

WALKER & LYONS, L.L.P.

Attorneys At Law
1700 Irving Place
Shreveport, LA 71101

Henry C. Walker
Laurie W. Lyons
H. Clay Walker

Telephone 318/221-8644
Telefax 318/221-7059
Author's E-Mail Address:
cw@walkerlyons.com

December 13, 2006

Via Facsimile - 225-342-1197 & U.S. MAIL

Louisiana Department of Education
P.O. Box 94064
Baton Rouge 70804-9064
ATTN: Legal Department, Ms. Adrienne DuPont

Re: Class Administrative Complaint on Behalf of [REDACTED]
[REDACTED] and a Class of All Similarly Situated and Treated
Emotionally Disturbed Students as well as on behalf of [REDACTED]
[REDACTED] and a Class of All Similarly Situated Special Education
Students who manifest behavioral issues and are subject to repeated disciplinary
removals totaling more than ten school days (either In-School Suspensions or
Out-of-School Suspensions) and/or placement in alternative school settings in the
Caddo Parish Public School System

Class Administrative Complaint on behalf of:

I. [REDACTED]
[REDACTED]
Grade: 8th
[REDACTED]
[REDACTED]
Exceptionality: Emotional Disturbance

II. [REDACTED]
[REDACTED]
Grade: 9th
[REDACTED]
[REDACTED]
Exceptionality: Emotional Disturbance

III. [REDACTED]
[REDACTED]
Grade: 6th
[REDACTED]

[REDACTED]
Exceptionality: Emotional Disturbance

IV. [REDACTED]
[REDACTED]
Grade: 7th
[REDACTED]
[REDACTED]
Exceptionality: Emotional Disturbance

V. [REDACTED]
[REDACTED]
Grade: 9th
[REDACTED]
[REDACTED]
Exceptionality: Mental Disability

VI. [REDACTED]
[REDACTED]
Grade: 9th
[REDACTED]
[REDACTED]
Exceptionality: Specific Learning Disability

Dear Ms. DuPont:

The undersigned counsel are filing this Class Administrative Complaint (on behalf of [REDACTED] and all similarly situated Special Education students, including Emotionally Disturbed students and students with Mental Disabilities and/or Specific Learning Disabilities) versus Caddo Parish School System (hereinafter "CPSS") for violations of the Individuals with Disabilities Education Improvement Act of 2004 (hereinafter "IDEA"), 20 U.S.C. § 1400 *et seq.*

Petitioner [REDACTED] was a student at [REDACTED] Alternative School during the 2005-2006 school-year before being sent to [REDACTED] Middle School in August 2006. At all times relevant to this complaint and since 1999, she has been determined eligible for special education services under the IDEA.

Petitioner [REDACTED] is a student at [REDACTED] ([REDACTED] alternative high school). At all times relevant to this complaint and since 2005 he has been determined eligible for special education services under IDEA.

Petitioner [REDACTED] is a student at [REDACTED] ([REDACTED] alternative middle school). At all times relevant to this complaint and since 2004 he has been determined eligible for special education services under IDEA.

Petitioner [REDACTED] is a student at [REDACTED]. At all times relevant to this complaint and since 1998 he has been determined eligible for special education services under IDEA.

Petitioner [REDACTED] is a student at [REDACTED]. At all times relevant to this complaint and since 1999 he has been determined eligible for special education services under IDEA.

Petitioner [REDACTED] is a student at [REDACTED]. At all times relevant to this complaint and since 1998 he has been determined eligible for special education services under IDEA.

CLASS CLAIMS ON BEHALF OF [REDACTED] and All Similarly Situated and Treated Emotionally Disturbed Students and Class Claims on behalf of [REDACTED] and a Class of All Similarly Situated Special Education Students who manifest behavioral issues and are subject to repeated disciplinary removals totaling more than ten school days (either In-School Suspensions or Out-of-School Suspensions) and/or placement in alternative school settings in the Caddo Parish Public School System

Denial of FAPE- Failure to Provide Sufficient Related Services

Denial of FAPE- Failure to Provide Educational Services in the Least Restrictive Environment

Denial of FAPE- Failure to Comply with IDEA's Discipline Regulations

Denial of FAPE- Failure to Provide Educational Benefit

Petitioners contend that CPSS has engaged in an ongoing and systemic pattern of violating their substantive and procedural rights under the IDEA, and those of similarly situated Special Education students, including Emotionally Disturbed students and all other special education Students who manifest behavioral issues and are subject to repeated disciplinary removals totaling more than ten school days (either In-School Suspensions [ISS] or Out-of-School Suspensions [OSS]) and/or placement in alternative school settings in the Caddo Parish Public School System (CPSS) resulting in a denial of Free Appropriate Public Education (hereinafter "FAPE").

