

COLLIN COUNTY, TEXAS

1

THE LEARNING EXPERIENCE **FAILS TO PROTECT CHILDREN** FROM ENRAGED CAREGIVER

3. Every day, parents across the country face a difficult decision: *Who can they trust to care for their child and keep them safe while they're at work?* Leaving your child in someone else's care is stressful and takes an immense amount of trust by parents. Parents deserve to feel confident that their child is safe, supported, and well cared for while at daycare.

4. When Franchester Wilson chose The Learning Experience, she chose it based on its promises of a safe and nurturing environment with qualified caregivers, an award-winning curriculum, and open communication—everything families need to feel confident that their child is in good hands.

How do I find the best preschool near me?

If you're searching for a preschool near me or "daycare in Dallas", look no further. Our centers are built on a foundation of trust, education, and family-focused care.

Why Families Choose Our Daycare in Dallas, TX



Award-Winning Curriculum

Our proprietary L.E.A.P.* curriculum is designed to develop the whole child through academic, social, and cognitive learning.



Safe & Secure Environment

Secured entrances, background-checked staff, and detailed health protocols keep your child safe and protected.



Qualified Teachers

Our educators have degrees in early childhood education and maintain ongoing professional development.



Family Communication

Stay connected with daily reports, photos, and updates through our secure parent app.

² The Learning Experience Website, <https://thelearningexperience.com/centers/dallas-frankford/> (last visited September 28, 2026).

5. The Learning Experience's Owners Salam Alshaikh and Salam Saeed go as far as to guarantee families that they are committed to providing a peaceful and nurturing environment where "Happy Happens" every day.³ The Learning Experience assures parents that they need not look any further for the best preschool because they are "built on a foundation of trust, education, and family-focused care."⁴

6. But the environment The Learning Experience subjected 3-year-old N.B. to was everything *but* safe, peaceful, nurturing, and happy when they neglected to protect her and keep her safe from an unqualified, overwhelmed, and enraged caregiver.

ENRAGED CAREGIVER TAKES OUT FRUSTRATIONS ON PRESCHOOLERS RIGHT UNDER THE NOSE OF THE LEARNING EXPERIENCE DIRECTOR

7. On September 3rd, 2025, Franchester Wilson made an unannounced drop-in visit to The Learning Experience in the middle of the day to pick up an item from the daycare. While there, Ms. Wilson requested to view the video feed that is always up and streaming on screens within The Learning Experience Director Nelda Jackson-Moses's office — a feature advertised to families as one of the many ways they ensure the safety of children. Ms. Wilson requested to observe the classroom while there because her 3-year-old daughter had recently started making some concerning comments about The Learning Experience Caregiver Mojgan Ahadzadeh being angry and hitting her.

8. Within minutes of Ms. Wilson observing the live video feed that streams on monitors inside of The Learning Experience Director's office, **3-year-old N.B.'s concerning remarks became a frightening reality.**

³ *Id.*

⁴ *Id.*

9. It was lunchtime at The Learning Experience and as Ms. Wilson looked in on her daughter's class, she located her seated at the lunch table. As Ms. Wilson continued to observe the classroom, she witnessed her daughter stand up from the lunch table and begin walking around. What happened next, shook her to her core as she watched in horror as the The Learning Experience Caregiver Mojgan Ahadzadeh walked up to 3-year-old N.B. and aggressively grabbed her and shoved her towards the sink, causing her to stumble. Ms. Wilson immediately pointed out the incident to The Learning Experience Director and another caregiver, who were both present in the office, asking them in disbelief and shock if they had just witnessed what she saw. As they all looked up at the screen, The Learning Experience Caregiver looked enraged and struck again – this time yanking another child and forcefully throwing that child to the ground.

10. The Learning Experience Director rushed out of the office towards the classroom ahead of Ms. Wilson. By the time Ms. Wilson arrived at the classroom, The Learning Experience Director had sent the Caregiver away, and she was nowhere to be found. Ms. Wilson removed her child from the daycare and reported the incidents to the authorities.

11. An independent investigation by the Texas Health and Human Services Commission Child-Care Licensing Division and the Texas Department of Family and Protective Services was performed, concluding that The Learning Experience violated the Texas Child Care Safety Laws in relation to the incident involving N.B.:

- **746.2805(3) – Cited for the Use of Prohibited Punishments – Grabbing and Pulling.**
The Learning Experience's Caregiver grabbed children in an aggressive manner.
- **746.1201(1) – Cited for the Failure of Employees and Caregivers to Demonstrate Competency, Good Judgment, Self-control.**
The Learning Experience staff did not demonstrate good judgment and self-control when children were grabbed in an aggressive manner.

