

CAUSE NO. DC-25-09345

BRIAN MORROW, ET. AL,

Plaintiffs,

V.

RANDY SCHACKMANN, ET. AL,

Defendants,

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§

IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95TH JUDICIAL DISTRICT

PLAINTIFFS' SECOND AMENDED PETITION FOR INJUNCTIVE RELIEF

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs BRIAN MORROW, LISA SUTTER, NELLY SHANKLE, VENUS BASARAN, NICOLE YARBROUGH, AMANDA NAUERT, AARON NAUERT, IRIS MOORE, TIERNEY GONZALEZ, JACOB GONZALEZ, CANDACE VALENZUELA, and THOMAS MENDEZ (collectively, "Plaintiffs") file this Second Amended Petition. Plaintiffs seek injunctive relief against Defendants RANDY SCHACKMANN, KIM BRADY, CASSANDRA HATFIELD, ILEANA GARZA-ROJAS, and MARJORIE BARNES, who are sued in their official capacities as members of the Carrollton-Farmers Branch Independent School District Board of Trustees ("the Board"), WENDY ELDREDGE, who is sued in her official capacity as the Superintendent of the Carrollton-Farmers Branch Independent School District, and the CARROLLTON-FARMERS BRANCH INDEPENDENT SCHOOL DISTRICT ("the District"). In support, Plaintiffs would respectfully show the Court as follows:

I.
DISCOVERY CONTROL PLAN

1. Pursuant to Texas Rule of Civil Procedure 190.4, Plaintiffs intend to conduct discovery under a Level 3 Discovery Control Plan.

II. **PARTIES**

A. PLAINTIFFS

2. The following Plaintiffs are individuals who reside and pay property taxes within the boundaries of the Carrollton-Farmers Branch Independent School District ("CFBISD").

1. **Brian Morrow**
1020 Magnolia Dr. Carrollton, Texas 75007
2. **Lisa Sutter**
2304 Watermill Court Carrollton, Texas 75006
3. **Nelly Shankle**
1603 Woodcrest Lane Carrollton, Texas 75006
4. **Venus Basaran**
1800 Fernwood Circle Carrollton, Texas 75006
5. **Nicole Yarbrough**
2028 Lymington Road Carrollton, Texas 75007
6. **Amanda Nauert**
1111 Golden Gate Drive Carrollton, Texas 75007
7. **Aaron Nauert**
1111 Golden Gate Drive Carrollton, Texas 75007
8. **Iris Moore**
1420 Tierra Calle Carrollton, Texas 75006
9. **Tierney Gonzalez**
17919 Mary Margaret Street, Dallas, Texas 75287
10. **Jacob Gonzalez**
17919 Mary Margaret Street, Dallas, Texas 75287
11. **Candace Valenzuela**
3925 Saint Christopher Lane, Dallas, Texas 75287

12. Thomas Mendez
2027 Verlaine Drive Carrollton, Texas 75007

B. DEFENDANTS

3. Defendant RANDY SCHACKMANN is an individual who resides in Dallas County, Texas. At all relevant times, he served as a Trustee on the CFBISD Board of Trustees. He is sued in his official capacity. He may be served with process at his residence located at 1300 Osceola Trail, Carrollton, Texas 75006, or at 2105 North Josey Lane, Apartment 137, Carrollton, Texas, 75006.

4. Defendant NANCY KIMMEL BRADY is an individual who resides in Dallas County, Texas. At all relevant times, she served as a Trustee on the CFBISD Board of Trustees. She is sued in her official capacity. She may be served with process at her residence located at 2692 Waterford Way, Carrollton, Texas 75006.

5. Defendant CASSANDRA HATFIELD is an individual who resides in Dallas County, Texas. At all relevant times, she served as a Trustee on the CFBISD Board of Trustees. She is sued in her official capacity. She may be served with process at her residence located at 1405 North Trail Drive, Carrollton, Texas 75006.

6. Defendant ILEANA GARZA-ROJAS is an individual who resides in Dallas County, Texas. At all relevant times, she served as a Trustee on the CFBISD Board of Trustees. She is sued in her official capacity. She may be served with process at her residence located at 13212 Glenside Drive, Farmers Branch, Texas 75234.

7. Defendant MARJORIE BARNES is an individual who resides in Dallas County, Texas. At all relevant times, she served as a Trustee on the CFBISD Board of Trustees. She is sued in

her official capacity. She may be served with process at her residence located at 14340 Tanglewood Drive, Farmers Branch, Texas 75234.

8. Defendant WENDY ELDREDGE is an individual who resides in Dallas County, Texas. At all relevant times, she served as the superintendent of the Carrollton-Farmers Branch Independent School District. She is sued in her official capacity. She may be served with process at 4536 Redwood Court, Irving, Texas 75038.

9. Defendant CARROLLTON-FARMERS BRANCH INDEPENDENT SCHOOL DISTRICT is a Texas independent school district and is subject to the Texas Open Meetings Act pursuant to Tex. Gov't Code § 551.001(3)(E). Carrollton-Farmers Branch Independent School District may be served with process through its Superintendent, Dr. Wendy Eldredge, at 1445 North Perry Road, Carrollton, Texas 75006.

III. JURISDICTION & VENUE

10. **Jurisdiction.** This Court has subject matter jurisdiction over this cause. The Texas Constitution grants district courts jurisdiction over all actions except where jurisdiction is exclusively conferred on another court. TEX. CONST. art. V, § 8. Furthermore, the Texas Open Meetings Act specifically authorizes a district court to grant injunctive relief to remedy a violation of the Act. Tex. Gov't Code § 551.142.

11. **Venue.** Venue is proper in Dallas County, Texas, because the Carrollton-Farmers Branch Independent School District's principal office is located in Dallas County, and all or a substantial part of the events giving rise to this claim occurred in Dallas County. Tex. Civ. Prac. & Rem. Code § 15.015.

IV. FACTUAL BACKGROUND

A. The Board Abandons a Public Process for a Secretive Plan

12. In 2023, the Carrollton-Farmers Branch Independent School District ("CFBISD") Board of Trustees ("the Board") sought public support for a \$716.4 million bond. To build community trust, the District created a "Citizens' Committee" of 60 community members who met for six months to develop a long-range facilities plan. Their public recommendations formed the basis of the bond measure, which voters approved in May 2023.

13. However, just four months later, the Board and the District administration began a systematic process to abandon the Citizens' Committee's public recommendations. In September 2023, they hired new consultants, Woolpert and Population and Survey Analysts (PASA), to develop an alternative plan. This new direction, which would ultimately become a controversial "Campus Consolidation Plan" to close four schools, was developed largely outside of public view through a pattern of conduct that violated the Texas Open Meetings Act ("TOMA").

B. The Board's Violations of the Texas Open Meetings Act

14. The Board violated TOMA in two distinct ways: by providing **inadequate and misleading public notice** for its meetings and by conducting **secret deliberations** through a series of meetings designed to circumvent the law (a "walking quorum").

