



February 4, 2026

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Re: Kirkwood School District's further violation of parents' rights following your November 26, 2025, correspondence re: Kirkwood School District's obligations under *Mahmoud v. Taylor*

Dear Ms. Moutray,

We are writing in follow-up of your e-mail of November 26, 2025, making certain undertakings on behalf of your client, Kirkwood School District (KSD). Specifically, we refer to this statement you made regarding KSD's intention to bring its communication and notice to parents into compliance with the notice and opt out requirements the Supreme Court recognized in *Mahmoud v. Taylor*, including with regard to the Sora app:

I can confirm that **the District is revising the notices that will be provided to families so they can make informed decisions regarding their students' access to Sora**. The notices will also continue to be provided through a variety of methods throughout the school year. In the meantime, should you represent any District families that wish to restrict their student's access to *Sora*, those families can find the current opt out form available on the District's website:<https://www.kirkwoodschools.org/academics/librarymedia/audio-ebooks-through-sora>. **(As noted, however, this form will be revised.)** Additionally, should any District family have questions about what materials are available on *Sora*, those questions can be directed to the District's Assistant Superintendent for Curriculum & Instruction, Dr. Liz Grana.

11/26/25 e-mail from M. Moutray (emphasis added).

As you are aware, the Thomas More Society replied on December 11, 2025, making **explicit several features of KSD's use of Sora that parents have a right to know as part of any sufficient notice** regarding their children's use of that app. Specifically, we advised you that your client at that time:

fail[ed] to inform parents of at least three salient and highly objectionable features of KSD's use of Sora . . . :

- (1) because KSD chooses to link Sora to the public library catalog, the Sora app provides students with private, electronic access to materials that would be illegal for the school or any adult to physically provide to children;
- (2) unlike in their libraries and for other resources, KSD takes no responsibility for reviewing books available through Sora for age-appropriateness;
- (3) offensive or illegal materials accessed through the Sora app may not be blocked by KSD's otherwise operative content filter.

It has come to our attention that, in the weeks since our communication with you on December 11, KSD has made several confusing and insufficient efforts to amend its implementation of the Sora app. It is unclear whether these efforts are meant to include or substitute for the aforementioned improved notice KSD owes to parents, but **either as notice or as any other remedy, they are wholly inadequate.**

Specifically, on December 18, 2025, a "KSD eSpotlight" informed parents that KSD would be changing its use of Sora to require parents to permit their students to have public library catalog access via the Sora app. Specifically, the following information was sent to parents as part of a long newsletter addressing mostly other issues:

Public Library and Sora Updates

... Within the Sora app, students have the ability to access three different sources of materials: our KSD collection, the MOREnet collection, and public library collections. Beginning next semester, we will update how students access the public library collection by having students use their personal library card to access public library collections directly. This update will not affect students' access to the KSD or MOREnet collections within Sora. However, starting next semester, students will not be able to access the public library collections without a personal library card. Please note, titles available through the public library are purchased with the general public in mind. **If you choose to add access for your students**, they may encounter material—whether related to sex or other sensitive topics—that differ from or conflict with your personal or religious beliefs. Families may add or remove access to the public library collections at any time. Instructions for updating your students' access to the public library collections are provided below. . . . Families can use these instructions after December 23. . . .

These instructions are now echoed on the KSD website, at

<https://www.kirkwoodschools.org/academics/librarymedia/audio-ebooks-through-sora>, in a section called “Audio & eBooks through Sora.” One option includes “How to **Sign Your Student Up** For a Library Card.”

Deficiencies in KSD’s new Sora implementation and notifications

In reality, KSD’s new Sora implementation and notifications are wholly deficient—and even misleading—for several reasons.

As an initial matter, as of the date of this letter, the change forecasted for this semester (the restriction of public library access to those students who have entered a library card) has not taken effect. **Students at KSD still have unrestricted access through Sora to the public library catalog, which KSD has now finally admitted includes materials that are objectionable to many parents.**

Perhaps relatedly, a January 8, 2026, e-mail communication from Mrs. Christy White to Nipher Middle School students indicated that students must delete public library access in their accounts before adding it back with their own library cards. The same information has been shared with North Kirkwood Middle School students in a file within their Library Schoology folders.

This flatly contradicts the December “eSpotlight” stating that *parents* must choose to “add access” to the public library collection for it to be available to their student, consistent with the separate website instruction to “*Sign Your Student Up*.” Thus, parents have now been misinformed and downright misled.

