

Complaints Form

Complaints ID: 2025-02-0276 **Submission Date:** 2/18/2025 7:47 PM

Complainant Contact Information

Prefix	Mr.
First Name	Joe
Last Name	Bravo
Phone Number	9729559929
Email	jnbravo14@gmail.com
Confirm Email	jnbravo14@gmail.com
Address	2901 Hollow Oak Drive
Address Line 2	
City	Grand Prairie
State	TX - Texas
Postal/Zip Code	75052
Additional Contact Information (optional)	
Complainant's Role	Citizen
Other Role	Former Dallas ISD Teacher 2024

School Information

District/Charter School	DALLAS ISD
Campus	RAUL QUINTANILLA SR MIDDLE STEAM ACADEMY
Educator Preparation Program (if applicable)	

Complaint Description

Individual Student Issue	No
Employee Issues	No
State Assessment Test Security Violations	No

Misuse of Federal or State Funds	No
LEA has provided false/misleading information to TEA	No
School Board/Governance	No
Discrimination/Civil Rights Violations	No
Non-Compliance with Academic/Special Program Requirements	No
Educator Misconduct	Yes
Teacher Incentive Allotment (TIA) Complaint	No
Educator Preparation Programs	No
Other	Yes
Other (Description)	As a result of recently discovered evidence, violations of DFPS/CPS child abuse mandatory reporting.
Named Educator	Teacher - Timothy Minor, Assistant Principal - Roger Ceballos, Principal - Tameca Ward
Describe the alleged violation or the nature of the problem	• Mr. Minor – Violations of Texas Family Codes 261.101 and 261.109. • Texas Family Code § 261.101(a) states: A person having reasonable cause to believe that a child's physical or mental health or welfare has been adversely affected by abuse or neglect shall immediately make a report. • Texas Family Code § 261.101(b) further mandates that professionals, including teachers and administrators, must report suspected abuse within 48 hours and may not delegate this duty to another individual. • Mr. Ceballos and Ms. Ward – Violations of Texas Family Codes 261.104 and 261.109. • Under Texas Family Code § 261.104(a), a child abuse report must include, if known, the following: (1) The name and address of the child, (2) The name and address of the person responsible for the child's welfare. • By failing to properly report the allegations of child abuse, these three educators knowingly violated their mandatory reporting duty, constituting a Class A misdemeanor under Texas law, or a state jail felony if intentional concealment is proven (Texas Family Code § 261.109).
Describe the facts in which the allegation is based. Please be specific	• On 04/08/22, two students identified as VV and FT reported allegations of misconduct, first to Mr. Minor then to Mr. Ceballos. • Four additional students identified as JM, MD, EA,

	and EF reported similar allegations to Mr. Ceballos. • After obtaining all six students' statements, Ms. Ward read the statements and completed an investigation without speaking to the students or vetting the allegations, and substantiated that I had violated Educators' Code of Ethics Standard 3.2, "The educator shall not intentionally, knowingly, or recklessly treat a student or minor in a manner that adversely affects or endangers the learning, physical health, mental health, or safety of the student or minor." • Mr. Ceballos reported to Dallas ISD that he reported the allegations to Child Protective Services (CPS) and cited report 1a410f98 in Dallas ISD's Critical Incident Report used to recommend my termination, but CPS denied its existence. • Two years later, in response to a subpoena by the plaintiff, CPS did verify a second report, 75180163 existed, but that students/parents names/addresses were not reported. • Mr. Minor's 09/13/24 Deposition Excerpts, pages 140-147, and his 11/19/24 Declaration, pages 2-3, confirm VV's and FT's allegations were communicated to him. • Mr. Ceballos 09/10/24 Deposition Excerpts, pages 55-95, and his 11/19/24 Declaration pages 399-404, confirm the six students' allegations were communicated to him and that he had access to the students/parents names/addresses. • Ms. Ward's 09/24/24 Deposition Excerpts, pages 105-133, and her 11/19/24 Declaration, pages 482-499, confirm the six students' allegations were communicated to her, that she had access to the students/parents names/addresses, that she was responsible for vetting and verifying the evidence, supervising and completing the investigation, and making a recommendation based on her findings. • Individually or combined, the evidence shows that despite Mr. Minor being aware of the first two students allegations, and Mr. Ceballos and Ms. Ward being aware of the six students' identities and their parents/guardians names and addresses, all three educators failed to report this critical information to CPS, thereby obstructing investigations and preventing any meaningful intervention.
Include significant dates and events related to the allegation. Please be specific	• On 04/08/22, these three Dallas ISD educators accused me, Joe Martin Bravo (BRAVO), a resolute and highly regarded teacher, of misconduct and child abuse—allegations I vehemently deny and assert were used as a pretext for racial and ethnic discrimination. • During this incident, two students made direct