1. Inadequate and Misleading Public Notice

15. For over a year, as the Board moved toward shuttering four schools, it provided legally insufficient notice to the public. Instead of clearly stating the significant subject matter, the Board posted agendas with vague, generic descriptions such as "Presentation and Discussion for Facilities Master Plan," "Master Facilities Plan Update with Education Specifications," and "Facilities Master Plan Update."

16. These descriptions failed to inform the public that the Board was actively deliberating a plan to close specific schools, a matter of immense public importance. This pattern of vague notices effectively hid the Board's true agenda, discouraging public attendance and scrutiny.

17. The Board's capacity to provide proper notice is undisputed. For its March 6, 2025, meeting—where the final vote was scheduled—the agenda explicitly stated the purpose was to "Consider/Approve Proposed Consolidation of Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School..." As a direct result of this clear notice, public attendance was so massive that citizens, including a Carrollton City Council member, were denied entry due to the building reaching maximum capacity. This starkly contrasts with the empty chambers during the preceding months when the plan was developed under the guise of generic agenda items.

2. Secret Deliberations and Illegal "Walking Quorums."

18. The Board and District administration also engaged in a series of private meetings intentionally structured to constitute a quorum deliberating outside of the public view, in clear violation of TOMA.

- a) **February 2024 Meetings with Woolpert:** District administration coordinated a series of separate video-conference calls on **February 5, 7, and 8, 2024**, between small groups of trustees and the Woolpert consultants. The meeting invitations confirm the subject was the "Board of Education FMP Overview." During a subsequent public meeting on February 15, 2024, a consultant from Woolpert inadvertently referred to these private meetings, stating, "...I know we had talked about that **last week in our conversations...**" This public slip confirmed that a

walking quorum of the Board had secretly deliberated on the plan before any public presentation.

- b) **January 2025 Meetings with PASA:** The administration repeated this strategy to discuss attendance rezoning. Emails from District staff reveal an explicit intent to circumvent TOMA. A January 8, 2025, email states the need to "visit with the remainder of the board in **2x2 sessions**." A subsequent email on January 22, 2025, from a Deputy Superintendent instructs the Board secretary to ensure a trustee's attendance at a specific meeting will "**not create a quorum**." These "2x2 meetings" with the rezoning consultants (PASA) occurred on **January 24 and 27, 2025**, but the results were never presented in a public meeting before the final plan was unveiled.

C. The Final Vote

19. This pattern of inadequate notice and secret deliberations culminated in the March 6, 2025, Board meeting. After listening to an hour of overwhelming public opposition, the Board members—some reading from prepared speeches—voted 6-1 to approve the Campus Consolidation Plan. The plan they approved had been crafted and deliberated largely in private, depriving the citizens of CFBISD of their right to observe how and why the decision to close their neighborhood schools was reached.

V.

CAUSE OF ACTION: VIOLATIONS OF THE TEXAS OPEN MEETINGS ACT

20. **Incorporation.** Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.

21. **TOMA Requirements.** The Texas Open Meetings Act ("TOMA") mandates that meetings of a governmental body, including a school district board of trustees, be open to the

public after proper notice. Tex. Gov't Code § 551.002. This notice must provide the date, hour, place, and subject of the meeting. Tex. Gov't Code § 551.041. For subjects of special public importance, the notice must be **full and adequate** so that a reader can understand the topic. *Cox Enter., Inc. v. Bd. of Trs. of Austin Indep. Sch. Dist.*, 706 S.W.2d 956, 958 (Tex. 1986). Texas law demands exact and literal compliance with TOMA. Any action taken in violation of TOMA is **voidable**. Tex. Gov't Code § 551.141. A governmental body violates TOMA when a quorum of its members, with knowledge that a quorum is involved, engage in a series of communications outside of an open meeting to deliberate on public business. Tex. Gov't Code § 551.143.

22. **Defendants' Violations of TOMA.** Defendants have engaged in intentional and systematic violations of TOMA. These violations include, but are not limited to:

- a) **Unlawful Deliberations:** Improperly convening in a series of meetings between February 5-8, 2024, and January 24-27, 2025, which constituted a quorum deliberating outside of a properly noticed open meeting. (Exhibits A.1-A.3, B.1-B.6). Defendants had knowledge that these discussions involved a quorum to deliberate on official business, as evidenced by the meeting invitations.
- b) **Inadequate Public Notice:** Failing to provide full, adequate, and meaningful notice for meetings where matters of special public importance were discussed, including deliberations on capacity studies, attendance zone revisions, and the Campus Consolidation Plan. (Exhibits C.1-C.12).

23. **Standing to Seek Relief.** An "interested person" may bring an action for an injunction to stop or reverse a TOMA violation. Tex. Gov't Code § 551.142(a). Plaintiffs are parents, grandparents, and residents of CFBISD who share the public's interest in ensuring the Board of Trustees complies with TOMA. The Board's actions and the resulting Campus

Consolidation Plan directly and irreparably harm Plaintiffs by shuttering their neighborhood schools, disrupting their children's educational environments, diminishing their community connections, and negatively impacting their property values.

24. **Request for Injunctive Relief.** Pursuant to Texas Government Code § 551.142, Plaintiffs are entitled to a **permanent injunction** to restrain Defendants from continuing to violate TOMA. Plaintiffs respectfully request that the Court **reverse** any decisions and actions resulting from deliberations that violated TOMA and issue appropriate injunctive orders to prevent future violations.

VI. CONDITIONS PRECEDENT

25. All conditions precedent have been performed or have occurred.

VII. PRAYER FOR RELIEF

26. **WHEREFORE, PREMISES CONSIDERED,** Plaintiffs respectfully pray that the Court enter a final judgment against Defendants for the following relief:

- a) An order **reversing** the actions taken by Defendants in violation of the Texas Open Meetings Act, thereby rendering them void;
- b) A **permanent injunction** prohibiting Defendants from taking any further action in violation of the Texas Open Meetings Act;
- c) **Costs of court;** and
- d) All other and further relief, both at law and in equity, to which Plaintiffs may be justly entitled.

Respectfully submitted,

/s/ Brian T. Morrow _____

Brian T. Morrow

State Bar No. 24110136

b.thomas.morrow@gmail.com

The Law Office of Brian T. Morrow

PO Box 116100

Carrollton, Texas 75007

Tel: (805) 801-5253

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2026, a true and correct copy of the foregoing document was transmitted to all parties and counsel of record in this case *via* email and/or the Court's electronic case filing/service system.

