

CAUSE NO. 348-360983-25

MATTHEW MUCKER,

Plaintiff,

v.

CHARLES RANDKLEV, JOHN BIRT, JONI SHAW SMITH, MICAH YOUNG, CHELSEA KELLY, CHRIS COKER, AND HEATHER WASHINGTON,

Defendants,

v.

HERITAGE HOMEOWNERS ASSOCIATION, CARY MOON, AND BRIAN BLACK,

Intervenors,

v.

KELLER INDEPENDENT SCHOOL DISTRICT,

Third-Party Defendant.

IN THE DISTRICT COURT OF

TARRANT COUNTY, TEXAS

348TH JUDICIAL DISTRICT

INTERVENORS' ORIGINAL PETITION IN INTERVENTION, THIRD-PARTY PETITION, AND APPLICATION FOR INJUNCTIVE RELIEF

Intervenors Heritage Homeowners Association (“Heritage”), Cary Moon (“Moon”) and Brian Black (“Black”) (collectively, “Intervenors”) file this *Original Petition in Intervention, Third-Party Petition, and Request for Injunctive Relief* against Third-Party Defendant Keller Independent School District (“KISD”), Defendants Charles Randklev, Heather Washington, John Birt, Chris Coker, and Micah Young in their capacities as members of the KISD Board of Trustees

(each individually, a “Trustee” and collectively, the “Rump Board” or “Defendants”).¹ In support, Intervenor respectfully show the Court as follows:

I.
DISCOVERY CONTROL PLAN

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

II.
PARTIES

2. Intervenor Heritage Homeowners Association is a homeowners association comprised of 3,200 homes located within the boundaries of KISD. Heritage represents the interests of its members, each of whom are residents and taxpayers within the boundaries of KISD. Heritage is also the manager of property tax revenues generated for the benefit of Fort Worth Public Improvement District (PID #7). The services PID #7 provides to Heritage improve the quality of life and property values of homeowners in the HOA. PID # 7 revenues will be negatively impacted if KISD’s illegitimate plan to split KISD is approved. Heritage is located at 9536 Courtright Drive, Fort Worth, Texas 76244.

3. Intervenor Cary Moon is an individual who resides and pays taxes within the boundaries of KISD. His residence is 5016 Exposition Way, Fort Worth, Texas 76244.

4. Intervenor Brian Black is an individual who resides and pays taxes within the boundaries of KISD. His residence is 9136 Tate, Fort Worth, Texas 76244.

5. Third-Party Defendant Keller Independent School District is a Texas independent school district and is subject to the Texas Open Meetings Act pursuant to Tex. Gov’t Code §

¹ The full Board of KISD (which also includes Joni Shaw Smith and Chelsea Kelly) is defined herein as the “Board.” Intervenor assert no claims against Ms. Smith or Ms. Kelly.

551.001(3)(E). KISD may be served with process through its interim Superintendent, Cory Wilson, at 350 Keller Parkway, Keller, Texas 76248.

6. Defendant Charles Randklev is a Trustee elected to Place 6 of the Board, is the President of the Board, and resides in Tarrant County, Texas. Randklev is represented by counsel and has already made an appearance in this lawsuit.

7. Defendant Heather Washington is a Trustee elected to Place 7 of the Board and resides in Tarrant County, Texas. Washington is represented by counsel and has already made an appearance in this lawsuit.

8. Defendant John Birt is a Trustee elected to Place 4 of the Board, is the Vice President of the Board, and resides in Tarrant County, Texas. Birt is represented by counsel and has already made an appearance in this lawsuit.

9. Defendant Chris Coker is a Trustee elected to Place 5 of the Board and resides in Tarrant County, Texas. Coker is represented by counsel and has already made an appearance in this lawsuit.

10. Defendant Micah Young is a Trustee elected to Place 1 of the Board and resides in Tarrant County, Texas. Young is represented by counsel and has already made an appearance in this lawsuit.

III. **JURISDICTION & VENUE**

11. This Court has subject matter jurisdiction over this suit pursuant to Section 65.021 of the Texas Civil Practice and Remedies Code, which provides any district court with jurisdiction to hear claims for injunctive relief. Pursuant to Tex. R. Civ. P. 47, Intervenors seek only non-monetary relief, plus attorneys' fees.

12. Venue is proper in Tarrant County because that is the county where all or a substantial part of the events or omissions giving rise to this suit occurred. TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1).

13. This Court has jurisdiction over the individual Board members because, as further detailed herein, each acted outside the scope of their authority and failed to perform their discretionary duties in good faith. *See Ballantyne v. Champion Builders, Inc.*, 144 S.W.3d 417, 424 (Tex. 2004).

IV. **FACTUAL BACKGROUND**

A. Overview of the Texas Open Meetings Act (“TOMA”).

14. As noted in the Attorney General Handbook, “Texas law has long agreed the inherent right of Texans to govern themselves depends on their ability to observe how public officials conduct the people’s business.” Office of the Attorney General–State of Texas, Open Meetings Handbook (2024). Indeed, “[p]ublic access to the proceedings and decision-making process of government is essential to a properly functioning and free state.” *Id.* The Texas Supreme Court has amplified this point, declaring that Texas citizens “are entitled to more than a result. They are entitled not only to know what government decides but to observe how and why every decision is reached.” *Acker v. Texas Water Comm’n*, 790 S.W.2d 299, 300 (Tex. 1990).

15. TOMA was enacted to ensure the protection of these ideals, and to promote open and transparent government that is accountable to the people. At its core, TOMA requires government entities to keep official business open to the public by ensuring that every action taken by a governmental body be voted upon by a quorum in a properly noticed meeting. *See* TEX. GOV’T CODE § 551.144.

