

**Transmitted via Electronic Mail**

December 11, 2025

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**Re: The Inglewood Unified School District, Los Angeles County Office of Education, and California Department of Education's discriminatory school closures violate constitutional and statutory civil rights protections for students and laws guaranteeing public transparency in the operation of government agencies.**

Dear Attorney General Bonta:

We submit this formal complaint along with the President of the Inglewood Teachers Association, on behalf of Inglewood students, parents, and community members to urge the Bureau of Children's Justice ("BCJ") to investigate and take action regarding the Inglewood Unified School District's ("IUSD" or "District") ongoing school closures and neglect. IUSD's recent school closures under state receivership by the Los Angeles County Office of Education ("LACOE") and oversight from the California Department of Education ("CDE") have eliminated nearly half of the district's schools since 2018, disproportionately impacting students with disabilities, English learners, and other vulnerable students.<sup>1</sup> Entire neighborhoods have been left without a local school, creating "school deserts" while disrupting educational services. The closures have been accompanied by egregious procedural and equity failures, as District leadership made decisions without meaningful community engagement or proper analysis of impacts on high-need students, in clear violation of recently enacted state laws and Attorney General guidance. Unelected state-appointed administrators have also misused takeover powers to disband neighborhood schools without transparency, compounding decades of disinvestment, unsafe facilities, and neglected student services. We respectfully request that the BCJ investigate these practices and intervene to prevent further irreparable harm. We further ask that the Attorney General exercise his authority to require IUSD (and LACOE and CDE as its overseers) to rescind the unlawful and discriminatory closures and institute remedies to ensure equity and transparency going forward.

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<sup>1</sup> 2025 Inglewood Unified School District Report Card, pp. 1, 15–17 (ACLU SoCal/Inglewood Equity Coalition, Nov. 2025)

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### I. Complaint and Background

The **Inglewood Teachers Association** (“ITA”) is the union representing the teachers of the IUSD. Current ITA President John Hughes has worked in the District for over 30 years and is also an IUSD parent. IUSD has been under state receivership since 2012, the longest of any school district in California history. Rather than stabilizing the district, state and county administrators have overseen a cycle of budget deficits, exacerbated enrollment, deepened educational harm, eroded public trust, and closed nearly 50% of Inglewood’s schools.<sup>2</sup> This wave of closures has made IUSD one of the most rapidly disintegrating school systems in the state. IUSD’s harmful policies, fiscal mismanagement, and governance breakdowns continue to deny students access to the quality public education they deserve.

These closures have disproportionately impacted students with disabilities, English learners, and students of color while exacerbating gentrification. IUSD is the largest landowner in Inglewood, a city that hosted the Super Bowl inside the \$5.5 billion SoFi Stadium (the most expensive stadium in the world as of 2023).<sup>3</sup> Between 2016 and 2023, the average home price in the 90305 zip code where the SoFi stadium was built increased from \$506,300 to \$853,700, more than 20% above the countywide benchmark.<sup>4</sup> In this same neighborhood, the closure of Warren Lane Elementary created a “school desert” by removing the only elementary campus in a majority-Black neighborhood. A year after the world's most expensive basketball stadium opened in Inglewood in 2024 (Intuit Dome costing over 2 billion dollars), Morningside High School was closed nearby.

<sup>2</sup> IUSD Report Card, supra note 1, at 1. See map graphic.

<sup>3</sup> Forbes Magazine, [“LA Rams’ New \\$5 Billion Stadium Triggers Complaints Of Gentrification In Inglewood”](#) (2020)

<sup>4</sup> Capital B (2025) [“In LA, Olympic Dreams Lead to Nightmares for a Historic Black Community”](#)

## MAP AND LIST OF SCHOOLS (OPEN AND CLOSED) IN INGLEWOOD<sup>5</sup>

**X** = Closed Schools Since 2018 under State Receivership and LACOE Control (**12** of 25 or **48%**)



### **CLOSED/MERGED SCHOOLS AND CLOSURE YEAR**

- Freeman Elementary – 2013
- Monroe Magnet Middle – 2018
- ICEF Middle Charter – 2019 (Charter)
- Children of Promise Prep – 2020 (Charter)
- Today's Fresh Start – 2020 (Charter)
- Warren Lane (WL) Elementary – 2022
- Worthington Elementary – 2023
- Kelso Elementary – 2025 (Reopened at Warren Lane)
- Crozier Junior High – 2025
- Highland Elementary – 2025
- Hudnall Elementary – 2025
- Morningside High – 2025

### **OPEN SCHOOLS**

- Animo High (Charter)
- Bennett/Kew K-8
- Beulah Payne STEAM
- Centinela K-8
- City Honors High (Charter)
- Frank Parent Elementary
- Grace Hopper STEM (Charter)
- ICEF Elementary (Charter)
- Inglewood High
- Kelso Elementary – 2025 (Reopened at Warren Lane)
- La Tijera Academy (Charter)
- Oak Street Elementary
- Wilder's Prep K-8 (Charter)
- Woodworth-Monroe K-8

IUSD's remaining schools face large class sizes, staff shortages, unsafe facilities, and the highest chronic absenteeism in Los Angeles County.<sup>6</sup> Yet instead of addressing these inequities, state-appointed officials have doubled down on austerity by closing more schools despite nominal cost savings.

Inglewood families have experienced trauma and loss because of the actions of LACOE and state officials. One parent recounted: "When my daughter learned her school would close, she started crying and said, 'I'm going to miss my friends'... That school was our community. When it closed, it felt like they erased part of our history."<sup>7</sup> Students have lost beloved teachers and safe, walkable campuses. Parents report emotional distress, distrust, and disconnection.