/s/ Brian T. Morrow
Brian T. Morrow

Exhibit A.1

Moore, Christopher "Chris"

Subject: **External Email**CFBISD - Meeting Board of Education FMP Overview
Location: <https://coopstrategies.zoom.us/j/82466316499?pwd=GbQJkaP85gSK7vFTBidwMgk4m2RZ5Y.1>

Start: Mon 2/5/2024 8:30 AM
End: Mon 2/5/2024 9:30 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Miller, Susan

CAUTION: This email originated from outside of Carrollton-Farmers Branch ISD. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Susan Miller is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://coopstrategies.zoom.us/j/82466316499?pwd=GbQJkaP85gSK7vFTBidwMgk4m2RZ5Y.1>

Meeting ID: 824 6631 6499

Passcode: 548977

One tap mobile

+17207072699,,82466316499# US (Denver)

+17193594580,,82466316499# US

Dial by your location

- +1 720 707 2699 US (Denver)
- +1 719 359 4580 US
- +1 253 215 8782 US (Tacoma)
- +1 346 248 7799 US (Houston)
- +1 669 444 9171 US
- +1 253 205 0468 US
- +1 386 347 5053 US
- +1 507 473 4847 US
- +1 564 217 2000 US
- +1 646 558 8656 US (New York)
- +1 646 931 3860 US
- +1 689 278 1000 US
- +1 301 715 8592 US (Washington DC)

Exhibit A.1

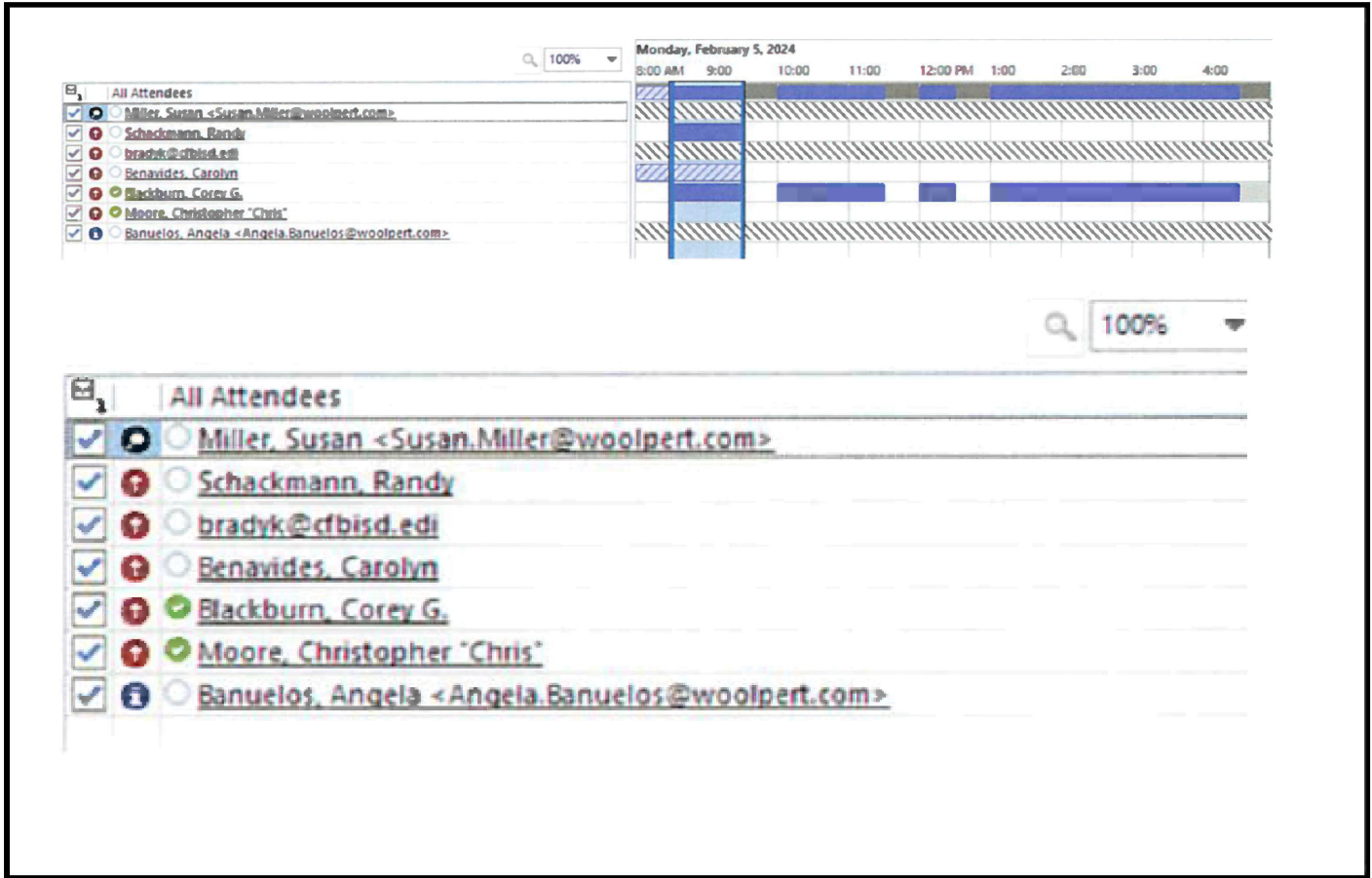


Exhibit A.2

Moore, Christopher "Chris"

Subject: **External Email**CFBISD Meeting Board of Education FMP Overview
Location: <https://coopstrategies.zoom.us/j/81655850867?pwd=zNhabNqNKfb3KNaAFpcbmICA2sNaQg.1>

Start: Wed 2/7/2024 3:30 PM
End: Wed 2/7/2024 4:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Miller, Susan

CAUTION: This email originated from outside of Carrollton-Farmers Branch ISD. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Susan Miller is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://coopstrategies.zoom.us/j/81655850867?pwd=zNhabNqNKfb3KNaAFpcbmICA2sNaQg.1>

Meeting ID: 816 5585 0867

Passcode: 787404

One tap mobile

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+17193594580,,81655850867# US

Dial by your location

- +1 720 707 2699 US (Denver)
- +1 719 359 4580 US
- +1 253 215 8782 US (Tacoma)
- +1 346 248 7799 US (Houston)
- +1 669 444 9171 US
- +1 253 205 0468 US
- +1 312 626 6799 US (Chicago)
- +1 360 209 5623 US
- +1 386 347 5053 US
- +1 507 473 4847 US
- +1 564 217 2000 US
- +1 646 558 8656 US (New York)
- +1 646 931 3860 US