**LIVE CAMERAS. VULNERABLE CHILDREN.
AND A BREAKDOWN IN SUPERVISION.
WHAT ARE CAMERAS FOR IF NO ONE IS WATCHING?**

12. The Learning Experience is responsible for ensuring that it employs caregivers who are fit for the job, qualified, properly trained, and adequately supervised. The Learning Experience had surveillance cameras installed throughout the classrooms in the daycare. The live-feed from the classroom surveillance cameras streamed onto screens in The Learning Experience Director's office – where she could look up at *any* time and observe the interactions between children and caregivers. So, it begs the questions:

- *Why did it take just a few short minutes for Ms. Wilson to discover what so blatantly should have been seen and addressed long beforehand?*
- *Why weren't the cameras monitored to ensure that the daycare was supervising interactions between employees and children?*
- *Why weren't the classrooms and employees supervised to ensure appropriate discipline and redirection occurred?*
- *If a caregiver was treating children like this in plain sight with the camera feed visible around the clock from The Learning Experience Director's office, what are caregivers doing in places where the cameras aren't streaming?*
- *Why did it take a concerned parent to come up to the daycare and do the job The Learning Experience Director should have done all along?*

13. Franchester Wilson brings this case in search of answers to these questions and asking The Learning Experience to take responsibility for its failures in protecting 3-year-old N.B. and other children in its care.

14. Because the one thing that *is* clear, is the aggressive and physical mistreatment 3-year-old N.B. experienced was preventable.

**N.B. WAS ONCE A HAPPY AND CARE-FREE LITTLE GIRL
BUT THE LEARNING EXPERIENCE CHANGED THAT
THE TRAUMA OF WHAT SHE WENT THROUGH STILL IMPACTS HER TO THIS DAY**

15. Prior to attending The Learning Experience, N.B. was independent, confident, and outgoing 3-year-old child who loved exploring her surroundings. Since the incident, N.B. has become withdrawn, less social, and struggles to regulate her emotions. A once happy and care-free little girl who could be calmed down easily when she is upset, she is now easily frustrated and acts out with aggression — often hitting, kicking, and biting. N.B. has also become anxious and increasingly clingy with her mother. Instead of playing and sleeping independently, N.B. now follows her mother everywhere requiring her attention and reassurances that all is okay as she relearns to trust her environment.

16. The simple truth is that every child deserves to feel safe at daycare. The Learning Experience could have and should have kept N.B. safe — along with all other children in that classroom — and they failed. As a direct and proximate result of the actions and omissions of The Learning Experience, N.B. suffered physical, emotional, psychological, and mental injuries.

DISCOVERY CONTROL PLAN & CLAIM FOR RELIEF

17. Discovery in this matter is intended to be conducted under Level 3 of the Texas Rules of Civil Procedure.

18. As required by the Texas Rule of Civil Procedure 47(c), Plaintiffs' counsel states that Plaintiffs seek monetary relief \$325,000.00; however, the amount of monetary relief awarded will ultimately be determined by a jury.

PARTIES

19. Plaintiff Franchester Wilson, Individually and as Parent and Next Friend of Plaintiff N.B., a minor, and is a citizen and resident of Collin County, Texas.

20. **Defendant Peace Nest Childcare, LLC D/B/A The Learning Experience Dallas** is a limited liability company doing business in the State of Texas, its state of formation. Defendant operates a daycare under operation license number 1802040, with a physical address location of 3099 Frankford Road, Dallas, Texas 75287-5657. Defendant may be served with process by serving its registered agent, **ZenBusiness Inc.**, at **5511 Parkcrest Dr., Suite 103, Austin, Texas 78731**, or wherever they may be found. Service of process is requested.

21. **Defendant Mojgan Ahadzadeh** is an individual citizen and resident of Collin County, Texas. Defendant Mojgan Ahadzadeh may be served with process at **4219 Winding Way Ct., Dallas, Texas, 75287-2768**, in Collin County, or wherever else she may be found. Service of process is requested.

JURISDICTION & VENUE

22. The Court has subject matter jurisdiction over this lawsuit because the amount in controversy exceeds this Court's minimum jurisdictional requirements.

23. Venue is proper in Collin County, Texas, under Texas Civil Practices and Remedies Code Section 15.002(a) because it is the county of a Defendant's residence at the time the cause of action accrued.