I. CPSS Has Failed to Provide Sufficient Related Services

CPSS has denied Petitioners [REDACTED] and all other similarly situated ED students FAPE by its failure to provide specially designed instruction and related services that address the inherent behavioral characteristics and issues associated with the classification of Emotionally Disturbed and which adversely affect such students' educational performance. See 20 U.S.C. § 1401 (a)(26), § 1412 (a)(1), § 1414 (d); 34 C.F.R. § 300.34, §300.101, §300.320-328; Bulletin 1706, Subpart A § 101, §440-446.

CPSS has consistently failed to provide Petitioners and all other similarly situated ED students with appropriate behavioral programming which includes both specialized instruction and sufficient and necessary related services such as social work, counseling, and school psychology services tailored to address identified behavioral issues that adversely affect their education. Indeed CPSS has furnished Petitioners and all other similarly situated Emotionally Disturbed students with woefully inadequate levels of social work\counseling\psychological services....levels that are unrelated to their individual needs but instead are cookie-cutter in nature and based upon the limited availability of such personnel at any given school.

CPSS has also denied FAPE to Petitioner [REDACTED] and all other similarly situated students with disabilities who have been subject to repeated disciplinary removals totaling more than ten school days (either ISS or OSS) and/or placement in one of CPSS Alternative Schools due to behavioral\discipline issues by also failing to provide specialized instruction and appropriate levels of related services (such as social work, counseling, and school psychology services) necessary to address this class of students behavioral challenges and issues

Petitioner [REDACTED] who is classified as a student with emotional disturbance has been in a self-contained setting since the third grade and for significant periods of time has been in an alternative school setting. Despite these circumstances, Petitioner [REDACTED] was provided no related services from 2004-2006. Presently during the 2006-2007 school-year, she is only receiving 30 minutes per week of individual school social work services. The lack of related services has effectively denied her an opportunity to return to a less restrictive setting on a regular school campus.

Petitioner [REDACTED] was placed in a self-contained setting immediately upon being classified as emotionally disturbed and yet received no related services for years. After an IEP in April 2006, at which [REDACTED] was represented by counsel, he was provided several services, including counseling and a child specific aid. During the remaining two months of the school year, [REDACTED] had no disciplinary problems. At the beginning of the 2006-2007 school-year, [REDACTED] was moved to a non-alternative high school and placed in a regular class setting, but had all related services removed from his IEP except for a completely inadequate 30 minutes of counseling per week. Within one month, [REDACTED] was expelled to [REDACTED] alternative high school for discipline reasons.¹ At the alternative high school, there have been no adjustments to [REDACTED] related services and even the above 30 minutes of counseling is not being provided.

Petitioner [REDACTED] has not only been in a self contained setting, but at an alternative school since the 2004-2005 school-year. Remarkably, he received no related services in 2005-2006 school-year even with the ED classification and placement in an alternative school setting. Again, the woefully inadequate levels of related services have effectively denied him an opportunity to return to a less restrictive setting on a regular school campus.

¹ At the hearing to expel [REDACTED] his mother asked if counsel could be present (as his counsel had not been notified). Rather than offering to reconvene (as CPSS's counsel was also not in attendance) the school personnel told the parent that [REDACTED] counsel could not be present as CPSS's counsel was not present.

Like petitioner [REDACTED] Petitioner [REDACTED] has been not only in a self contained setting, but at an alternative school since the 2004-2005 school-year and yet has received few if any related services since the 2002-2003 school year. Petitioner [REDACTED] has been provided woefully inadequate levels of related services such as social work, counseling, psychological services and this reality has effectively denied him an opportunity to return to a less restrictive setting on a regular school campus.

Petitioner [REDACTED] has been in self-contained and alternative school settings for significant periods of time since the 2003-2004 school-year. He was not provided any related services in 2004-2005. In 2005-2006 he was provided a Behavior Intervention Specialist just once a week despite being subject to 9 days of OSS and 34 days of ISS. Once again this school year (2006-2007) he is not being provided any related services and this remains true even though he has recently been expelled to an alternative high school for the entire year.