Exhibit A.2

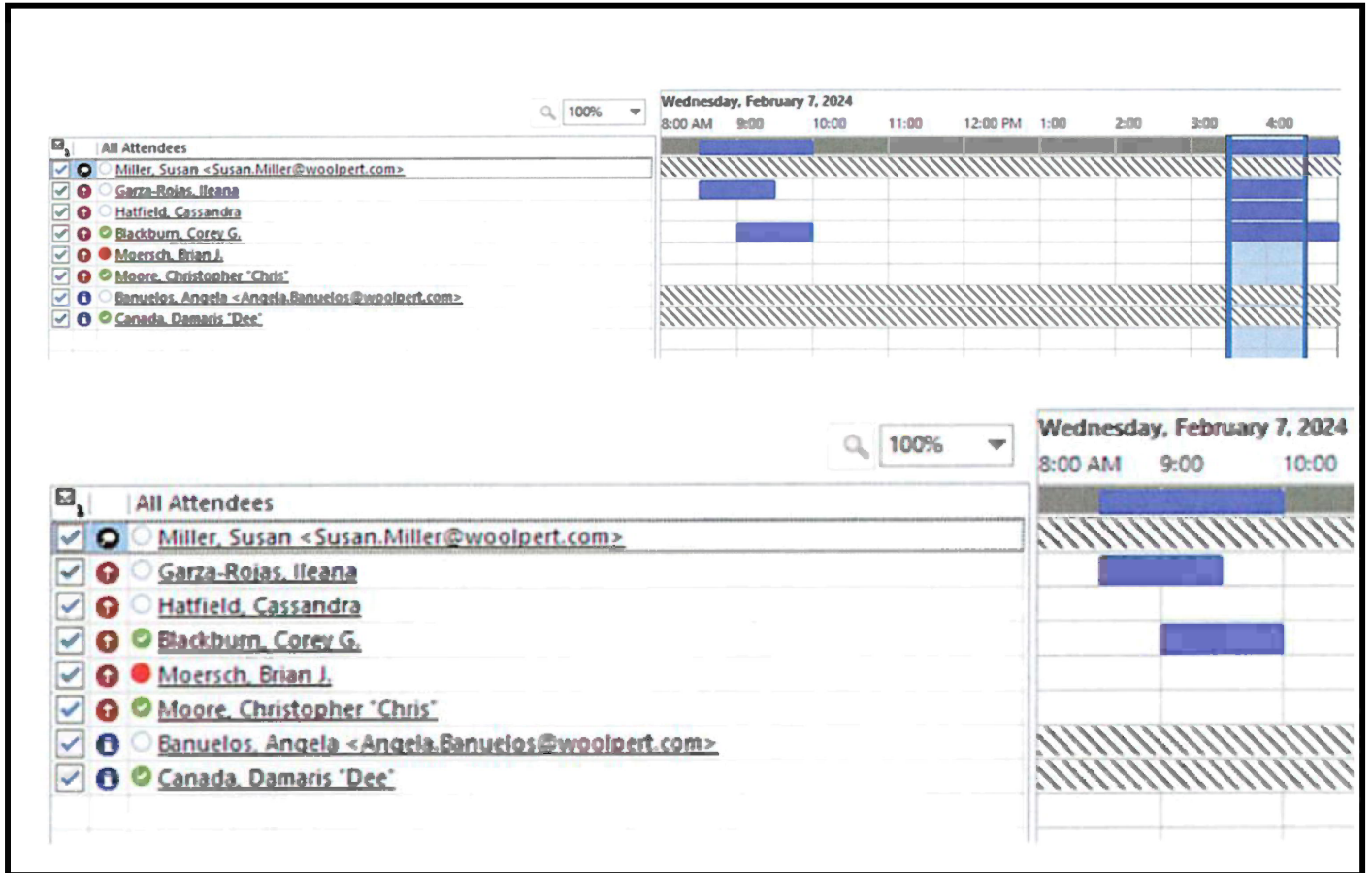


Exhibit A.3

Moore, Christopher "Chris"

Subject: **External Email**CFBISD - Meeting Board of Education FMP Overview
Location: <https://coopstrategies.zoom.us/j/86943701836?pwd=eBXDyjK6tYJndXkdTPgDmigbw2VCl.1>

Start: Thu 2/8/2024 6:00 PM
End: Thu 2/8/2024 7:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Miller, Susan

CAUTION: This email originated from outside of Carrollton-Farmers Branch ISD. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Susan Miller is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://coopstrategies.zoom.us/j/86943701836?pwd=eBXDyjK6tYJndXkdTPgDmigbw2VCl.1>

Meeting ID: 869 4370 1836

Passcode: 455828

One tap mobile

+17193594580,,86943701836# US

+17207072699,,86943701836# US (Denver)

Dial by your location

• +1 719 359 4580 US

• +1 720 707 2699 US (Denver)

• +1 253 205 0468 US

• +1 253 215 8782 US (Tacoma)

• +1 346 248 7799 US (Houston)

• +1 669 444 9171 US

• +1 646 931 3860 US

• +1 689 278 1000 US

• +1 301 715 8592 US (Washington DC)

• +1 305 224 1968 US

• +1 309 205 3325 US

• +1 312 626 6799 US (Chicago)