CAUSES OF ACTION AGAINST DEFENDANT

Count One – Negligence Against Defendant The Learning Experience

24. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

25. The occurrence made the basis of this suit, reflected in the above paragraphs, and the resulting injuries and damages of Plaintiffs were proximately caused by the negligent conduct of the Defendant. Defendant had a duty to maintain a safe environment for children in their care to prevent harm and injury to N.B. and other children similarly situated. Defendant was negligent by breaching the duty that was owed to Plaintiffs, to exercise ordinary care in one or more of the following acts or omissions, constituting negligence:

- a. Failing to exercise the care that was necessary under the circumstances;
- b. Failing to do what a reasonable daycare would have done under the circumstances;
- c. Failing to maintain a safe environment for children;
- d. Failing to intervene to prevent injury to children;
- e. Failing to ensure that prohibited discipline methods were not being used against children;
- f. Failing to employ caregivers who demonstrate competency and good judgment;
- g. Failing to properly hire, qualify, train, and supervise its employee-caregivers and staff trusted with the care of minor Plaintiff N.B.;
- h. Choosing to employ staff who do not know or adhere to the Texas Minimum Standards for Child Care.
- i. Choosing to continue to employ an unqualified, untrained, and unsupervised caregiver;
- j. Failing to ensure no child is abused, neglected, or exploited; and
- k. Failing to ensure the daycare was operating in compliance with the Texas Minimum Standards for Child Care.

26. Defendant had a duty to exercise ordinary care in caring for, handling, and disciplining the children in its care so as to prevent injury to minor child N.B. and other children similarly situated.

27. Defendant had a duty to maintain a safe environment for children in its care to prevent injury to N.B., and other children similarly situated.

28. Defendant had a duty to hire, train, and supervise employees to ensure that children were not being subjected to inappropriate discipline methods, physical mishandling, and prohibited punishments, so as to prevent injury to Plaintiff N.B. and other children similarly situated.

29. Defendant breached the duty of care by failing to properly care for the children; failing to safely and properly discipline children; failing to exercise competency, good judgment, and self-control in disciplining children; failing to properly train, hire, and supervise its employees; failing to intervene in a situation placing a child at risk of injury; failing to hire, train, and supervise qualified caregivers and staff to care for children; and failing to maintain a safe environment for children.

30. Defendant's negligent acts and/or omissions and breach of duties directly and proximately caused injury to Plaintiffs, which resulted in significant damages.

Count Two – Negligence Per Se Against The Learning Experience

31. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

32. Defendant failed to exercise the mandatory standard of care in violation of the Texas Department of Family Protective Services, Minimum Standards for Child-Care Centers.

33. In the foregoing claims of negligence per se, Plaintiff was, at all times, a member of the class that the statutes were designed to protect.

34. Defendant's violation of the statutes was the proximate cause of the incident in question.

Count Three – Negligent Activity Against Defendant The Learning Experience

35. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

36. Defendant is the owner, operator, and/or possessor of the daycare premises located at 3099 Frankford Road, Dallas, TX 75287-5657, operation license number 1802040.

37. At the time of the incident, N.B. was a minor placed in the care of Defendant and was thus an "invitee" to whom Defendant owed a duty to exercise ordinary care.

38. Plaintiffs' injuries were the direct and contemporaneous result of Defendant's ongoing negligent activity on the premises at the time of the injuries and damages sustained.

39. Defendant owed Plaintiffs a legal duty to ensure N.B.'s safety in maintaining proper care over the children, ensuring the employees are necessarily hired, trained, supervised, and terminated in order to maintain a safe environment where children are cared for and supervised at all times. Defendant breached these duties by failing to supervise and monitor the children in their care; failing to hire, train and supervise its employee-caregivers and management; by failing to intervene in a situation placing a child at risk of injury; and by failing to immediately terminate caregivers who posed a serious risk to the safety and wellbeing of children.

40. Such negligent activity on the part of the Defendant proximately caused the injuries and other damages suffered by Plaintiffs.

Count Four - Negligence Against Defendant Mojgan Ahadzadeh

41. Plaintiffs' negligence claim is based on the facts set out in this Petition.

42. Defendant Mojgan Ahadzadeh was acting in the course and scope of her employment with Defendant The Learning Experience at all times material to this lawsuit. The occurrences made the basis of this lawsuit and reflected in the above paragraphs, and the resulting injuries and damages to Plaintiffs was proximately caused by the negligent conduct of Defendant Ahadzadeh. Defendant Ahadzadeh owed Plaintiffs a duty of ordinary care. Defendant Ahadzadeh was negligent by breaching the duty owed to Plaintiffs to exercise ordinary care in one or more of the following acts or omissions, constituting negligence:

- a. Failing to do what a reasonable caregiver would do in regard to interacting, supervising, care for, redirecting, and disciplining children placed in her care.
 - b. Failing to provide a safe environment for the children placed in her care, including N.B.
 - c. Failing to comply with local and state laws and regulations pertaining to the care, interaction, supervision, and discipline of children.
 - d. Failing to adhere to the Texas Minimum Standards for Child Care.
 - e. Failing to use only positive methods of discipline and interaction with children by choosing to use prohibited punishment methods.
43. The standard of care violations of Defendant Ahadzadeh by her own acts and omissions, has directly and proximately caused injuries to Plaintiffs. Plaintiffs seek damages for Defendant Ahadzadeh's negligence.

