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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT PALMER

NATALIA ROMANOVA, individually )  
and on behalf of minor child G.S., )  
) )  
Plaintiffs, )  
) )  
vs. )  
) )  
THE ACADEMY ADVISORY )  
BOARD, INC. d/b/a ACADEMY )  
CHARTER SCHOOL, )  
) )  
Defendant. )  
\_\_\_\_\_ )

Case No. \_\_\_\_\_

**COMPLAINT**

COMES NOW Plaintiff Natalia Romanova, individually and on behalf of her minor child G.S., and by and through counsel, the Northern Justice Project, LLC, and alleges and requests relief as follows:

**INTRODUCTION**

1. Academy Charter School (“ACC”) is a public charter school in Palmer, Alaska. Plaintiff G.S. has been a student at ACC since he entered kindergarten in 2021.
2. Although ACC is a public school, it requires the parents of its students to donate

unpaid labor to ACC by completing mandatory “Parent Participation Hours” each year. Parents must provide 36 hours of unpaid labor—which may include classroom work, maintenance, fundraising, or other work that “supports and assists” the school—for each child enrolled in the school, or a maximum of 80 hours if more than two children are enrolled in the school.

3. In August 2025, G.S.’s parents discovered that he had been disenrolled from ACC for the 2025–26 school year because ACC claimed that G.S.’s parents did not volunteer enough in the prior school year. ACC did not give the family any notice or an opportunity to respond or cure the alleged deficiency in “Parent Participation Hours” before unilaterally disenrolling G.S. from the school.

4. When G.S.’s parents subsequently tried to explain that the school was missing certain volunteer hours and that the household was navigating medical issues that prevented them from volunteering the full amount, ACC simply responded that the hours were non-negotiable and that its decision was final.

5. ACC is a public school. As such, while ACC may strongly encourage parental participation, it cannot expel a student because his parents had family medical issues and were unable to provide volunteer labor to the school. Moreover, as a public school, ACC must comply with the Alaska Constitution’s guarantee of due process, including notice and an opportunity to be heard, before it expels a student from the school.

6. ACC disenrolled and expelled G.S. without due process and in an arbitrary manner that violates ACC’s charter, its contractual obligations, and G.S.’s rights under the Alaska Constitution and Alaska law.

7. G.S. and his family request an injunction allowing him to re-enroll at ACC and a declaration that ACC’s parental participation requirement is unlawful.

## **JURISDICTION AND VENUE**

8. This Court has jurisdiction under AS 22.10.020(c) and (g).
9. Venue is proper under AS 22.10.030 and Alaska Civil Rule 3(c).

## **PARTIES**

10. Plaintiff Natalia Romanova is a resident of Palmer, Alaska. She is the mother of minor child G.S., a student in the Matanuska-Susitna Borough School District.

11. Defendant Academy Advisory Board, Inc. is an Alaskan non-profit corporation doing business as Academy Charter School (“ACC”), located at 801 East Arctic Avenue in Palmer, Alaska, 99645. ACC is a public charter school within the Matanuska-Susitna Borough School District. ACC has a current enrollment of approximately 265 students in kindergarten through the eighth grade.

## **GENERAL ALLEGATIONS**

12. Plaintiff Natalia Romanova has been a parent at ACC for over a decade. Her youngest child, G.S., has been a student at ACC since kindergarten.

13. Pursuant to its charter and to state law, ACC shall enroll all eligible students that seeks admission to its program. If ACC is over capacity, the school uses a lottery system to determine enrollment.

14. Despite its promise to enroll all eligible students, ACC requires each student’s parent to provide 36 hours of labor, per student, to the school. These “participation hours” are mandatory and a condition of enrollment with the school. If a student’s parent does not complete the required hours, the student is disenrolled from ACC.

15. On or about July 5, 2025, Ms. Romanova registered G.S. to return to ACC in fourth grade for the 2025–26 school year.

16. On July 10, 2025, Ms. Romanova received a “Welcome Back” email from principal Barbara Gerard. On July 24, 2025, she received another email from principal Gerard regarding upcoming important dates for the start of the school year.

17. Unbeknownst to Ms. Romanova, ACC’s Advisory Board held a special meeting on July 1, 2025, and voted to send “termination letters” to Plaintiffs for failing to comply with their “volunteer hour obligations.” Plaintiffs were not given any notice that this special meeting of the ACC Advisory Board would be taking place, much less that the Board would be deciding whether G.S. would be expelled from the school.

18. Ms. Romanova and G.S. were attending a back-to-school open house at ACC on August 5, 2025, when principal Gerard ambushed Ms. Romanova and called her into her office. Ms. Gerard informed Ms. Romanova that G.S. had been disenrolled from ACC and would not be allowed to return to school because his family did not work enough hours with the school during the prior school year.

19. This impromptu meeting was the first time ACC communicated to Ms. Romanova that it was concerned about her parental participation hours. Ms. Romanova had not previously received any notice from ACC, either verbal or written, that G.S. was in danger of disenrollment because of missing parental participation hours. When Ms. Romanova explained to Ms. Gerard that she was blindsided by ACC’s decision and was wholly unaware there was an issue with the participation hours recorded with the school, Ms. Gerard called Ms. Romanova a liar and abruptly ended the meeting.

