State of New Jersey

OFFICE OF ADMINISTRATIVE LAW

DECISION

EMERGENT RELIEF

OAL DKT. NO. EDS 15798-14

AGENCY DKT. NO. 2015 22062 E

R.M. AND V.M. ON BEHALF OF J.M.,

Petitioners,

v.

WASHINGTON TOWNSHIP BOARD OF EDUCATION,

Respondent.

_____

R.B., pro se

Sanmathi Dev, Esq., for respondent (Capehart Scatchard, attorneys)

Record Closed: December 22, 2014 Decided: December 23, 2014

BEFORE **ROBERT BINGHAM II**, ALJ:

STATEMENT OF THE CASE AND PROCEDURAL HISTORY

Petitioners R.M. and V.M. apply for emergent relief on behalf of their daughter, J.M., seeking an order maintaining J.M.'s current placement at Brookfield Academy. On December 1, 2014, petitioners' request for a due-process hearing was filed with the Office of Special Education Programs (OSEP), New Jersey Department of Education,

along with an application for emergent relief.[1] On December 5, 2014, the emergent matter alone was filed with the Office of Administrative Law for oral argument, which was held on December 22, 2014, after which the record was closed.

FACTUAL DISCUSSION

J.M. is a sixteen-year-old student who resides within the Washington Township School District (the District). Since August 2011 she has been eligible for special education and related services under the classification of emotionally disturbed, having been diagnosed with oppositional defiant disorder and mood disorder. (R-G.) Since June 2013 she has attended a number of out-of-district placements, including the Strang School[2] and the East Mountain School (tenth grade).[3] In March 2014, petitioners removed J.M. from East Mountain and, pursuant to an agreed-upon individualized education plan (IEP) dated April 24, 2014, that included a behavior plan, she was placed out of district at the Brookfield Academy (Brookfield). An IEP meeting on June 3, 2014, resulted in the continued agreed-upon placement at Brookfield for the remainder of the 2013–14 school year and for the 2014–15 (eleventh grade) school year.

Between September and October 23, 2014, Brookfield issued a number of disciplinary infractions based on J.M.'s alleged disruptive conduct. Consequently, an IEP meeting was held on October 27, where the District agreed to conduct additional assessments, as requested by petitioners, who rejected the idea of a change of placement. On October 29, J.M. signed a behavior contract to "ensure that [she]

[1] On November 24, 2014, the District filed with OSEP a request for an expedited hearing for an order placing the student in an alternative interim placement for forty-five days due to dangerousness. The matter was transmitted to the Office of Administrative Law, where it was filed on December 2, 2014, under docket number EDS 15608-14.

[2] The Strang School is located in Alloway, New Jersey, and specializes in behavioral management for students with emotional and behavioral disabilities. It is an on-site educational facility affiliated with Ranch Hope, a residential treatment facility. J.M. attended the Strang School for an extended school year during the summer of 2013, following ninth grade.

[3] The East Mountain School is located in Belle Mead, New Jersey, and specializes in management and therapeutic services for adolescents with behavioral and psychiatric disorders. It is an on-site educational facility affiliated with the Carrier Clinic, a residential treatment facility that J.M. attended simultaneously.

remains in good standing and continues to make progress in her Brookfield Academy placement." (R-E.)[4] By letter dated November 5, 2014, Brookfield's principal, Patrick Kiernan, recommended a change in placement, citing the following behaviors: (1) non-compliance and refusal to respond to redirection, (2) refusing to consistently attend and remain in scheduled classes, (3) disruption of other students and school environment, (4) unauthorized use of school and staff computers and computer searches of inappropriate topics, and (5) student contract violation.

The District convened an IEP meeting on November 10, 2014, where it recommended out-of-district placement at Creative Achievement Academy (Creative Achievement). According to the IEP, J.M.'s 2014 psychiatric assessment indicated a diagnosis of "mood control disorder and possible anxiety disorder," and her 2014–15 discipline report indicated fourteen infractions in eight days of attendance, through October 23, 2014. The rationale for removal from general education indicated that the benefits of the recommended out-of-district program include "a high degree of support and structure required to meet the individual needs of this student." The IEP further indicated that, despite Brookfield's efforts, [J.M.'s] "oppositional and noncompliant behaviors cannot be maintained in this setting." Instead, "Creative Achievement is appropriate and is in the least restrictive environment because it offers additional therapeutic support to address [J.M.'s] behavioral needs, which are severely impacting her education." According to the District's case manager, Kelly Graham-Owens, Creative Achievement has accepted J.M. and she could start immediately. However, petitioners disapprove of Creative Achievement as J.M.'s educational placement.

