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**SUPERIOR COURT OF NEW JERSEY  
UNION COUNTY – LAW DIVISION**

TAMAR HERMAN,

*Plaintiff,*

v.

IBTIHAJ MUHAMMAD, SELAEDIN MAKSUT,  
COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS A/K/A/ CAIR A/K/A CAIR-  
FOUNDATION INC., and CAIR NEW JERSEY  
A/K/A CAIR NJ A/K/A CAIR NJ INC.,

*Defendants.*

CIVIL ACTION

DOCKET #:

**COMPLAINT  
& JURY DEMAND**

Plaintiff, TAMAR HERMAN (“Herman” or “Plaintiff”), by and through her attorneys Bochner IP PLLC by way of Complaint against Defendants IBTIHAJ MUHAMMAD (“Muhammad”), SELAEDIN MAKSUT (“Maksut”), COUNCIL ON AMERICAN-ISLAMIC RELATIONS A/K/A CAIR (“CAIR”), and CAIR NEW JERSEY A/K/A CAIR NJ (“CAIR NJ”), says as follows below. Statements are made on personal knowledge as to Plaintiff’s own actions, and on information and belief as to all other matters:

### **SUMMARY OF THE ACTION**

1. This action relates to the incalculable reputational, financial, professional, mental, medical, emotional, and other personal harm caused to Herman—a beloved, veteran teacher with a stellar reputation at Seth Boyden Elementary School (the “School”) in the South Orange Maplewood School District (the “District”) in Maplewood, New Jersey for twenty years, with more than thirty years of overall teaching experience—by categorically false allegations of bigotry, child abuse, and gross pedagogical misconduct made by the Defendants against Herman on October 7, 2021 and October 8, 2021, arising out of events that occurred at the School on October 6, 2021. As a result of the Defendants’ fabricated claims, Herman had her reputation impugned, she was targeted with threats to her physical safety, was mercilessly bullied and ridiculed, was shamed in local and national news articles, and humiliated in front of her community—by being removed from her classroom at the School and placed on administrative leave by the District, by a District letter sent to all District families, by an “anti-bias” training company hired by the District, by a Tweet from New Jersey Governor Phil Murphy, and by a public Facebook post from the rabbi of her childhood synagogue. Furthermore, as this was going on, she was also subjected to antisemitic vitriol and hatred by readers and viewers of the libels made by Defendants. Moreover, due to the widely published nature of the fabrications, she has no reasonable prospect of securing future public school teaching opportunities and was subjected to a criminal investigation and the threat of criminal charges by the Essex County Prosecutor’s Office. She suffered and continues to suffer from emotional and mental harm to such a degree that she has had no realistic choice but to permanently move out of her home and, prior to that, had to ask for

police protection and temporarily relocate in the immediate aftermath of Defendants' lies. The Defendants—all famous, powerful, and well-financed individuals and/or entities with major public platforms both online and elsewhere—and motivated by a combination of greed and a fierce desire to burnish their brands as fighters against Islamophobia, have inflicted irreparable harm on Herman through their false statements as detailed hereinafter. Accordingly, Herman brings this action to recover damages for defamation and false light invasion of privacy based on the harm she suffered at the hands of the Defendants as a direct and proximate result of their fabricated claims. Moreover, as set forth at length hereinafter, punitive damages are warranted against all of the Defendants, as their false statements were motivated in substantial part by greed and a reckless desire to burnish their brands as fighters against Islamophobia.

### **PARTIES**

2. Plaintiff Herman is a natural person, at all relevant times was and still is a resident of New Jersey and is currently a resident of Union County, New Jersey; was and still is a licensed teacher with twenty years of experience at the School, and thirty-three years of overall teaching experience, also including twenty-nine years of experience as a Hebrew School teacher and experience conducting High Holiday and Sabbath services for children at three local congregations. Herman, until being placed on administrative leave by the District as a result of the Defendants' fabrications, had never been subjected to professional discipline of any kind. Herman is well-known in the District and at the School for her support to students of all backgrounds<sup>1</sup> and her unusual level of dedication to her students. For example, over her many years of teaching, her car was usually the

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<sup>1</sup> See **Exhibit A**, an image from a lesson Herman distributed to her students during the COVID-19 pandemic that included an image of a girl wearing a hijab while reading.

last one in the parking lot because she was working late in service to her students. During the COVID-19 pandemic, to make sure her students felt connected and did not fall behind, she visited all her students' homes multiple times to deliver school supplies and Valentine's Day packages. Herman is also a loving mother and grandmother. Herman has received numerous glowing reviews from the most important persons – her students – as well as numerous professional accolades and commendations from, supervisors, parents and others, a selection of which is attached hereto. *See Exhibit B.*

3. Defendant Muhammad is a natural person and, on information and belief, at all relevant times was and still is a resident of New Jersey; is a native of Maplewood, New Jersey; has been a member of the United States National Fencing Team since 2010; is a former United States Olympic sabre fencer who gained national and international publicity because she wore a hijab while competing at the 2016 Summer Olympics in Rio de Janeiro, Brazil, at which she won a bronze medal in the Team Sabre event, and for which she attracted enormous media attention both for her successful finish, and more notably for becoming the first woman to wear a hijab while competing for the United States in the Olympics and the first female Muslim-American athlete to earn a medal at the Olympics; was named by President Obama to the President's Council on Fitness, Sports, and Nutrition in 2017; as of 2017, was ranked number two in the United States and number seven in the world in fencing; was and still is a five-time Senior World medalist, including 2014 World Champion in the team event; was and still is a co-owner and proprietor, together with her siblings, of a clothing company established in 2014 and known as Louella; has authored three books that are for sale on Amazon.com and other

major online marketplaces: *Proud: My Fight for an Unlikely American Dream* (2018),<sup>2</sup> *The Proudest Blue: A Story of Hijab and Family* (2019),<sup>3</sup> and its sequel, *The Kindest Red: A Story of Hijab and Friendship (The Proudest Blue)* (release date 2023);<sup>4</sup> is also the subject of two biographies: one authored by Daniel R. Faust entitled *Ibtihaj Muhammad: Muslim American, Champion Fencer, and Olympian (Breakout Biographies)* (2017)<sup>5</sup> and one authored by Katie Lajiness entitled *Ibtihaj Muhammad (Big Buddy Olympic Biographies)* (2016);<sup>6</sup> was one of the subjects of Mattel’s 2017 International Women’s Day Campaign, through which Mattel introduced a line of female role model Barbies, including one in a hijab, modeled after Muhammad,<sup>7</sup> and also for sale on Amazon.com and other major online marketplaces; did and still does engage in substantial efforts to promote herself and her personal brand, her various businesses, and her books, and to realize profits from these promotional efforts, both online and in-person, and both through her website<sup>8</sup> and personal Facebook,<sup>9</sup> Instagram,<sup>10</sup> and Twitter<sup>11</sup> accounts; has approximately 513,000 followers on Facebook, approximately 382,000

<sup>2</sup> <https://www.amazon.com/Proud-Fight-Unlikely-American-Dream/dp/0316518964> (last visited Aug. 7, 2022).

<sup>3</sup> [https://www.amazon.com/Books-Ibtihaj-Muhammad/s?rh=n%3A283155%2Cp\\_27%3A1Ibtihaj+Muhammad](https://www.amazon.com/Books-Ibtihaj-Muhammad/s?rh=n%3A283155%2Cp_27%3A1Ibtihaj+Muhammad) (last visited Aug. 7, 2022).

<sup>4</sup> [https://www.amazon.com/Kindest-Red-Story-Friendship-Proudest/dp/0759555702/ref=sr\\_1\\_2?crid=13WBN3FOTMEZN&keywords=Ibtihaj+Muhammad&qid=1659918454&s=books&sprefix=ibtihaj+muhammad%2Cstripbooks%2C88&sr=1-2](https://www.amazon.com/Kindest-Red-Story-Friendship-Proudest/dp/0759555702/ref=sr_1_2?crid=13WBN3FOTMEZN&keywords=Ibtihaj+Muhammad&qid=1659918454&s=books&sprefix=ibtihaj+muhammad%2Cstripbooks%2C88&sr=1-2) (last visited Aug. 7, 2022).

<sup>5</sup> <https://www.amazon.com/Ibtihaj-Muhammad-American-Champion-Biographies/dp/1508160600> (last visited Aug. 7, 2022).

<sup>6</sup> [https://www.amazon.com/Ibtihaj-Muhammad-Buddy-Olympic-Biographies/dp/1680785540/ref=sr\\_1\\_6?crid=13WBN3FOTMEZN&keywords=Ibtihaj+Muhammad&qid=1659918454&s=books&sprefix=ibtihaj+muhammad%2Cstripbooks%2C88&sr=1-6](https://www.amazon.com/Ibtihaj-Muhammad-Buddy-Olympic-Biographies/dp/1680785540/ref=sr_1_6?crid=13WBN3FOTMEZN&keywords=Ibtihaj+Muhammad&qid=1659918454&s=books&sprefix=ibtihaj+muhammad%2Cstripbooks%2C88&sr=1-6) (last visited Aug. 7, 2022).

<sup>7</sup> <https://www.amazon.com/Barbie-FJH67-Ibtihaj-Muhammad-Doll/dp/B079JCZMMH> (last visited Aug. 7, 2022).

<sup>8</sup> <https://www.ibtihajmuhammad.com> (last visited Aug. 15, 2022).

<sup>9</sup> <https://www.facebook.com/ibtihajmuhammadusa> (last visited Aug. 15, 2022).

<sup>10</sup> <https://www.instagram.com/ibtihajmuhammad/> (last visited Aug. 15, 2022).

<sup>11</sup> <https://twitter.com/IbtihajMuhammad/> (last visited Aug. 17, 2022).

followers on Instagram, and approximately 62,100 followers on Twitter; did and still does conduct substantial business in the State of New Jersey through her aforementioned business ventures; and did and still does target consumers in the State of New Jersey in connection with her business activities.

4. Defendant Maksut is a natural person and, on information and belief, at all relevant times was and still is a resident of New Jersey; was named Deputy Executive Director of CAIR NJ on October 17, 2019;<sup>12</sup> holds a B.A. in Middle Eastern and Islamic Studies from New York University, and an M.A. in Religious Studies from Columbia University; and is also the Vice-President of The Muslim Network, a New Jersey-based not-for-profit organization. Like Muhammad, he maintains an active presence on social media through, *inter alia*, his Twitter,<sup>13</sup> Facebook,<sup>14</sup> and Instagram<sup>15</sup> accounts, as well as on CAIR NJ's social media accounts.

5. Defendant CAIR is a non-profit Muslim civil rights and advocacy group with its principal offices located in Washington, D.C. and numerous satellite chapters and offices located nationwide, including in New Jersey; conducts substantial operations in New Jersey, both through its New Jersey chapter (CAIR NJ) and otherwise; is, by its own description, “a grassroots civil rights and advocacy group . . . [and] America’s largest Muslim civil liberties organization . . . .”;<sup>16</sup> claims on its website that its “mission is to enhance understanding of Islam, protect civil rights, promote justice, and empower American Muslims”;<sup>17</sup> engages in substantial fundraising efforts in support of its mission

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<sup>12</sup> <https://m.facebook.com/CAIRNewJersey/photos/meet-selaedin-maksut-our-new-deputy-executive-director-selaedin-holds-a-ba-in-mi/2601407306583889/> (last visited Aug. 7, 2022).

<sup>13</sup> <https://twitter.com/mselaedin?lang=en> (last visited Aug. 15, 2022).

<sup>14</sup> <https://www.facebook.com/selaedin.maksut> (last visited Aug. 17, 2022).

<sup>15</sup> <https://www.instagram.com/s.maksutt/> (last visited Aug. 17, 2022).

<sup>16</sup> [https://www.cair.com/about\\_cair/about-us/](https://www.cair.com/about_cair/about-us/) (last visited Aug. 7, 2022).

<sup>17</sup> *Id.*

nationwide and in New Jersey; has regional chapters and offices nationwide, including co-Defendant CAIR NJ. According to the Anti-Defamation League (ADL), members of “CAIR’s current leadership had early connections with organizations that are or were affiliated with Hamas [a designated foreign terrorist organization by the United States].” Additionally, members of CAIR’s leadership “have used . . . antisemitic tropes related to Jewish influence over the media or political affairs, or has descended into the vilification of Zionists, which includes the majority of American Jews, who view a connection with Israel as a component of their Jewish identity.”<sup>18</sup> CAIR maintains an active presence on social media through, *inter alia*, its Twitter,<sup>19</sup> Facebook,<sup>20</sup> and Instagram<sup>21</sup> accounts, and has approximately 139,000 followers on Facebook, approximately 9,034 followers on Instagram, and approximately 56,100 followers on Twitter.

6. Defendant CAIR NJ at all relevant times was and still is the New Jersey chapter and office of CAIR and engages in substantial fundraising efforts in support of CAIR’s mission in New Jersey. CAIR NJ maintains an active presence on social media, through - *inter alia* - its Twitter,<sup>22</sup> Facebook,<sup>23</sup> and Instagram<sup>24</sup> accounts.

### **JURISDICTION & VENUE**

7. This Court has jurisdiction over this matter because all parties reside in the State of New Jersey or conduct substantial business within the State of New Jersey.

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<sup>18</sup> <https://www.adl.org/education/resources/backgrounders/the-council-on-american-islamic-relations-cair> (last visited Oct 2, 2022).

<sup>19</sup> <https://twitter.com/CAIRNational> (last visited Aug. 15, 2022).

<sup>20</sup> <https://www.facebook.com/CAIRNational> (last visited Aug. 15, 2022).

<sup>21</sup> [https://www.instagram.com/cair\\_national/](https://www.instagram.com/cair_national/) (last visited Aug. 15, 2022).

<sup>22</sup> <https://twitter.com/CAIRNJ> (last visited Aug. 15, 2022).

<sup>23</sup> <https://www.facebook.com/CAIRNewJersey> (last visited Aug. 15, 2022).

<sup>24</sup> <https://www.instagram.com/cair.nj/> (last visited Aug. 15, 2022).

8. Venue is proper in Union County because Herman resides in Union County.

### **FACTUAL BACKGROUND**

#### **A. The Events of October 6, 2021**

9. On October 6, 2021, Herman was teaching her second-grade class at the School (the class was busily engaged in a writing workshop assignment) when she noticed one of her second grade students (the “Student”) wearing a hood that was blocking her eyes. While Ms. Herman was aware that the Student regularly wore a form-fitting hijab, the article of clothing Herman witnessed on October 6, 2021 did not resemble the hijab that this student wore every day prior. Accordingly, Herman believed in good faith that the student’s hijab was being worn under the hood. Intending to encourage the Student to engage in her schoolwork as her eyes were partially blocked by the hood, Herman—in accordance with school policy which indicates the students should not be allowed to wear items that block their vision—asked the Student to brush back her hood. This was a particularly reasonable request as the rest of the Student’s face was already significantly covered by a mask being worn to protect against COVID-19. When the student did not respond to Herman’s request, Herman, believing the Student’s hijab was underneath, brushed the hood back a few inches to uncover the Student’s eyes. While lightly brushing back the hood itself, and without making contact with the Student physically, Herman noticed the Student’s hair and that the Student was not wearing her regular form-fitting hijab underneath. Herman immediately brushed the hood back to cover all the Student’s hair and apologized to the Student. The hood never left the Student’s head, and the classroom learning went on as normal.

10. When Herman arrived at the School the next morning, October 7, 2021, she met with Principal Shannon Glander and Assistant Principal Sheila Murphy, who informed Herman that they had heard from the Student's mother of the momentary interaction with the Student the previous day. Principal Glander told Herman that the Student's mother had told Principal Glander that she understood what had happened with her daughter was simply a misunderstanding.<sup>25</sup>

11. Later that same day, Herman was placed on administrative leave. Typically, these incidents are quickly and quietly resolved, and the teacher returns to the classroom when no wrongdoing is found.

12. It is now almost a full year later and, due to Muhammad and CAIR's defamation and the firestorm it created (discussed below), Herman remains on administrative leave with her employment status at best describable as "in limbo."

13. Muhammad's October 7<sup>th</sup> defamatory post (discussed below) led to a "flood" of complaints to the District from "thousands of people," including some that were "vulgar" and "threatening."<sup>26</sup> The flood of interest and outrage instigated by her defamation and its amplification by CAIR transformed a minor interaction that would have been resolved in favor of Herman into a national news story that wrecked Herman's life and from which she has not recovered.

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<sup>25</sup> The Student's mother repeated this belief a few months later when she showed up at Herman's home (uninvited) on January 28, 2022, and told Herman, in the presence of others that her daughter, the Student, loves Herman and that the interaction was all a "misunderstanding."

<sup>26</sup> Jesse O'Neill, *NJ teacher accused of removing student's hijab speaks out as cops investigate*, New York Post (Oct. 13, 2021) (last visited Aug. 10, 2022), <https://nypost.com/2021/10/13/nj-teacher-tamar-herman-accused-of-removing-2nd-graders-hijab-speaks-out/>

14. Even though District Superintendent Ronald Taylor had announced that social media was not a “reliable form of due process,”<sup>27</sup> the public pressure caused by Defendants’ explosive lies proved too much for Taylor to withstand.

15. The District quickly caved to the pressure brought to bear by the reaction from misguided individuals posting on social media and the thousands of people that contacted the District in response to Defendants’ lies, and posted a letter on October 11<sup>th</sup> on the District’s website to all District parents disavowing Herman for her alleged actions and sending resources for children about Islamophobia, implying that Herman was Islamophobic.<sup>28</sup> Five days after Muhammad’s initial post, the District held a District-wide implicit bias training for teachers and used Herman as an example of inappropriate teacher behavior.

16. On October 8, 2021, even New Jersey’s Governor, Phil Murphy, offered his opinion on his Twitter account, which has over 447,000 followers.<sup>29</sup> Governor Murphy, further fanning the flames of the fire started by Defendants, tweeted, *inter alia*, that he was “[d]eeply disturbed by these accusations.”<sup>30</sup>

17. The public pressure was so frenzied that the rabbi of the local synagogue where Herman grew up, and who did not know Herman at all, felt compelled on the evening of October 9<sup>th</sup> to condemn Herman for her actions in a public Facebook post.

**B. Defendants’ Defamatory Social Media Posts of October 7, 2021 and October 8, 2021**

**i. Muhammad’s First Defamatory Social Media Post**

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<sup>27</sup> *Id.*

<sup>28</sup> Superintendent’s Statement: SB Discrimination Allegations Follow-Up & Update (October 12, 2021)

<sup>29</sup> <https://twitter.com/govmurphy/status/1446584729550168066?lang=en> (last visited Aug. 15, 2022).

<sup>30</sup> *Id.*

18. On October 7, 2021, only one day after the interaction, Muhammad made two defamatory social media posts about Herman and her interaction with the Student.

19. First, at 4:03 p.m. Eastern Time on October 7, 2021, Muhammad published the following post on her verified Facebook and Instagram accounts, featuring a photo of her book *The Proudest Blue: A Story of Hijab and Family* and the following message:

*I wrote this book with the intention that moments like this would never happen again. When will it stop? Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. School should be a haven to all of our kids to feel safe, welcome and protected – no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal sglander@somso.k12.nj.us and the superintendent rtaylor@somso.k12.nj.us*

20. A copy of this social media post is attached hereto as **Exhibit C** and is available on Muhammad’s Facebook account<sup>31</sup> (hereinafter referred to as “Muhammad Post #1”).

