

Dear LISD Board of Trustees and LISD District Administration,

This letter serves as a **formal notice** regarding the proposed dismantling of LISD's centralized DAEP model, the pending sale of the Student Success Center, and the relocation of DAEP programs into six general education campuses.

Concerned parents, homeowners, and community members across Flower Mound, Highland Village, The Colony, and surrounding areas are mobilizing rapidly. Word is spreading through PTAs, neighborhood groups, HOA networks, and voter coalitions. Many families are expressing anger that this structural safety change was not clearly and directly disclosed — and that meaningful community input was not sought **before** the sale process began and before relocation planning advanced.

The perception — and increasingly the reality — is that the wheels were set in motion first and community engagement came later.

That is unacceptable governance.

### **Campuses Directly Affected**

The following campuses are proposed to house DAEP programs:

#### **Elementary School Co-Locations**

- **Camey Elementary School** (east side elementary)
- **Old Settlers Elementary School** (west side elementary DAEP)

#### **Middle School Co-Locations**

- **Lakeview Middle School** (east side middle school DAEP)
- **DeLay Middle School** (west side middle school DAEP)

#### **High School Co-Locations**

- **The Colony High School** (east side high school DAEP)
- **Harmon High School and/or Killough High School** (west side high school DAEP)

This plan would terminate the long-standing centralized DAEP model currently housed at the Student Success Center and Lewisville Learning Center.

Implementation could begin as early as the 2026–27 school year.

### **I. Immediate Disclosure Required — Student Success Center Sale**

Before any further steps are taken, the Board must publicly disclose:

1. The executed or pending purchase contract for the Student Success Center.
2. All appraisals and valuation reports.
3. All Board discussions, minutes, and internal memoranda regarding the decision to sell.
4. Any financial modeling comparing centralized DAEP operations versus six-site co-location.
5. Any risk assessment, safety study, or feasibility analysis supporting relocation.
6. Any contingency planning if co-location proves unsafe or cost-prohibitive.

The sale of a purpose-built DAEP facility before full public transparency creates irreversible structural consequences.

If this decision is sound, the data should support it.

## **II. Formal Litigation Hold & Preservation of Evidence**

Given the foreseeable safety and liability implications of dispersing DAEP populations into elementary, middle, and high school campuses, LISD is hereby placed on formal notice to preserve **all** records and electronically stored information (ESI) related to:

- Relocation of DAEP programs
- Closure and sale of the Student Success Center
- Safety assessments
- Security evaluations
- Threat assessment data
- Cost modeling and staffing projections
- Superintendent and cabinet communications
- Trustee communications (including private devices used for district business)
- Email correspondence
- Text messages
- Meeting recordings
- Draft proposals and revisions

- Consultant reports
- Law enforcement coordination communications
- Facilities planning documents

This preservation obligation includes communications conducted on personal devices if used for district business.

Any deletion, alteration, or destruction of responsive materials after receipt of this notice may constitute spoliation of evidence under Texas law.

### **III. Release of Safety and Incident Data**

Before implementing a structural change of this magnitude, the district must release:

1. DAEP incident reports for the past 5–10 years.
2. Categories of disciplinary placements assigned to DAEP.
3. Law enforcement involvement statistics.
4. Restraint/seclusion data (if applicable).
5. Threat assessment documentation involving DAEP students.
6. Any behavioral escalation incidents.
7. Current security staffing costs at the centralized facility.
8. Projected security staffing costs under the six-site model.

If co-location does not increase risk, the data should demonstrate that clearly.

### **IV. Before- and After-School Supervision Risks**

The Board has not addressed the most foreseeable exposure points:

#### **Middle School Campuses (Lakeview & DeLay)**

- Students routinely walk to school unsupervised.
- Students gather on sidewalks and in neighborhoods before doors open.
- DAEP students will inevitably interact and engage with general education students on a regular basis.

#### **High School Campuses (The Colony HS, Harmon HS/Killough)**

- Students drive themselves.

- Students bike and walk independently.
- Students congregate in parking lots and surrounding public areas before and after school. DAEP students will inevitably interact and engage with general education students on a regular basis.

Internal facility separation does not extend to:

- Parking lots
- Sidewalks
- Public right-of-way
- Pre-arrival and post-dismissal timeframes

If an incident occurs in these transitional spaces, the question will center on foreseeability and structural choice.

## **V. Community Mobilization and Governance Concerns**

This issue is expanding rapidly.

Parents are organizing. Information is circulating widely. Voters are engaged.

The central concern is not discipline — it is governance.

Families believe this structural safety shift was advanced without full transparency and without meaningful public input before the sale of the Student Success Center was initiated.

Trust has been damaged.

## **VI. Deadline for Records Release**

I formally request that all responsive records and safety data outlined above be produced no later than:

**March 3, 2026, at 5:00 PM CST**

If additional time is required under the Texas Public Information Act, the district must provide written acknowledgment and a production timeline by that same date.

## **VII. Immediate Actions Requested**

Before proceeding further, the Board should:

1. Pause implementation of DAEP co-location.

2. Suspend finalization of the Student Success Center sale.
3. Issue a written litigation hold to all relevant personnel.
4. Publish a comprehensive centralized vs. six-site financial comparison.
5. Commission and release an independent third-party security assessment.
6. Conduct widely publicized public forums prior to any final vote.

Once six campuses are renovated and staffed — and once the centralized facility is sold — the structural shift becomes entrenched and difficult to reverse.

The community is engaged. Voters are watching. Transparency now will determine whether public trust can be preserved.

I urge the Board to pause, disclose, and re-evaluate before committing LISD to a costly and high-complexity path with foreseeable risk and potentially devastating liability exposure.

Respectfully,