On or about November 18, 2014, within two weeks of the November 10 IEP meeting, Brookfield's assistant principal, Nacovin Norman, suspended J.M. for eight days for alleged drug distribution to other students on the school bus, resulting in one student being rushed to a hospital emergency room. A second eight-day suspension

[4] Pursuant to the contract, J.M. would "avoid any [p]hysical, [v]erbal, [e]lectronic [p]rovocations, [t]hreats, [b]ullying, or [i]ntimidation," and would "refrain from all verbal and/or physically threatening activities, provocations, threats, intimidations, or harassments of her peers or adults, either directly or indirectly, at school or on the school bus." Further, she would be given one warning regarding "out of area" in the school and would "respond to redirection from staff to get back in area." J.M. would also follow Brookfield's cell-phone policy, and promptly arrive at, remain in, and participate in each class.

was also issued at that time for alleged verbal/terroristic threats to another student. Also, on November 17, 2014, Cherry Hill police reportedly arrested J.M. at Brookfield following an investigation into alleged threats that she made against "Student A" and the school.

On November 21, 2014, following the suspension, a manifestation-determination meeting and IEP meeting was convened by the District. J.M.'s conduct was determined to be a manifestation of her emotional disability, but the District proposed her immediate removal to Creative Achievement as a forty-five-day alternative interim placement due to dangerousness. According to the IEP dated November 21, 2014, which essentially supplemented the November 10 IEP, Creative Achievement was the proposed placement, and it maintained its acceptance of J.M. despite the more recent incidents.

The parties stipulate as to the above facts, which are undisputed.[5] Additionally, the Board submitted several certifications of school staff or administrators, and both petitioner R.M. and J.M. submitted certifications as well.

Kelly Graham-Owens, a school psychologist and case manager employed by the District, certified that she was familiar with the numerous infractions that J.M. received since September 2014, based upon communications with Brookfield administrators and/or staff, as well as a review of her discipline report. Brookfield had also reported a "Columbine-like threat" via social media that involved the Cherry Hill Police Department, and misuse of school computers, including the inappropriate access of Columbine-related topics. The District convened an IEP meeting on October 23, 2014, and it was then agreed that the District would conduct additional assessments and a student behavior contract would be implemented for J.M. The District convened an additional IEP meeting on November 10, as well as a manifestation review and IEP meeting on November 21, 2014. On both occasions, it proposed placement at Creative Achievement as a forty-five-day alternative interim placement. According to Graham-Owens, the services, modifications and accommodations set forth in J.M.'s previous

[5] The second suspension for alleged threats to another student was not specifically included among the stipulated facts, but the fact that the suspension was issued is uncontested.

IEPs for Brookfield can be delivered at Creative Achievement, and placement at Creative Achievement is available immediately.

Ed Travis, director of admissions/supervisor of special education at Brookfield, certified that J.M. has exhibited disruptive, protest, and refusal behavior on a continuous basis since the beginning of the 2014–15 school year. During that time she had been disciplined for conduct including: a verbal/terroristic threat to a student, distribution of drugs, refusing to respond to direction, being "out of area," smoking, defacing property, computer misuse, and loitering in unauthorized areas. Further, she has been open about her fascination and fixation with serial killers, as reflected by her activity on social media, which includes numerous references to the Columbine High School tragedy, murders, and killing on her Facebook and Instagram accounts. Despite signing a behavior agreement on October 29, 2014, J.M. continued exhibiting disruptive and protest/refusal behavior that Brookfield could no longer manage. Brookfield had provided the following interventions: a student behavior contract, unlimited visits to Brookfield's social worker, and informal meetings/counseling by administrators with J.M. regarding her behavior, all in addition to the services and supports set forth in her IEP. Travis was also made aware of alleged drug distribution and a second threat to the school, and concluded that J.M.'s actions were causing significant disruption to the education of Brookfield students and that Brookfield could no longer accommodate and meet her needs.