If students are themselves responsible for removing the public library catalog from their accounts, KSD’s reform of its Sora policy is so far illusory. This is particularly true since KSD’s notice to parents in December indicated that the District would be suspending public library access and explained why. Instead of improving their notice about Sora, as KSD stated it would do, it has further misinformed them and handicapped them in their ability to protect their children from objectionable material.

More fundamentally, even if put into effect, this change to the public library catalog’s accessibility does nothing to restrict access to offensive and even illegal materials that *remain unrestrictedly available to students via Sora in the Missouri MOREnet collection*. For example, the following titles are included in the MOREnet collection.

Elementary & Middle School (ages 5 – 14):
The Gender Identity Workbook for Kids by Kelly Storck

The Breakaways by Cathy G. Johnson

High School

Doing It! by Hannah Wilton

This Book is Gay by Juno Dawson

Queer by Kathy Belge & Marke Bieschke

Examples of adult and even obscene content from these titles and others have been made available to KSD by Kirkwood for Educational Integrity (KFEI) and others over the four years that KSD has been giving students access to them. Given the sexually explicit and potentially illegal nature of the content, we have chosen not to attach example images to this letter. Samples from just these titles are available at this age-protected link: <https://www.kfei.org/ksd-sora-morenet-examples>.

Please understand that this is not a comprehensive list of the offensive materials available on MOREnet. Similar materials may also be available in the so-called “KSD collection,” as it was referred to in the December “eSpotlight,” absent a contrary showing by KSD.

Giving parents responsibility for providing their children access to the public library catalog therefore does nothing to protect students from these and **many other books that are inappropriate for their age groups that are available in the MOREnet and KSD collections.** Worse, providing notice that the public library catalog includes inappropriate materials misleads parents into believing that the other two collections, since they are not being treated similarly, do NOT provide such materials. Because it is misleading in this way, **KSD’s incomplete notice to parents is worse than none at all.**

Similarly unaddressed in KSD’s latest communications with parents is the fact, noted in our December 11 letter to you and your client, that **Sora provides students with unfiltered Internet content.** This is because some materials their students access via Sora, including live Internet links that are embedded in books found in the MOREnet collection, are accessible to students free from the operation of the content filter that KSD is required by law to apply to school devices.

For example, when a student clicks on a link within the book *Doing It!* by Hannah Wilton, to the website “Sexplanations,” he or she is taken to a graphic catalog of videos including “All Things Anal Sex,” “Orgasms,” “Oral Sex,” “The Ultimate Blow Job” and “Sex Toys.” This is true even though the same student would be subject to discipline by KSD for trying to access such content directly. **Parents have a right to be notified that Sora provides students with a portal to otherwise restricted Internet material, separate and apart from the public library collections portal.**

On behalf of our client, KFEI, Thomas More Society reminds KSD that it undertook, through you, to improve the notice it provides parents related to the Sora app. After years of communications regarding the materials provided on Sora, and with the information Thomas More Society has now provided your client, twice, through you, their counsel, KSD can have no confusion about the notice that is necessary and due to parents in order to comply with *Mahmoud* and allow them to make decisions about whether to limit their children's access to Sora. **Because KSD's curtailment of access to the public library catalog, even if effected, will leave students with unrestricted access to many inappropriate or illegal resources in the MOREnet collection as well as private access to otherwise-filtered Internet content, these two features of Sora must be part of any adequate notice to parents.**

To be sure, **Thomas More Society commends KSD for finally admitting to parents that, since 2022, it has been providing their children with unsupervised access to objectionable content** by providing them with public library access in Sora. However, KSD's promise to parents that going forward they would have to "add access" and "sign up" their children in order for them to view materials in the public library catalog has not been put into effect—misleading many parents into thinking no further action is required to protect their children.

And, as noted, merely putting a (not-actually-implemented) gate in front of the public library catalog is wholly inadequate as long as similarly offensive materials remain available through the MOREnet collection and possibly KSD's own collection, and as long as KSD's content filter does not reliably filter materials accessed through Sora.

Please respond by February 19, 2026, explaining whether KSD intends to immediately comply with its own December "eSpotlight" ensuring that parents would have to "add access" to the public library catalog on Sora before their children have access to it; whether KSD will place similar limitations on student access to the MOREnet catalog and related unfiltered access to the internet; and whether and how it will adequately notify parents of their children's ongoing ready access to offensive, inappropriate, and even illegal materials on the Sora app, to come into alignment with the notice and opt out requirements of the Supreme Court's decision in *Mahmoud*.

Ms. Moutray
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Sincerely,



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