• +1 360 209 5623 US

Exhibit A.3

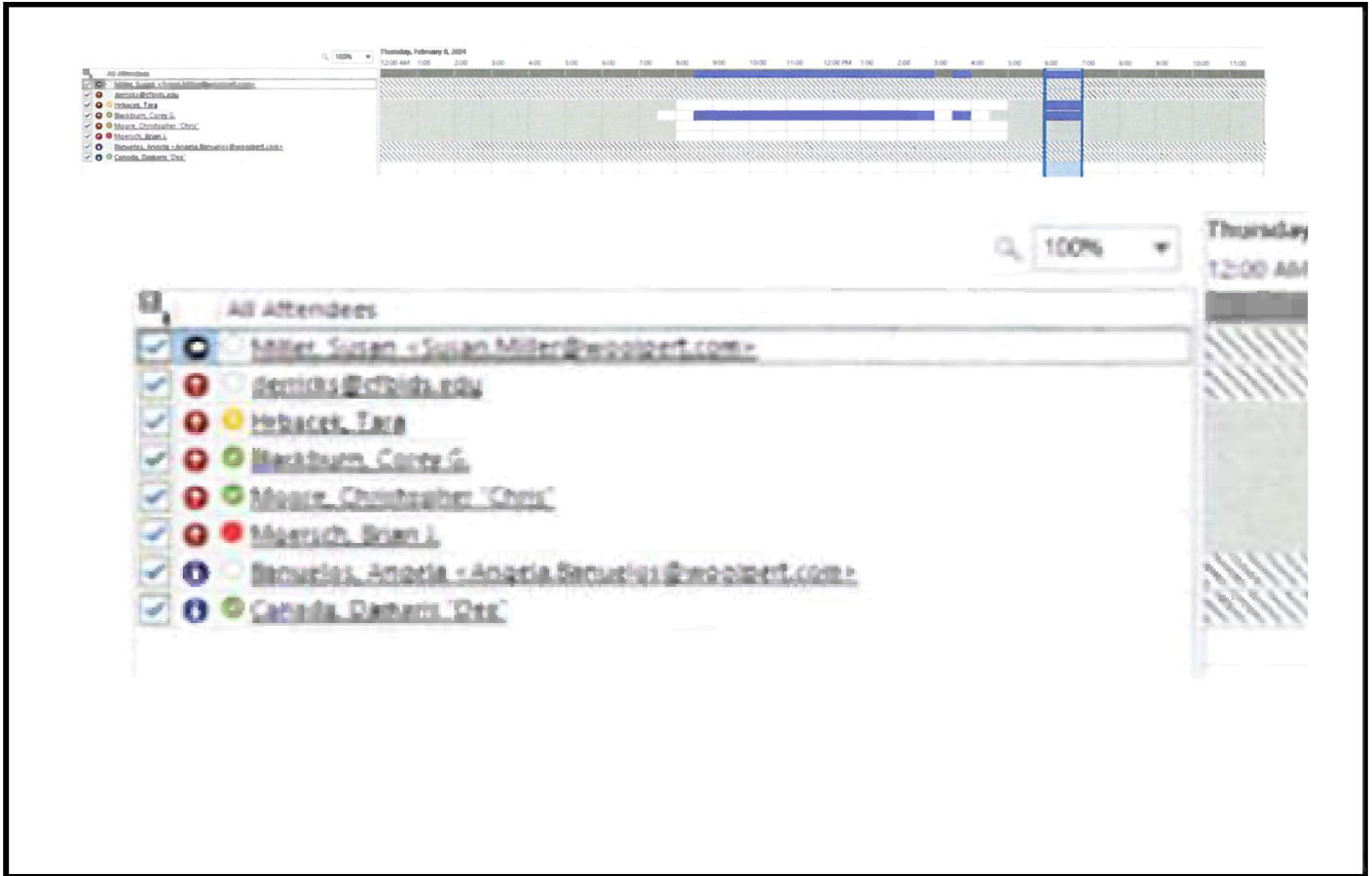


Exhibit B.1

From: [Canada, Damaris "Dee"](#)
To: [Blackburn, Corey G.](#)
Cc: [Moore, Christopher "Chris"](#); [Moersch, Brian J.](#); [Kris Pool](#)
Subject: RE: Attendance Zone Discussions
Date: Wednesday, January 15, 2025 9:46:54 AM
Attachments: [image001.png](#)

Thank you Corey 💎 I will get those meeting scheduled.

Dee

From: Blackburn, Corey G. <blackburnc@cfbisd.edu>
Sent: Wednesday, January 15, 2025 8:41 AM
To: Canada, Damaris "Dee" <canadad@cfbisd.edu>
Cc: Moore, Christopher "Chris" <moorechr@cfbisd.edu>; Moersch, Brian J. <moerschb@cfbisd.edu>; Kris Pool <kpool@pasatx.com>
Subject: Attendance Zone Discussions

Dee,

Kris Pool from PASA (copied), who is helping us with rezoning, told us she was available to meet with the Board Officers on 1/24. She is also available on 1/27 & 1/28 for 2x2 meetings with the remainder of the board as requested.

- I have forwarded the 1/24 meeting invite to Kris; **please add a Teams virtual meeting option for her use.**
- Please send invites for the 1/27 and 1/28 meetings.

COREY BLACKBURN

Executive Construction Officer

email_signature_logo



1505 Randolph St. Carrollton, TX 75006
Office: 972.968.6319

Exhibit B.2

From: [Moersch, Brian J.](#)
To: [Moore, Christopher "Chris"; Eldredge, Wendy P.](#)
Cc: [Blackburn, Corey G.](#)
Subject: RE: For tomorrow's meeting with board officers (3)
Date: Friday, January 24, 2025 7:53:35 AM
Attachments: [image001.png](#)

I have a call with TASB Policy Services from 8-8:30 am. I am available from 8:30-10 AM. I can move meetings to ensure availability.

From: Moore, Christopher "Chris" <moorechr@cfbisd.edu>
Sent: Thursday, January 23, 2025 10:10 PM
To: Moersch, Brian J. <moerschb@cfbisd.edu>; Eldredge, Wendy P. <EldredgeW@cfbisd.edu>
Cc: Blackburn, Corey G. <blackburnc@cfbisd.edu>
Subject: For tomorrow's meeting with board officers

Good evening,

I would like to talk through this presentation with you two and Corey before we visit with board members tomorrow. It can be over the phone if needed but there are some recommendations we are developing that need consent higher than ours and you both need to hear them in general—namely a high level look at funding and plans for vacated facilities. You can see that in the slide deck toward the end. This is the basic shell. Corey is still tweaking and will add some more in morning.

A major note (and I am re-emphasizing what I already shared yesterday)—the tables we are referencing move LEAP at both the elementary level and secondary level. Elementary is moving from McCoy to Landry as part of the consolidation recommendation. Middle school is moving from Perry to Bush as a general move. The extra space at Perry freed up room for almost 100 students from the Polk feeder, which lessened Polk's utilization. Also, 51 of the middle school LEAP students are currently transferring to Perry from Bush. Money that would have gone to Long could also remain centered at the middle school level and redirected to Bush to help dress up LEAP as part of that program move. And it better balances middle school attendance.

This will be a lot to talk through tomorrow and I suspect the bulk of time will be spent on rezoning—both as it relates specifically to the consolidation recommendations and also as it relates to the overall balancing of zones since it has not been done in 20 years. We will have printouts of the tables and maps in addition to what is on the slides.

High level of what we will cover:

- Recap Woolpert summary of 3 ES/1 MS (from June 2024)
- Introduce neighborhood rings slide
- Talk through rezone as it relates to Woolpert 3/1
- Talk through rezone as it relates to demographer report, by HS feeder
- High level funding
- High level vacated facilities

Exhibit B.3

From: [Moersch, Brian J.](#)
To: [Hrbacek, Tara](#)
Subject: RE: Meet with Board Officers regarding Community Feedback and Woolpert Study (3)
Date: Wednesday, January 22, 2025 8:54:14 AM

Good morning Tara,

We have two other meetings scheduled next week. Dee will reach out to see if you are available for either meeting.

Stay warm!

Brian

-----Original Appointment-----

From: Hrbacek, Tara <hrbacekt@cfbisd.edu>
Sent: Tuesday, January 21, 2025 11:25 PM
To: Moersch, Brian J.
Subject: Declined: Meet with Board Officers regarding Community Feedback and Woolpert Study
When: Friday, January 24, 2025 11:30 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Administration Building, Exec Conf Room

Brian - my return to Dallas from my work trip this week has changed from Friday morning to Friday night; I will not be able to attend this meeting.

Thanks,

Tara

Exhibit B.4

From: [Moersch, Brian J.](#)
To: [Canada, Damaris "Dee"](#)
Subject: FW: Meet with Board Officers regarding Community Feedback and Woolpert Study (2)
Date: Wednesday, January 22, 2025 7:42:58 AM

Please see if she can attend one of the other meetings in which her attendance will not create a quorum. Thank you

-----Original Appointment-----

From: Hrbacek, Tara <hrbacekt@cfbisd.edu>
Sent: Tuesday, January 21, 2025 11:25 PM
To: Moersch, Brian J.
Subject: Declined: Meet with Board Officers regarding Community Feedback and Woolpert Study
When: Friday, January 24, 2025 11:30 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Administration Building, Exec Conf Room

Brian - my return to Dallas from my work trip this week has changed from Friday morning to Friday night; I will not be able to attend this meeting.

Thanks,

Tara

Exhibit B.5

Kris,

We are meeting with district leadership this Thursday, 1/9 to brainstorm suggestions for rezoning to send to you for review. You should have them by end of day 1/9.

