in the closure of your complaint.

Please sign section A or section B (but not both) and return to OCR:

- If you filed the complaint on behalf of yourself, you should sign this form.
- If you filed the complaint on behalf of another specific person, that other person should sign this form. EXCEPTION: If the complaint was filed on behalf of a specific person who is younger than 18 years old or a legally incompetent adult, this form must be signed by the parent or legal guardian of that person.
- If you filed the complaint on behalf of a class of people, rather than any specific person, you should sign the form.

A. I give OCR my consent to disclose my name (and that of my minor child/ward on whose behalf the complaint is filed) and other personal information contained in the Discrimination Complaint Form to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint Form.

Signature Veronica Wilson Veronica Wilson (Oct 29, 2026 13:07:59 EDT) Date 29/10/2026

Signature Kenyon Clark Kenyon Clark (Oct 29, 2026 12:46:49 EDT) Date 29/10/2026

I declare under penalty of perjury that it is true and correct that I am the person named above; and, if the complaint is filed by a parent or legal guardian on behalf of a minor child/individual who has been declared to be incompetent due to physical or mental incapacity or age by a court of competent jurisdiction, that I am that person's parent or legal guardian. This declaration only provides consent for the disclosure of identity of the persons (and other individually identifiable information about them contained in the Discrimination Complaint Form) and does not extend to any of the claims filed in the complaint.

B. I do not give OCR my consent to disclose my name (and that of my minor child/ward on whose behalf the complaint is filed) nor other personal information contained in the Discrimination Complaint Form to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint Form. I understand that OCR may have to close my complaint.

Signature _____ Date _____

Signature _____ Date _____

November 2, 2026

United States Department of Education
Office for Civil Rights
Lyndon Baines Johnson Department of Education Bldg.
400 Maryland Avenue, SW
Washington, DC 20202
OCR@ed.gov Sent via Email

To Whom It May Concern:

We submit this Complaint on behalf of Reagan Wilson, a minor, through her mother, Veronica Wilson, and Morgan Clark, a minor, through her father, Kenyon Clark.

Reagan and Morgan are high school juniors who compete in girls' varsity soccer in Maine. Reagan is an accomplished multisport athlete who also competes in cross country, indoor track and field, and softball. Morgan is captain of her school's varsity soccer team and intends to play soccer in college.

But because Maine's unlawful policy allows biological males to compete in girls' sports, the deck is stacked against them and every other girl who plays varsity soccer. A biological male who identifies as female now plays on South Portland High School's girls' team—and dominates. Since joining, he has consistently outperformed other players and sent his team's ranking soaring. Reagan's team has already lost to South Portland, and Morgan's team tied, lowering their rankings. Despite all their hard work and discipline, Reagan and Morgan may be denied the thrill of victory because Maine lets males with inherent biological advantages compete on girls' teams. Reagan and Morgan urge OCR to step in, stop this violation of federal law, and protect the right of women and girls to compete on a level playing field.

Overview

1. Complainants are two female athletes who play on the girls' varsity soccer teams at their respective high schools in Maine. Both have played sports since a young age and devote considerable time, effort, and sacrifice to becoming the best athletes they can be.

2. Complainant Reagan Wilson, acting through her mother Veronica Wilson, is a junior at Fryeburg Academy in Fryeburg, Maine. Reagan earned "All Conference" in both cross country and softball and was a state qualifier in both cross country and indoor track and field.

3. Complainant Morgan Clark, acting through her father Kenyon Clark, is a junior at Windham High School in Windham, Maine. She has played soccer since childhood and is captain of her school's girls' varsity soccer team.

The Maine Principals' Association and Maine's discriminatory law and guidelines

4. The Maine Department of Education (MDOE) is authorized to "[s]upervise, guide and plan for a coordinated system of public education for all citizens of the State," to "[i]nterrelate public education with other social, economic, physical and governmental activities, programs and services," and to "[e]ncourage and stimulate public interest in the advancement of education." Me. Rev. Stat. Ann. tit. 20-A, § 201. Accordingly, MDOE "administers both state education subsidy and state and federal grant programs … and leads many collaborative opportunities and partnerships in support of local schools and districts."[1]

5. MDOE receives federal financial assistance and must comply with Title IX.

6. The Maine Principals' Association (MPA) is a non-profit corporation and the governing body responsible for "regulat[ing] interscholastic activities in the state of Maine . . . All public high schools and a number of private schools are MPA members; they currently total 148."[2] By joining the MPA, schools specifically agree to abide by all MPA policies, which include comprehensive eligibility and competition rules for interscholastic athletics. As dues-paying MPA members, Windham High School and South Portland High School have delegated authority over their students' participation in interscholastic athletics to the MPA.