16. Under TOMA, every regular, special, or called meeting of a governmental body

must be open to the public. *Id.* at § 551.002. The public must be given written notice of the date, hour, place, and *subject matter* of all meetings of the governmental entity. *Id.* at § 551.041. This notice must be posted at least 72 hours in advance of the meeting in a place readily accessible to the general public. *Id.* at § 551.043. While the Texas Government Code does allow for some meetings to be closed to the public, Texas law is clear that the governmental body must give the public advance notice of the subjects it will consider at either an open meeting or closed executive session. *Cox Enterprises, Inc. v. Bd. of Trustees of Austin Indep. Sch. Dist.*, 706 S.W.2d 956, 958 (Tex. 1986); *Porth v. Morgan*, 622 S.W.2d 470, 475–76 (Tex. App.—Tyler 1981, writ ref’d n.r.e.). Additionally, any final action, decision, or vote on a matter deliberated in a closed meeting may only be made in an open meeting that is held in compliance with the notice provisions of TOMA. TEX. GOV’T CODE § 551.102.

B. The Rump Board Deliberates and Acts in Violation of TOMA.

17. KISD is an independent school district located in Tarrant County, Texas. KISD serves almost 35,000 students from Fort Worth, Keller, and other surrounding areas. The Board has the executive power and duty to govern and oversee the management of KISD.

18. For several years, the Rump Board has engaged in a pattern of persistent, systematic, and secretive conduct for the purpose of hiding its business from the public it serves. No wonder given the leader of this group, Charles Randklev, controlled what was, and was not, included in the agenda of each Board meeting. As further detailed herein, the conduct of the Rump Board has shielded its actions from the public, and has ultimately culminated in the creation of a highly-criticized plan to detach a huge portion of KISD, and spin it off by a truncated resolution

process.²

19. The effort to divide KISD between the desired east region and the supposed “less desired” west region (the dividing line being Denton Highway, US 377) predictably started with the hiring of a lawyer. On or around June 15, 2022, Tim Davis, a Texas attorney, was hired to advise the Board in connection with “various legal matters.” On information and belief, this hiring was not in compliance with Board policies nor TOMA.³ Based on the Board’s expenditure reports, Davis (now working at a different firm) has continuously provided assistance to the Board, and all fees associated with his work are being paid by KISD. Davis has been attributed with constructing and providing “advice” on how to split KISD through an abbreviated and improper resolution process.

20. Later, in or around May of 2024, step two of the Rump Board’s plan to divide KISD took shape. During a closed executive session, the Board discussed hiring RSM US, LLP (“RSM”) for the stated purpose of conducting a forensic audit of KISD’s financial statements. These audit deliberations and the hiring of RSM never appeared on any posted meeting agenda, nor was a vote to hire them ever conducted in an open meeting. Upon information and belief, the Board hired RSM, and has since expended significant KISD funds to pay for RSM’s services.

21. On October 10, 2024, the Board held a special meeting listed on the agenda as a “Team of 8” training. Despite the stated purpose of the meeting, Chairman Randklev used the opportunity to invite a man named Grant Anderson to discuss the undisclosed audit of KISD, including draft reports received from RSM. Mr. Anderson, a self-proclaimed thirty-year veteran

² A separate suit has been filed in the United States District Court for the Northern District, Fort Worth Division, *Claudio Vallejo v. Keller Independent School District et. al*, No. 4:25-cv-00138-O (N.D. Texas, February 14, 2025), related to corollary issues involving the abridgement of voting rights in KISD.

³ All meeting agendas for the Board are published by KISD on BoardBook Premier, accessible via the following link: <https://meetings.boardbook.org/Public/Organization/2320>.

in school finance, accounting, business, and operations management, had no disclosed role for KISD at the time, and appears to have been engaged to help Randklev build his case for dividing the district. Mr. Anderson works for an organization called Texans for Excellence in Education (“TEE”), a group that promotes itself as a “fresh new vision for Texas public school boards.”⁴ During this undisclosed meeting, Mr. Anderson suggested that the Board hire Moak Casey, LLC (“Moak Casey”) to perform additional audit work and to create a financial outlook for KISD.

22. On October 24, 2024, the Board proceeded into a closed executive session at the conclusion of its general meeting. The meeting agenda⁵ provided no details on the information discussed by the Board during the executive session. Instead, it merely stated:

“EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Superintendent), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).”⁶

However, upon information and belief, the Board used this executive session to meet with two RSM employees via a Zoom call to discuss conclusions to be drawn from the RSM work. During the call, RSM presented the Board with the results of its forensic audit. Additionally, the Board again discussed engaging Moak Casey to perform a forecast of KISD’s finances. Despite the public’s special interest in knowing the status of the school district’s finances and what that could

⁴ <https://www.texasobserver.org/school-boards-partisan.../>

⁵ A true and correct copy of the October 24, 2024, meeting agenda is attached hereto as Exhibit “A.”

⁶ It is the typical practice of the Board to provide similar paragraphs of recapitulated statutory authority—at the exclusion of listing the actual topics to be discussed—in connection with each of its closed executive sessions. Thus, the public generally has no knowledge of the Board’s activities once it enters an executive session.

mean for the future of KISD, the Board concealed these deliberations from its residents.

C. The Rump Board's Secret Plan to Split KISD Takes Shape.

23. In or around October of 2024, the Board made the decision to hire Moak Casey under the guise of providing a five-year financial outlook for KISD. Once again, this decision took place outside of a noticed meeting.