Patrick Kiernan, Brookfield's principal, certified that since the beginning of the 2014–15 school year, J.M. has engaged in continuous disruptive, protest, and unsafe behavior that has negatively impacted her education and the education of Brookfield students. She has been open about her fascination and fixation with serial killers, as reflected by her activity on social media, which includes numerous references to the Columbine High School shooting, murders, murderers, and killing on her Facebook and Instagram accounts. On September 30, 2014, Cherry Hill police arrived at Brookfield and discussed with Kiernan a "Columbine-like threat" against Brookfield made by J.M. via social media, and police therefore maintained a heavy presence at Brookfield during the following week. On October 21, 2014, J.M. was reprimanded for misuse of a school computer by searching for Facebook pages and photos of Columbine suspects. On

October 23 she was disciplined for loitering in an unauthorized area, where she searched a teacher's computer for one of the Columbine suspects and changed the computer's desktop photo to that Columbine suspect holding his shotgun during the shooting, and then directed other students to view it.

According to Kiernan, J.M. broke the behavior contract that she signed on October 29, thereafter reportedly made a second threat to the school, and then threatened on Facebook the student who reported that threat. She also had reportedly distributed drugs to another student, who was then hospitalized. The administration, staff and students had become extremely concerned about their safety, given J.M.'s two terroristic threats, and her actions were deemed to be a significant disruption to the education of Brookfield students. Kiernan thus concluded that Brookfield could no longer accommodate J.M., as was indicated in the November 10, 2014, IEP meeting.

Nacovin Norman, Brookfield's assistant principal, certified that on the morning of November 17, 2014, the parent of "Student A" reported to her that "Student A" was rushed to the emergency room on Thursday, November 13, 2014, as a result of taking Xanax and Percocet that was distributed to her by J.M. Norman's investigation revealed that J.M. had distributed Xanax and/or Percocet, for which she has no prescription, to at least two students, including "Student A." Further, Student A told Norman that it was not the first time that J.M. had distributed pills to her. Student A's mother reported J.M.'s mother, V.M., as having told her that "J.M. must have taken [V.M.'s] pills again." Also, on November 17, Student A told Norman that J.M. had discussed with her a "suicide mission" to "kill her, and then kill herself while shooting up the school." Student A said J.M.'s Instagram account is all about killing. Norman immediately notified the Cherry Hill police, who responded to the school and interviewed Student A and her mother, J.M., and Norman. According to Norman, Cherry Hill police then arrested J.M. and removed her from the premises. And Norman suspended J.M. for eight days "as a result of J.M. distributing drugs." At the November 21, 2014, manifestation determination/IEP meeting, Norman indicated that the staff and students were concerned for their safety and that J.M. could not return to Brookfield; he agreed with the District's determination to change her placement.

J.M. certified, in pertinent part, that she never made any terrorist threat against Brookfield via any social media, including Instagram. Her Facebook account is "public" and her Facebook account contains no references to "serial killers" or "mass murderers." She has never assaulted another student or staff at Brookfield (or any other school) and was never disciplined for any physical or verbal aggression at Brookfield (or any other school). However, she had been assaulted at Brookfield by three different students, and each time she chose to retreat. "Student A" has been her friend since April 2014, when J.M. began attending Brookfield, though they had differences at times. But J.M. never told her anything that could be construed as a terroristic threat against Brookfield or any other school. J.M. was evaluated by the District's psychiatrist on July 7, 2011, and again on May 22, 2014, when she discussed with him her "social media interests" in detail.

J.M. further certified that she never possessed, used or distributed any illegal drugs or prescription medication at Brookfield or any other school. And she has "never been suspected or questioned about drug possession, use, or distribution" at school. She also has neither been questioned by nor given any statements to "any law enforcement agency about any terroristic threats or about any use, possession, or distribution of any of illegal or prescription drugs." J.M. intends to graduate high school and attend college.

R.M. certified, in pertinent part, that, as J.M.'s parent, he periodically reviews her social media accounts and, on September 29, 2014, he noticed two suspicious messages posted on her Instagram page "by someone unknown to J.M." One referred to the "Columbine" shooting and being a "hero," the other referenced being successful by "memorizing the layout of the school." With over 400 people worldwide following J.M.'s Instagram, he was concerned whether the postings were local, and contacted the Washington Township Police Department. He gave them a printout of the messages and suggested contacting the Cherry Hill Police Department in the event the poster was a Brookfield student. According to R.M., J.M. made no terroristic threats against any school via Instagram or Facebook. Further, Brookfield was familiar with J.M.'s issues when she was accepted to the school, and she should not be disciplined for behavior that results from her disability.