CPSS's failure to provide sufficient related services (in many cases providing no related services) in light of several disciplinary referrals\behavioral issues that led to petitioners being expelled and assigned to alternative school settings reflects that the provision of related services in CPSS is cookie-cutter in nature, based upon the limited availability of such personnel at any given school and their general unavailability at CPSS's alternative schools and bear no relationship to the actual individual needs of petitioners or students similarly situated. Indeed, despite the above circumstances for each of the petitioners, the amount of "Counseling\Other Therapy" services provided bears no discernable relation to the any of the petitioners' behaviors or restrictive alternative school placements. Consequently, the repeated failure of CPSS to either provide any related services or to increase the amount of Counseling\Other Therapy during the relevant time periods can only be explained by a profound and appalling indifference to the petitioners' individual needs.

II. CPSS Has Failed to Provide Educational Services in the Least Restrictive Environment

CPSS has denied petitioners [REDACTED] and all other similarly situated ED students FAPE by failing to provide them educational services in the Least Restrictive Environment (LRE) as required by IDEA. See 20 U.S.C. § 1412 (a)(5); 34 C.F.R. § 300.114-117; Bulletin 1706 Subpart A § 446,448).

Petitioner [REDACTED] has been in a self-contained setting since entering special education in the third grade. In the 2005-2006 and 2006-2007 school years, CPSS has failed to provide her with any access to general education for any academic subject. There is little evidence much less any documentation that CPSS has attempted to meaningfully provide Petitioner with supplemental aids and services or other accommodations (modified curriculum) the past several years to enable her to participate in general education.

Petitioner [REDACTED] has been not only in a self contained setting, but at an alternative school since the 2004-2005 school-year. Moreover, since the 2004-2005 school-year, he has had

no access to general education for any academic subject. CPSS's decision to place petitioner ██████ in a self-contained setting immediately upon classifying him as Emotionally Disturbed is clear evidence that no attempt was made to provide sufficient supplementary aides and services and/or curriculum modifications in regular education settings so that he could remain in some of his core academic classes. CPSS failed to pursue any number of strategies that would have allowed petitioner ██████ to continue accessing general education classes including the use of a Paraprofessional Aides, and/or the use Special Education Teachers in general education settings; modifications of the curriculum; provision of increased related services from a Social Worker/School Psychologists; school-wide and classroom based positive behavioral support plans; peer supports/coaching and/or peer tutoring. Instead of implementing any of these supplemental aids/services/supports prior to removing petitioner ██████ from regular education, CPSS chose to segregate petitioner ██████ in a highly restrictive self-contained setting.² Furthermore, at no point did CPSS provide any cogent justification or reasoning for its determination that petitioner ██████ was capable of functioning in a regular education setting for ancillary subjects such as Physical Education and other nonacademic electives but not for academic subjects.

Like petitioner ██████ Petitioner ██████ has not only been in a segregated self contained setting, but at an alternative school since the 2004-2005 school-year. Also, since the 2004-2005 school-year, petitioner ██████ has been denied access to general education for any academic subjects. Like petitioner ██████, CPSS also placed petitioner ██████ in a self-contained setting immediately upon classifying him as Emotionally Disturbed. As with petitioner ██████, CPSS has made no efforts to provide any supplementary aides/services/supports or curriculum modifications to Petitioner to enable him to participate in general education.

² For example, even a cursory review of petitioner ██████'s records reveal that he could have easily been included in general education with proper supplemental academic and behavioral aids/services/supports. Petitioner believes that Regular/General Education in CPSS simply does not welcome much less include ED students generally and there has been inadequate staff training regarding the types of supplemental aids, services, accommodations, supports, modifications and other teaching practices that would provide ED students with opportunities to participate and progress in the general curriculum. There has also been a woefully inadequate provision and use of Paraprofessional/Behavior Aides, much less Special Education Teachers with ED students in general education settings. Team or Co-Teaching arrangements and coordination amongst General Education and Special Education teachers is essentially nonexistent in CPSS for ED students and this reality effectively denies ED students with opportunities to participate and progress in the general curriculum. This reflects CPSS's systemic failure to provide appropriate supplemental aids and services, accommodations, supports and modifications necessary to enable ED students to participate in general education.

Petitioners and other similarly situated ED students often do not address general curriculum requirements in CPSS' self-contained classroom settings and thus they are provided with no meaningful opportunity to return to general education in the future. Consequently, their opportunity for obtaining a high school diploma is also obviated by such restrictive placements.