24. It is now apparent the Rump Board hid the true reason for hiring Moak Casey from Trustees Smith and Kelly. While these two Trustees were led to believe that Moak Casey was engaged to develop a financial outlook for the benefit of the district, that was not the plan at all. Instead, Chairman Randklev and his counterparts had already secretly directed Moak Casey to provide a revenue impact analysis regarding a potential split of the district. At that point in time, this topic had never been discussed at any open meeting.⁷

25. Upon information and belief, the Rump Board engaged in private communications through Slack and courier messages over the next several months to further their scheme to divide KISD. Trustees Smith and Kelly were excluded from these communications. Upon further information and belief, the Rump Board members made the decision to implement the plan in secret, and further worked with counsel to create the appearance a public vote would be taken at a later date.

26. In order to avoid public suspicion, the Rump Board ensured that its plan to divide KISD was not mentioned during meetings open to the public. For example, on November 13, 2024, less than a month after engaging Moak Casey to analyze KISD finances in connection with a potential split, the Board hosted a special meeting in which a Moak Casey representative provided school financing training. However, there was no discussion at this meeting about splitting KISD,

⁷ A true and correct copy of the revenue impact analysis developed by Moak Casey is attached hereto as Exhibit "B."

or adding such discussions to future agendas.

27. On December 19, 2024, several Trustees and then-KISD superintendent Tracy Johnson participated in an un-noticed meeting with representatives from Moak Casey via Zoom. Trustees Smith and Kelly were not made aware of this meeting until after it took place.⁸

28. Later that day, the Board conducted an open general meeting where they publically discussed issues related to KISD's finances. Specifically, the Board announced that it received a report indicating that KISD received a "C" rating from the Financial Integrity Rating System of Texas. Notably absent from the topics covered by the Board, however, were: (i) its previous engagement of both RSM and Moak Casey, (ii) the significant deliberations regarding KISD finances prior to the December 19 general meeting, and most importantly, (iii) the ongoing communications between Rump Board members regarding a potential split of KISD.

29. Immediately following the general meeting, the Board proceeded into a closed executive session. The agenda listed Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Level 3 Grievances), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student) as the legal bases for meeting in a closed session. However, nothing in the agenda provided the public with

⁸ Recently, an email dated December 19, 2025, was disclosed showing that Randklev, Davis, Grant Anderson, and several others had been privately communicating with Moak Casey about revenue movement between KISD and the unannounced "new" school district called AISD.

notice that a discussion would be held on the potential split of KISD.⁹

30. Nevertheless, the Rump Board used the executive session as an opportunity to finally reveal their clandestine plan to detach certain portions of KISD via resolution (the “Plan”), claiming the Board had “legal” authority pursuant to Section 13.103 of the Texas Education Code to do so. The Rump Board proposed splitting KISD into two districts divided along the lines of Denton Highway. KISD would remain as a separate district to the east, while a new district, an unnamed ISD, would be formed to the west. In order to rapidly implement the Plan, Ranklev announced a vote would take place at a special meeting on January 16, 2025.

D. The Board Proceeds Toward Detachment.

31. In the days following the deliberation of the Plan in the Board’s December 19 executive session, Intervenors, along with the rest of the public, heard rumors regarding a potential split via social media. These rumors were later confirmed on January 10, 2025, when Trustees Smith and Kelly posted statements on their Facebook profiles sharing the Plan that had been discussed by the Board at the executive session in December.¹⁰

32. Ahead of the Board’s special meeting on January 16, 2025, with news of its secretive conduct finally leaking to the public, the Board for the first time posted an agenda that included the Plan as part of the Board’s deliberation.¹¹ At this meeting, then-KISD Superintendent Johnson offered her resignation after speaking out against the Plan. Almost 100 residents spoke in opposition to the Plan and the surreptitious nature of the Rump Board’s work, while dozens of community members were forced to stand outside due to the occupancy limits of the Keller ISD

⁹ A true and correct copy of the December 19, 2024, meeting agenda is attached hereto as Exhibit “C.”

¹⁰ The statements of Smith and Kelly confirmed that neither Trustee had been consulted about the Plan until the December 19 executive session. As a result, both Smith and Kelly felt blindsided by the news. True and correct copies of Smith and Kelly’s statements are attached hereto as Exhibits “D” and “E,” respectively.

¹¹ A true and correct copy of the January 16, 2025, meeting agenda is attached hereto as Exhibit “F.”

Administration Building.

33. At a public meeting on January 30, 2025, the Board finally revealed the RSM and Moak Casey Reports to the public as well. Underscoring their frustrations, Trustees Smith and Kelly publically questioned Josh Haney, a Moak Casey representative, regarding his company's reports. Haney stated that after Moak Casey was hired, the directive to alter the report to reflect a potential split of KISD came from "the board."¹² It's now quite clear that this had been the Rump Board's intention all along.

34. The Plan has received significant public backlash from KISD residents and students since that time. KISD residents have swarmed the Board's meetings since the news of a potential split became public to express their anger and feelings of distrust, while KISD students organized and conducted a peaceful school walk-out to protest the Plan's implementation. In addition, several community leaders across the Dallas-Fort Worth metroplex have publically opposed the Plan.

35. Nevertheless, the Rump Board has continued to push forward. Indeed, the Board has announced it intends to go forward with the Plan, and vote on the split of KISD by resolution, in the very near future.

V. **CAUSES OF ACTION**

A. Injunctive Relief for Violations of TOMA.

36. Intervenors incorporate by reference and re-allege in full the preceding paragraphs of this Petition.

¹² A record of this meeting is located at https://www.youtube.com/watch?v=J4pi8uB_Ugw&t=4550s.