21. The Instagram version of Muhammad Post #1 is largely identical to the Facebook version except that the bottom of the caption on the Instagram version tagged

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[https://www.facebook.com/ibtihajmuhammadusa/posts/pfbid0bPq5p9fcXfLg1EkbhTKjjrtXrv9XLC3w9r4NqQ9LMHheShN5UdkxrSVifgYNZy1tl?\\_cft\\_\\_\[0\]=AZVVbtaH4560iVVGos8egm58u42qwnf7eJk3NdgDvvLX7IPcabfA\\_gR34ViLCjEHpabI0h89-8HWr2NEBHaoj-2zOcywQtZXkxqtouPk-coHJ0I19y1QJ8QEfiSOUwnaYocRqdXOKIuHar2G8oP52ME7&\\_tn\\_=%2CO%2CP-R](https://www.facebook.com/ibtihajmuhammadusa/posts/pfbid0bPq5p9fcXfLg1EkbhTKjjrtXrv9XLC3w9r4NqQ9LMHheShN5UdkxrSVifgYNZy1tl?_cft__[0]=AZVVbtaH4560iVVGos8egm58u42qwnf7eJk3NdgDvvLX7IPcabfA_gR34ViLCjEHpabI0h89-8HWr2NEBHaoj-2zOcywQtZXkxqtouPk-coHJ0I19y1QJ8QEfiSOUwnaYocRqdXOKIuHar2G8oP52ME7&_tn_=%2CO%2CP-R) (last visited Aug. 15, 2022).

two Instagram accounts—@cair\_national and @cair.nj, the accounts affiliated with CAIR and CAIR NJ. A copy of Muhammad’s social media post on Instagram is attached hereto as **Exhibit D** and is available on Muhammad’s Instagram account.<sup>32</sup>

22. As of the present date, Muhammad Post #1 remains on Muhammad’s Facebook and Instagram accounts.

23. As of the present date, the Facebook version of Muhammad Post #1 garnered approximately 5,200 reactions, 470 comments, and 1,300 shares.

24. As of the present date, the Instagram version of Muhammad Post #1 garnered approximately 15,277 likes and 253 comments.

**ii. Muhammad’s Second Defamatory Social Media Post**

25. At 4:30 p.m. Eastern Time on October 7, 2021, less than a half an hour after her Facebook defamatory post, Muhammad published another Instagram post, featuring photos of the School and a photo of Herman herself, with the following message, again tagging CAIR and CAIR NJ:

*Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal sglander@somds.k12.Nj.us and the superintendent Rtaylor@somds.k12.Nj.us*

<sup>32</sup> [https://www.instagram.com/p/CUvWR81MkOQ/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/CUvWR81MkOQ/?utm_source=ig_web_copy_link) (last visited Aug. 15, 2022).

*@cair\_national @cair.nj*

26. A copy of the textual portions of this social media post is attached hereto as **Exhibit E** and is available on Muhammad’s Instagram account<sup>33</sup> (hereinafter referred to as “Muhammad Post #2”).

27. As of the present date, Muhammad Post #2 remains on Muhammad’s Instagram account.

28. As of the present date, Muhammad Post #2 garnered approximately 68,661 likes and 2,508 comments.

29. Upon information and belief, Muhammad tagged CAIR and CAIR NJ on both of her Instagram social media posts in order to reach the largest possible audience and to cause the maximum possible amount of inflammation and vitriol directed toward Herman.

**iii. Maksut’s Defamatory Social Media Post, Maksut’s Defamatory Interview on “Good Morning America”, and the Promotion of Maksut’s Defamatory Statements by CAIR**

30. On October 8, 2021, at 12:41 a.m. Eastern Time, Maksut, having seen Muhammad’s social media posts (like hundreds of thousands of other people), posted the following message on his Twitter account:

*Absolutely unacceptable. Teacher pulls off 7 year old’s hijab...in front of the class.*

*Our @CAIRNJ office is calling for immediate termination.*

*Racist teachers like this cannot be trusted around our children.*

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<sup>33</sup> [https://www.instagram.com/p/CUvZrQHsB6-/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/CUvZrQHsB6-/?utm_source=ig_web_copy_link) (last visited Aug. 15, 2022).

31. A copy of Maksut’s original Twitter post is attached hereto as **Exhibit F** and is available on Maksut’s Twitter account<sup>34</sup> (hereinafter referred to as “Maksut Post #1”).

32. As of the present date, Maksut Post #1 remains on Maksut’s Twitter account.

33. Also on October 8, 2021 at 9:45 a.m. Eastern Time, CAIR posted a substantially similar version of Maksut Post #1 on its Facebook and Twitter accounts, with a link to an NBC New York story referencing Herman by name and entitled *NJ Teacher Accused of Pulling Hijab Off 2nd Grade Student’s Head*:<sup>35</sup>

*A teacher pulled off a 7-year-old student’s hijab in front of her class. This is completely unacceptable, and we are calling for immediate termination. Our children are not safe with #Islamophobia in the classroom.*

34. Copies of these Facebook and Twitter posts are attached hereto as part of **Exhibit F** and are available on CAIR’s Facebook<sup>36</sup> and Twitter<sup>37</sup> accounts.

35. As of the present date, this post remains on CAIR’s Facebook and Twitter accounts.

36. At approximately 2:13 p.m. Eastern Time on October 8, 2021, Maksut posted, and later deleted, the following reply to his original Twitter post:

*Call and email the Superintendent, Dr. Ronald G. Taylor, today, and let him know Tamar Wyner Herman<sup>38</sup> is unfit to be a teacher.*

<sup>34</sup> <https://twitter.com/MSelaedin/status/1446334944960204832> (last visited Aug. 15, 2022).

<sup>35</sup> NBC News New York, *NJ Teacher Accused of Pulling Hijab Off 2nd Grade Student’s Head* (Oct. 8, 2021), <https://www.nbcnewyork.com/news/local/nj-teacher-accused-of-pulling-hijab-off-2nd-grade-students-head/3313080/?amp=1> (last visited Aug. 17, 2022).

<sup>36</sup> <https://www.facebook.com/CAIRNational/posts/pfbid0SBgbx8u1iBXDpH775ByQZCKLk6uYL4RoApNz7T83o8esGCFJNyDesyEBNDrepGtWI> (last visited Aug. 17, 2022).

<sup>37</sup> <https://twitter.com/CAIRNational/status/1446471920325701633?s=20&t=qeNRv4dZCurq8s44mQ2Wnw> (last visited Aug. 17, 2022).

<sup>38</sup> Wyner is Herman’s maiden name.

*rtaylor@somsd.k12.nj.us*  
*(973) 762-5600*

37. A copy of Maksut’s reply to his original Twitter post is attached hereto as **Exhibit G** (hereinafter referred to as “Maksut Post #2”).

38. As of the present date, Maksut Post #2 has been deleted.

39. On October 8, 2021 at 3:56 p.m. Eastern Time, CAIR posted the following message on its Twitter account with a link to an NBC News story entitled *Olympian accuses New Jersey teacher of pulling off girl’s hijab, school district investigating*,<sup>39</sup> tagging CAIR NJ and Maksut:

*CAIR-NJ Exec. Dir. Selaedin Maksut: “Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.”*  
*@CAIRNJ @MSelaedin*  
*#Islamophobia*

40. Copies of this Tweet are attached hereto as part of **Exhibit G** and are available on CAIR’s Twitter account.<sup>40</sup>

41. As of the present date, this post remains on CAIR’s Twitter account.

42. In addition, on the morning of October 8, 2021 at 7:34 a.m. Eastern Time, ABC’s television show “Good Morning America” broadcasted a report entitled *Calls to Fire Teacher Accused of Pulling Off Student’s Hijab* (the “GMA Report”).

43. During the GMA Report, a clip of an interview with Maksut appeared. Maksut stated: “The hijab, you know, is much like any other article of clothing for a

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<sup>39</sup> David K. Li, *Olympian accuses New Jersey teacher of pulling off girl’s hijab, school district investigating*, NBC News (Oct. 8, 2021), <https://www.nbcnews.com/news/us-news/olympian-accuses-new-jersey-teacher-pulling-girl-s-hijab-school-n1281117> (last visited Aug. 18, 2022).

<sup>40</sup> <https://twitter.com/CAIRNational/status/1446565117584367617?s=20&t=qeNRv4dZCurq8s44mQ2Wnw> (last visited Aug. 18, 2022).

Muslim woman. To remove that publicly can be very humiliating.” Later in the segment, a second clip of the interview with Maksut appeared. Maksut stated: “Anyone who thinks it’s OK to do this to a student clearly is not fit to be a teacher.”

44. After the GMA Report aired, CAIR then posted the GMA Report on its YouTube channel, called “CAIRtv”—which, as of the present date, has 11,300 subscribers—under a heading entitled *CAIR-NJ Director on ABC Amid Calls for Firing of Teacher Who Allegedly Pulled Off Student’s Hijab*. As of the present date, this YouTube post remains on CAIRtv.<sup>41</sup>

45. Also after the GMA Report aired, on October 9, 2021 at 9:52 a.m. Eastern Time, CAIR posted the GMA Report on its Facebook account under a heading entitled *Video: CAIR-NJ Director on ABC Amid Calls for Firing of Teacher Who Allegedly Pulled Off Student’s Hijab*.<sup>42</sup> CAIR then posted the GMA Report on its Twitter account on October 9, 2021 at 9:53 a.m. Eastern Time.<sup>43</sup> As of the present date, these posts remains on CAIR’s Facebook and Twitter accounts. Moreover, on October 9, 2021 at 10:56 a.m. Eastern Time, CAIR NJ posted the GMA Report on its Facebook account.<sup>44</sup> As of the present date, this post remains on CAIR NJ’s Facebook account.

46. Additionally, on October 8, 2021 at 11:28 a.m. Eastern Time, CAIR posted a press release on its website entitled *CAIR-NJ Calls for Immediate Firing of*

<sup>41</sup> <https://www.youtube.com/watch?v=az-6Xr44bfi> (last visited Aug. 15, 2022).

<sup>42</sup> <https://www.facebook.com/CAIRNational/posts/pfbid0cJuXHt7BZCmnPUHeCcum4Y34iejYWCU5FpKWCjgctQYWUrLvm8jdHraobaVmNqG9l> (last visited Aug. 17, 2022).

<sup>43</sup> <https://twitter.com/CAIRNational/status/1446836255430488071?s=20&t=qeNRv4dZCurq8s44mQ2Wnw> (last visited Aug. 17, 2022).

<sup>44</sup> <https://www.facebook.com/CAIRNewJersey/posts/pfbid0akivLSeuwmFTejoC66G1mkJynY7dExTXWzE78oYqHxstDcJok3i77RW8rX2XVEmEl>

*Teacher Who Allegedly Pulled Off Muslim Student's Hijab*, in which Maksut was quoted as follows:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ. Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

47. A copy of CAIR's press release is attached hereto as **Exhibit H** and is available on CAIR website<sup>45</sup> (hereinafter referred to as the "Press Release").

48. As of the present date, the Press Release remains on CAIR's website.

49. On October 8, 2021, CBS News New York quoted Maksut saying, "The teacher not only put her hands on her, removed her headscarf. And this is, of course, humiliating for any Muslim woman to be exposed this way, in public."<sup>46</sup>

50. According to WCBS NEWSRADIO 880, "Selaedin Maksut, Executive Director of The Council on American-Islamic Relations of New Jersey, called the alleged incident disturbing and is demanding the teacher be fired immediately. 'Clearly she's demonstrated she cannot be trusted around students,' Maksut told Haskell."<sup>47</sup>

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<sup>45</sup> [https://www.cair.com/press\\_releases/cair-nj-calls-for-immediate-firing-of-teacher-who-allegedly-pulled-off-muslim-students-hijab/](https://www.cair.com/press_releases/cair-nj-calls-for-immediate-firing-of-teacher-who-allegedly-pulled-off-muslim-students-hijab/) (last visited Aug. 15, 2022).

<sup>46</sup> Teacher Accused of Forcefully Removing 2<sup>nd</sup> Grader's Hijab (Oct 8, 2021) (last visited Sep. 14, 2022) <https://www.cbsnews.com/newyork/news/teacher-accused-of-forcibly-removing-2nd-graders-hijab-in-class/>

<sup>47</sup> Peter Haskell and Marta Zielinska, NJ mom says daughter who allegedly had hijab pulled off head by teacher is 'very, very sad,' WCBS NEWSRADIO 880 (Oct 9, 2021) (last visited Sep. 14, 2022), <https://www.audacy.com/wcbs880/news/local/nj-teacher-accused-of-removing-students-hijab-in-class>

51. On October 9, 2021, Maksut told NBC's TODAY in a phone interview, "Anything less than removing her from the classroom would be unacceptable. If she can't respect the religious practices of her students, then she shouldn't be teaching."<sup>48</sup>

52. Contemporaneously with the issuance of the Press Release on the CAIR website, CAIR NJ also posted defamatory portions of the Press Release on its Facebook account.

53. A copy of this Facebook post is attached hereto as part of **Exhibit H** and is available on CAIR NJ's Facebook account.

54. As well, on October 8, 2021 at 11:42 a.m. Eastern Time, CAIR posted the following message on its Twitter account, with a link to the Press Release, and tagging CAIR NJ and Maksut:

*Our children must be protected from anti-Muslim bigotry and abuse at school. The teacher who pulled a second grader's hijab off in class must be fired immediately.*  
 #Islamophobia  
 @cairnj @MSelaedin

55. A copy of this Twitter post is attached hereto as part of **Exhibit I** and is available on CAIR's Twitter account.<sup>49</sup>

#### **iv. CAIR NJ's Defamatory Social Media Posts**

56. On October 8, 2021, at 11:49 a.m. Eastern Time, CAIR NJ posted the following message its Twitter account, which was a partial repeat of the Press Release:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ.*

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<sup>48</sup> Alyssa Newcomb, New Jersey teacher under investigation after allegedly pulling hijab off student, Today Show (Oct 9, 2021) (last visited Sep. 14, 2022), <https://www.today.com/news/new-jersey-teacher-under-investigation-after-allegedly-pulling-hijab-student-t233784>

<sup>49</sup> <https://twitter.com/CAIRNational/status/1446501232399556631?s=20&t=qeNRv4dZCurq8s44mQ2Wnw>

57. Also on October 8, 2021, at 11:49 a.m. Eastern Time, CAIR NJ posted the following messages on its Twitter account in reply to the first message, which were also partial repeats of the Press Release, and which, taken together, were a complete verbatim repeat of Maksut's quoted statement in the Press Release:

*Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

58. Copies of CAIR NJ's Twitter posts are attached hereto as **Exhibit J** and are available on CAIR NJ's Twitter account.<sup>50</sup>

59. Contemporaneously with the posting of these messages on Twitter, CAIR NJ posted the same messages on its Facebook account, the first time at 11:34 AM ET, which are attached hereto as part of **Exhibit H**.

60. As of the present date, all of the CAIR NJ Twitter and Facebook posts remain on CAIR NJ's Twitter and Facebook accounts, even though their narrative was undermined when they were publicly sent screenshots of the Student's mother's antisemitism, see **Exhibit K**.

61. Neither Maksut, CAIR, CAIR NJ, nor any other representatives or agents of these organizations ever attempted to contact Herman to learn what actually happened.

### **C. The Criminal Investigation by the Essex County Prosecutor's Office**

62. On or about October 13, 2021, as a result of Defendants'

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<sup>50</sup> <https://twitter.com/CAIRNJ/status/1446502941507129344>

defamatory social media posts and the firestorm of controversy they ignited, the Essex County Prosecutor's Office opened a criminal investigation into the allegations against Herman arising out of the interaction that occurred between her and the Student on October 6, 2021.

63. On January 19, 2022, following a thorough investigation, the Prosecutor's Office informed Herman that there would be no criminal charges brought against her arising out of the interaction that occurred between her and the Student on October 6, 2021. Although Herman was vindicated by the outcome of the investigation, she had been the subject of a criminal investigation for over three months and had been forced to endure the acute emotional distress associated with such circumstances.

**D. Physical Threats Directed at Herman as a Result of Defendants' Defamatory Social Media Posts**

64. As a direct result of Defendants' defamatory social media posts, Plaintiff received threats to her physical safety, compelling her to seek police protection.

65. The threats against Herman were reported in online media coverage of the story. For example, Meaww.com reported that "[Herman] is getting death threats after allegedly being 'falsely' accused of pulling off a student's hijab in the middle of a class."<sup>51</sup>

**E. Subsequent Media Coverage and Other Public Discourse Resulting from Defendants' Defamatory Social Media Posts**

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<sup>51</sup> Sumanti Sen, *Tamar Herman: Teacher gets death threats after Olympian's 'fake' story of her pulling off girl's hijab*, Meaww.com (Oct. 12, 2021) (last visited Aug. 10, 2022), <https://meaww.com/tamar-herman-new-jersey-teacher-gets-death-threats-after-pulling-off-girls-hijab>

66. In addition, in the days and weeks following Defendants’ defamatory social media posts, numerous major media outlets reported about Herman, referencing the defamatory posts, thereby exposing Herman to humiliation, ridicule, and shame, and, overnight, destroying her hard-earned reputation as an outstanding teacher, which she had built for over three decades. The staggering amount of media coverage only added to the firestorm of lies and negativity ignited by the Defendants.

67. For example, The New York Times published an article entitled *Online Furor Over a Student’s Hijab Engulfs a Liberal Town*.<sup>52</sup> The headline also read, “A 7-year-old told her mother that she resisted a New Jersey teacher’s attempt to pull off her Muslim head covering. It spiraled from there.”<sup>53</sup> This article mentioned Herman by name.

68. The New York Post, in yet another example of the media frenzy, published a story entitled *NJ teacher accused of removing student’s hijab speaks out as cops investigate*.<sup>54</sup> The newspaper, borrowing language from the Muhammad posts, reported that “[a]uthorities in Maplewood, New Jersey have opened an investigation into allegations that a teacher ‘forcibly’ removed a second grader’s hijab.” The newspaper further reported, *inter alia*, that “[t]he alleged Oct. 6 incident at Seth Boyden Elementary School touched off an *online firestorm* after fencer Ibtihaj Muhammad, the first Muslim-American Olympic medalist, posted about it on Facebook last week.”<sup>55</sup> (Emphasis

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<sup>52</sup> Tracey Tully, *Online Furor Over a Student’s Hijab Engulfs a Liberal Town*, The New York Times (Oct. 22, 2021) (last visited Aug. 10, 2022), <https://www.nytimes.com/2021/10/22/nyregion/hijab-muslim-nj-student.html>

<sup>53</sup> *Id.*

<sup>54</sup> Jesse O’Neill, *NJ teacher accused of removing student’s hijab speaks out as cops investigate*, New York Post (Oct. 13, 2021) (last visited Aug. 10, 2022), <https://nypost.com/2021/10/13/nj-teacher-tamar-herman-accused-of-removing-2nd-graders-hijab-speaks-out/>

<sup>55</sup> *Id.*

added). This article mentioned Herman by name, referring to her as “[a]ccused teacher Tamar Herman.”

69. NBC News, in another example of the firestorm of negative attention, published a story entitled *Olympian accuses New Jersey teacher of pulling off girl’s hijab, school district investigating*.<sup>56</sup> The media giant reported that “[a]n Olympic medal-winning fencer accused a teacher of humiliating a second-grade girl by allegedly pulling off the child’s hijab in their New Jersey classroom, and officials said this week they are investigating the allegation.”<sup>57</sup> Yahoo! News picked up the same story.<sup>58</sup>

70. ABC News reported that “public backlash” was sparked “after fencer and Olympic medalist Ibtihaj Muhammad, who is also from Maplewood, [took to Facebook](#) to shed light on the incident. . . . ‘This is abuse,’ she wrote. ‘Schools should be a haven for all of our kids to feel safe, welcome and protected -- no matter their faith.’”<sup>59</sup>

71. CBS News New York reported on the interaction quoting CAIR NJ Executive Director Selaedin Maksut: “The teacher not only put her hands on her,

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<sup>56</sup> David K. Li, *Olympian accuses New Jersey teacher of pulling off girl’s hijab, school district investigating*, NBC News (Oct. 8, 2021) (last visited Aug. 10, 2022), <https://www.nbcnews.com/news/us-news/olympian-accuses-new-jersey-teacher-pulling-girl-s-hijab-school-n1281117>

<sup>57</sup> *Id.*

<sup>58</sup> David K. Li and Donna Mendel, *Olympian accuses New Jersey teacher of pulling off girl’s hijab, school district investigating*, Yahoo!News (Oct. 8, 2021) (last visited Sep. 14, 2022) [https://news.yahoo.com/olympian-accuses-jersey-teacher-pulling-180146510.html?guccounter=1&guce\\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce\\_referrer\\_sig=AQAAAH\\_hkVMePzS3wIuKjQyURg05fY4F-HO6VGvYF0N8ytmXV5ARc5f9WZwhAn0PfiH-Yfq95swEihWK8tINxFqRAME8Z6rHhxJQkiZybHhOaSyXjBxbV0nxM8EWWK-QGWIMi9o\\_bz3L1LO7TEGycY\\_CsAKThh6kQPH4QR99XXtYO4RtP](https://news.yahoo.com/olympian-accuses-jersey-teacher-pulling-180146510.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAH_hkVMePzS3wIuKjQyURg05fY4F-HO6VGvYF0N8ytmXV5ARc5f9WZwhAn0PfiH-Yfq95swEihWK8tINxFqRAME8Z6rHhxJQkiZybHhOaSyXjBxbV0nxM8EWWK-QGWIMi9o_bz3L1LO7TEGycY_CsAKThh6kQPH4QR99XXtYO4RtP)

<sup>59</sup> Family says daughter’s 2nd-grade teacher ripped hijab off her head in NJ school (Oct 9, 2021) (last visited Sep. 14, 2022) <https://abc7.com/teacher-pulls-off-hijab-muslim-maplewood-seth-boyden-elementary-school/11103242/>

removed her headscarf. And this is, of course, humiliating for any Muslim woman to be exposed this way, in public.”<sup>60</sup>

72. CBS NEWSRADIO 880 indicated that the story went viral due to Muhammad’s post: “The alleged incident sparked widespread outrage Thursday when Olympic fencer Ibtihaj Muhammad, a Maplewood native, claimed in a social media post that a teacher at Seth Boyden Elementary School ‘forcibly removed’ the child’s hijab during class Wednesday.”<sup>61</sup>

73. In another example of the online furor, USA Today published a story headline indicating that the furor originated from Muhammad’s social media post, entitled *New Jersey teacher pulled hijab off second grader’s head, Olympic fencer Ibtihaj Muhammad alleges*.<sup>62</sup>

74. Newsweek, on October 8, 2021, reported Muhammad’s allegations in the first lines of their story: “An elementary school teacher was accused of ‘forcibly’ removing the hijab of a second-grade student in Maplewood, New Jersey. Olympic fencer and Maplewood native, Ibtihaj Muhammad, wrote about the interaction [on Facebook](#).”<sup>63</sup>

75. Many local outlets reported on the story, referring to Muhammad’s allegations. Patch reported on October 7, 2022, only a few hours after Muhammad’s post.