7. MPA is subject to Title IX because MDOE has delegated control of high school interscholastic sports competitions to MPA, which assumes control of "all interscholastic tournaments, meets or other forms of competition"[3] for its members, including "all public high schools."[4] *See A.B. v. Haw. State Dep't of Educ.*, 386 F. Supp. 3d 1352, 1357-58 (D. Haw. 2019) (finding high school athletic association had controlling authority over many aspects of the Hawaii DOE's interscholastic athletic programs and was subject to Title IX, independent of funding source); *Williams v. Bd. of Regents of Univ. Sys. of Ga.*, 477 F.3d 1282, 1294 (11th Cir. 2007) (similar); *Communities for Equity v. Mich. High Sch. Athletic Ass'n*, 80 F. Supp. 2d 729, 735 (W.D. Mich. 2000) (similar).

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[1] About, Me. Dep't of Educ., https://perma.cc/TV2G-HRZ2 (last visited Oct. 26, 2026).
[2] Me. Principals' Ass'n, https://perma.cc/FEW8-53TZ. (last visited Oct. 26, 2026).
[3] Me. Principals' Ass'n, *2025–2026 Handbook*, Interscholastic Div. Bylaws at 20 (2025), https://perma.cc/E2MQ-NNL9.
[4] *Supra*, note 2.

8. MPA sets athletics participation requirements for member schools. MPA's current "Gender Identity Participation Policy" provides that a "transgender student shall be eligible to participate in accordance with either their birth sex or in accordance with their gender identity, but not both."[5] Despite males' well-known advantages over females in nearly every sport—especially after puberty—the policy allows any male who subjectively identifies as female to play girls' sports if he so chooses. It imposes no physical or hormonal requirements to protect girls' equal opportunity to compete in their own sports and to have a fair chance to win.

9. MPA publicly stated that "[t]he executive order [President Trump's Executive Order 14201] and our Maine state Human Rights Act are in conflict, and the Maine Principal's [sic] Association will continue to follow state law as it pertains to gender identity."[6]

10. The Maine Human Rights Act provides that it is "unlawful educational discrimination … to exclude any person from any program or activity because of … gender identity." Me. Rev. Stat. Ann. tit. 5, § 4602.

11. South Portland High School is a public school within the South Portland School Department that receives federal funding and is subject to Title IX.

12. Windham High School is a public school within the Regional School Unit 14 (RSU 14), also known as the Windham Raymond School District, that receives federal funding and is subject to Title IX. On November 5, 2025, the RSU 14 Board voted to retain Maine Human Rights Act language in its Title IX Policy.[7]

Discrimination in violation of federal law

13. Consistent with President Trump's Executive Order 14201, *Keeping Men Out of Women's Sports*, Complainants contend that the MPA policy and Maine's non-discrimination laws, as applied by the MPA and the applicable public high schools to women's sports, violate Title IX's prohibition on sex discrimination and deprive women and girls of equal athletic opportunity.

14. Sex-based categories in school athletics exist to give women and girls—whose distinct biological and physiological features put them at a disadvantage in nearly every sport—the opportunity for meaningful competition and a fair chance at

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[5] Me. Principals' Ass'n, *2025–2026 Handbook*, Gender Identity Participation Policy at 39–40 (2025), https://perma.cc/E2MQ-NNL9

[6] Patty Wight, *Transgender female athletes can still compete under state law, Maine sports governing body says,* Me. Pub. (Feb. 7, 2025), https://perma.cc/D4WD-ZZVG.

[7] Julia Simone, *RSU 14 votes to keep Maine Human Rights Act language in Title IX policy*, WGME (Nov. 5, 2025), https://perma.cc/PDL4-FW5V.

victory. That's why it was proper and non-discriminatory under Title IX for Maine to create a system of sex-designated athletics.

15. But by layering on top of that system an exception whereby males can opt into female-designated teams, Maine discriminates against women and girls and deprives them of fair and safe competition.

16. The MPA policy and Maine's non-discrimination laws not only fail to protect a female category in school sports but also place no physical limits on when a biological male may compete in it. Indeed, under MPA's policy, "[n]o medical records or official documents shall be requested or required to establish a student's gender identity."[8]

17. This violates Title IX by depriving female students, because of their sex, of an equal opportunity to compete and win in their own sports. Under the policy, biological males can win not only in the male category but also in the female category, expanding opportunities for male athletes at the expense of female athletes. This violates Title IX's text as well as the applicable athletics regulations.

Unequal opportunity resulting from Maine's law and the MPA policy

18. This fall, a biological male freshman who identifies as female joined South Portland High School's girls' varsity soccer team and has reshaped the program. In the first several weeks of the season, he scored seven goals, including a "hat trick" in the season opener and his team's only goals in a later game, securing the win. Over the course of the season, the male athlete either directly scored, or assisted in scoring, roughly half of South Portland's total goals. *See* South Portland Statistics, Exhibit A. The season before he joined, South Portland ranked 14th in the region with a .167 win percentage.[9] It now ranks 2nd with a .750 win percentage.[10]

19. On August 29, 2026, Reagan's team lost to South Portland High School and the male athlete. Although Reagan's team did not make the playoffs this season, she intends to play varsity soccer next year and expects to face this male athlete again.

