

CAUSE NO. -09345

BRIAN MORROW, LISA SUTTER, NELLY §
SHANKLE, NICOLE YARBROUGH, §
AMANDA NAUERT, AARON NAUERT, IRIS §
MOORE, TIERNEY GONZALEZ, JACOB §
GONZALEZ, AND CANDACE §
VALENZUELA, §

Plaintiffs, §

v. §

RANDY SCHACKMANN, NANCY KIMMEL §
BRADY, CASSANDRA HATFIELD, ILEANA §
GARZA-ROJAS, MARJORIE BARNES, §
CAROLYN BENAVIDES, WENDY §
ELDREDGE, AND CARROLLTON-FARMERS §
BRANCH INDEPENDENT SCHOOL §
DISTRICT §

Defendants, §

IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95th JUDICIAL DISTRICT

**PLAINTIFFS' THIRD AMENDED PETITION FOR WRIT OF MANDAMUS,
INJUNCTIVE RELIEF, AND DECLARATORY JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs BRIAN MORROW, LISA SUTTER, NELLY SHANKLE, NICOLE YARBROUGH, AMANDA NAUERT, AARON NAUERT, IRIS MOORE, TIERNEY GONZALEZ, JACOB GONZALEZ, and CANDACE VALENZUELA (collectively, "Plaintiffs") file this Third Amended Petition, seeking relief under the Texas Open Meetings Act against Defendants RANDY SCHACKMANN, NANCY KIMMEL BRADY, CASSANDRA HATFIELD, ILEANA GARZA-ROJAS, MARJORIE BARNES, and CAROLYN BENAVIDES, who are sued in their official capacities as members of the Carrollton-Farmers Branch Independent School District Board of Trustees ("the Board" or the "Trustees"); 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. THE PARTIES

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

- a) **Brian Morrow**
1020 Magnolia Dr. Carrollton, Texas 75007
- b) **Lisa Sutter**
2304 Watermill Court Carrollton, Texas 75006
- c) **Nelly Shankle**
1603 Woodcrest Lane Carrollton, Texas 75006
- d) **Nicole Yarbrough**
2028 Lymington Road Carrollton, Texas 75007
- e) **Amanda Nauert**
1111 Golden Gate Drive Carrollton, Texas 75007
- f) **Aaron Nauert**
1111 Golden Gate Drive Carrollton, Texas 75007
- g) **Iris Moore**
1420 Tierra Calle Carrollton, Texas 75006
- h) **Tierney Gonzalez**
17919 Mary Margaret Street, Dallas, Texas 75287
- i) **Jacob Gonzalez**
17919 Mary Margaret Street, Dallas, Texas 75287
- j) **Candace Valenzuela**
3925 Saint Christopher Lane, Dallas, Texas 75287

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 CAROLYN BENAVIDES** 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 2914 Panorama Dr., Carrollton, TX 75007.

9. **Defendant WENDY ELDREDGE** (the “Superintendent”) 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.

10. **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

11. 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, and here it is not. In fact, the Texas Open Meetings Act specifically authorizes a district court to remedy violations of the Act. Tex. Gov’t Code § 551.142.

12. 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.

13. Plaintiffs have standing because they are "interested person[s]" expressly authorized by the statute to bring an action by mandamus or injunction to stop or reverse a TOMA violation. Tex. Gov’t Code § 551.142(a). Plaintiffs are parents, grandparents, residents, or taxpayers of CFBISD who have a vested interest in Defendants’ compliance with TOMA. Defendants’ actions
**PLAINTIFFS’ THIRD AMENDED PETITION FOR WRIT OF MANDAMUS,
INJUNCTIVE RELIEF, & DECLARATORY JUDGMENT**

and the resulting Campus Consolidation Plan directly and irreparably harmed Plaintiffs by shuttering their neighborhood schools, forcing their children and grandchildren to transfer to inferior schools, leaving the blight of empty building in their neighborhoods, and diminishing the value of their real property located within the District.

14. Texas Government Code § 551.142 waives sovereign immunity over actions seeking mandamus or injunctive relief under TOMA, as Plaintiffs do here.

IV. CLAIMS FOR RELIEF

15. The relief sought in this action is within the jurisdictional limits of this Court.

16. Plaintiff does not seek monetary damages in this action, but instead seeks non-monetary relief, including a writ of mandamus, permanent injunctions, and a declaratory judgment.