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<sup>60</sup> Teacher Accused of Forcefully Removing 2<sup>nd</sup> Grader’s Hijab (Oct 8, 2021) (last visited Sep. 14, 2022) <https://www.cbsnews.com/newyork/news/teacher-accused-of-forcibly-removing-2nd-graders-hijab-in-class/>

<sup>61</sup> Peter Haskell and Marta Zielinska, NJ mom says daughter who allegedly had hijab pulled off head by teacher is ‘very, very sad,’ WCBS NEWSRADIO 880 (Oct 9, 2021) (last visited Sep. 14, 2022), <https://www.audacy.com/wcbs880/news/local/nj-teacher-accused-of-removing-students-hijab-in-class>

<sup>62</sup> Liam Quinn, New Jersey teacher pulled hijab off second grader’s head, Olympic fencer Ibtihaj Muhammad alleges, USA Today, (Oct 9, 2021) (last visited Sep. 14, 2022), <https://www.usatoday.com/story/sports/olympics/2021/10/08/olympic-fencer-ibtihaj-muhammad-teacher-removed-student-hijab/6053259001/>

<sup>63</sup> Fatma Khaled, Elementary School Teacher Accused of ‘Forcibly’ Removing Hijab Off Girl’s Head, Newsweek, (Oct 8, 2021) (last visited Sep. 14, 2022), <https://www.usatoday.com/story/sports/olympics/2021/10/08/olympic-fencer-ibtihaj-muhammad-teacher-removed-student-hijab/6053259001/>

The first line of its story was “Olympic athlete Ibtihaj Muhammad said a Maplewood teacher was accused of removing a student’s hijab, but the teacher’s attorney denied it.”<sup>64</sup> NJ.com reported on the accusations, with the headline and the first five paragraphs of the story focusing on Muhammad and her statements.<sup>65</sup> The first line of the story published by Daily Voice Essex focused on Muhammad’s accusations.<sup>66</sup>

76. Even foreign-based outlets picked up on the story. For example, the Daily Mail Online (United Kingdom) published a story entitled *Muslim Olympic US fencer accuses NJ teacher of ‘pulling hijab off second-grade girl in front of her class.’*<sup>67</sup>

77. Other foreign, Jewish, and Muslim outlets reported on the story, including Timeturk,<sup>68</sup> an English language site that follows the news in Turkey and the world, The

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<sup>64</sup> Caren Lissner, Maplewood Probes Accusation That Teacher Removed Student’s Hijab, (Oct 7, 2021) (last visited Sep. 14, 2022), <https://patch.com/new-jersey/maplewood/maplewood-probes-whether-teacher-removed-students-hijab-reports>

<sup>65</sup> Anthony Attrino, NJ Olympian says elementary school teacher pulled hijab from 7-year old girl’s head, nj.com, (Oct 8, 2021) (last visited Sep. 14, 2022), <https://www.nj.com/education/2021/10/nj-olympian-says-elementary-school-teacher-pulled-hijab-from-7-year-old-girls-head.html>

<sup>66</sup> Cecilia Levine, NJ Teacher Accused of Ripping Hijab Off Student Was Trying To Fix Her Hood, Attorney Says, Daily Voice Essex, (Oct 9, 2021) (last visited Sep. 14, 2022), <https://www.nj.com/education/2021/10/nj-olympian-says-elementary-school-teacher-pulled-hijab-from-7-year-old-girls-head.html>

<sup>67</sup> Ronny Reyes, *Muslim Olympic US fencer accuses NJ teacher of ‘pulling hijab off second-grade girl in front of her class*, Daily Mail (Oct. 8, 2021) (last visited Aug. 10, 2022), <https://www.dailymail.co.uk/news/article-10074083/Olympic-fencer-accuses-New-Jersey-teacher-pulling-hijab-second-grade-girl.html>

<sup>68</sup> US Olympic Fencer Accuses Teacher of Removing Student’s Hijab, TIMETURK (Oct. 8, 2021) (last visited Sep. 14, 2022), <https://www.timeturk.com/en/us-olympic-fencer-accuses-teacher-of-removing-student-s-hijab/news-45518>

Jerusalem Post,<sup>69</sup> and The Times of Israel,<sup>70</sup> two English language outlets based in Israel, and other sites like Islamic Bridge<sup>71</sup> and Anadolu Agency.<sup>72</sup>

78. Smaller media outlets also picked up the story, reporting on various matters, including the numerous death threats against Herman.<sup>73</sup>

79. The damage to Herman's reputation extended well beyond negative media coverage. For example, a Change.org petition, entitled *Fire the Teacher that Pulled off a Second Grader's Hijab Forcefully!*, repeats Muhammad's false accusations, calls for Herman to be fired, and the comments thereto include anti-Jewish rhetoric.<sup>74</sup> This petition has garnered 41,006 signatures to date.<sup>75</sup>

80. Indeed, Defendants' notoriety and the public platform that comes with such notoriety, coupled with the inflammatory nature of their false accusations, caused their lies to resonate with such force that on October 8, 2021, even New Jersey Governor Phil Murphy offered his opinion on his Twitter account, on which he has over 447,000

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<sup>69</sup> Shira Hanau, Jewish teacher accused of forcibly removing a student's hijab at NJ school (Oct. 11, 2021) (last visited Sep. 14, 2022), <https://www.jpost.com/diaspora/jewish-teacher-accused-of-forcibly-removing-a-students-hijab-at-nj-school-681687>

<sup>70</sup> Shira Hanau, Jewish teacher accused of forcibly removing a student's hijab at NJ school (Oct. 12, 2021) (last visited Sep. 14, 2022), <https://www.timesofisrael.com/jewish-teacher-accused-of-forcibly-removing-a-students-hijab-at-nj-school/>

<sup>71</sup> Maplewood Teacher Accused of Pulling Hijab Off Student's Head (last visited Sep. 14, 2022), <https://islamicbridge.com/2021/10/maplewood-teacher-accused-of-pulling-hijab-off-students-head/>

<sup>72</sup> Michael Hernandez, US Olympic fencer accuses teacher of removing student's hijab. Anadolu Agency (Oct 8, 2021) (last visited Sep. 14, 2022), <https://www.aa.com.tr/en/americas/us-olympic-fencer-accuses-teacher-of-removing-students-hijab/2386878>

<sup>73</sup> Sumanti Sen, *Tamar Herman: Teacher gets death threats after Olympian's 'fake' story of her pulling off girl's hijab*, Meaww.com (Oct. 12, 2021) (last visited Aug. 10, 2022), <https://meaww.com/tamar-herman-new-jersey-teacher-gets-death-threats-after-pulling-off-girls-hijab>

<sup>74</sup> <https://www.change.org/p/everyone-fire-the-teacher-that-pulled-off-a-second-grader-s-hijab-forcefully> (last visited Aug. 15, 2022).

<sup>75</sup> *Id.*

followers.<sup>76</sup> Governor Murphy, further fanning the flames of the fire started by Defendants, tweeted, *inter alia*, that he was “[d]eeply disturbed by these accusations.”<sup>77</sup>

81. More damage was done on the local level with Herman being denounced in her community. Already mentioned is the condemnation of Herman by the rabbi from Herman’s childhood congregation, which was shared by others in the community. In addition, the SOMA Black Parent Workshop issued a statement on October 11, 2021 denouncing Islamophobia and notifying the Essex County Prosecutor’s office of the alleged incident, saying that the story is part of a pattern of abuse of Black children in the District. SOMA Justice, a racial justice/social justice organization in Maplewood/South Orange, thanked Muhammad on Instagram for drawing attention to this case and pledged to purchase Muhammad’s book for every elementary school classroom in the District. In addition, local Facebook group comments like those in SOMA Lounge accused Herman of Islamophobia, racism, and of perpetrating a hate crime—all because of the false accusations spread by the defendants.

**F. Herman’s Relationship with Muhammad, Muhammad’s Reckless Actions, and Muhammad’s Refusal to Retract Her Defamatory Social Media Posts Upon Herman’s Request**

82. Prior to October 7, 2021, Herman and Muhammad had been friendly for many years, having met at a gym where they shared the same personal trainer. They had worked out together at the gym on numerous occasions, had discussed holding a cross-cultural education event at the School, exchanged phone numbers, and were friends on

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<sup>76</sup>

<https://twitter.com/GovMurphy/status/1446584729550168066?s=20&t=mvOJKYGYokMw6NMFyVE6M> (last visited Aug. 17, 2022).

<sup>77</sup> *Id.*

Facebook, where Herman (and her ex-husband) had posted messages of support for Muhammad on a number of occasions, including at least one message in which Herman specifically recognized the significance of Muhammad’s achievements as a “Muslim female athlete”:

- On April 10, 2019, Herman posted on Facebook: “Go Ibtihaj! A Seth Boyden graduate and a Muslim female athlete who has amazing discipline, determination, and purpose in spite of soooo much adversity.”
- On May 5, 2019, Herman posted: “Go Ibtly! A Seth Boyden student and Bronze medal in the Olympics!”
- On August 6, 2016, Herman’s then-husband posted about Muhammad: “Rooting for her! She works out at the local gym with my wife.”

83. As well, on July 25, 2018, Herman attended a reading at a local bookstore for Muhammad’s book, *Proud: My Fight for an Unlikely American Dream*. Herman has a signed copy of the book, which she has used in her classroom. Herman also had a poster of Muhammad displayed in the hallway outside her classroom on a special class bulletin board of character traits and accomplishments. The class studied Muhammad as an example of perseverance, persistence, dedication, overcoming obstacles, overcoming adversity, and achieving excellence in spite of it all. Herman was a fan of Muhammad and repeatedly asked Muhammad to come speak to her students.

84. Without ever seeking Herman’s version of the interaction with the Student—something Muhammad could have easily done, given the fact that they were friends on Facebook and that they had exchanged phone numbers—Muhammad heedlessly repeated and embellished the words of the mother of the Student, Cassandra Wyatt, whom she personally knew. Muhammad’s posting of the mother’s report of what her 7-year-old said was reckless, as Muhammad knew that Herman was not Islamophobic and, to the contrary, repeatedly celebrated Muhammad’s Muslim heritage, and it is

common knowledge that young children are not reliable reporters and can be easily manipulated.

85. Furthermore, Muhammad’s repetition and embellishment of Wyatt’s inflammatory and false accusations was even more egregious because, upon information and belief, Muhammad was familiar with Wyatt’s antisemitic sentiments—knowledge that should have made her highly suspicious of Wyatt’s distorted presentation of Herman, who is Jewish.

86. Wyatt made numerous disparaging comments about Herman’s Jewish identity. Wyatt concluded a video that she posted on Facebook, in which she coaches her child about the interaction, with the words, “She’s Jewish. She’s Jewish,” as if Herman’s Judaism explains why her story is true.<sup>78</sup> Wyatt openly admitted that it was her discovery that Herman was Jewish that changed her understanding of what happened, posting on her Facebook account, “I JUST FOUND OUT THE TEACHER IS JEWISHHHHHHHHHHH                   . . . that’s why I believe she did it now I’m furious.” She also wrote, “Allahumma Aaaminnnn I keep saying the speechless I Im blown back I’m confused... so I kept mute.. I had no understanding she been in her class a month now....Nowwww I’m not speechless nor mute I undestand nowww.... SHE’S JEWISH OO SUS GOT A PROBLEM ON HER HANDS.” She posted on the SOMA Justice page the following statements

*SHES JEWISH! Period TRY & CHANGE THAT! Imma print 1000 SHIRTS THAT SAYS HERMAN IS JEWISH! Imma keep saying that! Isn’t she? A JEWSIH TEACHER THAT TAUGHT AT A JEWISH SCHOOL & A PUBLIC SCHOOL FOR 30 YEARS PULLED MY MUSLIM 7 YEAR OLD DAUGHTER HIJAB OFF HER HEAD CLAIMING IT WAS A HOODIES.. SHES JEWISH!*

<sup>78</sup> <https://rumble.com/vnktof-nj-hijab-story-mothers-facebook-live-session-she-deleted.html> (last visited Sep. 21, 2022, see 8:22-8:27)

*SHES JEWISH! HERMAN IS JEWISH AM IM WRONG?! SHES JEWISH! A JEWISH TEACHER PULLED MY 7 YEAR OLD MUSLIM DAUGHTER HIJAB OFF HER HEAD IN FRONT OF HER CLASS. WHO ONCE TAUGHT AT A JEWISH SCHOOL ALSO TAUGHT AT A PUBLIC SCHOOL FOR 30 YEARS CLAIMING IT WAS A HOODIE*

*HERMAN IS JEWISH!!!! IMMA PRINT 1000 SHIRTS SAYING HERMAN IS JEWISH &&& WHEN THE MUSLIMS COME OUT BCUZ IVE BEEN TRYING TO HOLD THEM BACK FROM FLOODING UR CITY. ILL BE SURE TO DROP TO DROP THE 1000 SHIRTS MASK && HATS OFF AT THE MASJID!*

*IM THE ONE THAT'S TRYING TO STOP THE MUSLIMS FROM ALL OVER FROM COMING OUT! ME THE VICTIMS MOTHER TRYING TO PROTECT OTHER KIDS && MOMS FEELINGS... NOW I WONT SAY A WORD IF THEY FEEL THEY WANNA FLOOD UR CITY IMMA SIP MY TEA 🍵*

87. Moreover, Muhammad's posting of such inflammatory accusations was particularly reckless because, she knew or should have known that the mother's accusations were in service of her own greed. The child's mother openly exhibited her desire to profit off a lawsuit<sup>79</sup> when she wrote on Facebook, "Allah perfect in his planning" in response to a post congratulating her for hitting the "jackpot."

88. Furthermore, Muhammad, instead of using her private access to Herman to check the accuracy of the allegations, used her personal connection to Herman to make her defamation "go viral." In the time Muhammad spent browsing Herman's private Facebook page to dig up the years-old photo of Herman for her false narrative, she could have privately messaged, called, or texted Herman to obtain her version of events. Muhammad's use of Herman's private Facebook page to obtain photos for her defamatory allegations was particularly reckless, given that she knew from Herman's supportive Facebook posts, multiple school speaking requests, and from her book event attendance and book purchase that it was not in Herman's character to have "forcibly"

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<sup>79</sup> Indeed, the Wyatt family filed a lawsuit against the SOMA District and Herman in March of 2022.

removed a hijab, or “stripped” a child of her clothing in front of classmates, or told a child that she need not wear her hijab to school anymore. Further, displaying a photograph of Herman along with her defamatory accusations served to promote visual recognition of her by members of the public, putting a target on her back.

89. Accordingly, on October 7, 2021 at 8:14 p.m. Eastern Time (approximately four hours after Muhammad’s first post regarding the previous day’s events), Herman and Muhammad exchanged several text messages in which Herman informed Muhammad that her social media posts were untrue. In a response, Muhammad admitted that she was relying on the recall of a 7 year old [who, as aforementioned video reveals, was being coached by her mother, something Muhammad knew or should have known<sup>80</sup>].

90. On October 9, 2021 at 8:24 p.m. Eastern Time, after receiving no further response from Muhammad and seeing that her Instagram and Facebook posts had not been deleted, Herman sent another text message to Muhammad. In this message, Herman again attempted to correct the record by explaining briefly what had transpired between her and the Student. Further, Herman wrote that, due to Muhammad’s “tremendous” influence, her social media messages had “turned [Herman’s] life upside down overnight,” and had resulted in Herman “receiving threats” and “being hounded by the media.” Herman explicitly stated that what had been posted by Muhammad and reported on the media was “completely false and terribly damaging.” She further requested that Muhammad remove the social media posts, explain that there are varying accounts of the

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<sup>80</sup> *Id.*, <https://rumble.com/vnktof-nj-hijab-story-mothers-facebook-live-session-she-deleted.html> (last visited Sep. 21, 2022) Notably, this video reveals that, even with the coaching, the child does not corroborate Muhammad’s false and inflammatory claims.

interaction, and allow the District to carry out its investigative process before passing judgment. Muhammad did not reply.

91. Rather than heed Herman's reasonable requests, instead, on or around October 30, 2021, Muhammad posted an Instagram Live video in which she referred to the "alleged incident" that happened in Maplewood, NJ, though she did not mention Herman by name.

92. The fact that Herman and Muhammad knew each other well enough to each have the other's phone numbers, and the fact that Herman immediately gave Muhammad an opportunity to correct or retract her defamatory posts, are particularly significant, as Muhammad's choice to instead perpetuate her lies and to not correct or retract her defamatory posts, and her choice to act as judge and jury, caused incalculable harm to Herman that was cruel, needless, and undertaken to advance Muhammad's personal, financial and political agendas.

93. Further, the fact that—subsequent to Herman's communications and almost one month after the initial post—Muhammad referred to the teacher-student interaction as the "alleged incident," which evidenced that Muhammad was aware at that point that she had committed libel against Herman and was (unsuccessfully) attempting to buffer herself *against her own libelous statements*. In all her previous posts, Muhammad, motivated by her desire to sell her book and burnish her brand, never once used the word "allegedly" – presenting her false allegations as statements of fact.

**FIRST COUNT – Defamation *Per Se***  
**(All Defendants)**

94. Herman repeats, reiterates, and restates each and every allegation contained herein with the same force and effect as if set forth at length.

95. At 4:03 p.m. Eastern Time on October 7, 2021, Muhammad knowingly, maliciously, and willfully published the following false and harmful statements about Herman, without authorization or privilege, on Muhammad’s Facebook and Instagram accounts, featuring a photo of her book *The Proudest Blue: A Story of Hijab and Family* and the following message:

*I wrote this book with the intention that moments like this would never happen again. When will it stop? Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. School should be a haven to all of our kids to feel safe, welcome and protected – no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@sommsd.k12.nj.us](mailto:sglander@sommsd.k12.nj.us) and the superintendent [rtaylor@sommsd.k12.nj.us](mailto:rtaylor@sommsd.k12.nj.us)*

96. In truth, Herman did not “forcibly remove[]” the Student’s hijab. Herman gently brushed back what she thought was a hood a few inches, based on her good-faith assumption that the Student was wearing her form-fitting hijab underneath. The Student did not “resist[]” in any way and there was no physical struggle of any kind. The interaction lasted only mere moments, Herman restored the Student’s hood to its original position immediately and apologized, and at no time did the hood come off the Student’s

head. Herman did not “pull[] the hijab off,” and Herman did not tell the Student that “her hair was beautiful and she did not have to wear a hijab to school anymore.” In fact, Herman said nothing to the Student during the interaction other than the initial request to remove the hood and the apology after Herman discovered that the Student was not wearing her form-fitting hijab underneath the hood. Herman did not “strip[]” the Student of her clothing in front of the class. Herman did not remove any articles of clothing from the Student other than gently brushing the hood back a few inches. Herman did not “abuse” the Student in any way, and in fact did not touch the child. Finally, Herman did not engage in an act of racism or bigotry.