R.M. further certified that no police report exists and no charges were filed regarding a threat made against the school from J.M. via her Instagram account. Kiernan said at the November 10 IEP meeting that he may have misunderstood from the Cherry Hill police who actually made the alleged threat. R.M. documented by letter dated November 19, 2014, his understanding that Kiernan would correct that information. According to R.M., J.M. was never interviewed or drug-tested by Brookfield staff and there was generally a lack of substantiation for the allegations against her. J.M. has never assaulted any student or staff, though she twice had been assaulted by Brookfield students and chose to retreat.

A psychiatric evaluation report by James L. Hewitt, M.D., dated May 22, 2014, (P-K attachment) diagnosed J.M. with mood disorder and possible anxiety disorder. According to Hewitt, she had logical and goal-directed thinking and there were no signs of psychosis. Though she did show signs of mood disorder, she had never had any psychotic episodes. She admittedly gets upset easily, but denied sadness. Prior medications included Abilify, Topamax, Prozac, and Geodon. She had not responded well to Prozac, and Hewitt "would be open to" utilizing long-acting Xanax. Dr. Hewitt concluded that "there are obvious issues with her personality and temperament. I still hold out hope that the proper medication would allow her to be more comfortable in her own skin and to then be able to make an effort to learn, get along with people, and prepare herself for college."

In support of the request for emergent relief, petitioners assert that the charges underlying respondent's removal of J.M. from Brookfield are totally unsubstantiated. There is no corroboration to hearsay allegations that she distributed drugs on school property or threatened either the school or any other student. As to irreparable harm, a change of placement would cause a break in the continuity of J.M.'s educational program. Additionally, the proposed school is essentially inferior and inappropriate for J.M.'s educational needs. As to a legal right to remain at Brookfield versus the Board's right for removal, R.M. reiterated that J.M. never assaulted anyone, hearsay allegations are insufficient to warrant removal, J.M.'s social-media interests were not extreme or

unusual, and the Board's filing of a separate petition for an expedited-process hearing was merely a "strategic move."

On the other hand, the Board argued that petitioners have not met the requisite criteria for emergent relief. First, no irreparable harm has been proved because the District offered an appropriate placement at Creative, a program that is more structured and better equipped to service J.M.'s behavioral and therapeutic needs, and that placement is available immediately. Petitioners' dislike of the setting does not render the program inappropriate. Second, petitioners have not established either a settled legal right underlying the claim or a likelihood of success on the merits of their claim. Finally, a balance of the equities favors the Board because the District has worked with J.M., convening multiple IEPs and offering an appropriate alternate placement.

LEGAL ANALYSIS AND CONCLUSION

The Individuals with Disabilities Education Act (IDEA), 20 U.S.C.A. §§ 1400-1482, is designed to assure that disabled children may access a free appropriate public education (FAPE) that is tailored to their specific needs. 20 U.S.C.A. § 1400(c). Under the IDEA and its implementing regulations, a school district "may remove a student to an interim alternative educational setting for not more than 45 school days without regard to whether the behavior is determined to be a manifestation of the child's disability, in cases where a child" possesses a weapon, possesses, uses, or sells illegal drugs, or inflicts serious bodily injury on another person while on school property. 20 U.S.C.A. § 1415(k)(1)(G); 34 C.F.R. § 300.530(g) (2014). If the school district believes that maintaining the child's current placement is substantially likely to result in injury to the child or others, the school district may request an expedited due-process hearing. 20 U.S.C.A. § 1415(k)(3); 34 C.F.R. §§300.532(a) and (c) (2014). In such a case, the child shall remain in the interim alternative educational setting until an administrative law judge renders his decision or until the expiration of the forty-five-day removal period, whichever occurs first. 20 U.S.C.A. § 1415(k)(4)(A); 34 C.F.R. § 300.533 (2014). At the end of the forty-five-day period, the school district may request another expedited due-process hearing if the school district still believes the child cannot safely return to his current placement. 34 C.F.R. § 300.532(b)(3) (2014).