(i) **TOMA Standard and Requirements.**

37. TOMA mandates that every regular, special, or called meeting of a governmental body be open to the public, except as otherwise provided. TEX. GOV'T CODE § 551.002. The term “governmental body” expressly includes a school district board of trustees. *Id.* at § 551.002(3)(E). The Texas Supreme Court “has demanded ‘exact and literal compliance with the terms of the statute.’” *Markowski v. City of Marlin*, 940 S.W.2d 720 (Tex. App.—Waco 1997, no writ) (quoting *Acker v. Tex. Water Comm’n*, 790 S.W.2d 299, 300 (Tex. 1990)). If a governmental body violates TOMA, any actions taken by the body are voidable. TEX. GOV'T CODE § 551.141.

38. A governmental body must provide written notice of the date, hour, place, and subject of each meeting. *Id.* at § 551.041. When an issue is one of special importance to the public, the governmental body must provide full and adequate notice of the subject matter of the meeting so that an objective reader receives meaningful notice. *Odessa Tex. Sheriff's Posse, Inc. v. Ector Cnty.*, 215 S.W.3d 458, 471 (Tex. App.—Eastland 2006, pet. denied).

39. TOMA provides certain limited exceptions to the general rule that all meetings of a governmental body be open to the public. *See* Tex. Gov't Code §§ 551.071–.089. Even so, all actions, decisions, or votes on a matter deliberated in a closed meeting must be made in an open meeting that is held in compliance with TOMA's notice provisions. *Id.* § 551.102.

40. A member of a governmental body violates TOMA when the member, outside of an open meeting (a) sends at least one communication within a larger series of communications regarding an issue within the governmental body's jurisdiction, (b) the members engaged in the series of communications constitute a quorum, and (c) the member has knowledge that the discussions involved or would involve a quorum, and would constitute a deliberation once a quorum of members engaged in the series of communications. *Id.* at § 551.143.

(ii) Defendants' Violations of TOMA.

41. As described above, Defendants have engaged in intentional, persistent and systematic violations of TOMA. These violations include:

- (i) Improperly convening in a closed executive session on December 19, 2024, to discuss the Plan without proper notice to the public;
- (ii) Failing to provide adequate notice of the subject matter of the Board's meetings, including meetings to discuss KISD finances and the Plan, which constitute matters of special importance to the public;
- (iii) Routinely taking actions outside of a properly noticed open meeting, including the hiring of Tim Davis, RSM, and Moak Casey;
- (iv) The Rump Board's engaging in secret communications via Slack and courier messages in which its members developed and constructed the implementation of the Plan; and
- (v) Using outside counsel to shield communications from the public in violation of TOMA.

42. Each of the aforementioned violations were performed in furtherance of the Rump Board's implementation of the Plan. Upon information and belief, the scheduled vote on the Plan is a mere pretext in order to avoid the appearance of misconduct, as the Rump Board made the decision to implement the Plan months ago.

(iii) Intervenor May Seek Relief for Defendants' Violations of TOMA.

43. 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 ANN. § 551.142(a); TEX. EDUC. CODE § 44.032.

44. “[T]he majority of courts addressing the ‘interested person’ requirement have adopted an extremely broad interpretation regarding who constitutes an ‘interested person.’” *Matagorda Cty. Hosp. Dist. v. City of Palacios*, 47 S.W.3d 96, 102 (Tex. App.—Corpus Christi 2001, no pet.). Indeed, a plaintiff seeking to bring a TOMA challenge need not show that he was affected differently from other members of the general public. *City of Donna v. Ramirez*, 548 S.W.3d 26, 34 (Tex. App.—Corpus Christi—Edinburg 2017, pet. denied). A plaintiff need only demonstrate that he shares the general public’s interest in ensuring that the protections of TOMA are enforced. *Id.*

45. Intervenor here are interested persons that have a right to bring an action to stop, prevent, and/or reverse the Board’s actions and threatened actions in violation of TOMA. Specifically, Intervenor Moon and Black are KISD residents who live in the portion of KISD set to be detached by the Plan. The same is true for each of Heritage’s 3,200 members, who are KISD residents who have children that attend schools within the district. Intervenor share the general public’s interest in ensuring that the Board and KISD are in compliance with the requirements of TOMA, and that they receive proper notice of all Board actions. Heritage has an additional interest in this case because the proposed split of KISD would negatively impact the revenues generated

by PID #7 that Heritage uses to improve the quality of life and enhance property values for its homeowners.

46. Pursuant to Tex. Gov't Code § 551.142, Intervenors may obtain temporary and permanent injunctive relief to restrain the Defendants, who have violated, and continue to violate TOMA. Accordingly, and as further detailed in the incorporated Application for Injunctive Relief, Intervenors seek appropriate injunctive orders to reverse the outcomes of Defendants' violations and prevent Defendants' continued violations of TOMA.

(iv) Intervenors' Right to Attorneys' Fees.

47. As a result of Defendants' violations of TOMA, Intervenors were forced to retain the undersigned counsel in relation to this action.

48. This is an action brought by Intervenors for injunctive relief under Tex. Gov't Code § 551.142(a) and Chapter 44 of the Texas Education Code.¹³ Accordingly, Intervenors are entitled to recover and collect reasonable attorneys' fees and costs. TEX. GOV'T CODE § 551.142(b); TEX. EDUC. CODE § 44.032. In the event of an appeal to the Court of Appeals or to the Supreme Court, Intervenors would be entitled to recover and collect additional reasonable attorneys' fees and court costs.

B. Ultra Vires Actions by the Rump Board.

49. Intervenors incorporate by reference and re-allege in full the preceding paragraphs of this Petition.

50. A state official is subject to an ultra vires claim when the official acts without legal authority or fails to perform a purely ministerial act. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009). The fact that the official has some limited discretion to act under the applicable

¹³ See also, Board Policy Manual of the Keller Independent School District (Section CH).

law does not preclude an ultra vires claim once the official exceeded the bounds of his/her authority. *Hous. Belt & Terminal Ry. Co. v. City of Hous.*, 487 S.W.3d 154, 163 (Tex. 2016). Ultra vires acts committed by governmental officials are acts that are by their nature taken without authority, and therefore should not be considered acts of the State. *Luttrell v. El Paso County*, 555 S.W.3d 812, 837 (Tex. App.—El Paso 2018, no pet.).