97. Muhammad has never retracted or withdrawn these defamatory statements contained in Muhammad Post #1, despite Herman having requested that Muhammad do so.

98. Muhammad’s inclusion of a photo of her book *The Proudest Blue: A Story of Hijab and Family* and her reference to the book in the post clearly demonstrate that, in making this defamatory post, she was substantially motivated by profit and by drawing attention to herself and her personal brand, and that the post was made with reckless disregard for the truth. Furthermore, the comments she received from people, thanking her for standing up against bigotry and wishing to buy her book, showed the effectiveness of her strategy.

99. At 4:30 p.m. Eastern Time on October 7, 2021, Muhammad knowingly, maliciously, and willfully published the following false and harmful statements about Herman, without authorization or privilege, on social media sites, including but not

limited to Muhammad’s Instagram account, featuring photos of the School and a photo of Herman herself, with the following message:

*Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@somsd.k12.Nj.us](mailto:sglander@somsd.k12.Nj.us) and the superintendent [Rtaylor@somsd.k12.Nj.us](mailto:Rtaylor@somsd.k12.Nj.us)*

[@cair\\_national](#) [@cair.nj](#)

100. In truth, Herman did not “forcibly remove[]” the Student’s hijab; Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her form-fitting hijab underneath the hood. The Student did not “resist[]” in any way and there was no physical struggle of any kind. Rather, the interaction lasted only mere moments and Herman restored the hood to its original position immediately. Herman did not “pull[] the hijab off.” Herman did not tell the Student that “her hair was beautiful and she did not have to wear a hijab to school anymore.” In fact, Herman said nothing to the Student during the interaction other than the initial request to remove the hood and the apology after Herman discovered that the Student was not wearing her form-fitting hijab underneath the hood. Herman did not “strip[]” the Student of her clothing in front of the class; Herman did not remove any articles of clothing from the Student other than gently brushing the hood back a few

inches. Herman did not “abuse” the Student in any way, and in fact did not touch the student. Finally, Herman did not engage in an act of racism or bigotry.

101. Muhammad has never retracted or withdrawn these defamatory statements contained in Muhammad Post #2, despite Herman having requested that Muhammad do so.

102. On October 8, 2021, at 12:41 a.m. Eastern Time, Maksut knowingly, maliciously, and willfully published the following false and harmful statements about Herman without authorization or privilege on his Twitter account:

*Absolutely unacceptable. Teacher pulls off 7 year old’s hijab...in front of the class.*

*Our @CAIRNJ office is calling for immediate termination.*

*Racist teachers like this cannot be trusted around our children.*

103. In truth, Herman did not “pull off [a] 7 year old’s hijab . . . in front of the class,” Herman is not a “[r]acist teacher,” and Herman is a highly trustworthy teacher with a track record of maintaining supportive classroom communities built over a period of twenty years educating students in the District.

104. CAIR NJ Executive Director Maksut said to CBS News: “The teacher not only put her hands on her, removed her headscarf. And this is, of course, humiliating for any Muslim woman to be exposed this way, in public.”<sup>81</sup> These statements were false.

105. In truth, Herman never “put her hands on” the Student, did not “remove her headscarf,” and did not “expose” her.

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<sup>81</sup> Teacher Accused of Forcefully Removing 2<sup>nd</sup> Grader’s Hijab (Oct 8, 2021) (last visited Sep. 14, 2022) <https://www.cbsnews.com/newyork/news/teacher-accused-of-forcibly-removing-2nd-graders-hijab-in-class/>

106. Maksut, CAIR, and CAIR NJ have never retracted or withdrawn these defamatory statements contained in Maksut Post #1 or the CBS News Interview.

107. Also on October 8, 2021, CAIR knowingly, maliciously, and willfully published the following false and harmful statement about Herman without authorization or privilege on its Facebook and Twitter accounts:

*A teacher pulled off a 7-year-old student's hijab in front of her class. This is completely unacceptable, and we are calling for immediate termination. Our children are not safe with #Islamophobia in the classroom.*

108. In truth, Herman did not “pull[] off a 7-year-old student’s hijab in front of her class,”and Herman did not engage in an act of Islamophobia.

109. CAIR has never retracted or withdrawn this defamatory statement.

110. At approximately 2:13 p.m. Eastern Time on October 8, 2021, Maksut knowingly, maliciously, and willfully published the following false and harmful statement about Herman without authorization or privilege in reply to his original Tweet:

*Call and email the Superintendent, Dr. Ronald G. Taylor, today, and let him know Tamar Wyner Herman<sup>82</sup> is unfit to be a teacher.*

*rtaylor@somso.k12.nj.us  
(973) 762-5600*

111. In truth, Herman is a highly fit teacher who worked tirelessly for *all* her students and helped many students make dramatic strides in their learning year after year. She had a strong pedagogical record built over a thirty-three-year teaching career, with twenty years in the District.

112. Maksut, CAIR, and CAIR NJ have never retracted or withdrawn this defamatory statement contained in Maksut Post #2.

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<sup>82</sup> Wyner is Herman’s maiden name.

113. On October 8, 2021 at 3:56 p.m. Eastern Time, CAIR and Maksut knowingly, maliciously, and willfully published the following false and harmful statement about Herman without authorization or privilege:

*CAIR-NJ Exec. Dir. Selaedin Maksut: “Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.”*  
 @CAIRNJ @MSelaedin  
 #Islamophobia

114. In truth, Herman did not “forcefully strip[] off the religious headscarf of a Muslim girl . . . .”

115. CAIR and Maksut have never retracted or withdrawn this defamatory statement contained in this Twitter post.

116. On October 8, 2021 at 7:34 a.m. Eastern Time, ABC aired the GMA Report (which CAIR then posted on its CAIRtv YouTube account, its Facebook and Twitter accounts, and the CAIR NJ Facebook account), in which Maksut was quoted as follows:

*The hijab, you know, is much like any other article of clothing for a Muslim woman. To remove that publicly can be very humiliating. Anyone who thinks its OK to do this to a student clearly is not fit to be a teacher.*

117. In truth, Herman is a highly fit teacher with a strong pedagogical record built over a thirty-three-year teaching career, with twenty years in the District.

118. Maksut, CAIR, and CAIR NJ have never retracted or withdrawn this defamatory statement made in the GMA Report.

119. On October 8, 2021, at 11:28 a.m. Eastern Time, CAIR posted the Press Release knowingly, maliciously, and willfully, without authorization or privilege, on the CAIR website containing the following quote from Maksut:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ. Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

120. In truth, Herman did not “pull[] off the headscarf of a young Muslim student” (Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her form-fitting hijab underneath), Herman did not “[f]orcesfully strip[] off the religious headscarf of a Muslim girl, and Herman did not engage in an act of Islamophobia.

121. Maksut, CAIR, and CAIR NJ have never retracted or withdrawn these defamatory statements.

122. On October 8, 2021 at 11:42 a.m. Eastern time, CAIR posted the following message knowingly, maliciously, and willfully, without authorization or privilege, on its Twitter account:

*Our children must be protected from anti-Muslim bigotry and abuse at school. The teacher who pulled a second grader's hijab off in class must be fired immediately.  
#Islamophobia  
@cairnj @MSelaedin*

123. In truth, Herman did not “pull[] a second grader’s hijab off in class” (Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her regular form-fitting hijab underneath).

124. CAIR has never retracted or withdrawn this defamatory statement.

125. On October 8, 2021, at 11:49 a.m. Eastern Time, CAIR NJ posted the following message knowingly, maliciously, and willfully, without authorization or privilege, on the CAIR NJ Twitter and Facebook accounts:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ.*

*Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

126. In truth, Herman did not “pull[] off the headscarf of a young Muslim student”; Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her regular form-fitting hijab underneath. Herman did not “[f]orcefully strip[] off the religious headscarf of a Muslim girl, and Herman did not engage in an act of Islamophobia.

127. CAIR and CAIR NJ have never retracted or withdrawn these defamatory statements.

128. Upon information and belief, all of these false and defamatory statements set forth in this Complaint were substantially motivated by Defendants’ desires to burnish their brand as fighters against Islamophobia.

129. All of these aforementioned false and defamatory statements made by Defendants and set forth in this Complaint constitute defamation *per se* because they were and still are about Herman and relating to Herman; were knowingly and/or with recklessness and/or malice published to third parties; falsely impugn, attack, malign, and

destroy Herman's professional reputation as a teacher, her reputation for fitness and trustworthiness as a teacher, her character, her honesty, her integrity, her tolerance, and her mental state; and, moreover, because these false and defamatory statements accuse Herman of engaging in criminal behavior and portray Herman as being a bigot, a racist, and generally as a disreputable and loathsome person.

130. All of these false and defamatory statements set forth in this Complaint have proximately caused Herman to be subjected to threats to her physical safety, antisemitic vitriol and hatred, relentless harassment from strangers, merciless bullying and ridicule, being the object of shame in local and national news stories, and to be subjected to humiliation in front of her community, by being placed by the District indefinitely on administrative leave from her teaching position, by a District letter sent to all District families associating Herman with Islamophobia, by being used as an example of bigoted behavior in a District-wide teacher professional development implicit bias training, by a Twitter post from Governor Phil Murphy, and by a public Facebook condemnation from the rabbi of her childhood synagogue. Furthermore, the defamation caused her to be put in a position of having no reasonable prospect of securing future public school teaching opportunities, to be subjected to a criminal investigation and the threat of criminal charges, to suffer emotional and mental harm to such a degree that she had no realistic choice but to permanently move out of her home, and, prior to that, to have to ask for police protection and temporarily relocate in order to escape the horrific fallout of the immediate aftermath of the Defendants' lies.

131. Herman, who had resided at her home for twenty-seven years, did not want to move but, as a result of Defendants' lies, Herman no longer felt safe in her home.

Indeed, ever since Defendants published their lies, Herman has experienced paralyzing fear every time she steps outside her home, and she surveys her surroundings for people who may wish her harm. In fact, ever since Defendants published their lies, Herman has stopped walking around the town of Maplewood, where she grew up and lived for more than twenty-five years, for fear that she will encounter someone who wishes her harm.

132. Moreover, as a result of Defendants' defamatory statements and their explosive consequences, Herman has been taking medication, seeing a psychotherapist on a regular basis, and has become terrified of visiting public locations.

133. The mental and physical harm suffered by Herman as a result of Defendants' defamatory statements and their explosive consequences are tangible and acute. For example, since the defamatory statements, Herman began to suffer and continues to suffer from devastating headaches that continue to plague her. She also is unable to get adequate sleep. And, as a result of the stress she experienced, she had to take prescription medication and still struggles to sleep through the night.

134. As a result of the foregoing, all of the Defendants are liable to Herman for defamation *per se*.

135. As a consequence of Defendants' defamation, Herman has been damaged, in an amount to be determined upon trial of this action, and is entitled to a money judgment against Defendants for compensatory damages, together with punitive damages, all in an amount to be determined upon trial of this action.

**SECOND COUNT – False Light Invasion of Privacy**  
**(All Defendants)**

136. Herman repeats, reiterates, and restates each and every allegation contained herein with the same force and effect as if set forth at length.

137. At 4:03 p.m. Eastern Time on October 7, 2021, Muhammad knowingly, recklessly, maliciously, and willfully published the following false and harmful statements about Herman, without authorization or privilege, on Muhammad’s Facebook and Instagram accounts, featuring a photo of her book *The Proudest Blue: A Story of Hijab and Family* and the following message:

*I wrote this book with the intention that moments like this would never happen again. When will it stop? Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. School should be a haven to all of our kids to feel safe, welcome and protected – no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@somsd.k12.nj.us](mailto:sglander@somsd.k12.nj.us) and the superintendent [rtaylor@somsd.k12.nj.us](mailto:rtaylor@somsd.k12.nj.us)*

138. In truth, Herman did not “forcibly remove[]” the Student’s hijab; Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her regular form-fitting hijab underneath. The Student did not “resist[]” in any way and there was no physical struggle of any kind; the interaction lasted only mere moments and Herman restored the hood to its original position immediately. Herman did not “pull[] the hijab off,” and Herman did not tell the Student that “her hair was beautiful and she did not have to wear a hijab to school anymore.” In fact, Herman said nothing to the Student during the interaction other than the initial request to remove the hood and the apology after Herman discovered that the Student was

not wearing her form-fitting hijab underneath the hood. Herman did not “strip[.]” the Student of her clothing in front of the class; Herman did not remove any articles of clothing from the Student other than gently brushing the hood back a few inches. Herman did not “abuse” the Student in any way, and Herman did not engage in an act of racism or bigotry.

139. These defamatory statements were false and created a false public impression about Herman. These statements were highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Muhammad, in making these defamatory statements, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

140. At 4:30 p.m. Eastern Time on October 7, 2021, Muhammad knowingly, maliciously, and willfully published the following false and harmful statements about Herman, without authorization or privilege, on Muhammad’s Instagram account, featuring photos of the School and a photo of Herman herself taken from her private Facebook page, with the following message:

*Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in the way we dress. Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@somsd.k12.Nj.us](mailto:sglander@somsd.k12.Nj.us) and the superintendent [Rtaylor@somsd.k12.Nj.us](mailto:Rtaylor@somsd.k12.Nj.us)*

*@cair\_national @cair.nj*

141. In truth, Herman did not “forcibly remove[]” the Student’s hijab; Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her form-fitting hijab underneath. The Student did not “resist[]” in any way and there was no physical struggle of any kind; the interaction lasted only mere moments and Herman restored the hood to its original position immediately. Herman did not “pull[] the hijab off.” Herman did not tell the Student that “her hair was beautiful and she did not have to wear a hijab to school anymore.” In fact, Herman said nothing to the Student during the interaction other than the initial request to remove the hood and the apology after Herman discovered that the Student was not wearing her form-fitting hijab underneath the hood. Herman did not “strip[]” the Student of her clothing in front of the class; Herman did not remove any articles of clothing from the Student other than gently brushing the hood back. Herman did not “abuse” the Student in any way, and Herman did not engage in an act of racism or bigotry.

142. These defamatory statements were false and created a false public impression about Herman. These statements were highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Muhammad, in making these defamatory statements, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

143. On October 8, 2021, at 12:41 a.m. Eastern Time, Maksut knowingly, maliciously, and willfully published the following false and harmful statements about Herman, without authorization or privilege, on his Twitter account:

*Absolutely unacceptable. Teacher pulls off 7 year old’s hijab...in front of the class.*

*Our @CAIRNJ office is calling for immediate termination.*

*Racist teachers like this cannot be trusted around our children.*

144. In truth, Herman did not “pull off [a] 7 year old’s hijab . . . in front of the class,” Herman is not a “[r]acist teacher,” and Herman is a highly trustworthy teacher with a track record of building supportive classroom communities over a thirty-three-year teaching career, with twenty years in the District.

145. These defamatory statements were false and created a false public impression about Herman. These statements were highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Maksut, in making these defamatory statements, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

146. Also on October 8, 2021, CAIR knowingly, maliciously, and willfully published the following false and harmful statement about Herman, without authorization or privilege, on its Facebook and Twitter accounts:

*A teacher pulled off a 7-year-old student’s hijab in front of her class. This is completely unacceptable, and we are calling for immediate termination. Our children are not safe with #Islamophobia in the classroom.*

147. In truth, Herman did not “pull[] off a 7-year-old student’s hijab in front of her class,” and Herman did not engage in an act of Islamophobia.

148. This defamatory statement was false and created a false public impression about Herman. This statement was highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, CAIR, in making this defamatory statement, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

149. At approximately 2:13 p.m. Eastern Time on October 8, 2021, Maksut knowingly, maliciously, and willfully published the following false and harmful statement about Herman, without authorization or privilege, in reply to his original Twitter post:

*Call and email the Superintendent, Dr. Ronald G. Taylor, today, and let him know Tamar Wyner Herman is unfit to be a teacher.*

*rtaylor@somds.k12.nj.us  
(973) 762-5600*

150. In truth, Herman is a highly fit teacher with a strong pedagogical record built over a thirty-three-year teaching career, with twenty years in the District.

151. This defamatory statement was false and created a false public impression about Herman. This statement was highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Maksut, in making this defamatory statement, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman was placed.

152. On October 8, 2021 at 3:56 p.m. Eastern Time, CAIR and Maksut knowingly, maliciously, and willfully published the following false and harmful statement about Herman, without authorization or privilege:

*CAIR-NJ Exec. Dir. Selaedin Maksut: “Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.”*

*@CAIRNJ @MSelaedin  
#Islamophobia*

153. In truth, Herman did not “forcefully strip[] off the religious headscarf of a Muslim girl . . . .”

154. This defamatory statement was false and created a false public impression about Herman. This statement was highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, CAIR and Maksut, in making this defamatory statement, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman was placed.

155. On October 8, 2021 at 7:34 a.m. Eastern Time, ABC aired the GMA Report (which CAIR then posted on its YouTube account, CAIRtv, its Facebook and Twitter accounts, and the CAIR NJ Facebook account), in which Maksut was quoted as follows:

*The hijab, you know, is much like any other article of clothing for a Muslim woman. To remove that publicly can be very humiliating. Anyone who thinks its OK to do this to a student clearly is not fit to be a teacher.*

156. In truth, Herman is a highly fit teacher with a strong pedagogical record built over a thirty-three-year teaching career, with twenty years in the District.

157. This defamatory statement was false and created a false public impression about Herman. This statement was highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Maksut, in making this defamatory statement, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

158. On October 8, 2021, at 11:28 a.m. Eastern Time, CAIR posted the Press Release knowingly, maliciously, and willfully, without authorization or privilege, on the CAIR website and Facebook account, containing the following quote from Maksut:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ. Forcefully stripping off the religious headscarf of*

*a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

159. In truth, Herman did not “pull[] off the headscarf of a young Muslim student” and Herman did not “[f]orcefully strip[] off the religious headscarf of a Muslim girl, and Herman did not engage in an act of Islamophobia.

160. These defamatory statements were false and created a false public impression about Herman. These statements were highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, Maksut, in making these defamatory statements, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

161. On October 8, 2021 at 11:42 a.m. Eastern time, CAIR posted the following message knowingly, maliciously, and willfully, without authorization or privilege, on its Twitter account:

*Our children must be protected from anti-Muslim bigotry and abuse at school. The teacher who pulled a second grader's hijab off in class must be fired immediately.  
#Islamophobia  
@cairnj @MSelaedin*

162. In truth, Herman did not “pull[] a second grader’s hijab off in class.” Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her regular form-fitting hijab underneath.

163. This defamatory statement was false and created a false public impression about Herman. This statement was highly offensive to Herman and would have been

offensive to any other reasonable person. Moreover, CAIR, in making this defamatory statement, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

164. On October 8, 2021, at 11:49 a.m. Eastern Time, CAIR NJ posted the following message knowingly, maliciously, and willfully, without authorization or privilege, on the CAIR NJ Twitter and Facebook accounts:

*We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ.*

*Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.*

165. In truth, Herman did not “pull[] off the headscarf of a young Muslim student.” Herman gently brushed the Student’s hood back a few inches based on her good-faith assumption that the Student was wearing her regular form-fitting hijab underneath. Herman did not “[f]orcesfully strip[] off the religious headscarf of a Muslim girl, and Herman did not engage in an act of Islamophobia.

166. CAIR NJ Executive Director Maksut said to CBS News: “The teacher not only put her hands on her, removed her headscarf. And this is, of course, humiliating for any Muslim woman to be exposed this way, in public.”<sup>83</sup> These statements were false.

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<sup>83</sup> Teacher Accused of Forcefully Removing 2<sup>nd</sup> Grader’s Hijab (Oct 8, 2021) (last visited Sep. 14, 2022) <https://www.cbsnews.com/newyork/news/teacher-accused-of-forcibly-removing-2nd-graders-hijab-in-class/>

167. In truth, Herman never “put her hands on” the Student, did not “remove her headscarf,” and did not “expose” her.

168. These defamatory statements were false and created a false public impression about Herman. These statements were highly offensive to Herman and would have been offensive to any other reasonable person. Moreover, CAIR and CAIR NJ, in making these defamatory statements, acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

169. All of these false and defamatory statements by the Defendants constitute the tort of false light invasion of privacy *per se* because they falsely impugn, attack, malign, and destroy Herman’s professional reputation as a teacher, her reputation for fitness and trustworthiness as a teacher, her character, her honesty, her integrity, her tolerance, her mental state, and, moreover, because these false and defamatory statements accuse Herman of engaging in criminal behavior and portray Herman as being a bigot, a racist, and generally as a disreputable and loathsome person. Thus, the false light in which Defendants placed Herman would be highly offensive to a reasonable person. Moreover, all of the Defendants acted in reckless disregard as to the falsity of the publicized matters and the false light in which Herman would be placed.

