STATE OF MAINE

SPECIAL EDUCATION DUE PROCESS HEARING DECISION

February 19, 2001

Cases #00.333/00.356, Parent v. MSAD 59

REPRESENTING THE PARENTS:	Richard L. O'Meara, Esq.
REPRESENTING THE SCHOOL:	Eric R. Herlan, Esq.
HEARING OFFICER:	Peter H. Stewart, Esq.

I. Preliminary Statement

While the factual findings are set out in greater detail in a separate section of this decision, it is useful to have a factual framework against which to consider the arguments of the parties to this dispute. Last fall, the student was suspected of possessing and selling illegal drugs on school property. The student was suspended from school while school officials investigated the matter.

On the evening of November 20, the last day of the student's ten-day suspension, the MSAD 59 school board voted to expel the student for the remainder of the school year. No manifestation hearing was held at this meeting. On the morning of November 21, the school began attempts to contact the student's parents to schedule a PET to make the manifestation determination and, if necessary, design an IEP to be provided to the student while he was out of school. The school did not

hear from the parents. On November 28, the school scheduled a PET meeting for December 11, 2000. The parents attended. At the meeting, which was held over the objection of the parents, the PET determined that the behavior at issue was not a manifestation of the student's disability. Consequently, the PET went on to develop an IEP for the student for the period of his expulsion.

The parents have filed two separate due process hearing requests. In case # 00.333, the parents assert that the school's decision to expel the student without first undertaking a manifestation determination review violates state and federal law. In case # 00.356, the parents challenge the PET as untimely and illegal, challenge the manifestation determination as incorrect and challenge the content of the IEP as inadequate. The two cases were consolidated for hearing.

A.

The parents assert that the school's expulsion of their son is illegal and should be annulled. They believe their son should be returned to school, free of any expulsion order, and offer a variety of arguments to support their position . First, the parents contend that the school made the decision to expel the student before it conducted any manifestation review, that is, considered the question of whether the behavior at issue - a drug sale on school property – was a manifestation of the student's learning disability. The parents assert that this action violates federal law and regulations that require a manifestation determination review to

be made prior to the imposition of any discipline upon a student with disabilities. Second, the parents argue that the school did not give the parents appropriate notice of a change in placement, or the accompanying procedural safeguards, as required by the federal regulations. These reasons alone require that the expulsion be annulled and the student be returned to school.

The parents further assert that the school failed to meet two critical deadlines set out in the federal/state scheme. First, the school failed to conduct a functional behavioral assessment of the student within the 10 business day time period set forth in the federal regulations; second, the school failed to hold a manifestation review meeting within 10 school days from the day the decision to change the student's placement occurred.

The parents also argue that the school cannot convert its "illegal" expulsion of the student into a "legal" 45-day interim alternative educational placement, pursuant to 34 CFR 300.520(a)(2), after the fact, as it attempts to do here. Further, even if the school could do such a thing, here it has again failed to comply with critical legal and regulatory requirements that attach to an interim alternative educational placement.

The parents submit two additional arguments to challenge the school's treatment of their son. The parents assert that the school did not carry its burden to prove that the behavior for which the student was

expelled was not a manifestation of his disability. And, finally, the parents contend that the IEP developed by the December 11th PET fails to provide the student with a free appropriate public education, as required by both federal and state law.

For remedy, the parents ask the hearing officer to annul the expulsion order and return the student to school, to expunge the expulsion from the student's school records, to order compensatory education for the student, and to require that the student's IEP be reviewed and enhanced to address all his current educational needs.

B.

The school, while admitting that the school board voted to expel the student prior to any manifestation determination review, rejects the parent's argument that the expulsion decision and subsequent events violate either state or federal special education law. The school asserts that both school officials and the parents knew, on the evening the school board voted to expel the student, that a manifestation determination review would have to be made, and that the student's program and placement would depend on the results of that review. The school argues that the procedure followed by the school in the process of making the manifestation determination did not depart from the regulatory requirements in any way sufficient to trigger remedial action for a violation of either state or federal law. Further, the school contends that the determination itself – that the sale of illegal drugs at school was

not a manifestation of the student's language based learning disability – was correct and that the IEP developed at the December 11 PET provided an appropriate education for the student.