17. Pursuant to Tex. Gov't Code § 551.142(b), Plaintiff also seeks reasonable attorneys' fees, costs, and costs of litigation.

V. FACTUAL BACKGROUND

A. The Texas Open Meetings Act

18. The Texas Open Meetings Act ("TOMA") was enacted in 1967 to prevent governmental bodies from conducting the public's business in secret, ensuring that Texans may observe and evaluate the actions of their public officials. *See* Tex. Gov't Code § 551.001 (policy) TOMA is a central structural safeguard of democratic accountability in Texas government: it is designed to ensure that the public can know what its government is doing, observe the deliberative process, and hold officials accountable for decisions made in the public's name. *See* Tex. Gov't Code § 551.001 (declaring that governmental bodies exist to aid in the conduct of the people's business and that the people are entitled to complete information about governmental affairs); *Acker*, 790 S.W.2d at 300 (construing TOMA in light of its transparency purpose); *Cox Enters., of*

Austin Indep. Sch. Dist., (recognizing the Act's role in ensuring openness and public access to governmental proceedings).

19. TOMA applies to “governmental bodies, including the governing boards of school districts. Tex. Gov't Code § 551.001(3) (defining "governmental body"); Tex. Gov't Code § 551.001(3)(E) (including a school district board of trustees as a governmental body subject to TOMA). Accordingly, meetings of school boards at which public business is discussed or acted upon are subject to TOMA. Tex. Gov't Code §§ 551.002, 551.041.

20. TOMA's core command is that every “regular, special, or called meeting” of a governmental body must be open to the public, and the governmental body may not deliberate or take action except in an open meeting, unless a specific statutory exception authorizes a closed session and the governmental body strictly follows TOMA's procedures for doing so. Tex. Gov't Code § 551.002 (open meetings requirement); Tex. Gov't Code §§ 551.071-. 089 (enumerated exceptions); Tex. Gov't Code § 551.101 (procedure for closed meeting); Acker, 790 S.W.2d at 300 (TOMA's purpose is openness; exceptions are not to be used to defeat that purpose).

21. TOMA requires governmental bodies to provide advance written notice of the date, hour, place, and subject of each meeting held by the governmental body. Tex. Gov't Code § 551.041 (notice requirements); Tex. Gov't Code § 551.043 (posting requirements for local governmental bodies). These notice provisions are integral to TOMA's design because the public cannot attend, observe, or respond to governmental deliberations without meaningful notice. See Tex. Gov't Code § 551.001 (policy)

22. TOMA requires that the meeting notice disclose the "subject" of the meeting with sufficient specificity to fairly apprise an interested member of the public of the business to be conducted. Tex. Gov't Code § 551.041 (subject requirement); { *Cox Enters. *} (notice must be adequate to inform the public); Acker, (Act construed to effectuate openness).

23. The adequacy of a subject description is evaluated in context, and the level of detail required increases with the level of public interest and the significance of the proposed governmental action, because vague or generic descriptions can functionally deprive the public of the opportunity to attend and be heard on matters of consequence. See Tex. Gov't Code § 551.001 (policy of complete information); { * Cox Enters. *} (notice must meaningfully inform).

24. TOMA prohibits governmental bodies from convening closed meetings unless authorized by statute and conducted in compliance with TOMA's procedural safeguards, including proper notice and proper identification of the statutory basis for the closed session. Tex. Gov't Code §§ 551.002, 551.041, 551.101; Acker, (TOMA's purpose is to prevent secret deliberations and decision-making). TOMA further prohibits taking final action, decision, or vote in a closed meeting unless specifically authorized by law. Tex. Gov't Code § 551.102.

25. TOMA prohibits members of a governmental body from knowingly engaging in a series of communications that, taken together, involve a quorum and deliberate public business outside a properly noticed open meeting, including so-called "walking quorums" and other serial or hub-and-spoke communications used to circumvent TOMA's open-meeting requirements. Tex. Gov't Code § 551.143 (prohibited series of communications); Tex. Gov't Code § 551.001 (policy); Acker, 790 S.W.2d at 300 (Act aimed at preventing circumvention of openness).