170. These false and defamatory statements, which place Herman in false light, have proximately caused Herman to be subjected to threats to her physical safety, antisemitic vitriol and hatred, relentless harassment from strangers, merciless bullying and ridicule, being the object of shame in local and national news stories, and subjected to humiliation in front of her community, by being placed by the District indefinitely on administrative leave from her teaching position, by a District letter sent to all District

families associating Herman with Islamophobia, by being used as an example of bigoted behavior in a District-wide teacher professional development implicit bias training, by a Twitter post from Governor Phil Murphy, and by a public Facebook condemnation from the rabbi of her childhood synagogue. Furthermore the defamation caused her to be put in a position of having no reasonable prospect of securing future public school teaching opportunities, to be subjected to a criminal investigation and the threat of criminal charges, to suffer emotional and mental harm to such a degree that she has had no realistic choice but to permanently move out of her home, and, prior to that, to have to ask for police protection and temporarily relocate in order to escape the horrific fallout of the immediate aftermath of Defendants' lies.

171. As a result of the foregoing, all of the Defendants are liable to Herman for the tort of false light.

172. As a consequence of Defendants' defamation, Herman has been damaged in an amount to be determined upon trial of this action and is entitled to a money judgment against Defendants for compensatory damages, together with punitive damages, all in an amount to be determined upon trial of this action.

**WHEREFORE**, Plaintiff, Tamar Herman, demands the following relief and judgment against Defendants:

- (a) Entry of Judgment in favor of Plaintiff and against Defendant Muhammad, in an amount to be proven at trial;
- (b) Entry of Judgment in favor of Plaintiff and against Defendant Maksut, in an amount to be proven at trial;
- (c) Entry of Judgment in favor of Plaintiff and against Defendant CAIR, in an

amount to be proven at trial;

- (d) Entry of Judgment in favor of Plaintiff and against Defendant CAIR NJ, in an amount to be proven at trial;
- (e) An award of pre- and post-judgment interest in favor of Plaintiff;
- (f) Punitive damages;
- (g) An award to Plaintiff of attorneys' fees;
- (h) Any other relief which to the Court seems just and proper.

DATED: Oct. 5, 2022

Respectfully submitted,

/Erik Dykema/  
Bochner IP PLLC  
Erik Dykema  
295 Madison Ave., 12<sup>th</sup> Floor  
New York, NY 10017  
646-971-0685 (Tel.)  
erik@bochnerip.com  
*Attorneys for Plaintiff*  
*Tamar Herman*

**DESIGNATION OF TRIAL COUNSEL**

Erik Dykema, Esq. is designated as trial counsel in this matter.

/Erik Dykema/  
Bochner IP PLLC  
Erik Dykema

**CERTIFICATION PURSUANT TO R. 4:5-1**

I certify that to the best of my knowledge there are no other pending actions or arbitration proceedings concerning the subject of this action, and that no such other

actions or arbitration proceedings are contemplated at this time. I further certify that I know of no other persons who should be joined as parties in this action at this time.

/Erik Dykema/  
Bochner IP PLLC  
Erik Dykema

**JURY DEMAND**

Plaintiff, by and through her undersigned attorneys, hereby demands a trial by jury as to all issues herein.

Respectfully submitted,

/Erik Dykema/  
Bochner IP PLLC  
Erik Dykema



EXHIBIT A

**Connection:** Have you ever had an experience when you were reading, when it was hard to keep track of all the characters? Perhaps you had a hard time remember who was doing what or who was saying certain things?



**EXHIBIT B**

2021

To: \_\_\_\_\_  
 Mrs. Herman,  
 You were really  
 a hero this year &  
 magically made this  
 year great! [redacted] hopes  
 this bracelet reminds  
 you of him" or [redacted]

Fri day

Dear Mrs Herman,

You are the most

thoughtful teacher in the world,

Thank you so much for the

phone call yesterday. I'm

glad it was recorded on the

machine so I could play it

for [redacted] when he got home,

and I'll save it to play it

for my in-laws when they visit  
next.

See you at 10:30 (10:00) -  
[redacted]

Dear Ms. Herman,

What a wonderful two years we have had with you. It's been such a joy to watch [REDACTED] grow and gain confidence in herself at school. Your guidance and encouragement have truly shaped the way [REDACTED] views herself. To think about the person she was coming into first grade last year, I'm amazed to see the person she's entering third grade as. I love that

You've taught the class to push through their fears and that you've modeled how to do this with kindness and constant support. [REDACTED] will take these lessons you've taught her and remember them for the rest of her life. Have a wonderful, much deserved, summer!

[REDACTED] (and her family!)



I LOVE YOU



6/23/21

Dear, Ms. Hermar

Thank you for helping

me learn this year.

I know the school

Year is over but

I will make sure I

visit you. I love you

and have a great

Summer. GOD

BLESS YOU



Mrs. herman  
you are very special to  
me even if i do virtual  
learning. I learn so much  
from you. you + hear  
every ~~one~~ of us like  
your only one  
I love you  
you are my best the  
teacher

From [redacted]  
to: Mrs herman



grateful we

1/13/22, 1:22 PM

South Orange Maplewood School District Mail - Valentine's Day Surprise

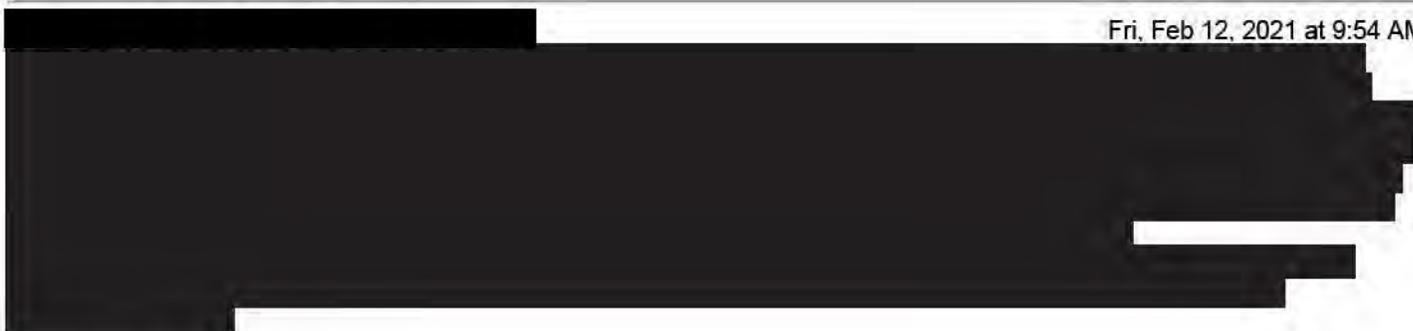


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## Valentine's Day Surprise

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Fri, Feb 12, 2021 at 9:54 AM



Good Morning 2H Families,

I am planning on dropping by your homes this afternoon to drop off a Valentine and a goody bag for your child. I will also be bringing a folder with important Math and Language Arts papers for your child as well as another notebook and some dry erase markers.

Hopefully I will get to see your child later today! Thank you again for your partnership and have a great weekend.

Yours, 🌻😊 Ms. Herman

-  
Ms. Tamar Herman  
Second Grade Teacher  
Seth Boyden Elementary School  
Together we can make the world a better place!

1/13/22, 1:51 PM

South Orange Maplewood School District Mail - [REDACTED] Log In

he School District of



[REDACTED]

[REDACTED]  
To: [REDACTED]

Wed, Apr 28, 2021 at 1:01 PM

[REDACTED] was super helpful today. Two children had tech difficulties and [REDACTED] helped them both with a confident smile. I was so proud of him. I wrote him a thank you note. As we know, [REDACTED] is amazing when he chooses to be. Thank you again for your partnership!

Have a beautiful day! Yours, Ms. Herman  
[Quoted text hidden]

1/13/22, 1:25 PM

South Orange Maplewood School District Mail - At last- Enjoy Our Fun Friday slides for the last week

The School District of




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## At last- Enjoy Our Fun Friday slides for the last week

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Thu, Jun 24, 2021 at 2:17 PM

To: Tamar Herman [REDACTED]

Cc: [REDACTED]

Thanks, Ms. Herman! I know it was a strange, taxing and challenging year, but we both very much appreciate the patience and unending enthusiasm with which you greeted it. [REDACTED] had a great second grade, all things considered, and we are grateful that she had you as her teacher for this very unusual period in her life. Enjoy a much-deserved break this summer, and may your fall be much more ... normal!

- [REDACTED]

0

On Wed, Jun 23, 2021 at 10:36 PM Tamar Herman [REDACTED] wrote:

Dear 2H Families,

Good Evening. Happy end of the 2020-2021 school year! Thank you for an amazing year of learning. Your children learned so much. They also learned that they can do anything if they try their hardest to do their very best, even during a pandemic.

It was my honor and privilege to be their teacher. They are a great group of thinkers and learners. Please find the link below to our last "Fun Friday" slideshow for the year. It is 39 slides long. Your children will love it! Also, please let your children know I will be checking See Saw periodically throughout the summer if they want to write to me. In addition, they can practice their skills on IXL and St Math all summer long.

Finally, thank you for your very generous and thoughtful end of the year gift. It feels so wonderful to be appreciated. And thank you again for your partnership. Please continue to read to your child throughout the summer. You and your child will treasure those moments forever! Have a wonderful and relaxing summer.

Fondly, Ms. Herman

[REDACTED]

--

Ms. Tamar Herman  
 Second Grade Teacher  
 Seth Boyden Elementary School  
 Together we can make the world a better place!

1/13/22, 1:37 PM

South Orange Maplewood School District Mail - Thank You



Tamar Herman [REDACTED]

---

## Thank You

2 messages

Mon, Oct 12, 2020 at 7:51 AM

To: therman [REDACTED]

Good Morning,

Your words of encouragement mean so very much!!! He will continue to work hard !!!!

Have a great day on purpose!

Sent from AOL Mobile Mail  
Get the new AOL app: [mail.mobile.aol.com](http://mail.mobile.aol.com)

---

Tamar Herman [REDACTED]

Mon, Oct 12, 2020 at 12:52 PM

To: [REDACTED]

Thank you, your words means a lot.

We are all going through the unimaginable, especially the kids. [REDACTED] is trying his best and I am so proud of him.

Thank you for your partnership. He is very smart and capable and will rise with our support!

Go [REDACTED]

[Quoted text hidden]

Ms. Tamar Herman  
Second Grade Teacher  
Seth Boyden Elementary School  
Together we can make the world a better place!

1/13/22, 1:38 PM

South Orange Maplewood School District Mail - Thank you!



**Thank you!**

2 messages

Fri, Oct 9, 2020 at 12:37 PM

To: Tamar Herman <[redacted]>

Hi Ms. Herman. Thank you so much for the supplies you gave your students. [redacted] loves them!

I hope all is well on your end. We appreciate the hard work you're putting into teaching the class, especially under these crazy circumstances. I love how you're incorporating mindfulness and [redacted] has been so excited about the writing assignments.

Thanks again,  
[redacted]

Sent from my iPhone

Sun, Oct 11, 2020 at 9:13 AM

Tamar Herman [redacted]

To: [redacted]

You are so welcome! I love the mindfulness activities too! Thank you for your kind and warm note. It is really appreciated.

[redacted] is a pleasure to teach and get to know. Enjoy your Sunday! Kindly, Ms. Herman



[Quoted text hidden]

Ms. Tamar Herman  
Second Grade Teacher  
Seth Boyden Elementary School  
Together we can make the world a better place!

1/13/22, 1:49 PM

South Orange Maplewood School District Mail - Good morning Ms.Herman. How are you ? I may not say this everyday. Thank yo...



Tamar Herman [Redacted]

**Good morning Ms.Herman. How are you ? I may not say this everyday. Thank you for all you've done. I really appreciate all your hard work, especially teaching all these kids online and in class at the same time. It's a lot . I thank you so very much, may God keep you strong everyday. Thank you and have a blessed day.**

3 messages

[Redacted]  
To: Tamar Herman [Redacted]

Tue, May 4, 2021 at 10:30 AM

Sent from Yahoo Mail for iPhone

Tamar Herman [Redacted]  
To: [Redacted]

Tue, May 4, 2021 at 12:52 PM

You are so sweet, thank you! It is my pleasure. I truly love them!

You have a blessed day as well! Yours, Ms. Herman

[Quoted text hidden]

Ms. Tamar Herman  
Second Grade Teacher  
Seth Boyden Elementary School  
Together we can make the world a better place!

[Redacted]  
To: Tamar Herman [Redacted]

Wed, May 5, 2021 at 7:40 AM

Thank you.

Sent from Yahoo Mail for iPhone

[Quoted text hidden]

1/13/22, 1:34 PM

South Orange Maplewood School District Mail - Thank you from [REDACTED]



Tamar Herman [REDACTED]

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**Thank you from** [REDACTED]

Fri, Feb 12, 2021 at 2:04 PM

Reply-to: [REDACTED]

To: Tamar Herman <[REDACTED]>

Thanks for the goodie bag for valentine's day. I was in the bathroom when you came by. I saw you from the camera but I couldn't recognize the face especially with the mask.

Thank you and have a wonderful weekend. You are a wonderful person and teacher. God bless you.

[REDACTED]

Sent from Yahoo Mail on Android



## Summative Evaluation Form - Evaluator

### User Information

<p><b>Name</b> Tamar Herman (2830)</p> <p><b>Building</b> Seth Boyden Elementary School</p> <p><b>Grade</b> None</p> <p><b>Assigned Administrator</b> [REDACTED]</p> <p><b>Submitted By</b> [REDACTED]</p> <p><b>Acknowledged By</b> N/A</p> <p><b>Finalized By</b> [REDACTED]</p>	<p><b>Title</b></p> <p><b>Department</b> None</p> <p><b>Evaluation Type</b> Teacher</p> <p><b>Evaluation Cycle</b> 09/01/2018 - 07/01/2019</p> <p><b>Date Submitted</b> 06/18/2019 5:40 pm EDT</p> <p><b>Date Acknowledged</b> Unacknowledged</p> <p><b>Date Finalized</b> 06/24/2019 2:16 pm EDT</p>
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### Summative Comments

#### What were this practitioner's significant achievements for the year?

2a Creating and Environment of Respect and Rapport and 2b Establishing a Culture of Learning- The climate and culture in your classroom is one of respect and learning. Your interactions with students show caring about them as individuals and models the way in which you are asking them to interact with each other. I was thrilled to see how students were pushing themselves to try multiple strategies and really thinking about what strategies would fit best for them.

4a Reflecting on Teaching-Ms. Herman is very reflective and it is evident in her plans and in her communications with administration and colleagues and parents. She has a passion for student learning that exudes from her and is driven by her constant reflection and desire to improve.

#### What are this practitioner's significant areas for growth?

1f Designing Student Assessments-Ms. Herman has created a variety of ways to assess her student's understanding and learning. Most importantly, the students are highly engaged in the tasks and want to "show off" what they have learned. I encourage Ms. Herman to continue to look for ways to have students increase their voice in what the assessments could be or develop their own rubrics for them.

3b Using Questioning and Discussion Techniques-Continue to model and create opportunities for students to take charge and drive some of the questioning to add depth to their understanding.

4e Growing and Developing Professionally-Ms. Herman should continue to seek out opportunities to participate in action research to reflect her passion for instruction. It would be fantastic for her to seek opportunities to grow fellow teachers based on her knowledge.

#### Any additional comments?

Great job partnering with a colleague this year to build creative and exciting units that motivate students to work hard and drive their own learning.

**Evaluator Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Teacher Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

Print this form



## Teacher Classroom Observation

### User Information

Name Tamar Herman (2830)  
Building Seth Boyden Elementary School  
Grade None  
Assigned Administrator [REDACTED]  
Submitted By [REDACTED]  
Acknowledged By Herman, Tamar  
Finalized By [REDACTED]

Title  
Department None  
Evaluation Type Teacher  
Evaluation Cycle 09/01/2018 - 07/01/2019  
Date Submitted 12/31/2018 1:54 pm EST  
Date Acknowledged 12/31/2018 6:30 pm EST  
Date Finalized 03/01/2019 2:54 pm EST

**Areas of Strength:**

- 2a Creating and Environment of Respect and Rapport
- 2b Establishing a Culture of Learning

The climate and culture in your classroom is one of respect and learning. Your interactions with students show caring about them as individuals and models the way in which you are asking them to interact with each other. I was thrilled to see how students were pushing themselves to try multiple strategies and really thinking about what strategies would fit best for them.

**Areas for Growth:**

- 3b Using Questioning and Discussion Techniques

**Recommendations:**

Continue to model and create opportunities for students to take charge and drive some of the questioning to add depth to their understanding.



## Teacher Classroom Observation

### User Information

Name Tamar Herman (2830)  
Building Seth Boyden Elementary School  
Grade None  
Assigned Administrator [REDACTED]  
Submitted By [REDACTED]  
Acknowledged By Herman, Tamar  
Finalized By [REDACTED]

Title  
Department None  
Evaluation Type Teacher  
Evaluation Cycle 09/01/2020 - 07/01/2021  
Date Submitted 01/27/2021 11:48 am EST  
Date Acknowledged 01/28/2021 4:39 pm EST  
Date Finalized 02/19/2021 12:13 pm EST

**Areas of Strength:**

**2a Building a Community of Respect and Rapport**

Ms. Herman has worked diligently to create an environment that is supportive of her students' SEL needs by getting to know them as individuals and building a community that enjoys one another and respects their purpose of learning.

**Areas for Growth:**

**1d Demonstrating Knowledge of Resources**

Ms. Herman will continue to work on identifying additional ways to create activities and plans using virtual learning applications and new technology. With virtual learning happening so quickly, she has worked hard to become more comfortable with the technology required and should continue to explore and expand her repertoire of skills.

## Observation 2005

10. Discussions or writing tasks connect situations and representations to the math.	X		
11. There are opportunities for students to conjecture or predict.	X		
12. There are opportunities for students to justify, verify, and explain.	X		
13. Students negotiate meaning with a partner and share ideas equally.	X		
14. Teachers support inquiry through questions and prompts.	X		
15. Students have opportunities to evaluate classmates' strategies.	X		

Observation Notes: See Attached

Post Observation Conference Date: 11/9/05

Conference Summary:

- 1) Mrs. Herman read the observation notes, as provided by Mr. [REDACTED].
- 2) Mr. [REDACTED] and Mrs. Herman discussed their concerns.
- 3) Mrs. Herman read and reacted to the evaluation.
- 4) Mr. [REDACTED] provided feedback.

Commendations:

- 1) Mrs. Herman effectively uses visuals as support to her students.
- 2) Mrs. Herman models the thought process involved in problem solving, thus guiding her students to success.
- 3) Mrs. Herman creatively incorporates games that reinforce key concepts.

Recommendations:

- 1) Mrs. Herman should continue to provide opportunities for students to evaluate the strategies of their classmates.

