

October 14, 2022

Mr. Chris Ragsdale, Superintendent
Cobb County School District
514 Glover Street
Marietta, Georgia 30060

**Re: Notice of Appeal to Georgia State Board of Education
[REDACTED] (N.G.); Campbell High School**

Dear Superintendent Ragsdale:

N.G. appeals the disciplinary decision of the Cobb County Board of Education (the Board) issued on September 15, 2022, wherein the Board considered N.G.'s appeal of the August 3, 2022 decision of a disciplinary hearing officer (DHO) finding him in violation of the Cobb County School District (CCSD) Code of Conduct. The Board's decision failed to resolve N.G.'s appeal or decide the contested issues raised. Instead, the decision remanded N.G.'s case for additional evidence on the limited factual issue of CCSD's jurisdiction over the matter. The decision did not include notice of N.G.'s right to appeal to the Georgia State Board of Education (SBE).

The Board's decision was contrary to law, arbitrary and capricious, an abuse of discretion, and a violation of N.G.'s statutory and constitutional rights and the Board's statutory obligations. And the decision of the DHO is void for lack of jurisdiction and was an abuse of discretion, contrary to law, unsupported by the evidence, and violated N.G.'s right to due process. N.G. therefore seeks review from the SBE and requests reversal of the Board's September 15, 2022 decision to remand N.G.'s case and reversal or vacatur of the DHO's August 3, 2022 decision finding N.G. in violation of the CCSD Code of Conduct.

Please submit the appeal record, including N.G.'s Motion for Reconsideration, to the SBE expeditiously and provide me with a copy of the record via email at claire.sherburne@splcenter.org upon submission. The SPLC is a non-profit legal organization that provides free legal assistance to its clients. N.G. therefore requests that all fees associated with the appeal and transcript be waived due to indigency. N.G. requests that oral argument be scheduled before the SBE and that the parties be provided the opportunity to brief the issues.

Thank you for your prompt attention to this matter.

Sincerely,

/s:/ Claire Sherburne

Claire Sherburne, Ga. Bar No. 732244

Eugene Choi, Ga. Bar No. 121626

Michael J. Tafelski, Ga. Bar No. 507007

Attorneys for N.G.

cc: Samantha Lewis, Esq.
samanthalewis@parkerpoe.com

Ashley Akins, Esq.
ashleyakins@parkerpoe.com

Nina Gupta
ninagupta@parkerpoe.com

Suzann Wilcox
suzannwilcox@parkerpoe.com

Julie James, Legal Services, GDOE
jjames@doe.k12.ga.us