Petitioners also believe CPSS views Special Education as a place rather than an array of services and supports for many students with disabilities and particularly ED students. This district philosophy has produced a self-contained class/setting placement rate for students with disabilities that is seventeen (17%) higher than the statewide average.

With regard to all of the above petitioners there is no evidence in any of their records that CPSS ever attempted to increase the amount of counseling\social work\psychological services or implement any of the previously described supplemental aids\services\supports or curriculum modifications in order to enable petitioners to access and succeed in a less restrictive general education settings. Such failures constitute clear violations of IDEA's LRE mandate. See 20 U.S.C. § 1412 (a)(5); 34 C.F.R. § 300.114-117; Bulletin 1706 Subpart A § 446,448).

III. CPSS Has Violated IDEA's Discipline Provisions

CPSS has denied petitioners [REDACTED] and all other similarly situated special education students who manifest behavioral issues and are subject to repeated disciplinary removals totaling more than ten school days, (either In-School Suspensions or Out-of-School Suspensions) and/or placement in alternative school settings in the CPSS FAPE by its violations of IDEA's discipline provisions involving students with disabilities who have been removed from their educational placement for more than 10 school days in a school year. These provisions require CPSS to conduct Manifestation Determination Reviews within 10 days of such cumulative removals and to conduct them in good faith; to furnish on-going educational services that enable students with disabilities to continue to participate in the general education curriculum and to progress toward meeting the goals set out in their IEPs; to have IEP committees conduct appropriate functional behavioral assessments; and to draft, review, or modify as necessary behavior intervention plans that also include positive behavioral interventions, strategies and supports. See 20 U.S.C. § 1415 (k) (1) (A)-(H); 34 C.F.R. § 300.121; 34C.F.R. § 530-536; Bulletin 1706 Subpart A § 519. At all times relevant to this administrative complaint, CPSS has failed to comply with these IDEA requirements. Moreover, CPSS has also violated IDEA by failing to provide IEP services to the above class of students when they are subject to In-School Suspension (ISS) and this specifically includes failing to provide instruction by Special Education Teachers in ISS settings; failing to furnish staff in ISS settings with students IEPs; failing to provide related services to students during ISS.

CPSS has further violated the above class of students rights under IDEA by conducting sham MDR's wherein students behaviors that are clearly related to their disabilities are routinely found to be unrelated and then such determinations are used to place students in Alternative School settings; by failing to provide all IEP services at its Alternative Schools including the implementation of Behavioral Intervention Plans(BIPs); failing to provide appropriate levels of related services, particularly social work\counseling\psychological services to students assigned to Alternative School settings. Indeed CPSS has furnished Petitioners and all other similarly situated students with disabilities who have all been placed\assigned to CPSSs' Alternative Schools due to repeated discipline\behavioral issues with woefully inadequate levels of social work\counseling\psychology services...levels that are unrelated to their individual needs but instead are cookie-cutter in nature and based upon the general unavailability of such personnel at any CPSS's Alternative Schools.

At all times relevant, CPSS has failed to comply with the above IDEA requirements. Moreover, it bears emphasis that CPSS's has consistently had some of the highest discipline rates for students with disabilities in Louisiana. CPSS's in-school-suspension (ISS) rate for the

2004-2005 school-year was 65% higher than the statewide average for students with disabilities (20.38% versus the state's average of 12.38%). CPSS's out of school suspension (OSS) rate for students with disabilities in 2004-05 was 26% higher than the statewide average (21.14% versus statewide average of 16.8%). These highly disproportionate rates reflect that CPSS's systemic solution for addressing the behavioral and emotional needs of students with disabilities is to subject them to out of school or in-school suspensions rather than to adjust and improve their behavioral programming. See Discussion in Sections I and II.

This is clearly the case with petitioner [REDACTED]. In 2003-2004, he had thirty-seven days of Out-of-School Suspension ("OSS"). In 2005-2006, he had nine days of OSS and thirty-four days of In-School-Suspension ("ISS"), for offenses such as disobedience, cursing, being disrespectful and fighting. As previously noted CPSS did not revise his IEP to include increased levels of Counseling\Other Therapy related services; did not revise his behavioral goals; did not revise his Behavior Intervention Plan ("BIP"). CPSS's failure to revise petitioner [REDACTED] behavior plan in light of its obvious failure, is evidence of the district's failure to follow the discipline regulations. Moreover, as specified above, CPSS failed to provide Petitioner with all IEP services during the 34 days he was subject to ISS. He had no Manifestation Determination Review ("MDR") during the 2005-2006 school-year. In 2006-2007, he has had three days of OSS and was recently expelled to the alternative high school for a year. A MDR was held prior to this expulsion (for attempting to strike a teacher³), but his conduct was remarkably found to be unrelated to his exceptionality. The Functional Behavioral Assessment ("FBA") in place at the time of the incident for which he was expelled was performed in September of 2003 at a different school when petitioner [REDACTED] was in the 6th grade. Also, as previously discussed, for the 2006-2007 school year, petitioner [REDACTED] was afforded no related services.⁴