	allegations of abuse to Mr. Minor, and an additional four students provided similar but fewer allegations to Mr. Ceballos and Ms. Ward. • Required reporting under Texas Family Code 261.101 was not made by the teacher. Mr. Minor, violating state law. • Required reporting under Texas Family Code 261.104 was not made by Mr. Ceballos and Ms. Ward, violating state law. • After ten months on administrative leave, the unanimous recommendation for termination was reversed, I was reinstated with back pay, and assigned to a campus with similar demographics to continue teaching subjects within my certification qualifications without any corrective action. • This report is being submitted because of (1) the attached trial postponement, (2) no evidence that Dallas ISD has addressed these violations has been produced, and (3) the impending expiration of the three-year statute of limitations on April 8, 2025, unless an exception is made based on the first date of discovery, August 22, 2024.
Describe the documents that support the described facts	• These failures are evidenced by documents from the United States District Court, Northern District of Texas, Dallas Division, Case No. 3:23-cv-01596-K, Joe Martin Bravo v. Dallas Independent School District. • The attached list provides the relevant documentary evidence and dates produced. • While this report does not include the actual supporting documents, to prevent accidental disclosure of confidential information, they are available from Dallas ISD, the court, or my attorney upon approval, by referring to the filing Bates numbers provided. • These materials substantiate that the educators had knowledge of the abuse allegations yet failed to fulfill their legal duties to report and identify the victims.
Describe your efforts to resolve the complaint	I have not attempted to resolve this locally.
Date Grievance Filed	

RE: Complain submitted to Texas Education Agency – #2025-02-0276 – Dallas ISD

Educators Involved

Timothy Minor, Teacher
c/o Raul Quintanilla Sr. MS STEAM Academy (Quintanilla)
2700 Remond Dr., Dallas, TX 75211
(972) 502-3200

Roger Ceballos, Former Quintanilla Assistant Principal
(Current Principal, Walnut Glen Academy)
c/o Walnut Glen Academy
3101 Edgewood Dr., Garland, TX 75042
(972) 494-8330

Tameca Ward, Former Quintanilla Principal
(Current Principal, Dr. L.G. Pinkston Sr. High School)
c/o Dr. L.G. Pinkston Sr. High School
2815 Bickers St., Dallas, TX 75212
(972) 502-2700

Evidence Supporting Allegations

Relevant documentary evidence and dates produced include:

DISD App. 413-414	VV Original Statement (03/09/23)
DISD 002330	VV Transcribed Statement (02/13/24)
DISD App. 411	FT Original Statement (03/09/23)
DISD 002325	FT Transcribed Statement (02/13/24)
DISD App. 412	JM Original Statement (03/09/23)
DISD 002327	JM Transcribed Statement (02/13/24)
DISD App. 415	MD Original Statement (03/09/23)
DISD 002332	MD Transcribed Statement (02/13/24)
DISD App. 416	EA Original Statement (03/09/23)
DISD 002334	EA Transcribed Statement (02/13/24)
DISD App. 417	EF Original Statement (03/09/23)
DISD 002336	EF Transcribed Statement (02/13/24)
DISD 002559-002560	Critical Incident Report 5854 (06/09/22)
DISD App. 322-326	Ethicspoint Incident Report 4142 (06/09/22)
DISD 003372-003373	Email re: CPS 1a410f98 (04/09/24)
BRAVO 3883	TX DFPS Letter re: CPS 1a410f98 Does Not Exist (08/22/24)
BRAVO APP. 346-357	CPS Intake Report 76180163 (06/24/24) (Known Child/Parent Name/Address Not Provided)
DISD 002308-002310	Bravo Administrative Statements (06/09/22)
DISD App. 001-004	Minor Declaration, pages 2-3, (11/19/24)
BRAVO APP. 137-149	Minor Deposition Excerpts, pages 140-147, (09/13/24)
DISD App. 398-409	Ceballos Declaration pages 399-404, (11/19/24)
BRAVO APP. 051-097	Ceballos Deposition Excerpts, pages 55-95, (09/10/24)
DISD App. 480-500	Ward Declaration, pages 482-499, (11/19/24)
BRAVO APP. 102-136	Ward Deposition Excerpts, pages 105-133, (09/24/24)
DISD 002280-002281	Signed Administrative Leave Request Form Indicating Child Abuse (06/09/22)
DISD 001490	Educators' Code of Ethics Standard 3.2 (06/09/22) "The educator shall not intentionally, knowingly, or recklessly treat a student or minor in a manner that adversely affects or endangers the learning, physical health, mental health, or safety of the student or minor."
DISD 002290-002307	Administrator's Investigation and Supporting Documents (02/13/24)
DISD 002581	Investigative Outcomes Definitions (02/13/24)
DISD 002337	Legal Review Recommendation Letter (06/09/22)