51. Each member of the Rump Board is a state official as a Trustee of a Texas independent school district. A board of an independent school district “may act only by majority vote of the members present at a meeting held in compliance with Chapter 551, Government Code, at which a quorum of the board is present and voting.” TEX. EDUC. CODE. § 11.051.

52. Each member of the Rump Board acted without legal authority in secretly creating the Plan to detach a huge portion of KISD by resolution. Specifically, Section 13.103 does not provide authority for a board of trustees of a school district to initiate detachment in this manner. *See* TEX. EDUC. CODE § 13.103. The only legal authority the Rump Board relied on was the self-interested advice given by Davis, one of the co-architects of the Plan.

53. As shown by their deliberate pattern of misconduct in violation of TOMA, and the fact that the majority of the deliberations regarding the Plan took place in secret, each Rump Board member knew that Section 13.103 did not provide the Board with sufficient authority to initiate detachment by resolution. However, the Rump Board appears to be rushing to a public vote before their action can be challenged.

54. KISD has adopted policies and procedures for the Board in connection with purchasing goods and services, including the purchasing of professional services for the district. *See* Keller ISD, Board Policy Manual § CH (LOCAL)—Purchasing and Acquisition (June, 20, 2023), <https://pol.tasb.org/PolicyOnline/PolicyDetails?key=1103&code=CH#localTabContent>. In

hiring Davis, RSM, and Moak Casey in derogation of these policies and procedures, the Rump Board has committed ultra vires acts. Intervenors seek termination of all invalid contracts entered into by the KISD.

55. In addition, a plaintiff alleging ultra vires actions by a state official may request prospective injunctive relief against government actors to require compliance with their duties going forward if he or she faces an ongoing violation of their rights. *PermiaCare v. L.R.H.*, 600 S.W.3d 431, 442 (Tex. App.—El Paso 2020, no pet.).

56. Accordingly, Intervenors seek termination of all contracts entered into in violation of the law as well as appropriate injunctive orders to prevent the ongoing violations caused by the Rump Board’s ultra vires acts.¹⁴

VI.

APPLICATION FOR INJUNCTIVE RELIEF

A. **Applicable Legal Standard.**

57. The purpose of both a temporary restraining order (“TRO”) and temporary injunction is to preserve the status quo. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2004); *Cannan v. Green Oaks Apts., Ltd.*, 758 S.W.2d 753, 755 (Tex. 1988). In interpreting what the preservation of the status quo means, Texas courts have noted that the status quo is the “last, actual, peaceable, non-contested status which preceded the pending controversy.” *In re Newton*, 146 S.W.3d 648, 651 (Tex. 2004). In order to maintain the status quo and, thus, to obtain a TRO, an injunctive-relief-applicant must show (i) a probable right to recovery; (ii) that without

¹⁴ Aside from the foregoing, this Court should also enjoin the Rump Board from engaging in any vote to enact the Plan due to the pending request from Tarrant County District Attorney Phil Sorrells to Attorney General Ken Paxton for interpretation of Section 13.103. Sorrells, Phil, *Request for Attorney General Opinion on the Detachment Process for a School District under Texas Education Code Section 13.101 through 13.105*, Tarrant County District Attorney (February 13, 2025). The District Attorney’s request to the Attorney General is further evidence that the Rump Board has no valid authority to move forward with the split of the school district by resolution.

extraordinary relief, the applicant will be subjected to imminent harm and irreparable injury; and (iii) that there is no adequate remedy at law. *Sun Oil Co. v. Whitaker*, 424 S.W.2d 216, 218 (Tex. 1968).

58. A plaintiff may obtain temporary and permanent injunctive relief to stop, prevent, or reverse a violation or threatened violation of TOMA by a defendant. TEX. GOV'T CODE § 551.142; TEX. EDUC. CODE § 44.032. A movant for injunctive relief is not required to meet the common law criteria to obtain injunctive relief when a statute expressly authorizes injunctive relief. See *Sonwalkar v. St. Luke's Sugar Land Partnership, L.L.P.*, 394 S.W.3d 186, 197 (Tex. App.—Houston [1st Dist.] 2012, no pet.).

59. A plaintiff alleging an ultra vires action may also obtain appropriate prospective injunctive relief against government actors to require compliance with their duties going forward. *PermiaCare*, 600 S.W.3d at 442.

B. Argument and Authorities.

60. Intervenors can affirmatively demonstrate that they have a probable right to recover, that they would be subjected to imminent and irreparable harm, and that there is no adequate remedy at law. As Intervenors need not show these elements to receive injunctive relief under TOMA, Intervenors limit their arguments on these points to their ultra vires claim against the Rump Board. Accordingly, Intervenors request a Temporary Restraining Order to reverse the Defendants' violations of TOMA, prevent Defendants' ongoing violations of TOMA, and require the Rump Board's compliance with its duties under the law. Injunctive relief should, thus, issue.

i. Intervenors Have a Probable Right of Recovery.