In response to the closures, parents, students, educators, community members, and advocates have vehemently opposed the District's process and decisions while demanding IUSD, LACOE, the Fiscal Crisis and Management Assistance Team (FCMAT), and state officials do more to address the enrollment crisis. In recent years, the community has conducted more than 15 protests, rallies, walkouts, teach-ins, and townhalls related to closures.

<sup>5</sup> California Department of Education, Public Schools Database, "Closed Schools" (2018–2025).

<sup>6</sup> [CDE Dashboard 2023-24](#)

<sup>7</sup> Parent testimony from community focus groups, IUSD Report Card, supra note 1, at 10.



Community members have also collaborated on publications, complaints, and letters to try to protect their schools and communities:

- **Formal Complaints Filed:** Multiple Uniform Complaint Procedures (UCP) filings, including a 2024 complaint by community member Steven Fisher highlighted violations of AB 1912 and Education Code § 41329 for failing to conduct a genuine racial-equity analysis before closures.
- **Advocacy Letters Submitted:** Community and legal advocacy groups sent letters to LACOE, the California Department of Education, and the County Board of Supervisors, citing conflicts of interest, minimal compliance, and exclusion of public input throughout the process.
- **School Board Silence/Transparency Concerns:** Board meeting minutes confirm no agenda item or public discussion of the Equity Impact Analysis (EIA) prior to closure votes. The report was buried in a supplemental agenda and not made available in multiple languages.
- **Publications:** The Inglewood Coalition for Educational Equity and ACLU SoCal published the Inglewood Unified Report Card (2025), which compiled a list of 30 policies and practices related to school closures and students.<sup>8</sup> In a section titled “IUSD Issues, Policies, and Failures Related to School Closures” these policies and practices were organized around the five areas identified by community members: (1) School Closures, (2) Enrollment Decline, (3) Fiscal Management, (4) Governance and Trust, and (5) Student Impact. Some of the specific issues mentioned include broken promises of bond funds (K and GG), widespread fraud and fiscal mismanagement, transportation gaps, special education failures, and more directly related to state-appointed leadership.

#### A. LACOE and CDE Created the Conditions Used to Justify School Closures Through Years of State Mismanagement and Disinvestment

Inglewood Unified School District (IUSD) has been under state receivership since 2012, when the state issued a \$55 million emergency loan and removed the district’s elected board. In the 13 years since, IUSD has been governed by a succession of nine appointed administrators under the direct oversight of the

<sup>8</sup> IUSD Report Card, pp 7-9

California Department of Education (CDE) and Los Angeles County Office of Education (LACOE).<sup>9</sup> During this period, state officials and appointees repeatedly failed to address systemic barriers to student success, allowed deteriorating facilities despite hundreds of millions of dollars in local construction bonds, neglected special education services, and refused to address declining enrollment in and collaborative ways.

In 2017, FCMAT found that “systemic administrative turnover” and the absence of “long-term strategic planning” had “weakened accountability and performance.”<sup>10</sup> The 2023 FCMAT report found that, under LACOE state receivership, IUSD had not achieved progress in essential areas such as fiscal control, instructional quality, or governance capacity. Instead, the district was caught in a “cycle of instability” according to the agency.<sup>11</sup>

Rather than remedying these failures, LACOE oversaw the closure of nearly half of IUSD’s schools between 2018 and 2025, citing the very harms their mismanagement exacerbated (declining enrollment, fiscal distress, and deteriorating infrastructure). According to Inglewood educator and professor Dr. Cicely Roxanne Bingener, “State control was top-down and unresponsive. The revolving door of leadership and a compliance-driven culture created conditions where schools were destabilized and community trust was shattered.”<sup>12</sup>

These harms precisely reflect the dangers of school closures outlined in the Attorney General’s 2023 guidance and legislation like AB 1912: “Without adequate safeguards, closures may replicate or exacerbate longstanding patterns of underinvestment and disproportionately harm high-need student groups.”<sup>13</sup>

## **B. Receivership Mismanagement and Austerity Caused Ongoing Harm to All Students, with Disproportionate Effects on Students with Disabilities and English Learners**

Since receivership began in 2012, IUSD has operated under the direct oversight of state and county officials without an elected board or community-driven governance. Yet despite more than a decade of control by CDE and LACOE, essential academic, operational, and equity benchmarks have gone unmet. According to FCMAT, IUSD remains in fiscal distress and has not demonstrated sufficient progress to return to local control.<sup>14</sup> Throughout this period, students have faced a revolving door of administrators, deteriorating facilities, shrinking program offerings, and deep inequities in student support services that have exacerbated decreases in enrollment. As the following chart demonstrates, IUSD’s student outcome data falls well below state averages across essentially every category.

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<sup>9</sup> FCMAT, Inglewood USD Comprehensive Review, 2022

<sup>10</sup> FCMAT, Inglewood USD Report, July 2017, p. 4.

<sup>11</sup> FCMAT, 2023 Follow-Up Report, pp. 5–7.

<sup>12</sup> Bingener, Cicely Roxanne. "Counter-Narratives in a State-Controlled District," UCLA Dissertation, 2024, p. 62.

<sup>13</sup> AG Guidance, supra note 4, at 2.