Jamae Herman  
Teacher's Signature

11/9/05  
Date

[REDACTED]  
Observer's Signature

11/9/05  
Date

## Observation 2007

	Obs.	Not	NA
3. The teacher uses strategies or materials to motivate students to communicate through reading, writing, speaking, listening, and/or viewing.	X		
4. After the mini lesson, there are opportunities for students to apply the skill or strategy directly to their work.	X		
5. The classroom environment supports a workshop environment, (i.e. the observer will be aware of the teaching time that has gone into establishing workshop routines, student methods for retrieval of materials, strategies and procedures for students to confer with peers, activities for students to do while waiting for teacher conference, etc.).	X		
6. The teacher differentiates the lesson for diverse levels of ability.	X		
7. Students are engaged in active processing.	X		
8. The teacher and students generate questions, resulting in discussion of appropriate content.	X		
9. The teacher reteaches concepts when required, through flexible groupings.	X		
10. The teacher ensures that all students are active participants in the observed lesson.	X		
11. The teacher asks the students basic metacognitive questions ("thinking about my thinking") when asking about understanding of the lesson's objective(s) and activities.	X		
12. Anchor chart (s) (see curriculum guide) support(s) student learning.	X		

**Observation Notes:** You introduced your anticipatory set. You reviewed reading fluency and then shifted the students' attention to the concept of reading with expression. You prodded your students with questions, such as: 1) what is reading with expression? and 2) why is expressive reading so important? Reading the Aesop's Fable The Crab and His Mother, you modeled reading with expression. You asked the students what they liked about the reading. You led them in a discussion about the various kinds of expressions and emotions used. You led the discussion to a thorough understanding of the characters and how clues are given to the reader through punctuation marks and special print. On the board, you wrote: *I can't believe this is happening!* You chose a few students (and even me!) to participate in reading the sentence with various emotions. After some more discussion, you gave the students an opportunity to do two guided practices through small groups. In an extended activity, you allowed one student to read while the other student(s) evaluated the reading according to the fluency chart. Then these students shared the feedback and switched roles. The lesson closed with partnered groups collaboratively answering the following questions: What were you expected to do this period? What's the big deal with reading with expression? How would you convince a student that reading with expression is really important? A few of the answers were shared with the whole group and the lesson ended.

**Post Observation Conference:****Conference Summary:**

**Commendations:** This was a well planned, well structured, and well presented lesson. You were careful to monitor student behavior, student understanding, and student engagement. It was clear that you held high expectations for your students in terms of behavior and participation. You maintained a warm, friendly, and supportive environment in which your students were encouraged to be active participants in the lessons. In fact, this supportive environment allowed for risk taking as evidenced by the students' active and appropriate participation throughout each activity. Careful consideration was taken to actively involve your students and it worked seamlessly. The timing and pacing in the lesson was on target. The class period did not feel over burdened with too much or too little activity. I observed that your directions were always clear and specific. In fact, you were very careful not to give too many multi step directions which are inherently problematic with special needs students. Well done!

**Recommendations:** Tamar, as I read your lesson plans, I noted only one stated objective. In fact, this reference was to the listening standard only. This lesson covered a number of other objectives in speaking (NJCCCS 3.3) and reading (NJCCCS 3.1). Nonetheless and as you already know, listed underneath each of the state standards are a multitude of indicators (refined or specific objectives). It is impossible to cover all of these indicators in one lesson or a week of lessons. I recommend that you reference the relevant NJCCC Standards and the specific indicator as your objectives for your lessons. While the absence of this needed change did not diminish the content nor the presentation of the lesson, adjusting the objectives in this manner would have better matched with what was presented to the class and observed. In addition, rather than posting one class size fluency indicator chart, I recommend that you provide each student with their own indicator chart.

Tamar Khan

Teacher's Signature

6/11/07

Date

[Redacted]

Observer's Signature

June 10, 2007

Date

## Observation 2010

### Observation Notes:

The lesson began with the anticipatory set which included the setting of the expectation for learning. You stated that: "Today you will learn... 1) how interdependence of organisms are affected by human activity and natural phenomena," you added, "2) you will use real-life experiences to evolve, predict and explain the consequences of a rapid eco-system change." You greeted the students as scientists and explained that together with you, all of them would begin the day's scientific exploration by reviewing a very important scientific term. You introduced the term and after the students were given a brief period of small group discussion, they defined the term: "interdependence of organisms". Many students shared their understanding and added to the depth of the meaning of the phrase/ term. Each group of scientists read the statements introduced by their peers as explanations of the term of interdependence. In a transition point in the lesson, you provided an experience with music and different volumes to help the students understand a concrete example of short and long term effects. After the example, you asked to focus on a current event. Then you asked and answered "what caused the oil spill?" You also asked: "What will be the impact in the next few weeks?" At this point, more student input was noted, such as: pollution in the water, affecting the animals; affecting the economy (seafood will cost more), wetlands will be destroyed, etc. After some extended discussion, you directed the students to return back to their biome group. Each student was given an article related to their biome. Then, the students focused on the effect on rapid ecosystem change. Together a small learning community, the students discussed and recorded the effects. A nearby anchor chart guided their thinking and the directions of the lesson. Notably, both teachers circled around the room interacting with the groups asking guiding questions or answering direct questions. Towards the end of the lesson, you had the students complete a self-reflective exit slip. This closing task was posed as a question: "As a scientist, what did you learn today about interdependence of organism on earth? What message do you have for the world?" Some comments were shared at that moment and at a later time.

### Post Observation Conference Date: June 11, 2010

#### Conference Summary:

Commendations: I noted that a lot of preparation went into this lesson: instructional materials, activities and the learning environment were prepared in advance for the lesson. As with previously viewed lessons, you consistently create a warm, friendly and caring learning atmosphere. In general, you continue to hold high behavioral expectations for your students. Combined with your high expectations of behavior and academic achievement, the students are surrounded by a strong and supportive culture of learning. You maintain a careful watch throughout the lesson, monitoring the work, behaviors, and understanding of the students carefully ensuring that all students are active participants in the observed lesson. The exit slips not only helped the students reconnect with the core idea/ concept of the lesson, but also encouraged the students toward social action now that they knew the issues of rapid ecosystem change. Brilliant!

#### Recommendations:

In past lessons, I have noted that you use questions to deepen the thinking of your students. As I observed this lesson, I noted that some questions from the students were answered directly. You explained that for the sake of helping the students quickly connect to the lesson/ activities, you may respond with a direct answer. I would also suggest adding a follow up question to the answer in order to continue to encourage critical thinking. I usually do. I will keep your recommendation in mind for

Jamaal Heeman  
Teacher's Signature

Teacher's Signature denotes that evaluation has been read.

6/14/10  
Date

upcoming lessons.  
Thanks!

[Redacted Signature]  
Observer's Signature

6/12/10  
Date

# Observation 2013

**Commendations/Recommendations** - This section provides commendations (areas of strength) and/or recommendations (areas for further development and growth or concern) that pertain to the lesson observed or comments on components of teaching that were discussed during the observation cycle, but were not necessarily evaluated in this report.

**Commendations:**

- Procedures and routines have been established.
- Ms. Herman communicated the learning objective was communicated; also reviewed and related new learning to previous learning.
- Ms. Herman modeled and demonstrated during mini lesson and paced the lesson to provide appropriate time for students to be intellectually engaged.
- Ms. Herman's interactions with students reflect genuine respect and caring.

**Recommendations:**

- Continue to maximize student learning by continuing to increase the complexity of learning activities in order to move students learning forward.
- Continue to design learning tasks that require high-levels of student thinking and student choice in learning activities

Samar Gleemas  
Teacher's Signature\*

11/21/13  
Date

\*Teacher's signature does not necessarily denote agreement but only that the observation/evaluation report has been read and discussed with the evaluator(s).

  
(Signature of Observer(s))

11/21/13  
Date

Dear Ms Hermann -

I wanted to write you a brief note of "thanks" for seeing - and bringing out - the potential in [REDACTED] last year. He has a very special place in his heart for you. Recently, when we were going through his binder (he is still struggling with organization), I discovered the only neat item: his report on George Washington Carver. When I asked [REDACTED] why he had it, he answered "I'm very proud of my work". It is not often that he keeps his school work - at least not intentionally.

So, thank you for giving him a terrific year in science and language arts.

Sincerely -

[REDACTED]

Dear Mr. [REDACTED],

Last school year my son [REDACTED] began experiencing learning problems in his class. At one point he was so emotionally distraught that [REDACTED] and I had no idea where to take him for an evaluation. He complained about not being able to concentrate. One night he buried his head on my chest and said "Please, Daddy, can't somebody help me?"

His fourth grade teachers were Ms. Herman and [REDACTED]. We began speaking with them about what could be done and they immediately jumped into the fray. From that point on, [REDACTED] progress and development was monitored daily. Every day I was given a heads-up as to his behavior and his schoolwork. When they thought [REDACTED] needed an adjustment to his meds, they would let me know. They, in particular, [REDACTED] would tell me the effects of the adjustments. Their help was priceless. By the beginning of the New Year, we had a brand new son, one who could interact with others and do fine schoolwork besides.

None of this would have happened without the cooperation and, above all, the endless patience of these two incredibly gifted, interested teachers working with one another. The information we needed to help the doctor which we received from them, helped the doctor make dosage changes, medicine changes, everything imaginable.

They should be commended for going very far and above what might have been considered normal expectations. Their part changed his life and will effect him on his long journey through school and life.

Sincerely,

[REDACTED]



Seth Boyden Elementary School  
Re: Mrs. Tamar Herman

Dear Principal [REDACTED],

My name is [REDACTED] and I am the parent of [REDACTED] he is enrolled in Mrs. Herman 4th grade class. I am sending my appreciation and gratitude for my son having Mrs. Herman as a teacher.

Tamar genuinely cares about her students and it shows in her efforts. She went above and beyond with providing [REDACTED] with the correct tools that he needed to be successful in her class. We've met on several occasions to connect and evaluate [REDACTED] progress. For example, [REDACTED] was having trouble with his language arts assessments, she reached out to me; set aside a time and we went through his assignments piece by piece. This was great because it gave me a sense of my son's strengths and weaknesses; it also allowed me to know what areas I needed to reinforce at home. Now I can actually say that [REDACTED] writing pieces have improved drastically and I am so proud of the progress and confidence that he has gained under Tamar's leadership.

In addition, Tamar always expresses the potential she sees in my son and this is very special to me. I was pleased when she enrolled [REDACTED] in the language arts after school enrichment because this was a greatly needed tool for him to improve his NJ asks test scores. She also went above and beyond to provide me with the materials I could use for his learning at home. As a parent, she has increased my engagement as well, and [REDACTED] really appreciates it. Whether the news was good or bad, I was aware of his actions every step of the way and this allowed me to effectively parent him, and for this I am forever grateful.

I hope in this letter, Tamar can receive some of the recognition she deserve and please feel free to contact me if you want to discuss further.

[REDACTED]

[REDACTED]

5/11/11

*Recommendation for Reappointment 2005*  
SCHOOL DISTRICT OF SOUTH ORANGE-MAPLEWOOD, NJ

Recommendation for Reappointment of Non-Tenured Certificated Staff Member

DATE: March 4, 2005

PROJECTED TENURE DATE: September 2, 2005

NAME: Tamar Herman

RECOMMENDATION COMPLETED BY: [REDACTED] Principal

RECOMMENDATION	YES	NO
ReAppoint	X	

YEAR	ASSIGNMENT			PRIME EVALUATOR
	LOC	POSITION	FTE	
3	SB	T4	1.0	[REDACTED]
2				
1				

- i. With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:

- A. What are this person's major strengths demonstrated as a teacher, supervisor or administrator?

Mrs. Herman is a dedicated teacher. She is always seeking input from the administration to ensure students' needs are being met. Mrs. Herman utilizes a strong sequence of activities to guide students through the lesson. She effectively models her expectations and gradually releases control to the students. In language arts, she uses games to motivate the students. Students often share their thoughts and ideas with the class to stimulate participation and reflection. **The process of learning is very important to Mrs. Herman. She provides the students many opportunities to share their work with the class thus building self-esteem and confidence.** In math, Mrs. Herman works to develop the students' vocabulary and problem solving skills. She encourages multiple methods of solution. Mrs. Herman collaborates well with her colleagues.

- B. What areas or skills require attention or improvement?

Since the fourth grade teachers are now required to teach math and science, Mrs. Herman will need to familiarize herself with the curriculum. She will need to explore ways of differentiating math instruction and still challenge students.

- C. What progress has been made in areas or skills previously cited as requiring improvement?

Mrs. Herman has improved her feedback on student writing. She is differentiating instruction more frequently and expanded her practice activities.

- ii. Attendance

Mrs. Herman has a satisfactory attendance record at this time. She is always prepared in the event of her absence.

- iii. What other significant information has informed this report?

Classroom observations, teacher conferences, and parent feedback have contributed to this report.

**Commendations/Recommendations**

In this section comments can be made about any of the 22 components with reference to supporting evidence. Identify areas the teacher will focus on next year for continued growth and professional development.

**1c Setting instructional outcomes**

- In review of Mrs. Herman's lesson plans, nearly all the plans include instructional outcomes rather than activity objections. I have observed that the learning outcomes are clear and written in the form of student learning. During our summative evaluation conference, Mrs. Herman and I talked at length on how to determine the difference between planning for an activity and listing in clear language the "why" of the activity which is the overall learning outcome/objective.
- Aside from the curriculum goals, the learning outcomes are also driven by assessment information and other data: teacher observation in guiding reading groups, IEPs and 504 plans, knowledge of the students proficiency and demeanor, and last but not least DRA/ Scholastic Reading Levels in Language Arts.
- With the input from her special education partner's input, Mrs. Herman accommodates her learning outcomes and activities to the needs of the SE students differentiating the instruction and individualizing work when needed. Mrs. Herman also differentiates for the top learner as well as the struggling learner.

**1d Demonstrating knowledge of resources**

- Mrs. Herman views and uses other building specialists as resources to extend and enhance learning for her students: [REDACTED]
- Mrs. Herman is recommended to share with parents a list of resources and online sites that parents can use with their children to improve their education and spark discussion for home reading.
- Mrs. Herman incorporates strategies learned in the Lynda Fote differentiated instruction workshop and other PD workshop experiences.
- Mrs. Herman has listed as evidence the various resources that she uses in reaching her students, including but not limited to websites such as [studyzone.org](http://studyzone.org), [www.sitemaker.edu/kendralinenger/realistic\\_fiction\\_unit](http://www.sitemaker.edu/kendralinenger/realistic_fiction_unit), [www.choiceliteracy.org](http://www.choiceliteracy.org), [readwritethink.com](http://readwritethink.com), and folk from Maplewood Patch. (see <http://patch.com/A-s8GC> Please click on the link above to read about Mrs. Herman's class. They became journalists and reported on the latest news concerning our new outdoor learning center and Strawberry Fields.
- It is recommended that Mrs. Herman share a list of these resources with her students and class parents in formal communication.

**1f Designing student assessments**

- In review of the presented evidence in math and language arts, I noted that Mrs. Herman aligns her assessments with the instructional outcomes in both content and process.
- Moreover, Mrs. Herman demonstrated evidence in which the students reflect on their assessment results, classifying the concepts that they understand from those that they need help with in order to understand.
- Unit reflection sheets help the students to keep track of their learning and organize their learning.
- Folders on student achievement and academic progress are maintained for each student in reading and writing
- With the help of her Special Education partner teacher, Mrs. Herman modifies her assessments as needed for individual students.
- Mrs. Herman uses anchor charts and other visuals to make clear the criteria and procedure by which the students will be assessed in a lesson.
- I examined the evidence of checklists, anchor charts and writing projects as examples of the diversity of assessment tools used by Mrs. Herman.

**2c Managing classroom procedures**

- As evidenced in formal and informal observations, I have noted that small-group work is well organized, and that nearly all students are productively engaged at all times.
- The students have been given procedures in place by which they operate in the classroom in a way as to help preserve instructional time.

- As evidenced in formal and informal observations, I have noted transitions tend to occur smoothly, with little loss of instructional time.
- There are set classroom routines for handling materials and supplies smoothly, so as to ensure little loss of instructional time.
- Mrs. Herman provided evidence of classroom procedural expectations chart built with the input of students on the first day of school.

#### **2d Managing student behavior**

- Mrs. Herman provided evidence of clearly defined behavioral expectations by the teachers.
- Mrs. Herman and her partner teacher establish clear guidelines for working in groups and activities to thwart off task behaviors and student misunderstanding.
- Weekly homework organizers and various trays for depositing work help the children to begin to monitor their own behaviors.
- Guided reading procedures and writing workshop procedures have been put in place to facilitate a smooth operation of those subject areas and the students participate in adhering to them. (being reminded by the anchor charts that Mrs. Herman uses in class.
- Weekly homework assignment books help the students to manage their academic behaviors and assignment deadline dates.

#### **2e Organizing physical space**

- The classroom space is well designed, orderly and safe.
- Various areas of the classroom feel open. During both formal and informal observations, I have noted that each area is a flexible multi-use space. The learning areas are accessible to all students.

#### **4d Participating in a professional community**

- I have observed collaborative relationship that both Mrs. Herman and her partner teacher share with their grade level colleagues, Academic Intervention Teacher, Child Study Team, Social Workers, Secretarial Staff and Administrators. I have noted formally and informally that their work and grade level meetings can be and are categorized by mutual support and cooperation.
- This year, Mrs. Herman has extended herself beyond her grade level and has connected with other colleagues in the building and around the district.
- Mrs. Herman often participates in school events such as the Black History Month School-wide Gallery, PTA Fundraising efforts including the most recent PTA Auction.
- Mrs. Herman also participates in a culture of professional inquiry developing her skills by and learning participating in a PLC. She also attends and actively uses the information from PD workshops.
- Mrs. Herman lends books to students and advocates for the top learners and the struggling or special needs learners. She also works with students during her lunchtime in an effort to reach all learners.

#### **4f Showing professionalism**

- Mrs. Herman complies with district and school regulations, procedures, and practices
- Mrs. Herman gave clear anecdotal evidence of how she and her partner teacher advocate for the needs of their students.
- Mrs. Herman and her partner teacher are both active in serving all of their students.
- Mrs. Herman has demonstrated high standards of integrity, honesty, and sensitivity in her interactions with colleagues, students, and parents (even the most difficult and challenging students and parents).

FINAL EVALUATION REPORT

(For Use With Tenured Certificated Administrators, Educational Services Staff, and Teachers)  
2008-2009 School Year

Name of Staff Member Tamar HermanJune 8, 2009Classroom Observation(s) Completed By 1<sup>st</sup> Observer [REDACTED]2<sup>nd</sup> Observer \_\_\_\_\_  
(if applicable)

ASSIGNMENT		
Location	Position	FTE
Seth Boyden	4 <sup>th</sup> Grade Teacher	1.0

- With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:
  - What are this person's major strengths demonstrated as a teacher, supervisor or administrator?  
As a teacher, Mrs. Herman sees her greatest strength to be providing prescriptive instruction to students in a child-centered way. In a recent self-reflection questionnaire, she writes: "IT is my goal to actively engage each child in a world of learning. I want them to see their own skills, abilities, and confidence develop and improve because of their hard work and effort. A child who feels empowered is a child who will strive for more knowledge and learning." As teacher, she indeed plans and prepares so that instructional outcomes are stated as goals that can be assessed, reflecting rigorous learning and curriculum standards. Her classroom interactions between the teacher and students and among students are polite and respectful, reflecting an overall warmth and caring, and are appropriate to the cultural and developmental differences among groups of students.  
Classroom management is strong. In fact, little instructional time is lost because of classroom routines and procedures for transitions, handling of supplies, and performance of non-instructional duties which appears to happen smoothly. She promotes the successful learning of all students, making adjustments as needed to instruction plans and accommodating student questions, needs, and interests.
  - What areas or skills require attention or improvement?  
Over this upcoming summer, Mrs. Herman will be attending *Responsive Classroom* training. Research has shown that teaching using the *Responsive Classroom* approach demonstrated a positive effect with respect to discipline and academic achievement. I encourage Mrs. Herman and the other teachers attending to return and present their learning to the staff. It is vital for all of us to continue to learn how best to integrate academic and social learning while establishing high expectations for learning and behavior.
  - What progress has been made in areas or skills previously cited as requiring improvement?  
While no specific skills were previously cited for improvement, Mrs. Herman should reflect on her

instruction and actively seeks out ways to improve instruction and increase student learning by incorporating technology such as SMART Board usage in her lessons.