In conclusion, the school asserts that none of its actions over the period relevant to this matter infringed upon the guarantee of a free and appropriate education contained in federal or state law. Therefore, the school argues, the expulsion should stand, and the student should be educated pursuant to the IEP developed by the December 11 PET.

II. ISSUES

Did the any of the actions of the school deprive the student of a free and appropriate public education?

A. Did the school violate the federal or state special education law when it expelled the student on November 20, 2000, prior to conducting a manifestation determination review?

B. Did the Pupil Evaluation Team violate federal or state special education law when it determined, on December 11, that the behavior for which the student was disciplined, the possession and sale of illegal drugs at school, was not a manifestation of the student's language based learning disability?

C. Did the Individualized Educational Program developed by the PET on December 11 provide an appropriate education as required by federal or state special education law?

III. FINDINGS OF FACT

1. The student is in the eighth grade and has been receiving special education services for his language based learning disability since the beginning of his sixth grade year. (Testimony of Irene Christopher)
2. None of the student's IEP's has contained goals of controlling behavior or impulsivity, or a behavior intervention plan. (Record at 49, 2000-2001 IEP; Record at 75, 1999-2000 IEP) (Hereinafter, the "Record" will be referred to as "R".)
3. Prior to this proceeding, none of the student's IEPs had been appealed. (Testimony of Irene Christopher)
4. The student's behavior at school was generally good. He was by all accounts a good kid in school, a social, friendly, personable, helpful, polite, respectful, happy student with lots of friends. He was regarded as a positive role model for other students. In eighth grade, the student failed to complete at least one assignment. He also seemed tired and inattentive in math class, a fact the student said was related

to fatigue from football practivce. (Testimony of Irene Christopher, Frances Peters, Mark Campbell, and the student's mother.)

5. The student had a clean disciplinary record in the sixth and seventh grades. The single exception was an incident in his seventh grade year when the student was involved in a beer drinking incident on a school bus with other football team members returning from a game. The student was clearly capable of distinguishing right from wrong, and of conforming his behavior to acceptable standards (Testimony of Rebecca Bellefleur, Frances Peters, Mark Campbell, and the student's mother.)

6. In November 2000, the student was suspended from school for ten days for "being in possession of and accepting money considerations for marijuana in the school", pursuant to school policy. The student was suspended from school on November 6, 7, 8, 9, 13, 14, 15, 16, 17, and 20. The investigation into the marijuana incident was conducted by Mark Campbell, principal of the school. He interviewed the participants, including the student, and concluded that the student had brought the marijuana to school, had knowingly given it to another student for resale to a third student, had left the second floor library to meet the two aforementioned

students in a first floor bathroom where he was paid, and some unsold portion of the marijuana was returned to him. Mark Campbell listened to, but did not believe, the student's explanation of those events. (Testimony of Mark Campbell and Irene Christopher; R- 39.)

7. On the evening of November 20, 2000, the school board met, received and discussed the investigation done by the school into the possession/sale of marijuana in the school by the student and voted to expel the student for the remainder of the school year. (Testimony of Mark Campbell, Irene Christopher, and the student's mother.)

8. Two other students were involved in the marijuana incident. Both were disciplined by the school board on November 20. The "buyer" of the marijuana was expelled from school and the third student, who functioned as a sort of "middleman", received a long-term suspension for his role in the transaction. (Testimony of Mark Campbell)

9. At its meeting on November 20, 2000, the school board did not conduct a manifestation determination review before imposing the discipline on the student. (Testimony of Irene Christopher)

10. After the school board meeting on November 20, the student's mother and Irene Christopher, the special

education director of the school, spoke about the need to conduct a manifestation hearing within ten days. (Testimony of Irene Christopher and the student's mother.)

11. On the morning of November 21, Irene Christopher and the student's mother talked about a convenient day and time to schedule a PET to conduct the manifestation determination review. Ms. Christopher suggested three possible dates for the PET. The mother did not then agree to any of the dates; she said she had to discuss the matter with her advocate. (Testimony of Irene Christopher and the student's mother)

12. During the period from November 21 to November 28, the mother received telephone calls from the school, as indicated by "caller ID", which she did not answer. (Testimony of the student's mother.)

13. When the family had not contacted the school by November 27, Ms. Christopher telephoned the family several times during the day but no one answered the phone. On November 28, Ms. Christopher, still not having heard from the family about a convenient time for the PET, wrote a letter offering several optional dates but scheduling a PET for December 8. A form entitled "PARENTAL NOTICE (Proposed Change of Program)" was enclosed with this letter. That

form indicates that "procedural safeguards" were included as attachments. (Testimony of Irene Christopher; R 37-38.)