<sup>14</sup> FCMAT reports 2013-2024 available online here

[https://www.inglewoodusd.com/apps/pages/index.jsp?uREC\\_ID=4454985&type=d&pREC\\_ID=1624946](https://www.inglewoodusd.com/apps/pages/index.jsp?uREC_ID=4454985&type=d&pREC_ID=1624946)

## INGLEWOOD COMPARED TO STATE AND COUNTY AVERAGES

| Metric   | IUSD (2023-24)   | State (CA) / County (LA)                                     |
|--|------------------|--|
| <b>Chronic Absenteeism Rate<sup>15</sup></b>                 | 43%              | 20.6 % CA<br>21.7% LA County                                 |
| <b>Math Proficiency<sup>16</sup><br/>(State Assessments)</b> | 16% met standard | 36% met standard (CA)<br>25% met standard (LA County/ LACOE) |
| <b>English / ELA Proficiency</b>                             | 29%              | 47% met standard (CA)<br>53% met standard (LA County/ LACOE) |
| <b>Graduation Rate<sup>17</sup></b>                          | 81%              | 87% CA<br>89% LA County                                      |
| <b>Class Size Average<br/>(Students per teacher)</b>         | 32.8             | 23.7 in CA<br>24.8 in LA County                              |
| <b>College Preparedness</b>                                  | 14.5% prepared   | 45% in CA<br>38% in LA County/ LACOE                         |
| <b>Appropriately Assigned<br/>Teachers<sup>18</sup></b>      | 75.6%            | 83.2% in CA<br>84.1% in LA County                            |

Critically, although the impact of these failures has been felt districtwide, the harm has been disproportionately felt by students with disabilities, English learners, and students of color. IUSD continues to operate with the highest teacher-to-student ratios in the county (33-to-1 in IUSD vs. 25-to-1 across LA County). IUSD also had the highest chronic absenteeism rate in LA County in 2023-24 with 43% students chronically absent. This was twice the state and county averages. Rates like this cost the district \$15-20 million in funding annually that could be used to serve students or keep community schools open. The following chart on the 10-year enrollment trends highlight troubling patterns under state-appointed leadership. Black students were disproportionately impacted.

<sup>15</sup> <https://dq.cde.ca.gov/dataquest/DQCensus/AttChrAbsRate.aspx?agglevel=District&cds=1964634&year=2023-24>

<sup>16</sup> <https://www.caschooldashboard.org/reports/1964634000000/2024/academic-performance#mathematics>

<sup>17</sup> <https://dq.cde.ca.gov/dataquest/dqcensus/Coh5YrOutcomeLevels.aspx?agglevel=county&year=2023-24&cds=19>

<sup>18</sup> <https://www.caschooldashboard.org/reports/1964634000000/2024/conditions-and-climate#priority1>

## 10-YEAR STUDENT ENROLLMENT TRENDS IN IUSD BY RACE

| Academic Year   | Total Students | Black       | Latinx      | Asian/Pacific Islander | White         | (%) All Students Decrease in Enrollment | (%) Black Student Decrease in Enrollment | Charter School Enrollment % of IUSD |
|-----------------|----------------|-------------|-------------|------------------------|---------------|---|--|-------------------------------------|
| 2024-25         | 8,241          | 3,004       | 4,838       | 108                    | 53            | -5.5%                                   | -6.3%                                    | 31.3%                               |
| 2023-24         | 8,724          | 3,206       | 5,117       | 116                    | 54            | -3.2%                                   | -0.9%                                    | 30.0%                               |
| 2022-23         | 9,011          | 3,235       | 5,381       | 126                    | 41            | -2.9%                                   | -4.3%                                    | 28.3%                               |
| 2021-22         | 9,279          | 3,381       | 5,520       | 130                    | 40            | -4.2%                                   | -7.0%                                    | 28.1%                               |
| 2020-21         | 9,683          | 3,636       | 5,706       | 115                    | 44            | -12.2%                                  | -16.0%                                   | 28.8%                               |
| 2019-20         | 11,026         | 4,329       | 6,326       | 105                    | 60            | -4.5%                                   | -7.2%                                    | 34.0%                               |
| 2018-19         | 11,542         | 4,665       | 6,506       | 124                    | 60            | -4.5%                                   | -3.8%                                    | 30.7%                               |
| 2017-18         | 12,086         | 4,848       | 6,936       | 112                    | 53            | -3.9%                                   | -1.1%                                    | 29.2%                               |
| 2016-17         | 12,570         | 4,902       | 7,285       | 114                    | 71            | -4.5%                                   | -5.8%                                    | 28.0%                               |
| 2015-16         | 13,162         | 5,202       | 7,602       | 132                    | 48            | -2.3%                                   | -4.5%                                    | 25.4%                               |
| 2014-15         | 13,469         | 5,447       | 7,670       | 139                    | 44            |   |  | 24.0%                               |
| 10 Year Trend # | -5,228         | -2,443      | -2,832      | -31                    | 9             |   |  |                                     |
| 10 Year Trend % | <b>-39%</b>    | <b>-45%</b> | <b>-37%</b> | <b>-22%</b>            | <b>(+)20%</b> |   |  |                                     |

Beyond the lagging student data, the District continues to struggle with culture, staff morale, and school climate. FCMAT issues annual reviews evaluating IUSD’s progress across five statutory recovery standards: pupil achievement, fiscal management, facilities, personnel, and governance.<sup>19</sup> Reports across the past decade paint a consistent picture: persistent operating deficits, inadequate workforce planning, deferred maintenance, enrollment collapse, and community mistrust. In 2022, FCMAT wrote to the community that “it is highly unusual for a district to still be at this stage of recovery after nine years.”<sup>20</sup> By 2024, FCMAT concluded that without consistent leadership and genuine community engagement, the district will “remain in a perilous position”.<sup>21</sup>

Some specific examples of leadership failures and neglect under state-appointed leadership include:

- At Oak Street and other sites, teachers reported repeated heating outages, gas leaks, and unsanitary conditions in special education classrooms—sometimes for months at a time.<sup>22</sup>
- Teachers and service providers reported unmanageable caseloads and disrupted IEP implementation following school closures and staff reductions.
- English Learner students were transferred between schools without consistent bilingual support or language development services, undermining continuity of instruction.
- The closing of Morningside High and merger with Inglewood High lacked a safety plan despite repeated demands and warnings from parents and educators. Unsurprisingly, the merger led to significant increases in violence and student trauma, especially among displaced students from rival campuses.<sup>23 24 25</sup>

<sup>19</sup> FCMAT Recovery Standards, Annual Reviews 2013–2024.