26. TOMA also prohibits the use of online message boards by members of a governmental body unless (1) the communication is in writing; (2) the writing is posted to an online message board or similar Internet application that is viewable and searchable by the public; and (3) the communication is displayed in real time and displayed on the online message board or similar Internet application for no less than 30 days after the communication is first posted.

27. TOMA authorizes civil actions to stop, prevent, or reverse violations through injunctive relief and mandamus, including actions to compel compliance with TOMA's open-meeting and notice requirements. Tex. Gov't Code § 551.142(a) (injunction); Tex. Gov't Code § 551.142(b) (mandamus). TOMA authorizes an award of court costs and reasonable attorneys' fees to a prevailing party. Tex. Gov't Code § 551.142(b). These remedies reflect the Legislature's intent that TOMA be enforceable in practice and not merely aspirational. See Tex. Gov't Code § 551.001 (policy).

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

28. In 2023, the Carrollton-Farmers Branch Independent School District ("CFBISD") Board of Trustees ("the Board") sought public support for a \$716.4 million bond.

29. 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.

30. Their public recommendations assigned specific sums of money for specific projects on specific campuses. These recommendations formed the basis of the bond measure, which voters approved in May 2023.

31. After the bond was approved, however, the Board and the District administration began a systematic and secretive process to close certain schools—McCoy Elementary, Central Elementary, Furneaux Elementary, and Long Middle School—and reallocate approximately \$131 million dollars to various pet projects of the Board and administration.

32. The District engaged consultants to help justify and execute their plan: Woolpert, who advised on enrollment projections, capacity, and current and future use of facilities. Population and Survey Analysts (PASA) advised on demographic trends and projections.

C. The Board Engages in a Prohibited “Walking Quorum”

33. Over the next year-and-a-half, the seven-member board met on several occasions with administration officials and/or representatives of Woolpert and PASA to deliberate on public matters. *See* Exs. A.1–A.3.; B.1–B.6. But instead of having open, public, and properly-noticed meetings, as required by TOMA, the Board and administration attempted to evade their responsibility by meeting in small groups such that their communication on matters within the Board’s jurisdiction within each group “occur outside of a meeting authorized by [Chapter 551 of the Texas Government Code] . . . in which the members engaging in the individual communications constitute fewer than a quorum of members but the members engaging in the series of communications constitute a quorum of members.” Tex. Govt Code § 551.143(a)(1). Texas law flatly prohibits such conduct. In fact, it is a criminal offense. *See id.*

34. **February 2024 Meetings with Woolpert:** District administration coordinated a series of separate video-conference calls on or about **February 5, 7, and 8, 2024**, between small groups of trustees and the Woolpert consultants during which Woolpert provided substantively identical information regarding its analysis of enrollment, capacity, and facilities use and needs. The meeting invitations confirm the subject was the “Board of Education FMP Overview.” *See* Exs. A.1–A.3.

35. 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.

36. **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 or about **January 24 and 27, 2025**, without notice to the public, and the results were never presented publicly before the final vote. *See* B.1–B.6.

37. Both Woolpert’s and PASA’s respectively communications to the Board members constitute “deliberation” because there was a “verbal or written exchange between . . . a quorum of a governmental body and another person, concerning an issue within the jurisdiction of the governmental body.” Tex. Govt. Code § 551.001(2).

38. The notice required by TOMA, however, was not given, and the public was not allowed to attend.

D. Defendants Finally Disclose Their Plans to Close Specific Schools to the Public Once

39. Over the next several months, the District concocted a controversial “Campus Consolidation Plan”—*i.e.*, a plan to permanently close four schools: Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School.

40. The administration first unveiled the plan to the public at the February 2025 Board meeting, at which the district made a formal proposal to the Board to close these campuses.

41. By the time the district formally proposed the closures, it was far too late for the general public to observe the Board’s decision-making process or share its views.

42. The schools had been selected months earlier during a series of non-public meetings between representatives of the district’s administration and groups of two or three Trustees. The express purpose of meeting in small groups was to avoid creating a quorum and triggering TOMA’s requirements.

E. Inadequate and Misleading Public Notice

43. 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 closure of several schools and the revision of feeder p 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."

44. 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.

45. 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.

F. Defendant Eldredge and the Trustees violated TOMA by communicating privately via a password-protected Google Q&A document.