14. On November 21, the student began receiving educational services in his home. The school assigned a tutor to work with the student two hours each day on the regular education curriculum and, in addition, provided special education in English. These services were provided from November 21 through December 11, and did not include Wilson reading instruction. (Testimony of Irene Christopher; R-12.)

15. A PET meeting was held on December 11, because of the school's concern that the November 28 letter would not arrive at the student's home in time to provide the 7 days notice required for such meetings. There were ten participants, seven from the school, the parents and their advocate, Rebecca Bellefleur. The school participants were the superintendent, principal, special education director, special and regular education teachers, an educational technician and a social worker. (R-8.)

16. At the meeting, the parents stated that the PET was illegal. After leaving the meeting to consult their lawyer, the parents returned to the meeting but did not fully participate in the

manifestation determination. (Testimony of Irene Christopher.)

17. The PET conducted the manifestation determination review and concluded that behavior at issue, the possession and sale of marijuana at school, was not a manifestation of the student's disability, a language based learning disability. (R-14, 17-18.)

18. The PET then proceeded to design an IEP to be provided to the student during his expulsion. The IEP calls for both regular education instruction, and special education services which included Wilson reading instruction. The services were to be provided in the student's home by a special teacher and an eduational technician working under her supervision (Testimony of Irene Christopher; R 9-14, 19-36.)

19. At the December 11 PET, the school proposed to have an outside evaluator conduct a Functional Behavior Assessment for the student sometime during that week, and reconvene the PET to discuss the report. The parents refused to consent to that proposal at the PET, and have not yet given their consent. (R-14; testimony of Irene Christopher and the student's.)

IV. CONCLUSIONS

A.

The parent's initial argument is that the school board's November 20 expulsion of the student is illegal because it was made prior to a manifestation determination review by the PET.[1] In making this argument, the parents rely upon 34 CFR 300.524(a), Determination that behavior was not manifestation of disability, which states, in part, that if the result of a manifestation determination review, is a

> "determination, consistent with 300.523, that the behavior of the child with a disability was not a manifestation of the child's disability, the relevant disciplinary procedures applicable to children without disabilities may be applied to the child in the same manner in which they would be applied to children without disabilities…"

The parents assert that 300.524 requires schools to conduct a manifestation review prior to considering what level of discipline, if any, to impose upon a student with disabilities.

This assertion is not supported by the federal regulations. 34 CFR 300.523, Manifestation determination review, expressly authorizes schools to make the manifestation determination review within 10 days after making a decision, which would amount to a change of placement for an eligible student. The regulation states, in part, that

[1] It should be noted that the parents do not assert that the initial 10-day suspension of the student violates any of the student's rights arising from state or federal special education law.

> "(2) Immediately, if possible, but in no case later than 10 school days after the date on which the decision to take that action is made, a review must be conducted of the relationship between the child's disability and the behavior subject to the disciplinary action."

In this case, the "date on which the decision to take that action (was) made..." was November 20, when the school board voted to expel the student. Clearly, these regulations do not require that the manifestation determination be made prior to the school board's vote. The parent's argument on this point fails in the face of the plain language of the regulations.

The applicable regulations, however, do impose upon schools the obligation to hold a manifestation determination review within "10 school days" of a decision that would change the placement of a student. In this case, the decision that changed the placement of the student was the school board's vote on November 20th; "10 school days" after November 20 is Thursday, December 7th.[2] A PET meeting held on Monday, December 11 conducted the manifestation determination review, which should have been done on or before December 7. It is clear that manifestation determination review was conducted beyond the period specified in the regulations.

There remains, however, a question as to what consequences, if any, should flow from that fact. Should the manifestation determination be rendered invalid? If so, should the expulsion decision itself be

considered invalid because of a two-day delay? Under the circumstances presented in this case, I conclude that those consequences are inappropriate responses to the school's failure to comply with the letter of the federal regulations.