61. In order to obtain injunctive relief, an applicant must first show that it has a probable right to recover the relief it seeks upon a final hearing. *Sun Oil Co.*, 424 S.W.2d at 218. The term

“probable right to recover” is a “term of art” and does not require the Court to make a determination of the facts based upon “probabilities.” *183/620 Grp. Joint Venture v. SPF Joint Venture*, 765 S.W.2d 901, 904 (Tex. App.—Austin 1999, writ dismissed w.o.j.). Rather, it merely means that the applicant must “adduce evidence that tends to support his right to recover on the merits.” *Id.* (citing *Camp v. Shannon*, 348 S.W.2d 517, 519 (Tex. 1961)). Within this context, a party seeking a TRO does not need to show a probable right to recover on each cause of action it pled; instead, it only needs to show a probable right to recover on one of its claims. *Argyle Indep. Sch. Dist. ex rel. Bd. of Trs. v. Wolf*, 234 S.W.3d 229, 237-38 (Tex. App.—Fort Worth 2007, no pet.).

62. As described above, the Rump Board—through private meetings, secret deliberations, and reliance upon reports from third parties, including an attorney hired by the Board without public oversight—has acted without authority in developing its Plan to divide KISD and force Intervenor out of the district to which many Heritage residents have belonged for more than twenty-five years. The Rump Board acted without proper authority, citing a contorted interpretation of Section 13.103 of the Texas Education Code as a vehicle to deny KISD residents a say in the future of their children by the passage of a simple resolution. Moreover, the Rump Board has continually neglected its own policies and procedures, as evidenced by the hiring of Davis, RSM, and Moak Casey.

63. The facts herein establish a probable right of recovery on Intervenor’s claims against Defendants.¹⁵

ii. Without Extraordinary Relief, Intervenor Will be Subjected to Imminent and Irreparable Injury.

64. Here, Intervenor will suffer irreparable harm if Defendants are not enjoined from

¹⁵ Intervenor will verify the necessary factual allegations prior to any hearing on a temporary restraining order or injunction.

going forward with their Plan to detach a portion of KISD and spin it off into a separate district. The Rump Board continues to expend KISD funds, including through the payment of Tim Davis's legal fees (and those of his associates), in furtherance of its Plan. These funds are comprised of Intervenor's tax dollars, and are in essence being used to monetarily support the Rump Board's TOMA violations. Additionally, Heritage has built significant good will due to its presence within the boundaries of KISD. *See Auburn Invs., Inc. v. Lyda Swinerton Builders, Inc.*, No. 04-08-00067-CV, 2008 WL 2923643, at *2 (Tex. App.—San Antonio July 30, 2008, no pet.) (mem. op.) (“Goodwill is generally understood to mean the advantages that accrue to a business on account of its name, location, reputation, and success.”). If injunctive relief does not issue, and the Rump Board proceeds with its Plan, Intervenor will suffer irreparable harm that is incapable of calculation. Furthermore, Heritage has been a part of KISD for more than twenty-five years, and has enjoyed the benefit of exceptional property values associated with being a part of the school district. If the Rump Board continues to act without authority to split the district, the losses in property values in connection with being forcibly removed from KISD are incapable of calculation. Moreover, there is no pecuniary standard that can measure the loss of children being able to attend KISD schools. Indeed, many homeowners in Heritage themselves are KISD alumni and live in KISD so that their children can one day attend KISD schools. The Rump Board's Plan rips that dream away from many of Heritage's homeowners. Finally, if the Plan is implemented, it will be too late for Intervenor to act to remedy the split. The facts set forth herein dictate a determination that Intervenor will be imminently and irreparably harmed if injunctive relief does not issue.

iii. Intervenor Do Not Have an Adequate Remedy at Law.

65. The final requirement for injunctive relief is that the applicant must show that it

does not have an adequate remedy at law. *Khaledi v. H.K. Global Trading, Ltd.*, 126 S.W.3d 273, 284 (Tex. App.—San Antonio 2003, no pet.). An adequate legal remedy is one that is as complete, practical, and efficient to the prompt administration of justice as is equitable relief. *Id.* Thus, a legal remedy is inadequate if, among other things, damages are difficult to calculate or their award may come too late. *Cardinal Health Staffing, Inc. v. Bowen*, 106 S.W.3d 230, 235-36 (Tex. App.—Houston [1st Dist.] 2003, no pet.).

66. Here, as detailed above, Intervenor's do not have an adequate remedy at law because an award of damages is impossible to calculate and would come too late to remedy the harm. *See T-N-T Motorsports, Inc. v. Hennessey Motorsports, Inc.*, 965 S.W.2d 18, 24 (Tex. App.—Houston [1st Dist.] 1998, pet. dismissed) (“A legal remedy is inadequate if damages are difficult to calculate or their award may come too late.”). Furthermore, civil penalties would not serve as an adequate remedy as such penalties would not return funds to KISD coffers, would not restore public trust in the Board’s actions, and would not put the district back together again.

C. Injunctive Relief Requested.

67. For the reasons set forth herein, Intervenor's seek injunctive relief, including a temporary restraining order, a temporary injunction and a permanent injunction, decreeing that Defendants and those in active concert or participation with them be:

- a. prevented from enforcing, effectuating, or taking any action, including a vote on the Plan, supported by their violations of TOMA;
- b. required to comply with the requirements of TOMA;
- c. required to declare all contracts or other forms of agreement entered into by the Board in derogation of the law or the adopted policies and procedures of KISD terminated, and null and void;
- d. prevented from enforcing, effectuating, or taking any action in furtherance of the Plan; and

- e. denied the right to protect any communications with Davis as privileged given his hiring was never properly noticed or approved by the Board.
68. The requested relief will preserve the status quo until the trial on merits of this case.
69. Additionally, and for the reasons set forth above, Intervenor further request that following a trial on the merits of this case, that the Court enter a permanent injunction against Defendants. Intervenor request a permanent injunction to the extent necessary to preserve the relief granted as requested herein.