In New Jersey, the State Board of Education has promulgated rules in accordance with the standards set forth in the IDEA. N.J.A.C. 6A:14-1.1(b)(1); N.J.A.C. 6A:14-1.1 to -10.2. Under these rules, a parent or school district may request a due-process hearing before an administrative law judge "when there is a disagreement regarding identification, evaluation, reevaluation, classification, educational placement, the provision of a free, appropriate public education, or disciplinary action." N.J.A.C. 6A:14-2.7(a). Generally, no change shall be made to the child's program or placement pending the outcome of a due-process hearing. N.J.A.C. 6A:14-2.7(u). The "stay-put" provision acts as an automatic preliminary injunction, the overarching purpose of which is to prevent a school district from unilaterally changing a disabled student's placement. See Drinker by Drinker v. Colonial Sch. Dist., 78 F.3d 859, 864 (3d Cir. 1996). However, there are exceptions to this "stay-put" provision.

For example, and as discussed above, if a school district has removed a student to an interim alternative educational setting because of a drug or weapons offense, or because the student caused serious bodily injury to another, the student shall remain in the interim setting pending the outcome of the expedited due-process hearing or until the expiration of the forty-five-day removal period. N.J.A.C. 6A:14-2.7(u) (citing 20 U.S.C.A. § 1415(k)(4)).

A parent may seek emergent relief as part of a due-process-hearing request. N.J.A.C. 6A:14-2.7(r); N.J.A.C. 1:6A-12.1. An application for such relief "shall be supported by an affidavit or notarized statement specifying the bases for the request for emergency relief." N.J.A.C. 6A:14-2.7(r). A judge "may allow the affidavits to be supplemented by testimony and/or oral argument." N.J.A.C. 1:6A-12.1(e).

Emergent relief may be granted if the judge determines from the proofs that:

1. The petitioner will suffer irreparable harm if the requested relief is not granted;

2. The legal right underlying the petitioner's claim is settled;

> 3. The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
>
> 4. When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.
>
> [N.J.A.C. 1:6A-12.1(e); N.J.A.C. 6A:14-2.7(s)(1).]

The burden of proving each of these factors rests with the party seeking emergent relief. Garden State Equal. v. Dow, 216 N.J. 314, 320 (2013) (citation omitted).

Here, petitioners request emergent relief to maintain J.M.'s placement at Brookfield Academy pending a due-process hearing to determine an appropriate educational placement for J.M. However, petitioners' request must be denied because it is premature and/or contrary to applicable law.

First, to the extent that petitioners may claim that J.M. is entitled to maintain her placement at Brookfield Academy as part of their request for due process because that is her "stay-put" placement, their request for emergent relief is premature because, according to federal and State law, J.M. shall remain in the interim alternative educational setting until the end of the forty-five-day removal period or until a decision is rendered in the expedited hearing, whichever comes first. This is an exception to "stay-put" under N.J.A.C. 6A:14-2.7(u). At the end of the applicable time period under 20 U.S.C.A. § 1415(k)(4)(A), J.M. shall return to Brookfield Academy, which is her "stay-put" placement. If, for some reason, the school district does not return J.M. to Brookfield Academy at the end of the applicable period, then petitioners may seek redress to enforce the stay-put placement. However, since a decision has not been issued in the expedited hearing and since the forty-five-day removal period has not expired, J.M. must remain in the interim alternative educational setting, and not Brookfield Academy.

Alternatively, and to the extent that petitioners seek emergent relief in response to the school district's removal of J.M. as part of the expedited due-process hearing,

petitioners have not shown entitlement to emergent relief pursuant to all of the standards set forth under N.J.A.C. 1:6A-12.1(e) and N.J.A.C. 6A:14-2.7(s).

(1) J.M. will not suffer irreparable harm if the requested relief is not granted.

Petitioners have failed to show that J.M. will suffer irreparable harm if she is not allowed to stay at Brookfield Academy. Irreparable harm has been defined as the type of harm "that cannot be redressed adequately by monetary damages." Crowe v. DeGioia, 90 N.J. 126, 132–33 (1982). At oral argument, petitioners argued that J.M. will suffer irreparable harm because her removal from Brookfield Academy would interrupt her education and because the interim setting at Creative Achievement Academy is for children with behavioral issues of a kind from which J.M. does not suffer, and is "like a jail." However, petitioners have not shown that J.M.'s placement at Creative Achievement Academy will irreparably interrupt her education, and petitioners' claims that the interim setting is exclusively for students who, unlike J.M., are violent, and that the interim setting is "like a jail," without any facts supporting these claims, are insufficient to show that J.M. will suffer irreparable harm if she is not returned instead to Brookfield Academy.