I do so for several reasons. First, it is clear to me that actions of the parents significantly contributed to the delay in scheduling the PET. Irene Christopher, the school's special education director, talked to the student's mother on the evening of November 20 immediately after the school board's vote and explained that a meeting had to be held within 10 days and talked again the following morning about the need to schedule a PET. Ms. Christopher offered the parents three or four dates for the PET, including December 8. The mother declined to agree to any of the dates offered on November 21 and stated she wanted to talk to her advocate. The mother further testified that, between November 21 and 28, she received frequent phone calls from the school, as indicated by her "caller ID", which she did not answer. The school tried to contact the parents until November 28, when Ms. Christopher wrote a letter scheduling a PET for December 8. That PET was finally held on December 11, with the parents in attendance. It was delayed from the December 8 date in order to ensure that the parents received the required 7 days notice of the meeting. Because the parent's behavior significantly contributed to the brief delay in holding the PET, they

[2] There was no school on 11/22 because of a teacher's workshop, and no school on

cannot now be allowed either to complain about or benefit from that delay.[3]

Second, another aspect of the situation must be considered. What is at issue here – what is always at issue in due process hearings – is whether a student has received, or is receiving, a free and appropriate public education. There are, of course, both procedural and substantive requirements for FAPE, but it is not mere technical compliance with, or technical violation of, the federal/state requirements that must govern in these matters. In order to compel remedial action in a due process hearing, the parents must show not only that a procedural irregularity occurred but also that it interfered in some meaningful way with the student's education itself or compromised his right to participate in the process that determines what his educational program should be. Roland M., 910 F.2d. 983 (1st Cir., 1990) Here, the parents have not made such a showing. The PET was held only two school days later than the regulations require. During the two-day period, the student was receiving educational services at home to the same extent he had been receiving them from November 21 to December 7. There was no evidence to indicate that the student did, or could, suffer any significant harm in

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11/23-24 because of the Thanksgiving holiday.

[3] The parents make an argument concerning the delay in conducting the functional behavior assessment. There, the parents refused to consent to the school's proposal to hire an "outside consultant" to evaluate the student and return the results of the evaluation to the PET for use in making the functional behavior assessment. The parents now complain that the school failed to meet the regulatory deadline. This is similar to the parent's complaint about the scheduling of the PET and merits the same response.

those two days.[4] Given the circumstances present in this case, I conclude that in holding the PET on December 11, two school days beyond the 10-day period set forth in 34 CFR 300.523, the school committed a *de minimus* violation of that regulation. I further conclude that, under these facts, the *de minimus* violation should not be construed either to annul the expulsion decision made by the school board or to invalidate the actions taken at the PET.[5]

B.

The parents next argue that the PET incorrectly decided that the behavior for which the student was being disciplined was not a manifestation of the student's disability. Here, the behavior at issue was the possession and sale of marijuana at school; the student's disability was a language-based learning disability.

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[4] This case involves a delay of two school days, making this is a different matter than in Westbrook School Department, 32 IDELR 251, a case cited by the parents in their closing argument, in which the manifestation determination was delayed for thirteen months and the student received either no or minimal educational services for that period.

The same principle applies to the parent's arguments concerning lack of notice and alleged failure to receive procedural safeguards from the school in a timely fashion. Even assuming arguendo that the parents are factually correct, there is no evidence of any harm flowing therefrom. In this matter, the parents were well aware of their rights at all times, were represented by an experienced advocate – and had access to legal counsel – whenever they deemed it necessary. These parents participated fully, to the extent they deemed appropriate, at every step of the process leading to this hearing.

[5] The actions of the school in this matter, while not triggering the remedy requested by the parents for the reasons discussed in this decision, are not beyond criticism. It would have been far better for the school to have placed the student in a 45-day interim alternative educational placement, pursuant to 34 CFR 300.520, on November 20, 2000, and then have proceeded with the manifestation determination review during that period. While I conclude that the actions of the school after November 20 were, in fact, consistent with its obligations under the interim placement scheme, it would have been far better, and far clearer, to have expressly referred to that section of the regulations at the beginning of this process.

The federal regulations give explicit instructions as to the findings a PET must make when conducting a manifestation determination review: (1), at the time of the behavior at issue, the IEP must be appropriate and the special education services provided to the student must be consistent with that IEP; (2), the student's ability to understand the consequences of his behavior must not be impaired by his disability; and, (3), the student's ability to control his behavior must not be impaired by his disability. 34 CFR 300.523(c)(2). The parents correctly state that the burden to demonstrate that the child's behavior is not a manifestation of the child's disability falls upon the school. (34 CFR 300.525(b)).