46. Throughout this time, Defendants Eldredge and the individual Defendant Trustees violated TOMA by communicating through an "online messaging board or similar Internet application"—specifically, Google Sheets, with the document known as the Google Q&A Document. Tex. Gov't Code § 551.006(a).

47. The communications were password protected. The public could neither view nor search them. *See id.* § 551.006(a)(2).

48. Additionally, the communications were not maintained for at least 30 days from when they were made but were instead frequently overridden. *See id.* § 551.006(a)(3).

G. Defendant Eldredge and the Trustees violated TOMA by communicating privately via a password-protected Google Q&A document.

49. Throughout this time, Defendants Eldredge and the individual Defendant Trustees violated TOMA by communicating through an “online messaging board or similar Internet application”—specifically, Google Sheets, with the document known as the Google Q&A Document. Tex. Gov’t Code § 551.006(a).

50. The communications were password protected. The public could neither view nor search them. *See id.* § 551.006(a)(2).

51. Additionally, the communications were not maintained for at least 30 days from when they were made but were instead frequently overridden. *See id.* § 551.006(a)(3).

H. The Final Vote

52. On March 6, 2026, the Board unveiled the Campus Consolidation Plan it had crafted outside the public view through the serial, small-group meetings described above. The public expressed overwhelming opposition, but approval of the plan was a *fait accompli*. The Board members—some reading from prepared speeches—voted 6-1 to approve the 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.

VI. CAUSES OF ACTION

**First Cause of Action: Violation of TOMA Notice Requirements
(Inadequate Subject Description and Posting)
Against Schackmann, Hatfield, and Eldredge**

53. Plaintiffs incorporate by reference all the preceding paragraphs in this petition as if fully set forth herein.

54. CFBISD is a governmental body subject to TOMA, which requires that “[a] governmental body shall give written notice of the date, hour, place, and subject of each meeting held by the governmental body.” [Tex. Gov’t Code § 551.041](#).

55. The notice must be sufficiently specific to alert the general public to the topic to be considered and must fairly alert the reader to the topic to be considered. Regarding issues of special interest to the public, such as the closure of several public schools, even more specific information is required. [City of Farmers Branch v. Ramos, 235 S.W.3d 462](#), [Salazar v. Gallardo, 57 S.W.3d 629](#).

56. For over a year the board posted agenda using vague, generic terms such as “Presentation and Discussion for Facilities Master Plan,” “Master Facilities Plan Update with Education Specifications,” and “Facilities Master Plan Update,” even though they knew their plan called for the closure of several schools—a matter of immense public importance, affecting the daily lives of thousands of families. These generic descriptions failed to inform the public that the Board was actively deliberating a plan to close specific schools, a matter of immense public importance.

57. The agenda for the February 2025 meeting said merely “Facilities Master Plan Update.” Readers of the agenda could not discern from that agenda item that the District would recommend the closure of McCoy, Central, Furneaux, and Long. Those who attended the meeting did so based on other information, such as a news article, or news that had started spreading by word of mouth.

58. Those with primarily responsibility for overseeing the drafting and finalization of the meeting agenda were the Superintendent and the Board President. At the time of the events described herein, Randy Schackmann, was Board President. Today, Cassandra Hatfield serves as President.

59. The Superintendent and Board President are fully capable of creating an appropriately informative agenda. For example, the March 6, 2025 meeting agenda explicitly stated it would "Consider/Approve Proposed Consolidation of Central Elementary, Furneaux Elementary, McCoy Elementary, and Long Middle School."

60. Defendant Eldredge and Schackmann's failure to include a similarly informative agenda item for the February 2025 meeting violated TOMA.

61. Plaintiffs seek a writ of mandamus requiring Defendant Eldredge, in her official capacity as Superintendent, and Cassandra Hatfield, in her official capacity as President of the Board, to cause the meeting notices/agenda to include sufficiently detailed descriptions of the topics of the meeting, with the level of specificity given in proportion to the public's level of interest in each topic.