1. Would it be possible to have your response back by noon on the following Thursday, 1/16?
We plan to reconvene the same group that afternoon and see if we can settle on our preferred zoning option to proceed with.
2. Are you available if needed for a workshop with the Board Officers on Friday, 1/24 at 11:30 am?
3. Are you available if needed for the formal board recommendation on Thursday, 2/6 at 7:00 pm? Might also need you for the pre-meeting briefing at 6 pm.

COREY BLACKBURN

Executive Construction Officer

email_signature_logo



1505 Randolph St. Carrollton, TX 75006
Office: 972.968.6319

Exhibit B.6

Attendee responses: 6 accepted, 0 tentatively accepted, 0 declined.

To... Benavides, Carolyn; Garza-Rojas, Ileana; Moore, Christopher "Chris"; Blackburn, Corey G.; Moersch, Brian J.; Kris Pool <kpool@pasabx.com>; Hamlin, Lance M.; Rodriguez, Caren I.; Hrbacek, Tara

Subject Meet with Board members regarding Community Feedback and Woolpert Study/Rezoning

Location Administration Building, Executive Conference Room

Start time Mon 1/27/2025 8:30 AM Central Time (US & Canada) All day event

End time Mon 1/27/2025 9:30 AM Central Time (US & Canada)

Attendee responses: 6 accepted, 0 tentatively accepted, 0 declined.

To... Hatfield, Cassandra; Barnes, Marjorie; Moore, Christopher "Chris"; Blackburn, Corey G.; Moersch, Brian J.; Kris Pool <kpool@pasabx.com>; Rodriguez, Caren I.; Hamlin, Lance M.; Schackmann, Randy

Subject Meet with Board Officers regarding Community Feedback and Woolpert Study/Rezoning

Location Administration Building, Executive Conference Room

Start time Mon 1/27/2025 1:00 PM Central Time (US & Canada) All day event

End time Mon 1/27/2025 2:00 PM Central Time (US & Canada)

Attendee responses: 7 accepted, 1 tentatively accepted, 1 declined.

To... Schackmann, Randy; Brady, Kim; Hrbacek, Tara; Blackburn, Corey G.; Moore, Christopher "Chris"; Kris Pool <kpool@pasabx.com>; Hamlin, Lance M.; Stout, Robin W.; Rodriguez, Caren I.; Cox, Donald "Donna"

Subject Meet with Board Officers regarding Community Feedback and Woolpert Study

Location Administration Building, Exec Conf Room

Start time Fri 1/24/2025 11:30 AM All day event

End time Fri 1/24/2025 1:00 PM

Note Change
Lunch will be provided.

If you have any questions, please provide those prior to the meeting, with ample time for us to be prepared to address them. Please email Brian with your questions.

Please RSVP to this invite.

Enhanced Image

es: 6 accepted, 0 tentatively accepted, 0 declined.

To... Benavides, Carolyn; Garza-Rojas, Ileana; Moore, Christopher "Chris"; Blackburn, Corey G.; Moersch, Brian J.; Kris Pool <kpool@pasabx.com>; Hamlin, Lance M.; Rodriguez, Caren I.; Hrbacek, Tara

Subject Meet with Board members regarding Community Feedback and Woolpert Study/Rezoning

Location Administration Building, Executive Conference Room

Start time Mon 1/27/2025 8:30 AM Central Time (US & Canada) All day event

End time Mon 1/27/2025 9:30 AM Central Time (US & Canada)

ses: 6 accepted, 0 tentatively accepted, 0 declined.

To... Hatfield, Cassandra; Barnes, Marjorie; Moore, Christopher "Chris"; Blackburn, Corey G.; Moersch, Brian J.; Kris Pool <kpool@pasabx.com>; Rodriguez, Caren I.; Hamlin, Lance M.; Schackmann, Randy

Subject Meet with Board Officers regarding Community Feedback and Woolpert Study/Rezoning

Location Administration Building, Executive Conference Room

Start time Mon 1/27/2025 1:00 PM Central Time (US & Canada) All day event

End time Mon 1/27/2025 2:00 PM Central Time (US & Canada)

To... Schackmann, Randy; Brady, Kim; Hrbacek, Tara; Blackburn, Corey G.; Moore, Christopher "Chris"; Kris Pool <kpool@pasabx.com>; Hamlin, Lance M.; Stout, Robin W.; Rodriguez, Caren I.; Cox, Donald "Donna"

Subject Meet with Board Officers regarding Community Feedback and Woolpert Study

Location Administration Building, Exec Conf Room

Start time Fri 1/24/2025 11:30 AM All day event

End time Fri 1/24/2025 1:00 PM

Exhibit C.1

Posted Agenda

Topic 3.B. 2023 Bond Planning

Recorded videos show Blackburn and the Board discussing intent to hire new consultants for studies that would serve as the foundation for the Campus Consolidation Plan and the departure from the Citizens' Committee recommendations.

View Options:

- Show Everything
- Description
- Attachments
- Policies
- Hide Everything

September 21, 2023 at 6:00 PM - Work-Study

| Agenda |
|---|
| 1. Call Meeting to Order |
| 2. Audience for Guests - Limited to Posted Agenda Items for this Meeting |
| 3. Work/Study Discussion Items |
| 3.A. Bond 101 Training |
| 3.B. 2023 Bond Planning |
| 3.C. Bond Oversight Committee (BOC) |
| 3.D. Facilities |
| 4. Adjournment |

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Exhibit C.2

Approved Minutes

Signed by Defendant President Cassandra Hatfield

**Minutes of Work/Study Session
September 21, 2023**

***The Board of Trustees
Carrollton-Farmers Branch ISD***

A Work/Study Session of the Board of Trustees of Carrollton-Farmers Branch ISD was held Thursday, September 21, 2023, beginning at 6:00 PM in the Board of the District Administration Building, 1445 North Perry Road, Carrollton, Texas.

1. Call Meeting to Order

Board President Cassandra Hatfield called the Work/Study Meeting to order at 6:00 p.m. Board members in attendance were: Cassandra Hatfield, Tara Hrbacek, Sally Derrick, Ileana Garza-Rojas, Randy Schackmann and Kim Brady. Carolyn Benavides was absent.

Administrative staff present were Superintendent Dr. Wendy Eldredge, Deputy Superintendent Brian Moersch, Associate Superintendent of Operations Chris Moore, Chief Financial Officer Larry Guerra, and Executive Construction Officer Corey Blackburn. Board Secretary, Dee Canada recorded the minutes of the meeting.

2. Audience for Guests – Limited to Posted Agenda Items for this Meeting

Jo Lyne Porter – spoke in regard to the 2023 Bond

3. Work/Study Discussion Items

A. Bond 101 Training

Larry Guerra introduced Derek Honea, RBC Capital who gave an overview of the Bond sale and current status.

B. 2023 Bond Planning

Corey Blackburn presented an overview of projected Bond projects, expenditures and timelines.

C. Bond Oversight Committee

Corey Blackburn and Chris Moore presented the updated Bond Oversight Committee Guidelines for the incoming Bond 2023 Committee.

D. Facilities

Corey Blackburn shared a map/document that noted the unoccupied land and/or buildings owned by the District and available for possible sale.