Petitioner [REDACTED] case reflects similar illegal disciplinary practices by CPSS. In 2005-2006, he had 15 days of OSS without a MDR. Thus far in 2006-2007, he has already had 15 days of OSS. The MDR which was held regarding a suspension in November of this year revealed that none of the measures outlined in his BIP were being implemented. His behavior goals were not being measured according to BIP; no one had yet been designated as his "go to" person in times of conflict, as required in the BIP; he was also not being provided any time or place to "cool down" as required in the BIP. In short, school officials had not reviewed, much less implemented his IEP or BIP in the two months he has been at the alternative school. Like petitioner [REDACTED] CPSS did not revise [REDACTED] IEP to include increased levels of Counseling\Other Therapy related services; did not revise his behavioral goals and did not revise his BIP. CPSS's failure to revise or even review petitioner [REDACTED] BIP in light of its obvious

³ According to the school's records, petitioner [REDACTED] was in the office along with three other students discussing an incident which had occurred on the bus some days prior. In reviewing the incident, the students began to get upset and petitioner [REDACTED] had to be restrained. There is no explanation of how his Behavior Intervention Plan was implemented to attempt to de-escalate the situation which unfolded entirely under the supervision of school employees.

⁴ One of Petitioner [REDACTED] problems in school is that he has a great deal of difficulty reading. CPSS has also been made aware that petitioner [REDACTED] mother also has difficulty reading. Nevertheless, although the undersigned had been representing petitioner [REDACTED] for some years, no notification was sent to counsel and petitioner [REDACTED] was unrepresented at his expulsion hearing.

failure, or to review and revise Petitioner's other IEP services including providing increased levels of social work\counseling\psychological related services is again evidence of the CPSS' failure to follow IDEA's discipline mandates and its failure to provide FAPE.

IV. CPSS Has Failed to Confer Meaningful Educational Benefit

CPSS has denied petitioner [REDACTED] and all other similarly situated ED students FAPE by providing petitioner and these students with an education that has failed to confer meaningful educational benefit as required by IDEA. Petitioner [REDACTED] has not been able to make any meaningful academic and in many cases non-academic (behavioral) progress for the past several years due to the denial of FAPE. The pervasive reality for a significant percentage of ED students across CPSS is that even though they are of average intelligence, by the time they reach Junior High School, they are typically performing years behind their chronological grade level and their peers. One result is that ED students are typically placed in restrictive self-contained settings and this leads to an almost non-existent High School Diploma rate for such students, which is the ultimate evidence of lack of meaningful educational benefit. The high school graduation rate for disabled students in Caddo Parish is consistently among the lowest in the state. Moreover, the drop out rate for special education students in Caddo is more than twice the state average. This reality reflects an obvious and systemic practice of providing inappropriate special education and related services to students with Emotional Disturbance. This is particularly true with petitioner [REDACTED] as she is already four to five years behind her non-disabled peers and this gap has only widened the past several years while she has received IDEA services. *See Board of Education of Hendrick Central School Dist. v. Rowley*, 458 U.S. 176, 200-201 (1982); *Cypress-Fairbanks ISD v. Michael F.* 118 F.3d 245, 253-254 (5th Cir. 1997).

Consistent with practices and policies that are widespread and reflected in CPSS's remarkably low high school diploma rate for students with disabilities (13.8%) and its alarming drop out rate (53.9%) which is currently more than twice the state average, CPSS effectively removed the petitioner from the high school diploma track when she entered special education by inappropriately placing her in a self-contained classroom with little or no access to the general curriculum. Upon entering special education as a third grader, petitioner [REDACTED] tested in the low-average range in math and written language. Yet by the seventh grade, she was functioning four to five years below grade level in all subjects. Currently in the eighth grade, she continues to function at the 2nd-3rd grade level in most subjects. In 2005-2006 she received all Fs except for 1 D in Social Studies. In 2006-2007 she's receiving all Ds. Petitioner [REDACTED] is clearly several years behind her chronological grade level and peers and has not received an education that has conferred meaningful educational benefit as required under IDEA. This same denial of FAPE also applies to a significant percentage of ED students who are of Junior High or High School age.