- Attendance  
Excellent
- What other significant information has informed this report?  
Formal and informal observations, and in professional conversations, and IEP and Intervention meetings.
- Summary of indicators of pupil progress/growth  
Grade level meetings, Intervention meetings, formal and informal assessments, progress reports.
- Professional Development  
See attached hours



June 12, 2009

Principal's/Supervisor's Signature

Date

Tamar Heeman

6/22/09

Employee's Signature\*

Date

**\*Staff Member's Signature does not necessarily denote agreement but only that the summative evaluation has been read and discussed with the evaluator(s)**

SCHOOL DISTRICT OF SOUTH ORANGE-MAPLEWOOD, NJ

FINAL TEACHER EVALUATION REPORT (TER)  
(For Use With Non-Tenured and Tenured Teaching Staff Members)

NAME OF TEACHER: Tamar Herman

SCHOOL: Seth Boyden

EVALUATION COMPLETED BY:



SCHOOL YEAR: 2007-2008

I. With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:

A. What are this person's major strengths demonstrated as a teacher, supervisor or administrator?  
Mrs. Herman is a dedicated teacher and a natural leader amongst her colleagues. As a teacher, Mrs. Herman actively continues to seek out opportunities for professional development to enhance content knowledge and pedagogical skills; in formal and informal observations, it can be noted that her efforts are reflected in classroom practice. Her planning reflects an understanding of the value of students' skills and previous knowledge as a significant background for learning. Her instructional strategies reflect a variety of ways to reach the varied learners in her classroom. In addition, Mrs. Herman demonstrates great sensitivity and care with the students of her classroom. She actively builds on the students' background knowledge when designing instruction and looking for causes for possible student misunderstanding. Mrs. Herman's planning reflects an awareness and understanding of student interest and cultural heritage.

B. What areas or skills require attention or improvement?  
While there is no direct skill set that needs improvement, Mrs. Herman should continue to seek out opportunities for professional growth particularly in the area of math and science. With this new knowledge, she should make systematic attempts to incorporate this new knowledge into practical classroom use.

C. What progress has been made in areas or skills previously cited as requiring improvement?  
While no specific skills were previously cited for improvement, Mrs. Herman should reflect on her instruction and actively seeks out ways to improve instruction and increase student learning.

II. Attendance  
Satisfactory

III. What other significant information has informed this report?  
Formal and informal observations.

IV. Summary of indicators of pupil progress/growth  
Grade level meetings, formal and informal assessments, progress reports.

V. Professional Development  
See attached.



*Tamar Herman*  
EMPLOYEE'S SIGNATURE

SUPERVISOR'S SIGNATURE

6/23/08  
DATE

June 21, 2008  
DATE

SCHOOL DISTRICT OF SOUTH ORANGE-MAPLEWOOD, NJ

FINAL TEACHER EVALUATION REPORT (TER)

(For Use With Non-Tenured and Tenured Teaching Staff Members)

NAME OF TEACHER: Tamar Herman

SCHOOL: Seth Boyden

EVALUATION COMPLETED BY:

SCHOOL YEAR: 2006-2007

I. With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:

A. What are this person's major strengths demonstrated as a teacher, supervisor or administrator? As a teacher, Mrs. Herman actively seeks out opportunities for professional development to enhance content knowledge and pedagogical skills; in formal and informal observations, it can be noted that her efforts are reflected in classroom practice. Her planning reflects an understanding of the value of students' skills and previous knowledge as a significant background for learning. Her instructional strategies reflect a variety of ways to reach the varied learners in her classroom. In addition, Mrs. Herman demonstrates great sensitivity and care with the students of her classroom.

B. What areas or skills require attention or improvement? While there is no direct skill set that needs improvement, Mrs. Herman should continue to seek out opportunities for professional growth particularly in the area of math and science. With this new knowledge, she should make systematic attempts to incorporate this new knowledge into practical classroom use.

C. What progress has been made in areas or skills previously cited as requiring improvement? Mrs. Herman has become proficient in using the NJCCC Standards and their subsequent indicators as the source for her students' learning objectives.

II. Attendance Satisfactory

III. What other significant information has informed this report? Formal and informal observations, unsolicited comments from parents and colleagues.

IV. Summary of indicators of pupil progress/growth Grade level meetings, formal and informal assessments, progress reports.

V. Professional Development Educational Media & Technology Training -1 hr; Lang Arts Curriculum Training - 2 hrs; Diagnosing Student Needs, Prescribing Effective Instruction - 6 hrs; Lucy Calkins Workshops - 12 hrs; NJASK Workshops - 6 hrs; Critical Thinking/ MI - 5 hrs; Strategies for Literacy Instr. - 45 hours; Teaching Reading - 45 hrs; Character Educ. - 45 hrs; Engaging Students in Critical Thinking-45 hrs

Tamar Herman EMPLOYEE'S SIGNATURE

[Redacted Signature] SUPERVISOR'S SIGNATURE

6/13/07 DATE

6/13/07 DATE

SCHOOL DISTRICT OF SOUTH ORANGE-MAPLEWOOD, NJ  
FINAL TEACHER EVALUATION REPORT (TER)  
 (For Use With Non-Tenured and Tenured Teaching Staff Members)

---

NAME OF TEACHER: Tamar Herman

SCHOOL: Seth Boyden

EVALUATION COMPLETED BY: [REDACTED]

SCHOOL YEAR: 2003-2004

- I. With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:

- A. What are this person's major strengths demonstrated as a teacher, supervisor or administrator?

Tamar is a very organized teacher who prepares extensively for engaging lessons. She cares for her students and goes to great lengths to create a true learning community. She is very task-oriented and motivates her students to achieve. She provides real-life connections for her students. For example, her students' work was published in the Star Ledger. She provides many such extension activities. She is also our faculty link to the school newspaper.

- B. What areas or skills require attention or improvement?

Due to the elimination of teaming, Mrs. Herman should familiarize herself with the math and social studies curriculum. She should continue to explore ways for students to discuss their thought process, particularly as it will apply to mathematical thinking.

- C. What progress has been made in areas or skills previously cited as requiring improvement?

Mrs. Herman has attended many workshops and has refined her instructional model to include differentiated instruction. She has grown in her knowledge and delivery of the writing process.

- II. Attendance

Mrs. Herman has a satisfactory attendance record.

- III. What other significant information has informed this report?

Input from [REDACTED] and scheduled observation has informed this report.

- IV. Summary of indicators of pupil progress/growth

Student progress reports, classroom observations, and assessments indicate that all students are progressing satisfactorily.

- V. Professional Development

Mrs. Herman has successfully achieved the goals as outlined in her PIP for 2002-2003. She completed 68 hours of In-Service this year.

## SCHOOL DISTRICT OF SOUTH ORANGE-MAPLEWOOD, NJ

FINAL TEACHER EVALUATION REPORT (TER)

(For Use With Non-Tenured and Tenured Teaching Staff Members)

NAME OF TEACHER: Tamar Herman

SCHOOL: Seth Boyden

EVALUATION COMPLETED BY: [REDACTED]

SCHOOL YEAR: 02-03

- I. With respect to subject expertise, knowledge of curriculum, effectiveness across varied levels of student ability, assessment strategies, and evidence of the maintenance of a positive relationship with students and parents/guardians:

- A. What are this person's major strengths demonstrated as a teacher, supervisor or administrator?

Ms. Herman is a very dedicated, creative teacher who has acclimated herself well to our school and District curricula. She has a great work ethic that is evident in just visiting her classroom. On a daily basis, Ms. Herman offers rigorous learning experiences for her students while accomodating individual needs. She has also designed a classroom climate where her students are motivated and demonstrate excellent character.

- B. What areas or skills require attention or improvement?

Ms. Herman should continue to improve communication between herself and her special education students' resource room teachers to provide as much continuity of instruction as possible while ensuring IEPs are being met.

- C. What progress has been made in areas or skills previously cited as requiting improvement?

Ms. Herman has demonstrated her willingness to meet all of her students' needs by making efforts to work well with resource room teachers-approvalment in this area has been noted.

- II. Attendance

Ms. Herman has maintained excellent attendance this year.

- III. What other significant information has informed this report?

Ms. Herman has completed her PIP for this school year by enhancing her students achievement through deeping her understanding of our District curricula, including varied instructional strategies to address every student's learning style, and further her knowledge of multiple intelligences as a theory and instructional tool.

- IV. Summary of indicators of pupil progress/growth

Ms. Herman's students demonstrated growth, which was observed through formal and informal classroom observations, student work samples, District assessments, K-8 curriculum supervisors, student report cards, and standardized testing.

- V. Professional Development

Ms. Herman has attended many District inservice opportunities that have included the achievement gap and differentiated instruction. On a building-level, she has been involved in educational experiences related to

Hilton ~~Neighborhood~~ Neighborhood Association & Principal Thank You

**Seth Boyden Demonstration School**

For Publishing Students  
in Star Ledger

School District of South Orange and Maplewood  
274 Boyden Avenue  
Maplewood, New Jersey 07040  
(973) 378-5209

2004

*MEMORANDUM*

TO: [REDACTED] T. Herman  
FROM: [REDACTED], Interim Principal  
DATE: March 19, 2004  
RE: Hilton Neighborhood Association

**Congratulations! Please share this message with the students mentioned. Thank you for your continued efforts to stimulate community involvement and critical thinking.**



Hilton Neighborhood Association  
P.O. Box 1305  
Maplewood, NJ 07040



February 26, 2004

Mr. [REDACTED] Principal  
Seth Boyden School  
274 Boyden Avenue  
Maplewood, NJ 07040

Dear Mr. [REDACTED]:

The members of the Hilton Neighborhood Association were so happy to read the five letters written by Seth Boyden students in the STUDENT FORUM section of the February 22, 2004 SUNDAY STAR LEDGER.

Please extend our congratulations to [REDACTED] and their fourth grade teachers. We hope these students will continue to express their opinions in a productive way and inspire their classmates to do they same. Bravo to them and to Seth Boyden School!

Sincerely,

[REDACTED]  
[REDACTED], President

Congratulations to [REDACTED]

and [REDACTED]

Their opinion pieces were recently published in the Star Ledger on May 20, 2004. They join the list of "famous authors" in the Student Forum.

The complete list of "famous authors" this year includes: [REDACTED]

[REDACTED] Keep up the great work. We are so proud of you!

*Mrs. Herman*

### Homework can help

Sometimes students do not like to do homework. Even I don't like homework at times. But I know that if we do our homework this will help us to become independent thinkers. You can look at this as self-education. When you do your homework, you become a smarter student. Homework also helps you to remember things. The work we have in the daytime we must remember at nighttime to complete our homework. The times that I like homework are when mom and dad are helping me. This can be fun.

There are other times when homework is hard. This happens when I have to study for a test. When there is a test, you have so much information to remember. But I think I am learning how to study better. I know homework helps me to learn. I hope others realize this too!

[REDACTED] Fourth Grade,  
Seth Boyden School,  
Maplewood

### Fight litter

Many people litter. Littering is bad for everybody. When you litter, it pollutes the world. You also will be considered a bad citizen in your community.

Once I was riding in a car and I saw scraps of paper all over the highway. Apparently people thought it was okay to leave food out on the road as if the road were a garbage can. Once I saw a TV show about nature and how people shouldn't litter, especially in natural environments. The show included a picture of a squirrel that got its head stuck in a piece of garbage. Sometimes when seagulls see something that someone threw in the water, they will dive for it and put their heads in it. Often the seagulls get stuck and suffocate.

The next time you see somebody litter or see litter on the ground, please pick it up and throw it away. Let's keep our world clean and remember: Don't litter.

[REDACTED] Fourth Grade,  
Seth Boyden School,  
Maplewood

### Words hurt

Some folks say that sticks and stones may break your bones but words will never hurt you. They are wrong. Words hurt just as much as anything else.

Words hurt your feelings. Hurtful words stick with you and make you feel depressed. You start trying to change yourself so that you will not be spoken to meanly again. Sometimes hurtful words affect your confidence and your ability to achieve life goals.

If you don't have something nice to say to someone, don't say anything at all. You wouldn't want to be hurt by cruel words. So stay cool and stay nice.

[REDACTED] Fourth Grade,  
Seth Boyden School,  
Maplewood

STUDENT FORUM

Why voting matters

Some people say that voting is not important, that it is only one measly vote. They say it won't matter. Actually it does matter. Not many people know how important their vote is. Citizens who do not vote or do not think highly of voting are sending a message: I do not care about public decisions, even if the decision made is against my beliefs.

When you vote you are telling the community that you care about public decisions. Your positive action tells people that you are important in a public decision. It lets people know what you, and you alone, think. Everybody wants to be heard. It makes you feel good when your vote is cast and your opinion is heard. My dad says, "If you don't vote, you'll have to live with the decision that is made."

Fourth Grade, Seth Boyden School, Maplewood

Candy in moderation

Candy is sometimes called "junk food." Its main ingredient is sugar. Candy manufacturers

usually make at least four types of candy: hard, chewy, whipped and chocolates. Candy was first made in ancient Egypt and India more than 3,000 years ago and started being made in large amounts in the late 1800s and early 1900s.

Easter, Christmas and Valentine's Day are some of the most popular holidays when candy's eaten. Eating too much can lead to tooth decay and cause people to become overweight.

Sugar comes from sugarcane and sugar beets. Sugar is great for energy but bad if too much gets into a person's system. Kids usually become too excited when they eat too much candy and can do themselves harm if they run or play too much. If we don't brush as much as we should, we can ruin our teeth and eventually our overall health.

I'm really glad my parents monitor what my sister and I eat. They make sure we don't eat anything with too much sugar, and we rarely buy candy. We get candy only when we attend birthday or class parties or as a special treat from friends and relatives.

Fourth Grade, Seth Boyden School, Maplewood

Challenging grade

Have you ever thought of how challenging fourth grade can be? Here are some of the challenges.

Homework is a challenge. Some days it's hard just to get started.

Chores are a challenge. We have many other things to do, like homework, play time and sports. Sometimes it is hard to do it all and the chores. School is a challenge because you try to be the best you can be!

Dancing is a challenge because of the new steps to learn. Singing is a challenge; sometimes you get butterflies. Knitting is a challenge because it's hard to keep track of the stitches.

Finally, taking state tests is a big challenge! I guess challenges never end, no matter where you are in life.

Fourth Grade, Seth Boyden School, Maplewood

Build skate parks

In Maplewood, we are lucky because the town has set up a small skate park. It is located near the parking lot by the town pool. The town chose this location for the safety of skaters as well as residents. This skate space helps prevent skaters from destroying other people's property.

While at the skate park, you can skate board or inline skate on ramps and grind on poles. It is also a good place to meet up with friends to talk and hang out as well as meet new people who like to skate. You can watch other people do cool tricks and learn how to do some of them yourself.

Other towns should build skate parks so people's property doesn't get destroyed and skaters can hang out, have a good time and stay safe.

Fourth Grade, Seth Boyden School, Maplewood

Get the reading habit

Some kids aren't reading

enough. If you're bored, don't just sit around and watch TV. Read a nice, long storybook. When it is rainy and there is nothing to do, pull out a good book.

A lot of kids can't afford books. If you can't afford them, just go to your local library. Reading is very important to me because it helps me write better, it brings me into another world and it helps me build a better vocabulary.

Don't get attached to TV. Get attached to a great book!

Fourth Grade, Seth Boyden School, Maplewood

Congratulations to our 5 "famous" writers. Continue to look in the Sunday Star Ledger, perspective section for more of our articles. Enjoy!

### Healthier lunches

Schools tells us to eat healthy food, but then they serve us unhealthy lunches. Some things we are served are fried chicken, nachos and french fries. Some kids know it's not healthy but don't care because it tastes good. Healthy food can taste just as good. Most parents don't have time to make their kids lunch, so it's up to the school to serve a healthy meal. Maybe healthy food is more expensive, but what matters more — money or kids' health?

Even when the school serves one healthy thing, most kids throw it out. Since kids don't always realize that they should eat healthy foods, schools should educate parents and kids about

### STUDENT FORUM

healthy lunches. A healthy lunch could include fruit, vegetables, a sandwich, juice, milk and a little dessert.

— [Redacted]  
Fourth Grade,  
Seth Boyden School,  
Maplewood

### STUDENT FORUM

CONTINUED FROM PAGE 7

### Family time

Family time is important. Families were meant to be together and should get to know each other. Some families never get a chance to see each other. On most evenings, family members go their separate ways.

A good idea is to set one night each week to be a game night, a reading night or a discussion night. When you're having a problem with friends or in school, it helps to talk about it with your family. Some ways to spend time with your family are learning together, working and relaxing together. A family that plays together is a happy and healthy family!

— [Redacted]  
Fourth Grade,  
Seth Boyden School,  
Maplewood

Congratulations to our  
4 "famous" writers.  
We are so proud of you!

### Journeys in reading

Reading is very important because it helps you think. Reading also helps you learn. Reading can teach you about history, new information and about other people's lives.

The problem is that many people don't like to read. They think it's boring. It's not. It's fun to read. You can read jokes, fairy tales, adventures, science fiction and many other kinds of books. Reading takes you on wonderful journeys. There are books for everyone. Parents should teach their children about the joys of reading.

— [Redacted]  
Fourth Grade,  
Seth Boyden School,  
Maplewood

### An extra hour

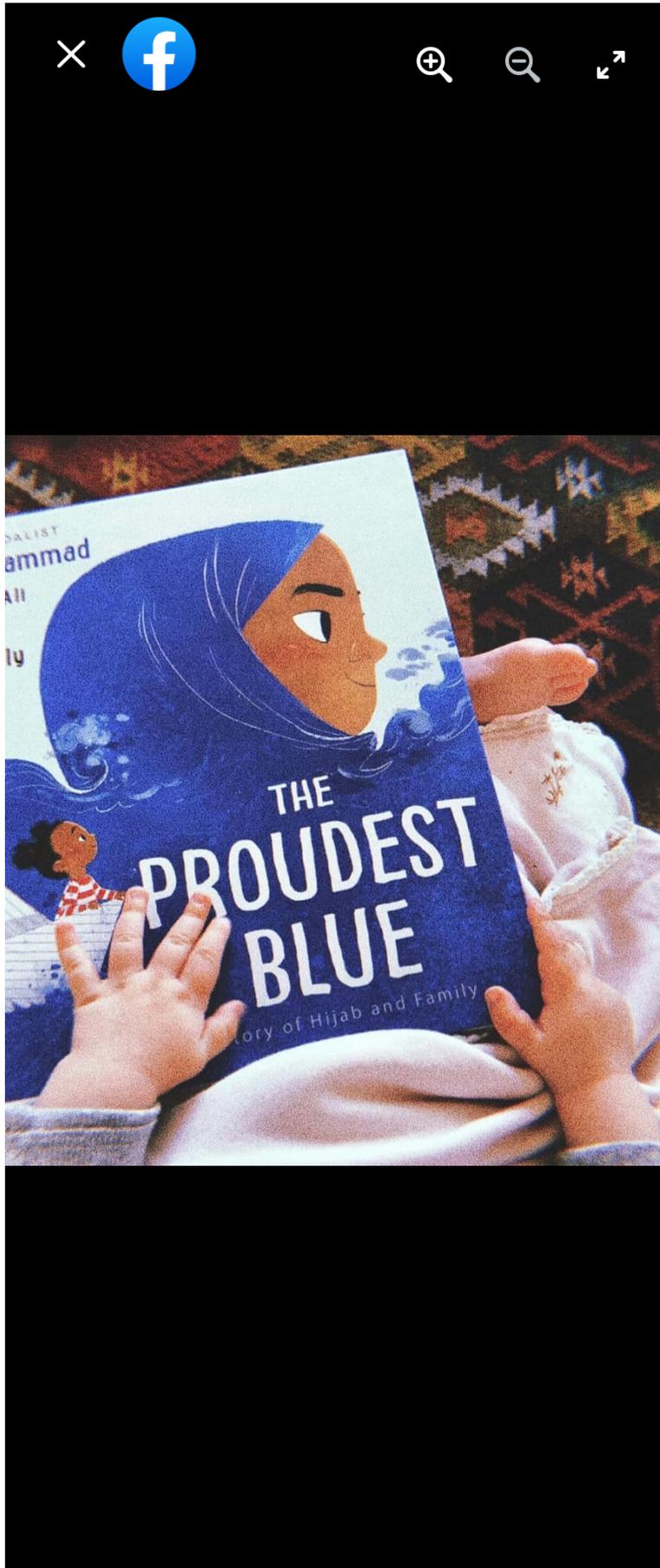
Some people think there should be no homework and we should stay in school an hour longer. Other people are fine with the way things are now. I think we should stay in school longer and complete our homework there. Then we can spend more time with our families and friends and have fun and not have to worry about getting homework done. Also, we would be able to go to music lessons, religious school or other activities and not feel so pressured to squeeze everything in.

Some people say that because we would be in school longer, we'd have less time after school. I think the feeling of free time would make it worth it. Of course, everyone should continue to do nightly reading because reading is so important that you must do it.

— [Redacted]  
Fourth Grade,  
Seth Boyden School,  
Maplewood



## EXHIBIT C



Ibtihaj Muhammad

October 7, 2021 · 🌐

I wrote this book with the intention that moments like this would never happen again. When will it stop? Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in the way we dress.

Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@somds.k12.Nj.us](mailto:sglander@somds.k12.Nj.us) and the superintendent [Rtaylor@somds.k12.Nj.us](mailto:Rtaylor@somds.k12.Nj.us) See less

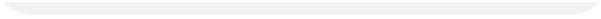
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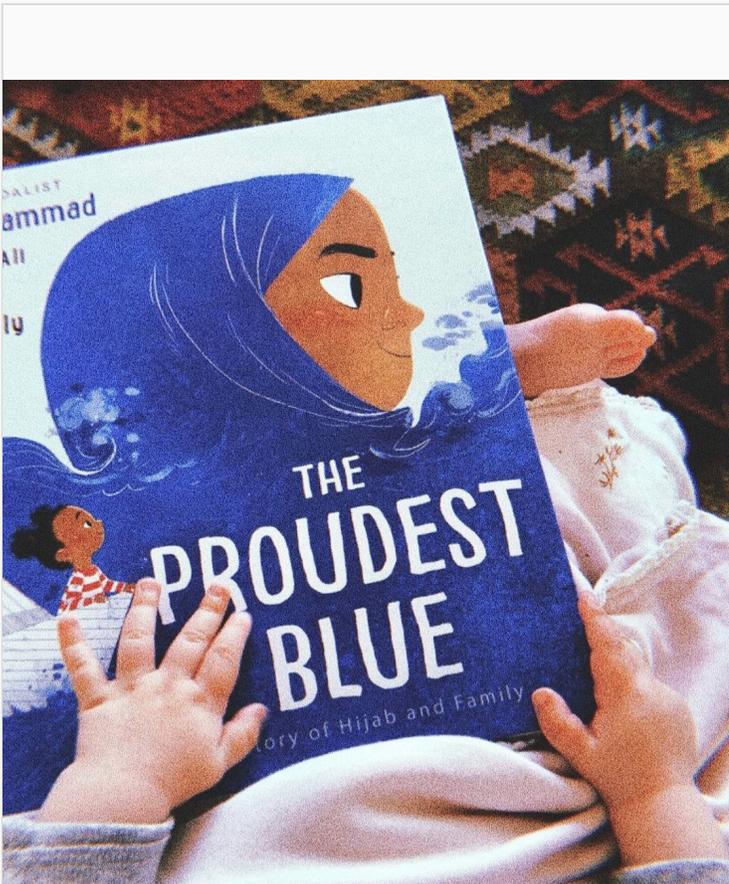
**EXHIBIT D**

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ibtihajmuhammad I wrote this book with the intention that moments like this would never happen again. When will it stop? Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school



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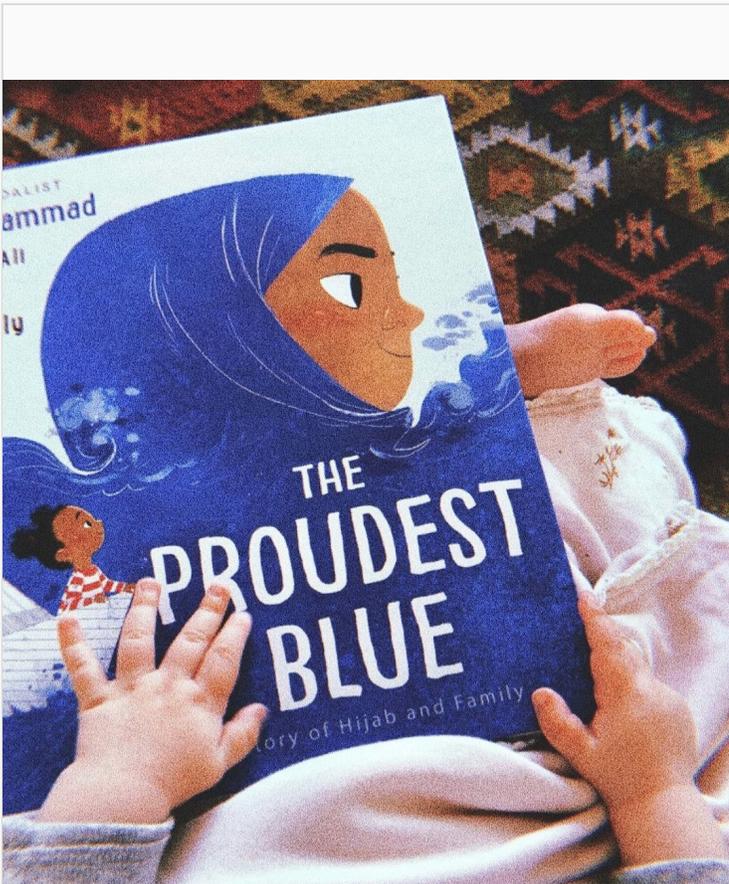
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not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us



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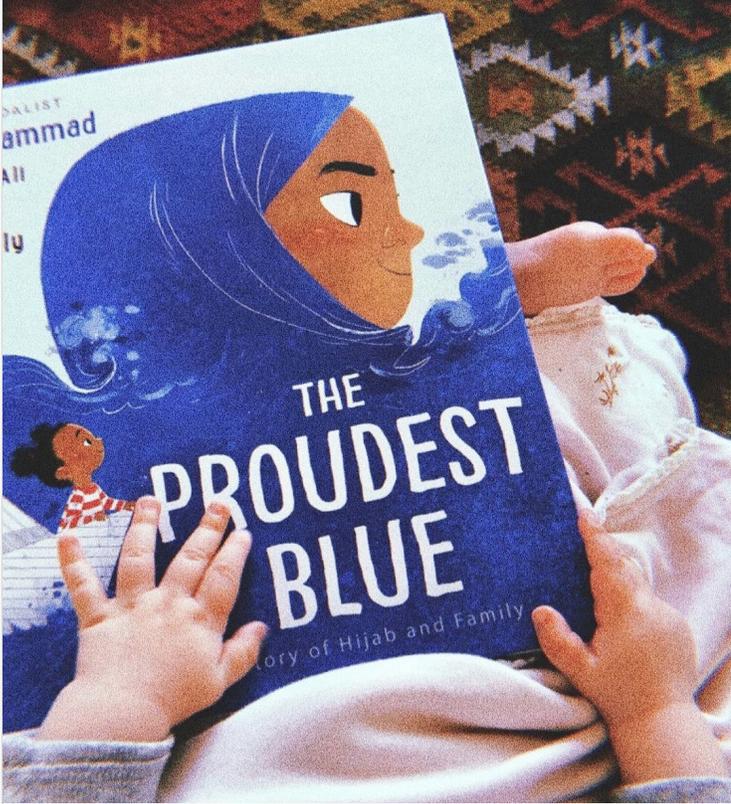
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we are protecting the rights of all of us to have a choice in the way we dress.

Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal sglander@somds.k12.Nj.us and the superintendent Rtaylor@somds.k12.Nj.us

@cair\_national @cair.nj



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OCTOBER 7, 2021

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EXHIBIT E



IBTIHAJMUHAMMAD

Posts



Liked by **nattitude94** and others

**ibtihajmuhammad** Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The young student resisted, by trying to hold onto her hijab, but the teacher pulled the hijab off, exposing her hair to the class. Herman told the student that her hair was beautiful and she did not have to wear hijab to school anymore. Imagine being a child and stripped of your clothing in front of your classmates. Imagine the humiliation and trauma this experience has caused her. This is abuse. Schools should be a haven for all of our kids to feel safe, welcome and protected— no matter their faith. We cannot move toward a post-racial America until we weed out the racism and bigotry that still exist in all layers of our society. By protecting Muslim girls who wear hijab, we are protecting the rights of all of us to have a choice in the way we dress.

Writing books and posting on social is not enough. We must stand together and vehemently denounce discrimination in all of its forms. CALL Seth Boyden Elementary (973) 378-5209 and EMAIL the principal [sglander@somsd.k12.Nj.us](mailto:sglander@somsd.k12.Nj.us) and the superintendent [Rtaylor@somsd.k12.Nj.us](mailto:Rtaylor@somsd.k12.Nj.us)

@cair\_national @cair.nj

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**ihunter973** @ibtihaimuhammad has anyone shared



7:31



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Posts

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lisa.zimouche 🙏🙏❤️



sza Exactly why we love you ❤️



October 12, 2021



ibtihajmuhammad



Maplewood, New Jersey



Liked by nattitude94 and others

ibtihajmuhammad Yesterday, Tamar Herman, a teacher at Seth Boyden Elementary in Maplewood, NJ forcibly removed the hijab of a second grade student. The... more

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ihunter973 @ibtihaimuhammad has anvone shared





EXHIBIT F



← Thread



**Selaedin Maksut**  
@MSelaedin



Absolutely unacceptable.  
Teacher pulls off 7 year old's hijab...in front of the class.

Our @CAIRNJ office is calling for immediate termination.

Racist teachers like this cannot be trusted around our children.

12:41 AM · Oct 8, 2021 · Twitter for iPhone

107 Retweets 9 Quote Tweets 248 Likes



This Tweet was deleted by the Tweet author. [Learn more](#)



**The Narrator** @tbdtbdtbd777 · Oct 8, 2021



Racism is when we come to judgement without due process.





CAIR National  
@CAIRNational

A teacher pulled off a 7-year-old student's hijab in front of her class. This is completely unacceptable, and we are calling for immediate termination. Our children are not safe with [#Islamophobia](#) in the classroom.  
[@CAIRNJ](#)



[nbcnewyork.com](http://nbcnewyork.com)

NJ Teacher Allegedly Pulls Hijab Off Student's Head in Elementary School



CAIR

Oct 8, 2021 · 🌐



A teacher pulled off a 7-year-old student's hijab in front of her class. This is completely unacceptable, and we are calling for immediate termination. Our children are not safe with [#Islamophobia](#) in the classroom.

CAIR New Jersey



nbcnewyork.com

### NJ Teacher Accused of Pulling Hijab Off 2nd Grade Student's Head

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**EXHIBIT G**



**Selaedin Maksut** @MSelaedin · 9h ...

Absolutely unacceptable.  
Teacher pulls off 7 year old's hijab...in front of the class.

Our @CAIRNJ office is calling for immediate termination.

Racist teachers like this cannot be trusted around our children.

3

17

22



**Selaedin Maksut** @MSelaedin ...

Call and email the Superintendent, Dr. Ronald G. Taylor, today, and let him know Tamar Wyner Herman is unfit to be a teacher.

 [rtaylor@somsd.k12.nj.us](mailto:rtaylor@somsd.k12.nj.us)

 (973) 762-5600



← Tweet



CAIR National  
@CAIRNational

CAIR-NJ Exec. Dir. Selaedin Maksut: "Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience."

@CAIRNJ @MSelaedin  
#Islamophobia



nbcnews.com

Olympian accuses New Jersey teacher of pulling off girl's hijab, school district i...

The allegations were made by fencer Ibtihaj Muhammad, who brought home a bronze in women's team sabre from the 2016 Rio games.



**EXHIBIT H**

(<https://www.cair.com>)



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# Press Releases

## CAIR-NJ Calls for Immediate Firing of Teacher Who Allegedly Pulled Off Muslim Student's Hijab



Ismail Allison ⌚ October 8, 2021 ⌚ 11:28 am

**(SOUTH PLAINFIELD, NJ, 10/8/2021)** -The New Jersey chapter of the Council on American-Islamic Relations (CAIR-NJ) today called for the immediate firing of a Maplewood, N.J., teacher for allegedly pulling off the Islamic head scarf, or hijab, of a 2nd grade Muslim student.

On Wednesday, the teacher at Seth Boyden Elementary allegedly forcibly removed the student's hijab. The young student reportedly resisted by trying to hold onto her hijab, but the teacher allegedly pulled it off, exposing her hair to the class.

The teacher reportedly told the student that her hair was beautiful, and she did not have to wear hijab to school anymore. Maplewood Police are investigating the incident.

### **SEE: Teacher Pulls Hijab From Head of Muslim Student at Elementary School in Maplewood**

<https://www.nbcnewyork.com/news/local/nj-teacher-accused-of-pulling-hijab-off-2nd-grade-students-head/3313080/> (<https://www.nbcnewyork.com/news/local/nj-teacher-accused-of-pulling-hijab-off-2nd-grade-students-head/3313080/>)

### **District Reacts to Seth Boyden Elementary Alleged Hijab Removal by Teacher**

<https://www.hitc.com/en-gb/2021/10/08/seth-boyden-elementary/>  
(<https://www.hitc.com/en-gb/2021/10/08/seth-boyden-elementary/>)

In a statement, **CAIR-NJ Executive Director Selaedin Maksut** said:

*"We call for the immediate firing of the teacher. Anything less is an insult to the students and parents of Maplewood. Forcefully stripping off the religious head scarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.*

*"Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in New Jersey and nationwide. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith."*

### **SEE: CAIR Marks Beginning of National Bullying Prevention Month with Resource Doc for Schools to Combat Anti-Muslim Bullying**

**CAIR Marks Beginning of National Bullying Prevention Month**

## with Resource Doc for Schools to Combat Anti-Muslim Bullying

(WASHINGTON D.C., 10/1/2021) – The Council on American-Islamic Relations (CAIR), the nation’s largest Muslim civil rights and advocacy organization, today released a resource document to help educators combat anti-Muslim bullying. CAIR released the document as institutions across the country mark today’s beginning of National Bullying Prevention Month. The document provides informative resources that school districts can ... [Continue reading](#)



CAIR's mission is to protect civil rights, enhance understanding of Islam, promote justice, and empower American Muslims.

La misión de CAIR es proteger las libertades civiles, mejorar la comprensión del Islam, promover la justicia, y empoderar a los musulmanes en los Estados Unidos.

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**END**

**CONTACT:** CAIR-NJ Executive Director Selaedin Maksut, 908-267-3119, [smaksut@cair.com](mailto:smaksut@cair.com)

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**CAIR Calls for Probe of Possible Bias Motive for Vandalism Targeting D.C. Catholic School** ([https://www.cair.com/press\\_releases/cair-calls-for-probe-of-possible-bias-motive-for-vandalism-targeting-d-c-catholic-school/](https://www.cair.com/press_releases/cair-calls-for-probe-of-possible-bias-motive-for-vandalism-targeting-d-c-catholic-school/))

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2021  
an accused of hate crime in alleged knife  
point over parking space. Victim charged with

([https://www.cair.com/press\\_releases/cair-ny-condemns-alleged-racist-knifepoint-menacing-of-black-marine-and-companions-in-staten-island-welcomes-hate-crime-charges/](https://www.cair.com/press_releases/cair-ny-condemns-alleged-racist-knifepoint-menacing-of-black-marine-and-companions-in-staten-island-welcomes-hate-crime-charges/))

**CAIR-NY Condemns Alleged Racist Knifepoint Menacing of Black Marine and Companions in Staten Island, Welcomes Hate Crime Charges** ([https://www.cair.com/press\\_releases/cair-ny-condemns-alleged-racist-knifepoint-menacing-of-black-marine-and-companions-in-staten-island-welcomes-hate-crime-charges/](https://www.cair.com/press_releases/cair-ny-condemns-alleged-racist-knifepoint-menacing-of-black-marine-and-companions-in-staten-island-welcomes-hate-crime-charges/))

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**CAIR-NY Denounces Destruction of Gandhi Statue Outside Hindu Temple in Queens, Calls for Hate Crime Investigation ([https://www.cair.com/press\\_releases/cair-ny-denounces-destruction-of-gandhi-statue-outside-hindu-temple-in-queens-calls-for-hate-crime-investigation/](https://www.cair.com/press_releases/cair-ny-denounces-destruction-of-gandhi-statue-outside-hindu-temple-in-queens-calls-for-hate-crime-investigation/))**

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**CAIR-NY Denounces Racist Party Mocking Juneteenth Sanctioned by Rochester Fire Department Captain, Calls for Transparent Investigation and Accountability ([https://www.cair.com/press\\_releases/cair-ny-denounces-racist-party-mocking-juneteenth-sanctioned-by-rochester-fire-department-captain-calls-for-transparent-investigation-and-accountability/](https://www.cair.com/press_releases/cair-ny-denounces-racist-party-mocking-juneteenth-sanctioned-by-rochester-fire-department-captain-calls-for-transparent-investigation-and-accountability/))**

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**CAIR-Georgia Welcomes Federal Settlement Agreement Between Sapelo Island Gullah Geechee Residents and McIntosh County, Notes More Work to Be Done**  
([https://www.cair.com/press\\_releases/cair-georgia-welcomes-federal-settlement-agreement-between-sapelo-island-gullah-geechee-residents-and-mcintosh-county-notes-more-work-to-be-done/](https://www.cair.com/press_releases/cair-georgia-welcomes-federal-settlement-agreement-between-sapelo-island-gullah-geechee-residents-and-mcintosh-county-notes-more-work-to-be-done/))

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## RESOURCES

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## CAIR New Jersey

2 hrs · 🌐



On Wednesday, the teacher at Seth Boyden Elementary allegedly forcibly removed the student's hijab. The young student reportedly resisted by trying to hold onto her hijab, but the teacher allegedly pulled it off, exposing her hair to the class.

The teacher reportedly told the student that her hair was beautiful, and she did not have to wear hijab to school anymore. Maplewood Police are investigating the incident.

 <p>CAIR New Jersey @CAIRNJ</p> <p>We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ.</p>	 <p>CAIR New Jersey @CAIRNJ</p> <p>Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.</p>	 <p>CAIR New Jersey @CAIRNJ</p> <p>Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.</p>
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 **Linda Sarsour and 2 others**



## EXHIBIT I



CAIR National

@CAIRNational

Our children must be protected from anti-Muslim bigotry and abuse at school. The teacher who pulled a second grader's hijab off in class must be fired immediately.

[#Islamophobia](#)

[@cairnj](#) [@MSelaedin](#)



[cair.com](http://cair.com)

CAIR-NJ Calls for Immediate Firing of Teacher Who Allegedly Pulled Off Muslim Student's Hijab

**EXHIBIT J**



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CAIR New Jersey @CAIRNJ

We call for the immediate firing of the Maplewood teacher who pulled off the headscarf of a young Muslim student. Anything less is an insult to the students and parents of Maplewood, NJ.

11:49 AM · Oct 8, 2021 · Twitter Web App

61 Retweets 9 Quote Tweets 172 Likes



Tweet your reply Reply

CAIR New Jersey @CAIRNJ · Oct 8, 2021 Replying to @CAIRNJ Forcefully stripping off the religious headscarf of a Muslim girl is not only exceptionally disrespectful behavior, but also a humiliating and traumatic experience.

5 37 105

CAIR New Jersey @CAIRNJ · Oct 8, 2021 Muslim students already deal with bullying from peers, it's unthinkable that a teacher would add to their distress. Islamophobia in our public schools must be addressed in NJ. Classrooms are a place for students to feel safe and welcome, not fear practicing their faith.

2 19 53

Melody Hawkins @hootie1965 · Oct 9, 2021 Replying to @CAIRNJ Yes, that is unacceptable!

1 2

Robert Corrow @PRCSBOB · Oct 11, 2021 If it's true.

2

Saladin 7x @saladin7x · Oct 9, 2021 Replying to @CAIRNJ and @Isarsour It is important that the school district do the right thing because when people in authority do not give out justice it leaves the door open for the people in the community to give out justice and we do not want that

1 2

MarcusG, Progressive #EarnMyVote #... @Marcus... · Oct 11, 2021 They are. They're investigating prior to recommending actions so dramatic and damaging as what @CAIRNJ demands.

1 1

Rita Dentino @RitaDentino · Oct 10, 2021 Replying to @CAIRNJ @CasaFreehold supports CAIR's call for the immediate firing of this

Palestinian Aparth... @PalApartheid

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Relevant people

CAIR New Jersey @CAIRNJ CAIR's vision is to be a leader, advocate for justice and understanding.

What's happening

News · LIVE Amber Heard resumes testifying in Johnny Depp defamation trial Trending with #JohnnyDeppVsAmberHeard,

#DoctorStrange In Theaters Tonight Promoted by Marvel Studios

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**EXHIBIT K**



**SnarkyInTheCity** @snarkyinthecity · 18h ...

Replying to @MSelaedin and @CAIRNJ

IF it happened, 100% unacceptable. But we have a FB post (and a very questionable one filled with antisemitism) against a decades experienced teacher in a half black school who used to work out with our own Muslim Olympian.

Something, isn't. Adding. Up.

[#dueprocess](#)