4. Adjournment

Cassandra Hatfield adjourned the meeting at 6:49 p.m.

Signed: _____



Cassandra Hatfield, President
Board of Trustees
Carrollton-Farmers Branch ISD

Attest: _____



Sally Derrick, Secretary
Board of Trustees
Carrollton-Farmers Branch ISD

October 5, 2023

Exhibit C.3

Topic 3.A. Presentation and Discussion for Facilities Master Plan

Recorded videos show Woolpert’s Susan Miller reviewing the utilization and capacity study with the Board, where she discusses feeder patterns, meetings from the previous week, and presents the cost per student metric that would serve as the Campus Consolidation Plan’s sound bite.

View Options:

- [Show Everything](#)
- Description
- Attachments
- Policies
- [Hide Everything](#)

February 15, 2024 at 6:00 PM - Work-Study

Agenda

1. Call Meeting to Order

2. Audience for Guests - Limited to Posted Agenda Items for this Meeting

3. Work/Study Discussion Items

3.A. Presentation and Discussion for Facilities Master Plan

3.B. Governance Core Book Study

4. Adjournment

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Exhibit C.4

Approved Minutes

Signed by Defendant President Cassandra Hatfield

**Minutes of Work/Study Session
February 15, 2024**

***The Board of Trustees
Carrollton-Farmers Branch ISD***

A Work/Study Session of the Board of Trustees of Carrollton-Farmers Branch ISD was held Thursday, February 15, 2024, beginning at 6 PM at the District Administration Building, 1445 North Perry Road, Carrollton, Texas.

1. Call to Order

President Cassandra Hatfield called the meeting to order at 6:00 pm. Trustees present: President Cassandra Hatfield, Vice President Tara Hrbacek, Carolyn Benavides, Kim Brady, Ileana Garza-Rojas, and Randy Schackmann. Sally Derrick was absent.

Executive Staff present: Superintendent Dr. Wendy Eldredge, and Deputy Superintendent Brian Maersch. Board Secretary, Dee Canada, took the minutes of the meeting.

2. Audience for Guests

None

3. Work/Study Discussion Items

A. Presentation and Discussion for Facilities Master Plan

Corey Blackburn, Executive Construction Officer, introduced Susan Miller from Woolpert. Ms. Miller gave an overview and answered questions regarding a Facilities Master Plan.

The meeting recessed at 7:15pm.


Meeting reconvened at 7:25pm.

B. Governance Core Book Study

Board members participated in an open discussion on chapter five (5) of the book titled: The Governance Core.

4. Adjournment

President Cassandra Hatfield adjourned the meeting at 8:22 pm.

Signed: 
Cassandra Hatfield, President
Board of Trustees
Carrollton-Farmers Branch ISD

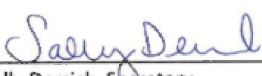
Attest: 
Sally Derrick, Secretary
Board of Trustees
Carrollton-Farmers Branch ISD

Exhibit C.5

Topic 3.A. Presentation and Discussion for Facilities Master Plan

Recorded videos show Woolpert’s Susan Miller reviewing the utilization and capacity study with the Board, where Woolpert states the district is stable and not losing children, contradicting the later narrative used by the District when presenting the Plan on February 6, 2025.

View Options:

- [👁 Show Everything](#)
- Description
- Attachments
- Policies
- [👁 Hide Everything](#)

April 11, 2024 at 6:00 PM - Work-Study

Agenda

1. Call Meeting to Order

2. Audience for Guests - Limited to Posted Agenda Items for this Meeting

3. Work/Study Discussion Items

3.A. Presentation and Discussion for Facilities Master Plan

3.B. Budget Workshop #1

3.C. Governance Core Book Study

4. Adjournment

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Exhibit C.6

Approved Minutes

Signed by Defendant Cassandra Hatfield

Minutes of Work/Study Session

April 11, 2024

The Board of Trustees

Carrollton-Farmers Branch ISD

A Work/Study Session of the Board of Trustees of Carrollton-Farmers Branch ISD was held Thursday, April 11, 2024, beginning at 6 PM at the District Administration Building, 1445 North Perry Road, Carrollton, Texas.

1. Call to Order

President Cassandra Hatfield called the meeting to order at 6:00 pm. Trustees present: President Cassandra Hatfield, Vice President Tara Hrbacek, Secretary Sally Derrick, Carolyn Benavides, Kim Brady, Ileana Garza-Rojas, and Randy Schackmann.

Executive Staff present: Superintendent Dr. Wendy Eldredge, and Deputy Superintendent Brian Moersch, Chief Financial Officer Larry Guerra and Assistant Superintendent of Operations Chris Moore. Board Secretary, Dee Canada, took the minutes of the meeting.

2. Audience for Guests

None

3. Work/Study Discussion Items

A. Presentation and Discussion for Facilities Master Plan

Chris Moore, Assistant Superintendent of Operation, introduced Susan Miller and David Sturtz from Woolpert, who gave an update and answered questions regarding a Facilities Master Plan.

The meeting recessed at 7:25pm.

Meeting reconvened at 7:37pm.

B. Budget Workshop -1

Chief Financial Officer Larry Guerra and Director of Budget Karla Stastny presented the first of three Budget Workshops to the Board.

C. Governance Core Book Study

Board members participated in an open discussion on chapter five (6) of the book titled: The Governance Core.

Exhibit C.7

Topic 4.C. Master Facilities Plan Update with Education Specifications

Recorded videos show Blackburn justifying departing from the Citizens' Committee's recommendations because of the adoption of a deficit budget. Woolpert proceeds to present their study that was previously presented to the board in private discussions and public meetings.

View Options:

- Show Everything
- Description
- Attachments
- Policies
- Hide Everything

June 6, 2024 at 7:00 PM - Regular Meeting

Agenda

1. Call to Order

1.A. Moment of Reflection and Pledge of Allegiance

1.B. Welcome Visitors

2. Special Presentations and Recognitions

2.A. Recognitions

2.B. District Announcements

2.C. Trustee's Reports

2.D. Update from PTA

2.E. Update from Educational Foundation

3. Audience for Guests

4. Non-Action Items for Discussion

4.A. SHAC Report

4.B. Preliminary STAAR EOC Results & Update on State Testing

Attachments: (1)

 [2024 Spring EOC & Accountability Update \(June 6\) Slides Only](#)

5/31/2024 at 11:58 AM

4.C. Master Facilities Plan Update with Education Specifications

5. Consent Agenda

5.A. Consider/Approve Requests for Carrollton-Farmers Branch Students to Travel Out-of-State

Description: Priority #1: Optimize Engaging and Diverse Learning

Background: In accordance with Policy FMG (LOCAL), students may be permitted to take out-of-state school-sponsored trips for the following purposes:

Exhibit C.8

Approved Minutes of June 6, 2024, Regular Meeting

Signed by Defendant President Randy Schackmann

She also expressed condolences on behalf of the District to the family of Shirley Tarpley and Juanita Rainwater in their recent passing.