<sup>20</sup> FCMAT Community Letter (2022).

<sup>21</sup> FCMAT Recovery Standards, Annual Review 2024.

<sup>22</sup> Email from Inglewood Teachers Association President to Dr. James Morris (LACOE appointed administrator), Nov. 25, 2025 (see appendix).

<sup>23</sup> Inglewood Report Card 2025

<sup>24</sup> Email from Inglewood Teachers Association President to Dr. James Morris (LACOE appointed administrator), Nov. 25, 2025 (see appendix).

<sup>25</sup> ABC News, November 6, 2025, “Student stabs another student with pocket knife during altercation at high school in Inglewood” available here <https://abc7.com/post/student-stabs-another-pocket-knife-during-altercation-morningside-high-school-inglewood/18122350/>

As summarized in the IUSD Report Card, “State control in Inglewood has delivered neither financial stability nor academic improvement. Instead, it has eroded public trust, destabilized schools, and left high-need students without support.”<sup>26</sup> The harms of state-appointed leadership and LACOE have disproportionately impacted students with disabilities, English Learners, and other vulnerable students the California Attorney General issued specific guidance to support.

### **C. The State and IUSD Have Violated the Law**

The closures violate federal civil rights and state laws. Most fundamentally, these conditions reflect a sustained failure to provide constitutionally adequate educational opportunities under California law. In *Butt v. State of California*, the California Supreme Court held that the state may not “deny students their fundamental right to basic educational equality” by allowing local dysfunction to persist without effective intervention.<sup>27</sup> Here, the state has not only allowed such conditions to continue but has directly overseen and imposed them.

Further, the pattern of shutting down schools with high percentages of students with disabilities and English learners, while failing to analyze or mitigate those impacts, contravenes the California Government Code § 11135, Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), and Title VI of the Civil Rights Act of 1964. Finally, the District failed to comply with Education Code § 41329 and the requirements outlined in the California Attorney General’s 2023 guidance on school closures, which emphasize robust community engagement, transparency, and equity-focused decision-making.<sup>28</sup>

### **D. School Closures Were Implemented Without Adequate Equity Impact Analyses or Community Engagement in Violation of Education Code § 41329 and the Attorney General’s School Closure Guidance**

Under Education Code § 41329, districts under state receivership are required to conduct timely and transparent community engagement processes, including Equity Impact Analyses (“EIAs”), before finalizing school closure decisions. The legislature established these procedures to ensure that closures do not disproportionately harm vulnerable student populations and to guarantee that local stakeholders have a voice in their school districts’ restructuring. The Attorney General’s 2023 guidance further reinforces these obligations, emphasizing that equity impact assessments must be performed early in the process and include meaningful consultation with affected families, especially those with students receiving special education services or English language support.<sup>29</sup> The guidance warns that failure to adhere to these safeguards risks violating anti-discrimination laws and undermining public trust.

Despite these legal requirements, IUSD (under the authority of LACOE and with oversight by CDE) closed seven schools since 2022 without fully compliant Equity Impact Analyses. In multiple cases, such as the 2022 closure of Warren Lane Elementary and the 2023 closure of Worthington Elementary, EIAs were completed retroactively, conducted with limited public visibility, or closed against the recommendation of School Closure Committee. For example:

- The EIA for the 2023–25 closures was released only weeks before final decisions were announced, after the community had already mobilized in opposition.

<sup>26</sup> IUSD Report Card, supra note 1, at 13.

<sup>27</sup> *Butt v. State of California*, 4 Cal.4th 668 (1992).

<sup>28</sup> California Department of Justice, Guidance Regarding School Closures, Apr. 11, 2023, pp. 3–6.

<sup>29</sup> AG Guidance, supra note 4, at 3–5.

- Public meetings were held without adequate interpretation for non-English-speaking families, and key planning documents were not translated as required.
- No formal mitigation plans were developed to address the needs of students with disabilities or English learners displaced by the closures.

Families and educators repeatedly protested and testified that the process was rushed and predetermined. As one parent stated, “they asked for our input after everything was already decided. It wasn’t a conversation—it was a notification.”<sup>30</sup> In failing to comply with these procedural safeguards, LACOE and CDE not only violated Education Code § 41329, but also undermined the purpose of the Attorney General’s guidance. Equity and transparency are not optional during school reorganization.