On December 11, the PET met to make the manifestation determination review at issue in this proceeding. The parents attended the meeting, accompanied by their advocate who, while not an attorney, had known, and worked with, the parents and the student for years. The parents protested that the meeting was illegal, and left the meeting to consult with their attorney by telephone. After that conversation, the parents and their advocate returned to the meeting but did not fully participate in the manifestation determination review.

The PET, notwithstanding the parent's limited participation, proceeded to conduct the manifestation determination review. The PET reviewed the IEP and available information and data concerning the student, considered the behavior at issue, and reached conclusions on

the questions set forth in 300.523. The PET concluded that the behavior for which the student was being disciplined, the possession and sale of marijuana at school, was not a manifestation of his disability, a language-based learning disability.[6]

The PET found that the IEP for the student was being implemented at the time of the incident[7], that the IEP was not inappropriate in relation to the behavior at issue, and that the student's disability did not impair either his ability to understand the consequences of his behavior or his ability to control his behavior. Those conclusions are reflected in the documents filled out by the PET. (R 17-18).

As to the first finding of the PET, that the IEP was appropriate, given the student's disability, the evidence produced at the hearing described a student who was doing well in the school, and had been doing well throughout his junior high school years there. In fact, in the opinion of some of his teachers, the student was a kind of role model for other students. He was a "good kid" in school, a social, friendly, personable, helpful, polite, respectful, happy student with lots of friends. He worked hard to achieve his grades, and strove to overcome his learning disability. He had a clean disciplinary record, marred only by a

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[6] In reaching this conclusion, the PET accepted as fact the investigator's conclusions that the student brought marijuana to school and knowingly participated in the sale of at least some of it there. The PET did not do an independent investigation of its own. Notwithstanding the parent's alternative explanation of the events involving the marijuana incident, I accept the investigator's conclusions as to what happened in school last fall and therefore decline to revisit those issues.

[7] It should be noted that neither the then current IEP nor any of the earlier IEP's for this student had been appealed.

incident in seventh grade involving a school athletic team and beer on a school bus. There was some testimony that, in the eighth grade, the student had changed somewhat. He had not completed some of his assignments, and appeared tired in school, particularly in math class. The student's explanation was that he was tired from playing football. Despite this occasional display of disinterest in certain school activities, he was doing pretty well in school, and was making good progress toward graduation. On balance, this is a student who was succeeding under the educational program designed for him by the school. His IEP was both appropriate and effective.

The December 11 PET also concluded that the student's disability did not impair his ability either to understand the consequences of, or to control, his behavior. It is hard to question that judgement, given the disability and behavior at issue here. The relationship between the student's language based learning disability and his possession/sale of drugs at school was simply not demonstrated at the hearing. While there was testimony regarding the student's "impulsivity" as a cause of the drug incident, there was no credible connection established between the so-called "impulsivity" of the student and his language based learning disability. This student had difficulty in reading and writing, and his IEP was aimed at helping him deal with that problem. Prior to the drug incident, there was no evidence that the student had engaged in any "impulsive" behavior at school, with the single possible exception of the

beer on the school bus episode in seventh grade. The student was uniformly described as knowing right from wrong, and as being capable of recognizing that it was wrong to bring drugs to school, and wrong to sell them. Given his disciplinary record, or lack of the same, there is abundant evidence that he had been able to control his behavior to conform to acceptable standards throughout his entire school career. Reviewing all the evidence at hand on December 11, and considering all the information school staff had acquired about the student in the years he had been enrolled in the school system, the PET's conclusion - that the student's learning disability did not impair his ability either to understand the consequences of, or to control, his behavior - seems unavoidable. It is consistent with the evidence presented in this hearing and will not now be overturned.

C.

Finally, the parents argue that the IEP developed by the December 11 PET does not provide the student with an appropriate education because it does not provide for enough education for the student. The parents point out that the regular education component of the IEP contains no provision for art, physical education, computer instruction or services connected with the Eighth Grade Exit Project, while the special education component is inappropriate because is reduces the student's services, and fails to contain any provision to address the student's "social and behavioral issues…(or to help him) deal with the

fall-out from the incident that has caused him to be expelled…" (Parent's brief at 31.)

