

May 20, 2025

Keith Burton, Superintendent
Jasmine Green, President
Caddo Parish School Board
1961 Midway Ave.
Shreveport, La 71108

SENT VIA EMAIL

Dear President Green & Superintendent Burton:

We write on behalf of our clients, Stevan Walpool and Niesha Walpool and their minor child, E.W. E.W. is a student at Queensborough Elementary School who was enrolled in kindergarten in the 2024-25 school year. He and his family were expecting him to attend Queensborough for the 1st grade in 2025-2026.

On April 15, 2025, the Caddo Parish School Board (“CPSB”) voted to close Queensborough Elementary after the 2024-2025 school year and to list the property for sale.

When CPSB voted to close Queensborough (as well as two other schools), it voted to change the school’s attendance boundaries. Students in the Queensborough attendance boundary, including E.W., will be required to attend J.S. Clark Elementary in 2025-26.

Because the Caddo Parish School Board failed to adhere to its own policies, the Board did not have the power to vote at the April school board meeting to close Queensborough Elementary, and it did not have the power to change Queensborough’s attendance boundaries. Accordingly, the School Board’s actions at the meeting are null and void.

Caddo Parish School Board Policy AD, “Student Attendance Districts,” states: “School attendance boundaries shall be approved by the Caddo Parish School Board. . . . Prior to the adoption of school boundaries, the School Board shall conduct public hearings for the purpose of receiving input regarding proposed boundary changes. Official notice of these hearings shall be published in the official journal of the School Board and other appropriate publications.”

To our knowledge, the Caddo Parish School Board did not hold public hearings for the purpose of receiving input regarding proposed boundary changes. In fact, at the April 15, 2025 meeting, School Board Member Dr. Terence Vinson asked Superintendent Keith Burton whether

community meetings had been held at all of the schools subject to “particular closures.” Superintendent Burton responded, “no, they were not.” Caddo Parish School Board Meeting, Meeting Video at 2:33:35-2:33:47, available at <https://www.youtube.com/watch?v=yPD41S5ccBE&t=9227s>. Moreover, CPSB did not issue notices for such hearings, as they did not take place.

We are writing on behalf of Mr. and Ms. Walpool and their minor child to demand that CPSB:

1. cease all actions, plans, and activities to close Queensborough Elementary school, including but not limited to: transferring student files; notifying families of the closure; reassigning students to J.S. Clark; reassigning Queensborough employees and staff to other schools in the district; changing transportation routes; terminating Queensborough employees and staff; eliminating or moving movable property from the Queensborough Elementary property;
2. keep Queensborough Elementary open until CPSB follows proper policy and procedure for changing attendance boundaries;
3. not list Queensborough Elementary for sale, take steps to secure a buyer, or engage in negotiations or conversations with potential buyers about selling the school property;
4. acknowledge at its regularly scheduled school board meeting on 5/20/25 that the votes to close Queensborough, Blanchard, and Eighty-First Street ECE are void;
5. adhere to Policy AD and issue notices for public hearings for the purpose of receiving input regarding the proposed boundary changes, in accordance and hold such public hearings;
6. hold more than three public hearings, and issue notice for such, for the purpose of receiving input regarding proposed boundary changes.

Notice to Preserve Evidence

We also write to demand that you preserve and not alter any evidence relating to the School Board’s decision to change attendance boundaries, including, but not limited to: communications about the decision to change the attendance boundaries for Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary; all reports, studies, data, publications, plans or information gathered or distributed regarding the closure of Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof; documents and files to inform the public about the closure of Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof.

This preservation is to include any and all word documents or other native file formats with metadata. Such documents subject to preservation include communications, including but not limited to emails, call logs, and text messages, between Caddo Parish School Board members, Caddo Parish School Board staff, and between Caddo Parish School Board staff and outside parties,

concerning closing Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof.

We request a response no later than 12:00 pm CT on May 21, 2025. If we have not heard from you by then, we will advise our clients of their right to seek judicial remedy, including their right to seek a temporary restraining order (TRO) to prevent CPSB and its Superintendent from closing Queensborough or selling the property due to its failure to adhere to school board policy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lauren".

Lauren Winkler, Esq.

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