### **EQUITY IMPACT ANALYSIS AND COMPLIANCE GAPS**

| <b>LEGAL REQUIREMENT</b>  | <b>WHAT THE LAW REQUIRES</b>   | <b>WHAT LACOE/ IUSD DID</b>  |
|---|--|--|
| <b>Equity Analysis AB 1912 (Education Code § 41329)</b>                     | Conduct an equity impact analysis before closing any school. Evaluate effects on whether closures exacerbate inequities.   | IUSD’s report was superficial and submitted only after major closure decisions were already announced.   |
| <b>Meaningful Community Engagement Under AB 1912 (§ 41329(a)(2)(A)-(C).</b> | Review how public input was incorporated into the final recommendation as well as a resolution concluding that the community engagement process was complete.  | Closure meetings held without adequate participatory sessions and resolution adoptions.  |
| <b>Government Code § 1090</b>   | Public officials, employees, and consultants involved in preparing or advising on district decisions (such as closure or property plans) must act independently from any entity that could benefit financially from decisions. | The contracting firm that authored the equity analysis had also been involved in earlier District reorganization work (self-dealing) and is named in community complaints. |
| <b>Title VI of the Civil Rights Act (42 U.S.C. § 2000d)</b>                 | Prohibits recipients of federal funds from using policies or actions that have a disparate racial impact.  | No consideration of disparate impact despite initial closures disproportionately affecting Black-majority schools and students with disabilities.                          |

### **E. Students with Disabilities Were Disproportionately Harmed by School Closures in Violation of California Law, the ADA, Section 504, and IDEA.**

Students with disabilities (SwD) were disproportionately impacted by IUSD’s school closures, in direct violation of California Government Code § 11135, the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), and. These laws

<sup>30</sup> IUSD Report Card, supra note 1, at 10.

prohibit school districts from discriminating against students with disabilities and mandate the provision of equal access to educational services in the least restrictive environment.

Furthermore, under the Attorney General’s 2023 guidance, school districts must “identify and evaluate the specific and disproportionate impact school closures may have on students with disabilities, including in relation to the provision of services under the IDEA and Section 504.”<sup>31</sup> The guidance requires robust planning and communication with families to ensure service continuity and compliance with each student’s Individualized Education Program (IEP). In violation of these mandates, IUSD/LACOE failed to evaluate, disclose, or mitigate the adverse impact of school closures on students with disabilities. To the contrary, the district closed schools serving the most students with disabilities.

According to 2024–25 CDE enrollment data, 15% of students in IUSD are identified as students with disabilities. Yet many of the schools selected for closure had substantially higher percentages:

- Morningside High School: 23% SwD (highest in the district)
- Kelso Elementary: 21% SwD (highest of any K-8 school in the district)
- Hudnall Elementary: 18% SwD (highest of any elementary school in the district)
- Warren Lane Elementary: 18% SwD (highest of any elementary school at the time)

Across the seven schools closed since 2022, 18% of the 1,908 students impacted by closure were students with disabilities. This represents a nearly 29% higher concentration of SwD students compared to schools that remained open (14%) in the closed schools than in the district average.<sup>32</sup>

IUSD failed to produce plans for preserving inclusive placements or ensuring comparable services in receiving schools. Educators report that students with IEPs were reassigned without team consultation, placed into overcrowded classrooms lacking trained staff, and separated from peers, aides, and settings that had previously supported their success.

One special education teacher explained: “They closed our school in the middle of the year. I had to call parents myself because the district didn’t communicate. None of the IEPs had updated placements. It was chaos.”<sup>33</sup> These failures deprived students of a Free Appropriate Public Education (FAPE) under federal and state law and exposed them to unnecessary disruption and harm. The Inglewood Coalition for Education Equity is currently working with IUSD parents and community members to file state complaints related to IDEA violations and harms to specific students.

#### **F. English Learners Were Disproportionately Impacted by Closures Without Legal Safeguards or Language Access, in Violation of State and Federal Law**

English Learners (“ELs”) also bore a disproportionate burden from IUSD’s school closures. Under federal and state law, including the Equal Educational Opportunities Act of 1974 (EEOA), Title VI of the Civil Rights Act of 1964, and California Government Code § 11135, districts must take appropriate action to ensure EL students can participate meaningfully in educational programs. California Education Code further requires robust language access and notice for families with limited English proficiency. Under LACOE’s leadership, EL students were disproportionately harmed by school closures with limited consideration.

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<sup>31</sup> AG Guidance, supra note 4, at 5.

<sup>32</sup> CDE Enrollment Data, 2022-2025

<sup>33</sup> Focus Group Transcript, IUSD Report Card Project, 2025, on file with authors.

According to 2025 CDE data, English Learner students make up approximately 21% of IUSD's total enrollment. Yet several of the schools selected for closure had much higher percentages:

- Worthington Elementary: 47% EL (highest in the district at time of its closure in 2023)
- Hudnall Elementary: 39% EL (highest in the district at time of its closure in 2025)
- Morningside High School: 35% EL (3<sup>rd</sup> highest in the district at time of its closure in 2023)
- Highland Elementary: 24% EL

The district failed to assess the impact of these closures on EL students or to offer meaningful plans to preserve bilingual services, dual-language immersion programs, or appropriate placement in receiving schools. For example, Worthington hosted one of IUSD's few bilingual immersion strands before its closure in 2023. Some support was offered in response to parent and community outcry *after* the school was closed.

In multiple cases, notices and public meetings related to closures were not adequately translated, and interpretation was either unavailable or insufficient. The Attorney General's 2023 guidance specifically requires that districts "engage meaningfully with English learner families and provide accessible communication about proposed closures."<sup>34</sup> IUSD failed to meet these standards. Parents reported being excluded from meetings or receiving incomplete information in their preferred language. One EL parent shared: "They didn't translate the documents. I didn't know my son's school was closing until another parent told me. We never got a chance to speak."<sup>35</sup> Ultimately, these failures violate both procedural and substantive legal obligations while placing EL students at risk of academic regression and language reclassification errors.

## II. Requested Remedies and Relief

In light of the violations detailed above, we respectfully request that the Bureau of Children's Justice investigate the actions of LACOE, CDE, and IUSD and exercise its authority to issue corrective orders and guidance as appropriate.