**Count Five - Gross Negligence Against Defendants The Learning Experience
and Mojgan Ahadzadeh**

44. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

45. Defendants' conduct was more than momentary thoughtlessness or inadvertence. Rather, the acts and/or omissions by Defendants in the preceding paragraphs constitute gross negligence as the term is defined in Texas Civil Practices and Remedies Code §41.001(11).

46. Defendants' conduct involved an extreme degree of risk, considering the probability and magnitude of potential harm to the Plaintiffs. Defendants had actual, subjective awareness of the risk involved, but, nevertheless, proceeded in conscious indifference to the rights, safety, or welfare of Plaintiffs or of others similarly situated.

47. The above acts and/or omissions were singularly and cumulatively the proximate cause of the occurrence in question and the resulting injuries and damage sustained by Plaintiffs.

RESPONDEAT SUPERIOR

48. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

49. The negligence and carelessness of Defendant's employees proximately caused the damage and losses suffered by Plaintiffs as a result of the injury. At all times material to their action, Defendant's employees were acting in the course and scope of their employment. Accordingly, Defendant may be held responsible for its employee's negligence under the doctrine of *respondeat superior*.

DAMAGES

50. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

51. As a direct and proximate cause of Defendant's negligent acts and/or omissions, Plaintiffs Franchester Wilson, Individually and as Parents and Next Friends of Plaintiff N.B., a minor child, suffered damages and injuries that include, but are not limited to:

- a. Physical pain and suffering in the past;
- b. Physical pain and suffering, in reasonable probability, sustained in the future;
- c. Disfigurement in the past;
- d. Disfigurement, in reasonable probability, sustained in the future;

- e. Mental anguish in the past;
 - f. Mental anguish, in reasonable probability, sustained in the future;
 - g. Reasonable and necessary medical expenses in the past;
 - h. Reasonable and necessary medical expenses, in reasonable probability, sustained in the future;
 - i. Loss of wages in the past;
 - j. Loss of wages, in reasonable probability, sustained in the future;
 - k. Loss of wage-earning capacity in the past;
 - l. Loss of wage-earning capacity, in reasonable probability, sustained in the future;
 - m. Physical impairment in the past;
 - n. Physical impairment, in reasonable probability, sustained in the future;
 - o. Loss of normal enjoyment of the pleasure of life in the past;
 - p. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the future;
 - q. Costs of suit; and
 - r. All other relief, in law and equity, to which Plaintiffs may be entitled.
52. Plaintiffs' damages clearly exceed the minimum jurisdictional requirements for this Court. Plaintiffs, therefore, seek compensation by the Court and jury for their damages, in an amount to be determined by the jury.

EXEMPLARY DAMAGES

53. Plaintiffs incorporate by reference the preceding paragraphs as if stated fully herein.

54. Plaintiffs would further show that the acts and/or omissions of the Defendants complained of herein were committed knowingly, willfully, intentionally, with actual awareness, and with the specific and predetermined intention of enriching said Defendants at the expense of Plaintiffs.

55. The grossly negligent conduct of Defendants, as described herein, constitutes conduct for which the law allows the imposition of exemplary damages. Accordingly, Plaintiffs seek the award of exemplary damages against Defendants pursuant to Chapter 41 of the Texas Civil Practices and Remedies Code.

JURY TRIAL

56. Plaintiffs demand a jury trial and have tendered the appropriate fee with the filing of this Original Petition.

U.S. LIFE TABLES

57. Notice is hereby given that Plaintiffs intend to use the U.S. Life Tables as prepared by the Department of Health and Human Services.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants be cited to appear and answer herein and upon final hearing hereof, they take, have and recover, of and from said Defendants, the above damages, exemplary damages, costs of court, pre-judgment interest, post-judgment interest, and for such other and further relief to which they may show themselves justly entitled.

Dated: October 15, 2026.

Respectfully submitted,

THE BUTTON LAW FIRM

/s/ Russell T. Button

Russell T. Button

Texas Bar No. 24077428

russell@buttonlawfirm.com

Ashley D. Knarr

Texas Bar No. 24102030

ashley@buttonlawfirm.com

Kaitlyn Moreno

Texas Bar No. 24125670

kaitlyn@buttonlawfirm.com

Rena K. Piper

Texas Bar No. 24120428

rena@buttonlawfirm.com

4315 W. Lovers Lane, Suite A

Dallas, Texas 75209

T: 214-88-2216

F: 214-481-8667

Email for Service: service@buttonlawfirm.com

ATTORNEYS FOR PLAINTIFFS