The "expulsion IEP" calls for a total of 22 hours of one-on-one instruction per week in regular and special education tutorials. That total includes 2 hours per week of Wilson reading instruction tutorial with Frances Peters, the special education teacher. Ms. Peters testified at the hearing that (1) she believed the student would be able to make more progress in the Wilson reading program in a 1-1 home tutorial than he would in the 1-4/5 class she taught at school and (2) she would be extending the time devoted to the Wilson reading program to 2¼ hours per week to make up for the fact that the student received no such services from November 21 through December 11. She also testified that the student had been doing well at home, since the "expulsion IEP" had been implemented, and had been earning about "B" grades in the work he had done with Ms. Lapointe, the special education technician III assigned to him.

Based upon the evidence presented at the hearing, I conclude that the "expulsion IEP" provides the student with an appropriate education, given his disability. There is some evidence that, in the time since December 11, the student has, in fact, been making real educational progress in the tutorials provided pursuant to the IEP, in both regular and special education. The evidence demonstrated that the student worked well with the educational technician assigned to him. If the

student completes the program as it is designed, he will be able to move ahead to the ninth grade next fall along with other members of his class. The regulations appear to require that an expulsion IEP must "provide services to the extent necessary for the child to appropriately progress in the general curriculum and appropriately advance toward achieving the goals set out in the child's IEP…." 34 CFR 300.121(d)(2)(I). The language in the current version reads to "appropriately progress in the general curriculum", while the prior version contained the phrase "participate in the general curriculum". This change seems to reduce a student's right to access the general curriculum while under an expulsion IEP. Consequently, the absence of art, physical education and computer skills in the expulsion IEP does not render that IEP inappropriate, particularly where, as here, those courses are not graduation requirements. This IEP meets the standards set out in federal and state law and regulations.

D.

As a final matter, at the pre-hearing conference held in this case, the parents advanced an argument based upon the "stay-put" provisions of the regulations. The parents argued that those provisions required the return of the student to school while this matter was pending. That request was denied, orally, prior to the hearing. The student was ordered to remain out of school for the remainder of the 45-day period set forth in 34 CFR 300.520.

The stay-put provisions require that a student involved in an administrative or judicial proceeding regarding a complaint arising from the provision of special education to the student remain in his or her current placement. 34 CFR 300.514(a). However, removals from school because of certain behavior, including the possession and/or sale of illegal drugs, receive special treatment under the regulatory scheme. 34 CFR 300.520(a) authorizes school personnel to remove a student from his current placement for up to 45 days if that student "knowingly possesses or uses illegal drugs or sells or solicits the sale of a controlled substance at school." The ability to remove a student with disabilities who engages in such behavior from school for 45 days exists even when the behavior at issue is a manifestation of the student's disability.

In the situation presented here, the PET conducted a manifestation determination review 12 school days into the student's removal from school and concluded that the drug possession/sale was not a manifestation of his disability. In that circumstance, special education law contemplates that the school may impose discipline upon a student with disabilities to the same extent that discipline would be imposed upon a student without disabilities.[8] 300.524(a). To invoke the stay-put provisions under this set of circumstances, prior to the expiration of the 45 day period, would upset the scheme contemplated by

[8] It should be noted that the other two students who participated in the "transaction" underlying the events involved in this matter were not eligible for special education

the regulations, and convert the shield of the stay-put provisions into a sword turned against the school's authority to take swift action when faced with drugs at school. Consequently, the parent's stay-put request was denied.

V. ORDER

After consideration of the evidence presented during this due process hearing, I find that the school did not violate any rights of the student arising from state or federal special education law or regulations when it voted to expel the student on November 20, 2000, for the possession and sale of marijuana at school. Further, I find that the PET meeting held on December 11, 2000, was not illegal, that the PET correctly concluded that the behavior for which the student was expelled was not a manifestation of his disability, and that the expulsion IEP provides the student with an appropriate education. The parent's appeals in cases # 00.333 and 00.356 are denied. In view of these conclusions, no order is required.

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PETER H. STEWART. ESQ.
Hearing Officer
February 19, 2001

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services and also received serious discipline. One of them, the "buyer", was expelled, while the other, the "middleman", received a lengthy suspension.

WITNESS LIST

Parents' Witnesses:

Rebecca A. Bellefleur
Mother
Father

School's Witnesses:

Irene Christopher
Frances Peters
Mark Campbell