Specifically, we ask that the Attorney General's Office:

1. **Require a moratorium on school closures** and prevent any further closures or consolidations until all procedural and equity requirements under the AG guidance, state law, and federal disability law are fully met.
2. **Require LACOE and CDE to rescind past closures** that violated legal mandates, with particular attention to schools serving disproportionately high percentages of students with disabilities or English learners. Kelso Elementary reopened in 2025 after being ordered closed, and this can happen with other schools.
3. **Ensure appropriate compensatory services and remedies** for students whose IEPs or language development supports were disrupted as a result of closure-related displacement.
4. **Mandate a full and independent audit** of IUSD's facilities, special education services, and EL programming to assess compliance with the ADA, Section 504, IDEA, EEOA, and state law.
5. **Initiate structural reform of state receivership authority**, including the development of transparency and accountability mechanisms to ensure community oversight, legal compliance, and educational equity while under state control.

<sup>34</sup> AG Guidance, supra note 4, at 4.

<sup>35</sup> Parent testimony, IUSD Report Card, supra note 1, at 11.

6. **Enforce community engagement protocols** as defined under Education Code § 41329.3, the AG's school closure guidance, and Government Code § 11135, including culturally and linguistically appropriate communication.
7. **Issue additional guidance statewide** to reaffirm that school closures must comply with all federal and state civil rights protections, and that closure cannot be used as a substitute for meaningful investment in school improvement.

Students in Inglewood deserve more than austerity and administrative churn. They deserve safe, fully resourced schools and a fair, transparent process for decisions that shape their futures. We urge your office to act with urgency and resolve.

Respectfully submitted,

John Hughes  
President of Inglewood Teachers Association  
Inglewood Unified Parent

Amir Whitaker, Senior Policy Counsel  
ACLU of Southern California

\*Not admitted in California; admitted to practice law in Florida and selected federal courts.

Victor Leung  
Chief Legal and Advocacy Officer / Senior Staff Attorney  
ACLU of Southern California

cc: Los Angeles County Office of Education  
California Department of Education  
Inglewood Unified School District

### III. Appendixes

The following supporting documents and evidence are included to substantiate the claims in this complaint:

#### **Appendix A. Mexican American Bar Association (MABA) of LA County Statement Regarding School Closures in Inglewood (April 2024)**



“MABA...denounces the Inglewood Unified School District's decision to close five (5) schools... MABA opposes the closures as they would effectively deprive Inglewood's majority Black and Latinx student population from access to an equitable education. On March 20, 2024, County Administrator Dr. James Morris, the district's sole decision-maker, announced his plans to close [5 schools]. The announcement comes less than one (1) year after the District's closure of Worthington Elementary School in 2023 and after the closure of Warren Lane Elementary School in 2022. The number of school closures is

startling and unprecedented.

The District has been under state receivership since 2012. Inglewood's Board of Education serves only as an advisory board with no governing authority. In effect, the Los Angeles County Office of Education's appointed leader (and County Administrator), Dr. James Morris, possesses sole authority over the district, with no meaningful checks and balances in place for the local community. Dr. Morris has unilaterally decided to focus on school closures as a remedy to deal with the District's financial woes despite both opposition by local community members and disagreement from the County Administrator's handpicked School Closure Committee.

MABA implores local political and business leadership to find alternative solutions to address the challenges faced by the Inglewood Unified School District that do not deny Inglewood students access to a school in their community.”

## Appendix B: 13 Years Of Local Reporting On IUSD Under State Receivership

Local award-winning journalists 2UrbanGirls Media have published dozens of articles on IUSD. Here's twelve years of reporting from 2013–2025. **Headlines are bold** and reflect years of failure, neglect and frustration from the community as transparency issues and gentrification dominate.