VII.
JURY DEMAND

70. In accordance with Texas Rule of Civil Procedure 216, Intervenor request a jury trial for all issues so triable.

VIII.
CONDITIONS PRECEDENT

71. All conditions precedent have been performed, been met, have occurred, or otherwise been satisfied.

IX.
PRAYER FOR RELIEF

Intervenor respectfully request that the Court enter judgment for Intervenor and against Defendants awarding Intervenor the following relief:

- a) A Temporary Restraining Order, Temporary Injunction, and Permanent Injunction as described above;
- b) Invalidation of the actions taken by Defendants in violation of TOMA, as described above;
- c) Attorneys' fees and costs as described above; and
- d) Such other and further relief, whether at law or in equity, to which Intervenor may be justly entitled.

Respectfully submitted,

/s/ Dee J. Kelly Jr.

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Fort Worth, Texas 76102

Phone: (817) 332-2500

Facsimile: (817) 878-9280

ATTORNEYS FOR INTERVENORS

FORT
WORTH
REPORT

Exhibit A

View Options:

Show Everything

- Presenter
- Description
- Attachments
- Goals
- Policies

Hide Everything

October 24, 2024 at 5:00 PM - Regular Meeting

Agenda

1. CALL TO ORDER

2. PLEDGES OF ALLEGIANCE

3. PRAYER

4. AWARDS/ACHIEVEMENTS

Attachments: (2)

| | |
|---|-----------------------|
|  Cover - 10October24 Coversheet Awards24 | 10/10/2024 at 8:16 AM |
|---|-----------------------|

| | |
|---|----------------------|
|  Attachment - 10Oct24 Awards | 10/8/2024 at 2:46 PM |
|---|----------------------|

5. COMMUNITY SPOTLIGHT

5.A. 121 Community Church

5.B. Keller ISD Council of PTAs

5.C. Panther Pond Project

6. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Superintendent), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).

7. RECONVENE INTO OPEN SESSION

8. BOARD PRESIDENT'S UPDATE

9. SUPERINTENDENT'S UPDATE

10. AUDIENCE WITH INDIVIDUALS

Description: To be eligible to speak, speakers must sign up using the [online form](#). Individuals may not sign up in person at the time of the meeting. To provide staff with sufficient time to run and organize a report of speakers for the presiding officer, the deadline to submit your request to speak is noon on the day of the meeting.


11. REPORTS

11.A. Academic Achievement Update

12. CONSENT AGENDA

12.A. Approval of Minutes

Attachments: (3)

| | |
|--|------------------------|
|  Cover - Approval of Minutes | 10/7/2024 at 10:35 AM |
|  Written Board Minutes - 09-26-2024 | 10/4/2024 at 2:04 PM |
|  Written Board Minutes - 10-10-2024 | 10/17/2024 at 10:42 AM |

12.B. Approval of Budget Amendments

Attachments: (2)

| | |
|--|-----------------------|
|  Cover-Approval of Budget Amendments | 10/1/2024 at 3:31 PM |
|  Attachment-Approval of Budget Amendments | 10/4/2024 at 10:11 AM |

12.C. Approval of Purchases Exceeding \$25,000

Attachments: (2)

| | |
|--|----------------------|
|  Cover-Approval of Purchases Exceeding \$25K | 10/9/2024 at 2:10 PM |
|  Attachment-Approval of Purchases Exceeding \$25K | 10/9/2024 at 2:14 PM |

12.D. Approval of Bids/Bid Renewals

Attachments: (4)

| | |
|---|----------------------|
|  Cover-Approval of Bids-Renewals | 10/8/2024 at 2:40 PM |
|  Attachment-Approval of Bids-Renewals-CTE Supplies, Services, Equipment & Curriculum | 10/8/2024 at 2:39 PM |
|  Attachment-Approval of Bids-Renewals-Refrigerated Milk Cooler | 10/8/2024 at 2:39 PM |
|  Attachment-Approval of Bids-Renewals-CN Sprinter Van | 10/8/2024 at 2:40 PM |

12.E. Approval of Resolution Adopting the 2024 Property Tax Roll

Attachments: (1)

| | |
|---|-----------------------|
|  Cover and Attachments - Approval of Tax Roll 2024-CORRECTED | 10/21/2024 at 4:57 PM |
|---|-----------------------|

12.F. Approval of Revenue and Expenditure Budget Summary

Attachments: (2)

| | |
|--|----------------------|
|  Cover-Budgetary Comparison-Revenue Expenditure Report | 10/9/2024 at 2:25 PM |
|  Attachment-Budgetary Comparison-Revenue Expenditure Report | 10/9/2024 at 2:27 PM |



12.G. Approval of Contract with Weatherford College for Dual Credit Instruction

Attachments: (2)

| | |
|---|-----------------------|
|  Cover - Weatherford College Contract for Dual Credit Instruction | 10/7/2024 at 11:59 AM |
|  Attachment - Weatherford College Contract for Dual Credit-Keller 2024FA | 10/7/2024 at 11:59 AM |



12.H. Approval of Financial Aid and Admissions Application Filing Status Information Sharing Agreement with Texas Higher Education Coordinating Board

Attachments: (2)

- | | |
|---|-----------------------|
|  Cover - FAFSA | 10/14/2024 at 8:47 AM |
|  Attachment - 10 11 24 THECB Higher Education Coordinating Board | 10/14/2024 at 8:04 AM |

12.I. Approval of Educational Affiliation Agreement Between The University of North Texas Health Science Center College of Nursing and Keller ISD

Attachments: (2)

- | | |
|--|-----------------------|
|  Cover - UNTHSC College of Nursing | 10/10/2024 at 8:19 AM |
|  Attachment - UNTHSC Clinical Affiliation Agreement template Nursing (00469118xC146B).(002) | 10/8/2024 at 12:34 PM |