20. This is not the first time Reagan has been forced to compete against a male athlete on an all-girls team. In 2024, Reagan lost to a male cross-country runner who placed first at the Western Maine Championships. The next year, in indoor track and field, her team's ranking suffered after a male athlete placed first in pole

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[8] *Supra*, note 5 at 40.
[9] *South Portland Red Riots Girls Soccer Schedule 2025*, MaxPreps, https://perma.cc/RV58-YXT7.
[10] *South Portland Red Riots Girls Soccer Schedule 2026*, MaxPreps, https://www.maxpreps.com/me/south-portland/south-portland-red-riots/soccer/girls/schedule/ (last visited Nov. 1, 2026).

vaulting at the state championships. These episodes were widely reported.[11] Although not the subject of this Complaint, they illustrate Maine's knowledge of the harm its policy causes women and girls and its repeated disregard for the equal treatment of women's athletics under Title IX.

21. On October 1, 2026, Morgan and her team, Windham High School, played South Portland and the male athlete to a tie, lowering Windham's ranking.[12] Morgan also intends to play varsity soccer next year and expects to face this male athlete during her senior year.

22. The MPA policy and Maine law will also likely harm Complainants during their senior seasons by forcing them to compete against a team rostering a talented male athlete, lowering their schools' results as female athletes face male athletes with distinct physiological advantages.

Request

23. Complainants respectfully request that the Office for Civil Rights of the Department of Education investigate the violations of Title IX described in this Complaint. Complainants believe that MPA, MDOE, South Portland School Department, and Windham Raymond School District are violating girls' rights by discriminating against them based on sex and depriving them of equal opportunity for athletic participation and victory.

24. Consistent with the executive order *Keeping Men Out of Women's Sports* and the Supreme Court's recent decision in *West Virginia v. B.P.J.*, which construed "sex" under Title IX to mean "biological sex and not gender identity, particularly in the sports context," 146 S. Ct. 2356, 2371 (2026), Complainants respectfully request that MPA and its member schools be required to amend their policies to eliminate the gender-identity exception to sex-based athletics participation, and to remedy all past Title IX violations resulting from those policies.

25. Prompt investigation and remedial action are critical. Because the soccer season is ongoing, Complainants, their teammates, and other girls across Maine continue to be deprived of Title IX's protections.

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[11] Seamus Othot, *Male Runner Dominates Maine Girls Cross-Country, Track Competitions*, Me. Wire (Oct. 21, 2024), https://perma.cc/BG6J-6DBU; Seamus Othot, *Trans Identifying Male Leap-Frogs Competitors at Girls' Pole Vaulting Meet in Maine*, Me. Wire (Feb. 18, 2025), https://perma.cc/96KQ-GQUN.

[12] *South Portland Girls Varsity @ Windham*, MaxPreps, https://perma.cc/RJ44-BSMK (last visited Oct. 28, 2026).

Respectfully,

Henry Frampton

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Exhibit A -- Male Athlete's Statistics

Male Athlete's Statistics Playing for

South Portland High School's Girls Varsity Soccer

Date	Game	Final Score	# of Goals	# of Assists
08.22.2026	Mt. Ararat v. Red Riots	1-1 (T)	-	-
08.25.2026	Yarmouth v. Red Riots	4-0 (L)	0	0
08.27.2026	Waynflete v. Red Riots	2-0 (W)	1	0
08.29.2026	Wells v. Red Riots	1-0 (W)	-	-
08.29.2026	Fryeburg v. Red Riots	1-0 (W)	-	-
08.29.2026	Morse v. Red Riots	2-0 (W)	-	-
09.03.2026	Portland v. Red Riots	7-0 (W)	3	0
09.08.2026	Kennebunk v. Red Riots	3-1 (L)	1	0
09.10.2026	Massabesic v. Red Riots	6-0 (W)	2	0
09.15.2026	Gorham v. Red Riots	2-0 (W)	2	0
09.18.2026	Thorton Academy v. Red Riots	3-2 (W)	1	1
09.22.2026	Sanford v. Red Riots	2-1 (W)	0	2
09.24.2026	Bonny Eagle v. Red Riots	0-0 (T)	0	0
09.26.2026	Deering v. Red Riots	3-1 (W)	2	0
10.01.2026	Windham v. Red Riots	1-1 (T)	0	0
10.05.2026	Biddeford v. Red Riots	9-0 (W)	2	2
10.08.2026	Scarborough v. Red Riots	2-1 (L)	0	1
10.15.2026	Portland v. Red Riots	3-0 (W)	1	1
10.17.2026	Noble v. Red Riots	6-1 (W)	0	3

10.19.2026	Falmouth v. Red Riots	4-1 (W)	1	0
10.27.2026	Bonny Eagle v. Red Riots	1-0 (W)	0	0
10.30.2026	Scarborough v. Red Riots	2-1 (L)	0	0
Totals		57	16	10