- Dec 2013 “Morningside High School alumni step in to save the schools’ football program.” ([\*\*\*Good things happening in the Inglewood Unified School District\*\*\*](#))
- July 2014 “Parents of IUSD are being denied an opportunity to keep their district accountable... committee voted against transparency.” - Sen. Bob Huff. ([\*\*\*Legislative Audit Committee kills audit of IUSD\*\*\*](#))
- June 2015 Instability in state oversight [\*\*\*IUSD Unified State Trustee announces his resignation.\*\*\*](#)
- July 2015 Teachers Union communication highlighting workload, morale, and resource gaps under state management. ([\*\*\*Inglewood Teachers Association wants you to know\*\*\*](#))
- March 2016 “IUSD shows no signs of recovery under State control.” FCMAT identifies fraud in practices of state-appointed superintendent Dr. Brann ([\*\*\*IUSD Legislative Hearing\*\*\*](#))
- April 2016 “[\*\*\*Inglewood Unified State Administrator works to make progress\*\*\*](#)”
- March 2017 “[\*\*\*Will ‘underutilized’ IUSD property become housing?\*\*\*](#)”
- March 2017 “Four years ago, voters passed a \$90M bond to repair our schools — where did it go?” ([\*\*\*How is Inglewood unified spending Inglewood residents tax money?\*\*\*](#))
- April 2017 “IUSD qualified for \$118M in funds — state administrators secured only \$44M, forfeiting \$74M.” ([\*\*\*State administrators allowed Inglewood unified to be out of compliance with state requirements\*\*\*](#))
- July 2017 “[\*\*\*Inglewood Unified gets its sixth state-appointed administrator\*\*\*](#)”
- April 2019 “[\*\*\*IUSD schools continue to suffer despite billion dollar NFL investment in city\*\*\*](#)”
- July 2019 “[\*\*\*Inglewood unified state administrator announces retirement\*\*\*](#)”
- Jan 2020 “[\*\*\*Inglewood unified prepares to lease out portion of land at Morningside high\*\*\*](#)”
- Feb 2020 “[\*\*\*Inglewood unified cracks down on low performing charter schools\*\*\*](#)”
- April 2020 “[\*\*\*CDE should move forward with closing Today’s Fresh Start\*\*\*](#)”
- Oct 2020 “[\*\*\*IUSD is a dysfunctional nightmare\*\*\*](#)” Parent/employee letter describing chaos.
- Oct 2020 “[\*\*\*Racial discrimination continues to fester in Inglewood Unified\*\*\*](#)”
- March 2021 “[\*\*\*Were Inglewood unified ... administrators involved in corruption coverup\*\*\*](#)”
- April 2021 “[\*\*\*Op-ed: IUSD is going through an ethnic cleansing of Black employees\*\*\*](#)”
- Sep 2021 “[\*\*\*Op-ed: Inglewood unified makes questionable new hire\*\*\*](#)”
- Oct 2021 “[\*\*\*IUSD school could be a casualty of the proposed transit connector\*\*\*](#)”
- March 2022 “[\*\*\*IUSD cuts video after residents speak out against pending school closure\*\*\*](#)”
- April 2022 “[\*\*\*Inglewood taxpayers deserve better from the County Administrator\*\*\*](#)”
- May 2022 “[\*\*\*IUSD sits on millions in developers fees\*\*\*](#)” also “[\*\*\*school closure doesn’t pass the smell test\*\*\*](#)”
- Oct 3, 2022 “[\*\*\*County Administrator resigns from IUSD\*\*\*](#)” Town hall met with frustration.
- Mar 13, 2023 “LACOE is forcing IUSD to shut Worthington; Morris disregarded the vote to keep it open.” ([\*\*\*Students to stage sit-in at Inglewood Unified District Office\*\*\*](#))
- Mar 24, 2023 ([\*\*\*Inglewood school board meeting erupts into chaos during vote on school closure\*\*\*](#))
- Sep 2023 “[\*\*\*Letter: IUSD quietly sells portion of Morningside High School to the Clippers\*\*\*](#)”
- Dec 11, 2023 “Fifty students do not have a teacher, three classes unmanned.” ([\*\*\*Parent Letter: Students without teachers in Inglewood Unified School District\*\*\*](#))
- Jan 29, 2024 “[\*\*\*County administrator paints grim outlook for district’s future\*\*\*](#)”
- Mar 21, 2024 “[\*\*\*Inglewood announces closure of 5 schools\*\*\*](#)”
- Apr 4, 2024 “[\*\*\*Letter: Inglewood school closures are a true ‘bloodbath’\*\*\*](#)”
- Mar 9, 2025 “[\*\*\*Letter: LAUSD to coordinate student transfers out of IUSD\*\*\*](#)”

- **Jul 31, 2025** “Thirty kids in kindergarten... Morris is failing IUSD.” Parent [Op-ed: “Is County Administrator James Morris good for IUSD”](#)

## Appendix C. UCLA Case Study On Inglewood & Oakland School Closures

A 2023 UCLA report examined the social, fiscal, and governance impacts of declining enrollment and school closures in Inglewood and Oakland.<sup>36</sup> Drawing on interviews, focus groups, and community meetings, it documents the lived experiences of students and families while identifying policies to prevent future harm and rebuild public trust. **RESEARCH QUESTION:** “How can the State of California and local school districts mitigate the impacts of declining public school enrollment to avoid school closures?”

**1. Declining Enrollment & Fiscal Distress:** More than a decade of state receivership left IUSD financially unstable, with chronic deficits and repeated school closures in predominantly Black and Brown neighborhoods. Families described a cycle of revolving administrators and austerity measures that never addressed root causes. *“Every year it’s a new administrator, a new plan, but nothing changes for the kids.”* **RECOMMENDATIONS:** End indefinite state takeovers; require transparent fiscal recovery plans; restore local control through democratic governance and participatory budgeting.

**2. Gentrification & Displacement:** School closures clustered near the SoFi Stadium redevelopment zone, where rising rents and housing loss displaced families and drove down enrollment. Participants saw education and housing instability as intertwined forces. *“We’re being pushed out twice — from our homes and from our schools... they find money for stadiums, not for classrooms.”* **RECOMMENDATIONS:** Adopt anti-displacement policies linking housing and education; align redevelopment with community benefit agreements; provide equitable state funding to protect neighborhood schools.

**3. Community Voice & Governance:** Families and educators described the closure process as top-down and racially exclusionary, controlled by state appointees “who did not know the community.” The lack of local accountability and democratic participation deepened mistrust. *“How can we have hope when the state runs our schools like a dictatorship? We can’t even vote out the person making decisions.”* **RECOMMENDATIONS:** Require community-led closure committees; include students and parents as voting members; mandate public reporting and audits of administrator decisions.

**4. School Closures & Trauma:** Students and families reported stress, grief, and instability, losing familiar teachers, friends, and safe spaces that anchored their neighborhoods. *“When my daughter found out they were going to close the school, she started crying and said, ‘I’m going to miss my friends.’ Parents had no answers.”* *“That school was our community. When it closed, it felt like they erased part of our history.”* **RECOMMENDATIONS:** Conduct impact assessments before closures; provide mental-health counseling, transportation, and transition supports for students.