(2) The legal right underlying petitioners' claim is settled.

In an expedited hearing requested by a school district that maintains that a child is too dangerous for her current placement, a judge may return the child to the placement if, for example, the school district improperly removed the child for a weapons, drugs, or violent offense, or order a change in placement to an appropriate interim alternative educational setting for not more than forty-five days. Thus, petitioners would have a legal right to have their daughter returned to Brookfield Academy if it is determined that the school district acted improperly in removing her.

(3) Petitioners are not likely to prevail on the merits of the underlying claim.

However, petitioners have not shown a likelihood of success on the merits, because they have not shown that the school district lacks a preponderance of credible

evidence to support J.M.'s removal.

(4) J.M. will not suffer greater harm than the school district if she is not immediately returned to Brookfield Academy.

Petitioners have not shown that J.M. will suffer greater harm than the school district if she is not immediately returned to Brookfield Academy. While J.M. has a right to a free appropriate public education, the school district has a right and responsibility to maintain order and safety in its schools. Petitioners have not shown that J.M. will suffer greater harm—educational or otherwise—if she is not returned to Brookfield Academy, and instead remains at her interim setting in accordance with 20 U.S.C.A. § 1415(k)(4), than the school district would suffer if J.M. is immediately returned to Brookfield Academy.

ORDER

Therefore, it is **ORDERED** that the petitioners' request for emergent relief is **DENIED** and, accordingly, the petition is hereby **DISMISSED**. It is further **ORDERED** that, by operation of 20 U.S.C.A. § 1415(k)(4), J.M.'s placement be at Creative Achievement for no more than forty-five days or until such time that a decision is issued in the matter of the Board's petition for expedited due process (EDS 15608-14), whichever occurs sooner.

This decision on application for emergency relief shall remain in effect until the issuance of the decision on the merits in this matter. The hearing having been requested by the parent, this matter is hereby returned to the Department of Education for a local resolution session, pursuant to 20 U.S.C.A. § 1415 (f)(1)(B)(i). If the parent feels that this decision is not being fully implemented with respect to the program or services, this concern should be communicated in writing to the Director, Office of Special Education.

December 23, 2014

DATE

ROBERT BINGHAM II, ALJ

Date eMailed to Parties: December 23, 2014

/bdt

APPENDIX

WITNESSES

For Petitioners:

None

For Respondent:

None

EXHIBITS

For Petitioners:

P-A IEP excerpts, dated October 27, 2014
P-B Email from Mike Rolen to R.M., dated October 27, 2014
P-C Email from R.M. to Mike Rolen, dated October 30, 2014
P-D Email from R.M. to Mike Rolen, dated December 11, 2014
P-E Letter from Patrick Kiernan, dated November 5, 2014
P-F Letter from R.M. to Patrick Kiernan, dated November 19, 2014
P-G1 Notice of suspension, dated November 18, 2014 (verbal threats)
P-G2 Notice of suspension, dated November 18, 2014 (drug distribution/use)
P-H IEP, dated October 27, 2014
P-I Not in evidence
P-J Not in evidence
P-K R.M.'s Certification, dated December 21, 2014
P-L J.M.'s Certification, dated December 21, 2014

For Respondent:

R-A Certification of Kelly Graham-Owens, Case Manager at the Washington Township School District
R-B Certification of Ed Travis, Director of Admissions/Supervisor of Special Education at Brookfield Academy

R-C Certification of Patrick Kiernan, Director of Admissions/Supervisor of Special Education at Brookfield Academy

R-D Discipline report for J.M.

R-E Behavior contract

R-F Correspondence from Patrick Kiernan, Principal of Brookfield, dated November 5, 2014

R-G IEP, dated November 10, 2014

R-H Certification of Nacovin Norman, Assistant Principal at Brookfield Academy

R-I Facebook message from J.M. to student

R-J Correspondences from Brookfield Academy to parents regarding suspension

R-K Parent request for due process, dated November 18, 2014

R-L IEP, dated November 21, 2014

R-M Correspondence from Kelly Graham-Owens to R.M., dated November 25, 2014