62. Plaintiffs also seek costs and reasonable attorney's fees as authorized for a party who substantially prevails in an action under TOMA. [Tex. Gov't Code § 551.142](#)

**Second Cause of Action: Violation of TOMA Open-Meeting Requirements
Through Serial Deliberations ("Walking Quorum" / Series of Communications)
Against Schackmann, Brady, Barnes, Garza-Rojas, Hatfield, Benavides**

63. Plaintiffs incorporate by reference all the preceding paragraphs in this petition as if fully set forth herein.

64. TOMA requires that every regular, special, or called meeting of a governmental body be open to the public except as provided by statute. [Tex. Gov't Code § 551.002](#)

65. A "meeting" includes a deliberation between a quorum of a governmental body (or between a quorum and another person) during which public business is discussed or considered. [Tex. Gov't Code § 551.001](#)

66. "Deliberation" means a verbal or written exchange between a quorum of a governmental body (or between a quorum and another person) concerning an issue within the jurisdiction of the governmental body. [Tex. Gov't Code § 551.001](#)

67. TOMA provides a civil enforcement mechanism: an interested person may bring an action by mandamus or injunction to stop, prevent, or reverse a violation or threatened violation of TOMA by members of a governmental body. [Tex. Gov't Code § 551.142](#)

68. Texas courts recognize that TOMA's provisions are mandatory and are to be liberally construed in favor of open government.

69. Defendants engaged in secret deliberations through a series of small, repetitive meetings, each involving fewer trustees than a quorum, structured to facilitate deliberation outside public view.

70. In February 2024, District administration coordinated separate video-conference calls on February 5, 7, and 8, 2024 between small groups of trustees and Woolpert consultants, with invitations reflecting the subject board of education fmp overview. *See* Exs. A.1–A.3.

71. Moreover, in January 2025, administration repeated the strategy using 2x2 sessions to discuss attendance rezoning with PASA, including meetings on January 24 and 27, 2025 without public notice. *See* B.1–B.6.

72. Plaintiffs allege internal emails reflect intent to avoid a quorum, including instructions to "visit with the remainder of the board in 2x2 sessions" and to ensure a trustee's attendance would not create a quorum. *See id.*

73. These series of communications and small-group meetings constituted deliberations by or involving a quorum, concerning public business within the Board's jurisdiction, conducted outside a properly noticed open meeting, in violation of TOMA's open-meeting mandate. [Tex. Gov't Code § 551.002](#)

74. Plaintiffs seek injunctive prohibiting Defendants from engaging in so-called “walking quorum”. And mandamus relief to stop, prevent, or reverse these alleged violations and threatened future violations.

75. Plaintiffs also seek costs and reasonable attorney’s fees as authorized for a party who substantially prevails in an action under TOMA. [Tex. Gov’t Code § 551.142](#)

**Third Cause of Action: Violation of TOMA Requirements for
Online Messaging Boards or Similar Internet Applications
Against All Defendants**

76. Plaintiffs incorporate by reference all the preceding paragraphs in this petition as if fully set forth herein.

77. Defendants Eldredge and the individual Defendant Trustees violated TOMA by communicating through an “online messaging board or similar Internet application”—specifically, Google Sheets, with the document known as the Google Q&A Document. Tex. Gov’t Code § 551.006(a).

78. The communications were password protected. The public could neither view nor search them. *See id.* § 551.006(a)(2).

79. Additionally, the communications were not maintained for at least 30 days from when they were made but were instead frequently overridden. *See id.* § 551.006(a)(3).

80. Their communications, therefore, did not fall under the narrow exception for online messaging boards and were subject to TOMA.

81. Defendants, however, failed to give notice of these meetings or to make them open to the public.

82. Plaintiffs seek an injunction prohibiting Defendants from deliberating public business by online messaging board or similar Internet application—specifically, the Google Q&A Document.

83. Alternatively, Plaintiffs seek a writ of mandamus requiring Defendants to make the communications viewable and searchable by the public, to maintain posts for a minimum of 30 days, and to otherwise comply with all requirements for the exception to TOMA’s general requirements contained in Tex. Gov’t Code § 551.006.

**Fourth Cause of Action: Declaration of Voidability of Board Action Taken in Violation of TOMA
(Campus Consolidation Plan Approval)
Against Schackmann, Brady, Barnes, Garza-Rojas, Hatfield, Benevides**

84. An action taken by a governmental body in violation of TOMA is voidable. [Town of Shady Shores v. Swanson, 590 S.W.3d 544.](#)

85. TOMA authorizes an interested person to bring an action by mandamus or injunction to stop, prevent, or reverse a violation or threatened violation of TOMA by members of a governmental body. [Tex. Gov't Code § 551.142](#)

86. On March 6, 2026, the Board unveiled the Campus Consolidation Plan and voted 6-1 to approve it. The plan had been crafted and deliberated largely in private through the serial small-group meetings described in the petition.