**5. Structural Inequity & Accountability:** Persistent inequities in resource allocation and facility conditions undermined recovery. Families voiced frustration that schools were labeled “underutilized” after years of disinvestment. *“They’ve been intentionally neglecting our public schools for years. It’s not that families don’t care, it’s that leadership doesn’t invest...they deliberately haven’t sent any money. Then they call us ‘underutilized.’”* **RECOMMENDATIONS:** Increase oversight of state administrators; require annual public audits; invest in Community Schools as stable, long-term alternatives to closures.

**6. Reimagining Public Schools for Black & Latinx Students:** Schools that affirm cultural identity, heal trauma, and rebuild trust through creative, student-centered learning. **RECOMMENDATIONS:** Expand

<sup>36</sup> Imelda Islas, Monica Mata, Nancy Olivares, Xochitl Lopez, and Yaritza Gonzalez *When a School Closes: The Impacts of Declining Public School Enrollment on Funding, Governance, and Communities in California—A Case Study of Inglewood and Oakland Unified School Districts*. UCLA Luskin School of Public Affairs, Applied Policy Project (2023).

Community Schools and culturally sustaining, abolitionist curricula; prioritize Black and Latinx student success through equitable staffing, restorative practices, and local partnership.

## **APPENDIX D. ITA Letter to Dr. James Morris (Nov. 25, 2025)**

On Tue, Nov 25, 2025 at 11:35 AM ITAPresident

Dear Dr. Morris,

I am writing to clearly and directly convey the priorities and unresolved concerns of our ITA members. These issues are serious, ongoing, and require immediate administrative action.

### **1. Safety**

Safety remains inadequately and inconsistently addressed at the site level. While I acknowledge the meeting you led last Tuesday at IHSU in effort to address the] safety issues is a beginning, it did not resolve the core concerns regarding the lack of effective planning, oversight, and leadership on campus. Members continue to report that essential decisions are being deferred to others—Dr. Sirls, Dr. Cain, Dr. Hosea, or cabinet—rather than being addressed by the site principal.

The absence of direct responsibility and accountability from the site principal, Dr. Collins, is a persistent concern. Members describe him as personable; however, they also report a lack of confidence in his ability to lead, to make informed decisions, and to respond appropriately to safety-related incidents.

In addition, **a member has reported on two separate occasions that Dr. Collins appeared to have alcohol on his breath.** This is a serious matter. If there is a wellness issue or personal difficulty that requires support, intervention is necessary for his wellbeing and for the stability and safety of the school community. These concerns, combined with previous failures to communicate violent incidents in a timely and transparent manner, can no longer be overlooked or minimized.

When we met to discuss the stabbing incident—two weeks after it occurred—the site’s focus was directed toward classroom management, lesson plans, and “engagement.” Our focus was and continues to be the unresolved systemic safety failures, including the delayed collection of witness accounts and the ongoing lack of protocols that protect students and staff. These gaps require your leadership and immediate corrective action.

### **2. Facilities**

The facilities issues at Oak Street mirror the unacceptable conditions that Kelso teachers endured last year. The situation remains unresolved, and the lack of urgency is unacceptable.

Below is the email I received from the site representative:

#### **Oak Street Bathrooms – Email from Site Representative**

*November 20, 2025*

“Hey John, wasn’t able to share tonight — we’re in dire straits at Oak. We have been sharing one adult bathroom for the last few weeks due to plumbing issues. The district keeps sending maintenance staff to snake the pipes, but they either don’t have the right equipment or the necessary expertise. These are not licensed plumbers. Is this something you can get behind?”

At OWL the Special Education Offices, there is no heat in our office. We discovered a gas leak. The gas has been shut off however the breaker panels are very old and cannot sustain the increase in current when electric heaters are turned on. This problem is not new. What’s frustrating is the investment in installing a rod iron security gate, upgrades to the airconditioning of the room where the server is located in

preparation for when the district offices will be moved. However, no concern shown for the working conditions for those of us who are there now.

Staff should not have to endure these conditions. Immediate, professional, and permanent solutions are required—not temporary fixes that repeatedly fail.

### **3. Communication and Accountability**

Across multiple sites, members report a pattern of delayed communication, incomplete information, and inconsistent follow-through from site and district leadership. These communication failures erode trust and directly impact staff morale, safety, and operational stability.

When incidents occur—whether safety-related, facilities-related, payment related, or otherwise—timely, accurate, and transparent communication must be the standard, not the exception. Staff cannot continue functioning in an environment where critical information is withheld, delayed, or only addressed after pressure is applied. This lack of accountability from leadership is unacceptable and must be corrected immediately.

### **Conclusion and Expectations**

Our members have been patient, professional, and solution-oriented. However, the conditions described above have persisted far too long and have repeatedly gone unaddressed at the site level. These issues require immediate, decisive action from district leadership.

#### **We expect the following:**

1. **Immediate intervention and oversight regarding the leadership and safety issues at IHSU.**

These concerns—including the reports from a member on two separate occasions that Dr. Collins appeared to have alcohol on his breath—must be taken seriously, evaluated promptly, and addressed appropriately.

2. **A permanent facilities solution at Oak Street**, implemented by qualified professionals, not temporary measures by staff lacking proper licensure.

3. **Clear, consistent, and timely communication from district leadership** whenever incidents occur, along with transparency regarding corrective actions.

These issues are not isolated. They reflect systemic problems that affect the daily working conditions of our certificated staff and the educational environment for students. Our members deserve leadership that is attentive, accountable, and proactive—not reactive only when pressure is applied.

We are requesting your direct involvement to ensure these matters are resolved. Our expectation is that Human Resources, Business Services, and site leadership will collaborate immediately and produce concrete, timely solutions.

I look forward to your prompt response.

Respectfully,

John Hughes

President ITA