20. Ms. Romanova sent a letter to ACC explaining that this was the first time the school had raised any concern about her parental participation. She explained that the family had experienced medical issues that prevented them from volunteering the full amount, but

regardless, that a substantial number of volunteer hours appeared to be missing from the school's records.

21. Specifically, Ms. Romanova and her family volunteered at least 38 hours during the 2024–25 school year. Additionally, in 2022–23, the family volunteered nearly 70 hours, and in 2021–22, the family volunteered over 130 hours. And prior to G.S.'s enrollment, his father—who works in construction—donated over 210 hours of labor and \$31,000 to expand the school's gravel parking lot.

22. On August 15, 2025, ACC sent a letter to Ms. Romanova confirming that G.S. would not be allowed to return to school due to her lack of parental participation. The letter described the parental participation hours as “non-negotiable” and did not respond to Ms. Romanova's assertion that the school's service log was inaccurate.

23. Thus, just days before G.S. was set to start fourth grade at ACC, he was told that he could not return because the school had unilaterally determined that his parent did not volunteer enough during the prior school year.

#### **FIRST CAUSE OF ACTION: VIOLATION OF DUE PROCESS**

24. Plaintiffs repeat and incorporate the above paragraphs.

25. Article VII, § 1 of the Alaska Constitution guarantees “a system of public schools open to all children of the State.” In accordance with this constitutional requirement, the Alaska Legislature has established “a system of public schools,” AS 14.03.010, for the purpose of ensuring “that all students will succeed in their education and work, shape worthwhile and satisfying lives for themselves, exemplify the best values of society, and be effective in improving the character and quality of the world about them.” AS 14.03.015.

26. Article I, § 7 of the Alaska Constitution provides that “[n]o person shall be deprived of life, liberty, or property, without due process of law.”

27. Students have a protected property interest in attending a public school in their district. As such, public schools cannot arbitrarily disenroll a student without first providing due process, i.e., notice and an opportunity to be heard.

28. Because neither G.S. nor Ms. Romanova were provided with any notice or any opportunity to be heard before ACC disenrolled G.S., ACC’s actions violate the Alaska Constitution’s guarantee of due process.

### **SECOND CAUSE OF ACTION: VIOLATION OF AS 14.03.265**

29. Plaintiffs repeat and incorporate the above paragraphs.

30. Charter schools are public schools. As such, Alaska law requires that the charter schools must be open to any eligible student in the district.

31. Pursuant to AS 14.03.265(b), “[a] charter school shall enroll all eligible students who submit a timely application.” If the school receives more applications than spaces available, the school “shall attempt to accommodate all of those applicants” by increasing enrollment, and if that is not possible, “students shall be accepted by random drawing.”

32. G.S. is eligible to attend ACC and has done so for years. By conditioning his enrollment on his parent’s ability to donate labor to the school, ACC violated AS 14.03.265.

### **THIRD CAUSE OF ACTION: VIOLATION OF AS 14.03.080**

33. Plaintiffs repeat and incorporate the above paragraphs.

34. The Alaska Constitution guarantees a free public school system for its residents. Accordingly, pursuant to AS 14.03.080, a child is entitled to attend a public school without the payment of tuition.

35. ACC requires the parents and families of students to contribute a large amount of unpaid labor as a condition for attending the school. Requiring parents to do unpaid work at public schools constitutes a non-monetary fee for enrollment in violation of AS 14.03.080.

**FOURTH CAUSE OF ACTION: VIOLATION OF AS 14.30.045**

36. Plaintiffs repeat and incorporate the above paragraphs.

37. Pursuant to AS 14.30.045, a public school may only deny admission to a student for certain enumerated reasons. These include certain behavioral issues, certain medical/physical conditions that pose a danger to other students, and criminal activity.

38. A student cannot be denied admission to a school he is otherwise eligible to attend simply because his parents cannot perform uncompensated labor for the school.

39. G.S. had no behavioral or disciplinary issues that warrant being denied admission to ACC. By disenrolling G.S. from ACC because his parents could not donate labor to the school, ACC violated AS 14.30.045.

**FIFTH CAUSE OF ACTION: BREACH OF ACC's CHARTER**

40. Plaintiffs repeat and incorporate the above paragraphs.

41. As a charter school, ACC has adopted a written charter that sets forth the school's governing policies and procedures.

42. ACC's charter provides that if the school denies enrollment to any student, "[t]he student's parent will be provided with a meaningful opportunity to comment upon and provide input into the Academy Charter's decision, and if appropriate, to provide additional relevant information. Due process and an appeal process to the Advisory Board is available."

43. ACC violated this provision of its own charter when it disenrolled G.S. from the school. Plaintiffs were not provided with any notice, any opportunity to be heard, or any appeal process before ACC disenrolled G.S.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court award:

- (1) A declaration that ACC's policy to require parental participation as a condition of enrollment violates the Alaska Constitution and state law;
- (2) An injunction ordering ACC to immediately re-enroll G.S.;
- (3) The costs and expenses of litigation, including full attorney's fees;
- (4) All other relief as the Court deems necessary.

DATED this 28<sup>h</sup> day of August, 2025.

NORTHERN JUSTICE PROJECT, LLC  
Attorneys for Plaintiffs

By: /s/ Aneliese Palmer  
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