87. Moreover, the February 6, 2025 meeting at which the district recommended closure of McCoy, Central, Furneaux, and Long to the Board was not properly noticed because “Facilities Masterplan Update” did not adequately inform the reader that the closure of specific schools would be recommended.

88. The public expressed overwhelming opposition at the time of the vote, but approval was effectively predetermined due to the prior private deliberations.

89. Because the approval of the Campus Consolidation Plan followed (and was the product of) TOMA violations-both inadequate notice and non-public deliberations-the resulting Board action is voidable under TOMA.

90. To any extent sovereign immunity is waived with respect to a declaration, Plaintiffs seek a declaration that Defendants violated TOMA and the resulting vote to close the schools was voidable.

VII. CONDITIONS PRECEDENT

91. All conditions precedent have been performed, have occurred, or have been excused.

PRAYER FOR RELIEF

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

- a) A writ of mandamus requiring Eldredge and Hatfield to cause sufficiently detailed descriptions of the public meeting topics to be included in the public notices of those meetings.
- b) A permanent injunction prohibiting Defendants deliberating public business by holding a series of small group meetings (*i.e.*, engaging in a walking quorum).
- c) An injunction prohibiting Defendants from deliberating public business by online messaging board or similar Internet application—specifically, the Google Q&A Document.
- d) Alternatively, a writ of mandamus requiring Defendants to make the communications viewable and searchable by the public, to maintain posts for a minimum of 30 days, and to otherwise comply with all requirements for the exception contained in Tex. Gov't Code § 551.006 to TOMA's general requirements.
- e) To any extent sovereign immunity is waived with respect to declaratory relief, Plaintiffs seek a declaration that Defendants violated TOMA and the resulting vote to close the schools was voidable.
- f) Reasonable Attorney Fees and Costs of court; and
- g) All other and further relief, both at law and in equity, to which Plaintiffs may be justly entitled.

Dated: May 22, 2026

Respectfully submitted,

/s/ R. Kent Piacenti

R. Kent Piacenti
Piacenti Law
8350 N. Central Expy.
Suite 1900, PMB 3169
Dallas, TX 75206
Tel: 214-888-3639
Fax: 214-396-2025
kent@piacentilaw.com

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 May 22, 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/ R. Kent Piacenti
R. Kent Piacenti

Exhibit A.1

Moore, Christopher "Chris"