A warm welcome was conveyed to newly elected Board Member, Marjorie Barnes.

Dr. Eldredge announced the Back-to-School event on August 2nd taking place at RL Turner HS.

Dr. Eldredge celebrated the fact that 1672 seniors graduated during the 2024 Graduation Ceremonies in May 2024.

D. Update from PTA

Stacy Homan gave an update regarding PTA.

3. Audience for Guests - Limited to Posted Agenda Items

Karim Kara addressed the Board regarding use of District track facilities.

4. Non-Action Items for Discussion

Note: Trustee Carolyn Benavides left meeting at 8:31pm due to feeling ill.

A. SHAC Report

Sandra Lieck, Director of Health Services, introduced April Hooper Christiansen, co-chair for SHAC Committee who shared an update.

B. Preliminary STAAR EOC Results & Update on State Testing

Director of Assessment and Accountability Hope Keane shared an overview of the preliminary STAAR EOC results and gave an update on state testing.

C. Master Facilities Plan Update with Education Specifications

Corey Blackburn, Executive Construction Officer, gave a brief overview and then introduced Susan Miller, Woolpert, who gave an extensive update on the Master Facilities Plan.

A brief recess was announced at 8:46pm.

President Schackmann called the meeting back to order at 8:53pm.

Exhibit C.9

Topic 3.B. Facilities Master Plan

Recorded videos show the presentation of the official Campus Consolidation Plan that would be approved twenty-eight days later to close four campuses and change the attendance zones for hundreds of families within the district.

View Options:

- Show Everything
- Description
- Attachments
- Policies
- Hide Everything

February 6, 2025 at 7:00 PM - Regular Meeting

Agenda

1. Call to Order

1.A. Moment of Reflection and Pledge of Allegiance

1.B. Welcome Visitors

2. Special Presentations and Recognitions

2.A. Recognitions

2.B. President's Report

2.C. Committee Reports

2.D. District Announcements

2.E. Update from PTA

3. Non-Action Items for Discussion

3.A. District Annual Report and HB3 Goals (TAPR)

Attachments: (1)

 [2023-24 CFBISD Annual Report \(TAPR\) \(1\)](#)

1/31/2025 at 4:02 PM

3.B. Facilities Master Plan Update

4. Audience for Guests

5. Consent Agenda

5.A. Consider/Approve Personnel Report

Description: Priority #1: Optimize Engaging and Diverse Learning

Background: The District employs full-time professional employees in positions requiring a certificate from the State Board of Educator Certification (SBEC), nurses under a probationary or term contract and other designated employees. The purpose of this agenda item is to facilitate Board approval of these contracts.

Exhibit C.10

Approved Minutes for the February 6, 2025, regular meeting

Signed by Defendant President Randy Schackmann

D. District Announcements

Dr. Eldredge highlighted the 30yr anniversary celebration for Rainwater Elementary. She also thanked the Caterpillar Corporation for donating a Manufacturing Box for the students of Ranchview HS. Dr. Eldredge commented on the Folkorico Competition and the work of teacher, Carla Hardaway.

E. Update from PTA

*Deana Nunez gave an update of PTA
Golden Apple Awards were awarded to various campuses.*

3. Non-Action Items for Discussion

A. District Annual Report and HB3 Goals (TAPR)

Hope Keane, Director of Assessment and Accountability reviewed the Annual Report from TEA.

B. Facilities Master Plan Update

Superintendent, Dr Wendy Eldredge along with Corey Blackburn, Dr, Tamy Smalskas, and Dr. Lance Hamlin presented the recommendation for school consolidations and rezoning of boundaries.

4. Audience for Guests

All speakers addressed the topic of school consolidation

Pranav Vemireddy – stakeholder/student

Diana Farrar – stakeholder/parent

Sarah Amond – stakeholder/parent

Brady Barnett – stakeholder/parent


Exhibit C.11

Topic 6.B. Consider/Approve Proposed Consolidation of Central, Furneaux Elementary, McCoy Elementary, and Long Middle School and Corresponding Proposed Changes to Elementary, Middle, and High School Attendance Zones.

Recorded videos show what is described in the agenda topic.

5.O. Consider/Approve Minutes of Regular Meeting Held February 6, 2025

Attachments: (1)

 [2.6.25 Minutes Regular Mtg](#)

2/12/2025 at 4:50 PM

5.P. Consider/Approve Minutes of Work Study Meeting Held February 12, 2025

Attachments: (1)

 [2.12.25 Minutes of Work Study](#)

2/13/2025 at 11:39 AM

6. Items for Discussion and/or Action

6.A. Items Removed from Consent

6.B. Consider/Approve Proposed Consolidation of Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School and Corresponding Proposed Changes to Elementary, Middle, and High School Attendance Zones

7. Comments from Board Members Regarding Posted Agenda Items

8. Adjournment

e for Carrollton-Farmers Branch ISD

Exhibit C.12

Approved Minutes for the March 6, 2025, regular meeting

Signed by Defendant President Randy Schackmann

B. Consider/Approve Proposed Consolidation of Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School and Corresponding Proposed Changes to Elementary, Middle, and High School Attendance Zones

Superintendent Dr. Eldredge, Asst Superintendent of Operations Chris Moore, Asst. Superintendent of Student Services Dr. Lance Hamlin, Chief Financial Officer Carla Settle, and Asst. Superintendent of Human Resources Tamy Smalskas gave an overview of the item in preparation for the vote.

Board members each spoke pertaining to the difficulty of making this decision.

A motion was given by Randy Schackmann that the Board approve the proposed Consolidation of Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School and Corresponding Proposed Changes to Elementary, Middle, and High School Attendance Zones as presented. A second was offered by Cassandra Hatfield. With a vote of 6 in favor, 1 opposed (CB) the motion carried.

7. Comments from Board Members Regarding Posted Agenda Items

None

8. Adjournment

President Randy Schackmann adjourned the meeting at 10:04 pm.

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Brian Morrow on behalf of Brian Morrow
Bar No. 24110136
b.thomas.morrow@gmail.com
Envelope ID: 110927603
Filing Code Description: Amended Petition
Filing Description: 2ND
Status as of 2/6/2026 10:18 AM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|------------------|-----------|---------------------------|---------------------|--------|
| Craig Wood | | cwood@wabsa.com | 2/5/2026 6:05:12 PM | SENT |
| Brian Morrow | 24110136 | b.thomas.morrow@gmail.com | 2/5/2026 6:05:12 PM | SENT |
| Meredith Walker | | mwalker@wabsa.com | 2/5/2026 6:05:12 PM | SENT |
| Jerome Patterson | | jpatterson@wabsa.com | 2/5/2026 6:05:12 PM | SENT |
| Anjela Young | | ayoung@wabsa.com | 2/5/2026 6:05:12 PM | SENT |
| Bethany Walters | | bwalters@wabsa.com | 2/5/2026 6:05:12 PM | SENT |
| Jennifer Barling | | jbarling@wabsa.com | 2/5/2026 6:05:12 PM | SENT |