V. Systemic Remedies Necessary to Settle This Class Complaint

LDE will need to ensure the following action is taken to redress CPSS's numerous systemic IDEA violations delineated in this class complaint:

1. Compel CPSS to hire a nationally recognized expert in Positive Behavioral Interventions and Supports (PBIS) to develop and implement with CPSS a systemic training program\protocol that shall include but not be limited to strategies, objectives, and timelines for students with disabilities related to: implementation of school-wide PBIS, the development of functional behavioral assessments (FBAs), the development and implementation of behavior intervention plans, and conducting manifestation determination reviews. The PBS training program\protocol shall include all pupil appraisal staff, teachers, paraprofessionals, disciplinarians, school administrators, and other educational service providers working at schools which serve students with disabilities and shall also include bus drivers who transport students with disabilities to such schools. The training protocol shall also include the active use of pupil appraisal staff for ongoing follow-up with staff in the designated schools above. The above PBIS expert must be agreed to by the undersigned counsel;
2. Compel CPSS to hire the above PBIS expert to conduct a review\audit of its of Special Education programs for students with Emotional Disturbance and all other students with disabilities who manifest behavioral issues and are subject to repeated disciplinary removals and/or placement in alternative school settings in the Caddo Parish Public School System including the alternative middle school [REDACTED] and high school [REDACTED] and to issue a report with specific recommendations for systemically addressing these students behavioral programming needs;
3. Compel CPSS to develop specific school system policies that are disseminated by the Superintendent to all school building administrators including principals, vice-principals, and disciplinarians outlining and mandating strict compliance with IDEA's discipline requirements including the requirements of Manifestation Determination Reviews; providing IEP services upon reaching the 11th cumulative day of out-of school suspensions; development of appropriate FBAs; development of BIPS involving positive behavioral supports, strategies and services; review and modification of BIPS after every 10 days of suspensions;
4. Compel CPSS to develop and implement in agreement with the nationally recognized PBIS expert specified above in Paragraph #1 specific annual strategies and objectives for significantly reducing the number of suspensions of students with disabilities;
5. Compel CPSS to develop and implement in agreement with the nationally recognized PBIS expert specified in Paragraph #1 above specific annual strategies and objectives for significantly reducing the number of ED students in self-contained classroom settings and concomitantly significantly increasing ED students access to the general education curriculum\classrooms over the next 3-4 years. Compel CPSS to also do the same for all other students with significant behavioral programming issues.
6. Compel CPSS to place certified special education teachers in its self-contained classrooms, its alternatives schools and its disciplinary centers and compel CPSS to provide all IEP services at its alternative schools.

7. Compel CPSS to significantly increase the frequency and duration of social work\counseling\psychological related services provided to ED students and all other students who are subject to repeated disciplinary removals and/or placement in alternative school settings in the CPSS and also ensure decisions involving such related services are based upon individual need and not staff availability;

8. Compel CPSS to develop with undersigned counsel specific strategies and objectives for implementing intensive reading\math remediation programs at all elementary schools serving ED students to ensure that they are reading at or within one year of chronological grade level by the time they move onto junior high school.

Sincerely,



H. Clay Walker, Esq.
Walker & Lyons, L.L.P.
1700 Irving Place
Shreveport, LA 71101
(Ph.) 318-221-8644
(Fax) 318-221-7059

Courtney Bowie, Esq.
Mississippi Youth Justice Project
753 N. Congress St.
Jackson, MS 39202
(Ph.) 601-948-8882
(Fax) 601-948-8885

Eden B. Heilman, Esq.
Juvenile Justice Project of Louisiana
1600 Oretha Castle Haley Boulevard
New Orleans, LA 70113
(Ph.) 504-522-5437 Ext. 234
(Fax) 504-522-5430

James Comstock-Galagan, Esq.
Southern Disability Law Center
6314 Carlson Dr.
New Orleans, LA 70122
(Ph.) 504-281-4767
(Fax) 504-281-4775

Lee Ann Vaught
Advocacy Center
1010 Common Street, Suite 2600
New Orleans, LA 70112
(Ph.) 504-522-2337
(Fax) 504-522-5507

cc: Fred Sutherland