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

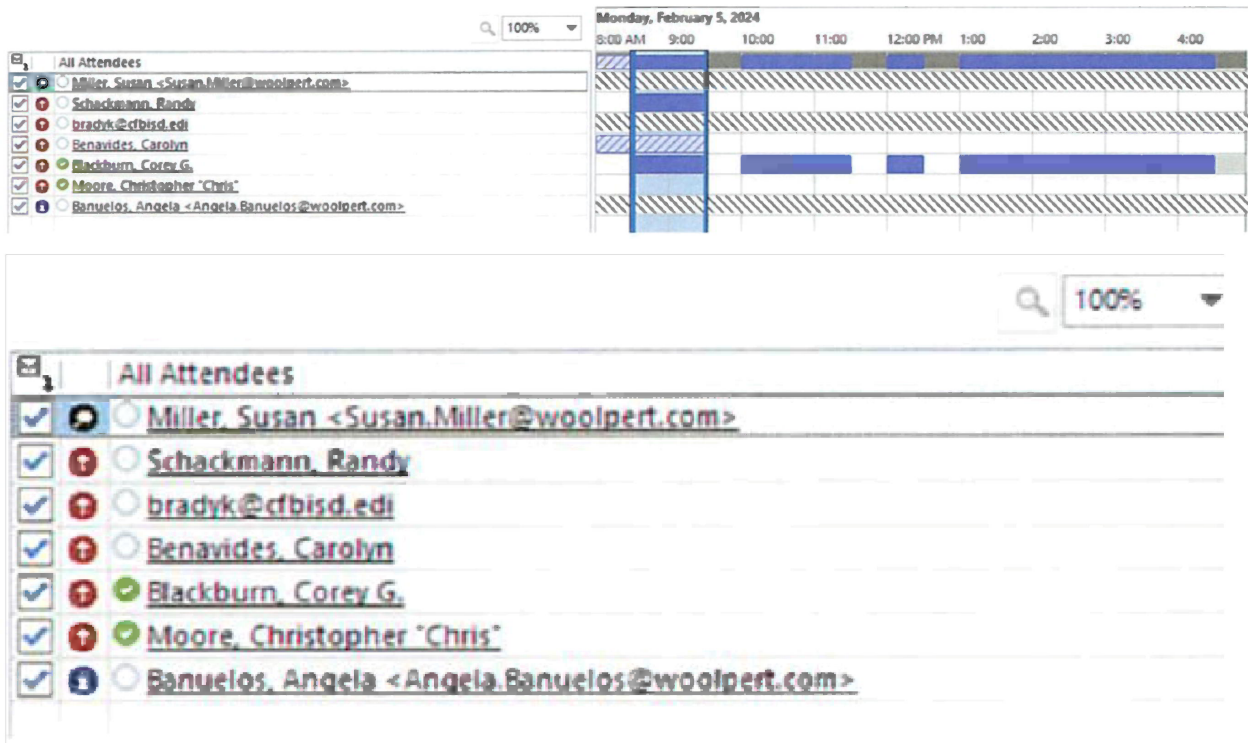


Exhibit A.2

Moore, Christopher "Chris"

