



September 21, 2007

VIA FACSIMILE & U.S. MAIL

ATTN: Legal Department, Ms. Adrienne DuPont
Louisiana Department of Education
P.O. Box 94064

2. C. W.

DOB: 7/16/90

Grade: 12th

School: LaGrange High School

ID No: 9403489

Exceptionality: Emotional Disturbance

3. D

I. CLASS

repeatedly suspended and/or subject to undocumented, illegal removals from school (cool-off removals) or assigned to an alternative school clearly manifests that the provision of related services in CPPSS bears no relationship to the actual individual needs of petitioners or students similarly situated, and is instead cookie-cutter in nature and based upon the limited availability

services, supplementary aids and services and/or curriculum modifications in the regular education setting so that he could remain in some of his core academic classes. CPPSS also failed to pursue any number of strategies that would have allowed Petitioner D. to continue accessing general education classes

CPPSS's placement decisions with respect to the petitioners and all those similarly situated violate IDEA's mandate that, to the maximum extent possible

days this school year.³ She has not been provided any sort of documentation or justification for these removals in spite of her multiple attempts t

These considerable and numerous violations of IDEA's discipline provisions have ultimately resulted in a denial of FAPE for Petitioner W..

CPPSS has similarly violated IDEA's disciplinary provisions in the case of Petitioner K. In addition to tw

related services to Em

Manifestation Determination Reviews; provision of IEP services upon reaching the 11th cumulative day of out-of-school suspensions; development of appropriate FBAs

programs,

PM (see attached Exhibit B). At F.K. White Middle School, the special education bus was photographed departing the campus at 2:37 PM despite the school's scheduled dismissal at 3:01 PM (see attached Exhibit C). The students were loaded onto the bus approximately 10 to 15 minutes prior to the 2:37PM departure time. At College Oaks Elementary School, the special education students were photographed being loaded onto the

- **Denial of FAPE**

A. CPPSS Has Failed to Provide FAPE to Petitioner J. D.

The purpose of IDEA is “[t]o ensure that all children with disabilities have available to them a free appropriate public education thate