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

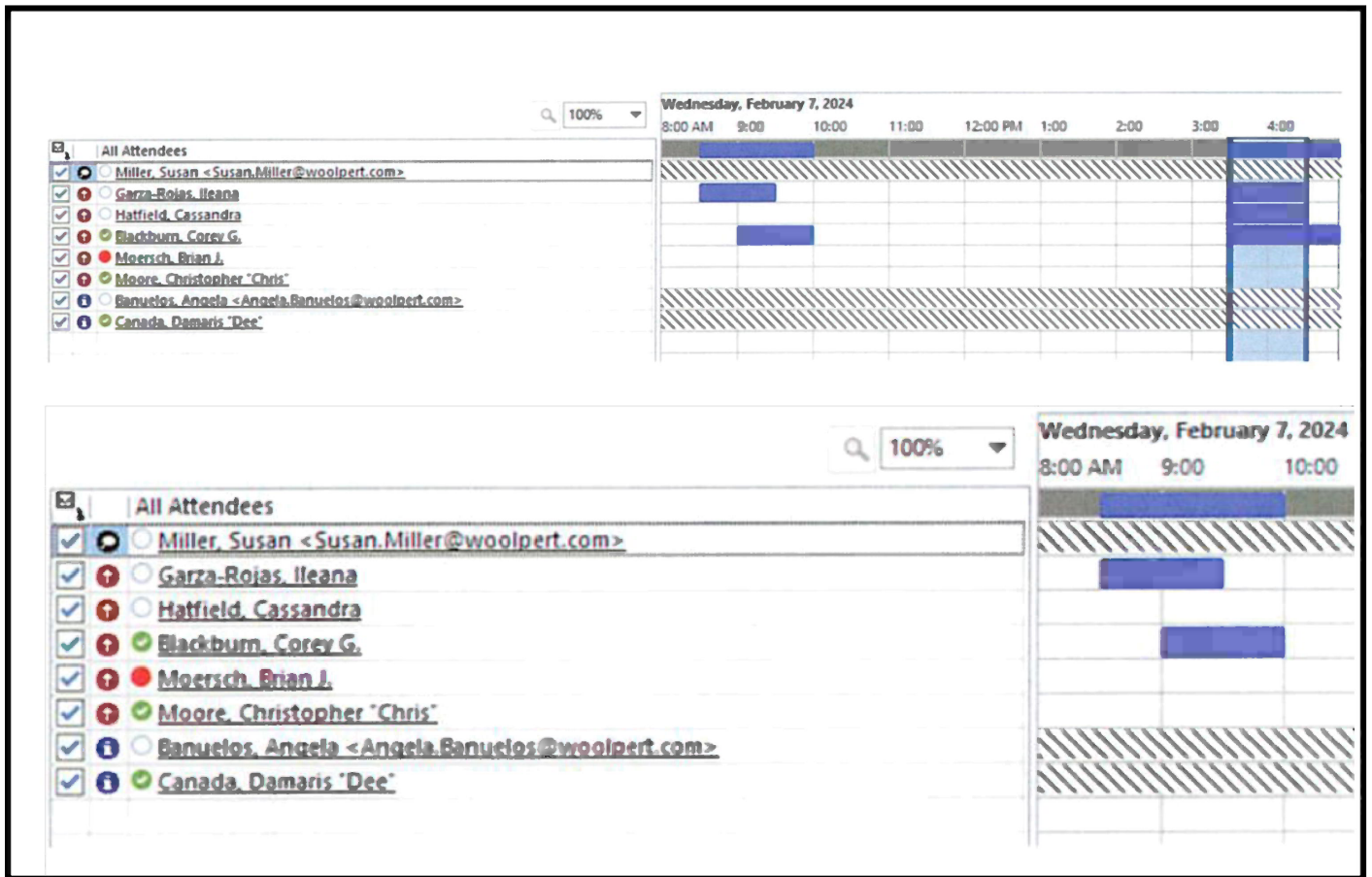


Exhibit A.3

Moore, Christopher "Chris"

Subject: **External Email**CFBISD - Meeting Board of Education FMP Overview
Location: <https://coopstrategies.zoom.us/j/86943701836?pwd=eBXDyjK6tYJndXkdTPgDmigbw2VCla.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=eBXDyjK6tYJndXkdTPgDmigbw2VCla.1>

Meeting ID: 869 4370 1836

Passcode: 455828

One tap mobile

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+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

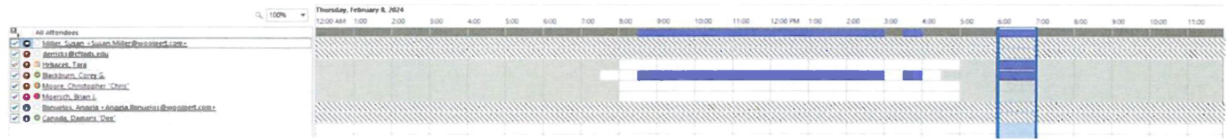


Exhibit B.1

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@pasatx.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@pasatx.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@pasatx.com>; Hamlin, Lance M.; Stout, Robin W.; Rodriguez, Caren I.; Cos, Donald "Dennis"

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

Date 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@pasatx.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@pasatx.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@pasatx.com>; Hamlin, Lance M.; Stout, Robin W.; Rodriguez, Caren I.; Cos, Donald "Dennis"

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.

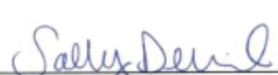
4. Adjournment

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

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 Moersch. 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.

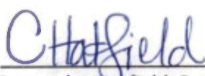
*The meeting recessed at 7:15pm.
Meeting reconvened at 7:25pm.*

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 Folklorico 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.

Automated Certificate of eService

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Donald Griffin Jr. on behalf of R. Piacenti
Bar No. 24083660
admin@piacentilaw.com
Envelope ID: 115285105
Filing Code Description: Amended Petition
Filing Description: 3RD
Status as of 5/26/2026 4:02 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Craig Wood		cwood@wabsa.com	5/22/2026 11:49:15 PM	SENT
Brian Morrow	24110136	b.thomas.morrow@gmail.com	5/22/2026 11:49:15 PM	SENT
Meredith Walker		mwalker@wabsa.com	5/22/2026 11:49:15 PM	SENT
Jerome Patterson		jpatterson@wabsa.com	5/22/2026 11:49:15 PM	SENT
Anjela Young		ayoung@wabsa.com	5/22/2026 11:49:15 PM	SENT
Cynthia Osborne		cosborne@wabsa.com	5/22/2026 11:49:15 PM	SENT
Jennifer Barling		jbarling@wabsa.com	5/22/2026 11:49:15 PM	SENT
Nicole Blaylock Thomas		nblaylockthomas@wabsa.com	5/22/2026 11:49:15 PM	SENT
Donald Griffin		admin@piacentilaw.com	5/22/2026 11:49:15 PM	SENT
Bethany Walters		bwalters@wabsa.com	5/22/2026 11:49:15 PM	ERROR
R. Kent Piacenti		kent@piacentilaw.com	5/22/2026 11:49:15 PM	SENT