13. ACTION



13.A. Approval of Employment Recommendations - Contracts/Contract Renewals

Attachments: (1)

- | | |
|---|-----------------------|
|  Cover - Approval of Employment Recommendations 10.24.24 | 10/14/2024 at 2:26 PM |
|---|-----------------------|

13.B. Approval of Renewal of Interlocal Agreement Between Keller ISD and the City of Fort Worth Regarding School Resource Officers (SROs) for 2024-2025

Attachments: (2)

- | | |
|---|-----------------------|
|  Cover - Approval City of Fort Worth SRO | 10/10/2024 at 8:24 AM |
|  Attachment-Approval of City of Fort Worth-SRO Agreement | 10/9/2024 at 3:58 PM |

13.C. Consideration of Items Pulled from Consent Agenda (if applicable)



Attachments: (1)

- | | |
|---|----------------------|
|  Cover-Consider Items pulled from consent agenda | 9/24/2024 at 9:24 AM |
|---|----------------------|

14. PREVIEW

14.A. Preview Revisions to Local Board Policies: BBD, BBFA, BQA, CE, CQC, DCE, DEC, DGBA, EEH, EFA, FNG, GF

Attachments: (2)

- | | |
|---|-----------------------|
|  BoardBookCover Preview PolicyUpdate 123plus | 10/4/2024 at 1:59 PM |
|  Attachment - PolicyUpdate123 RedLined - FINAL | 10/21/2024 at 4:25 PM |

15. WORK SESSION/DISCUSSION

15.A. SCHEDULING

15.A.1. November 5, 2024 - Student Holiday (Election Day)

15.A.2. November 13, 2024 - Special Board Meeting (Team of 8)

15.A.3. November 21, 2024 - Regular Board Meeting

15.A.4. November 25-29, 2024 - District Closed (Thanksgiving Break)

15.A.5. December 19, 2024 - Regular Board Meeting

16. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Superintendent), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).

17. RECONVENE INTO OPEN SESSION

18. ADJOURNMENT

[<< Back to the Public Page for Keller Independent School District](#)

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FORT
WORTH
REPORT

Exhibit B

REPORT

WORTH
REPORT



MOAKCASEY
PROVEN LEADERS ADVANCING TEXAS SCHOOLS

Revenue Impact Analysis

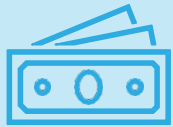
Prepared for



*Intentionally
Exceptional.*



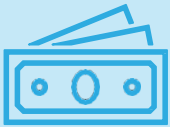
Overview



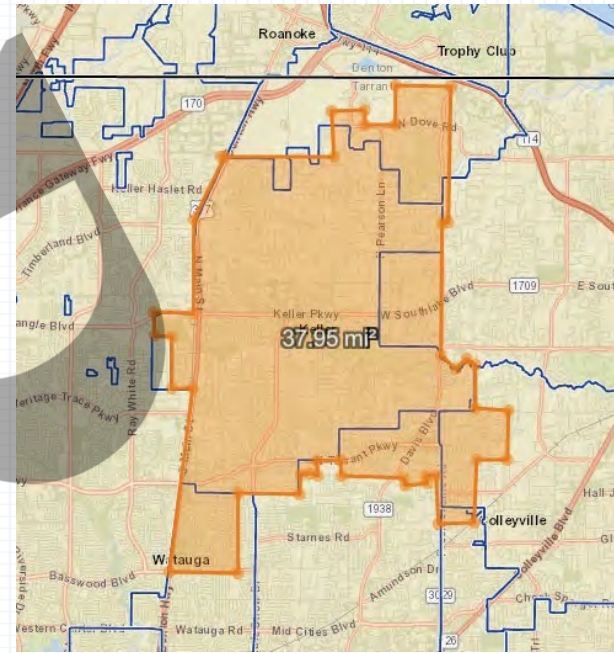
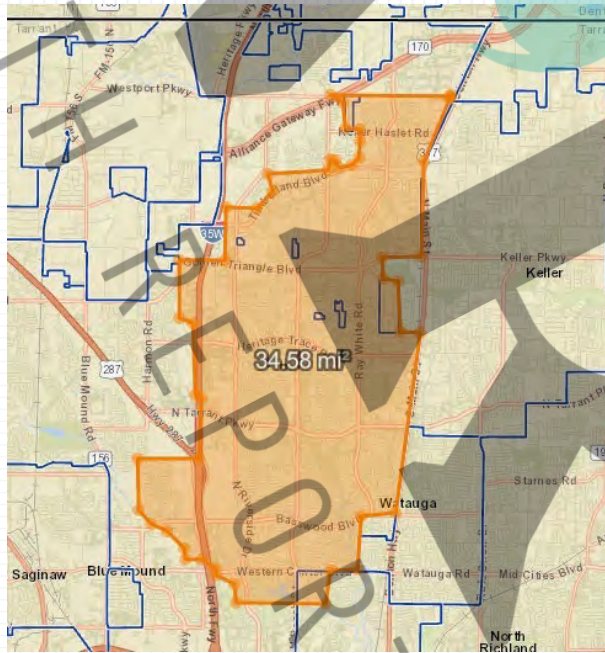
Revenue
Impact
Analysis

- Under the Texas school finance system, **maintenance and operations (M&O) revenues generally follow the student.**
- Students that receive additional services (special education, CTE, bilingual, compensatory education, etc.) **generate additional funding under special allotments** designed to support those programs.
- As a result, the state and local revenues for both entities after a potential east-west split would **very closely mirror combined state and local revenues if no split occurs** (i.e. parts will equal the whole).

Overview

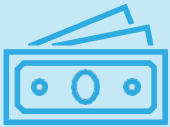


Revenue
Impact
Analysis





Overview

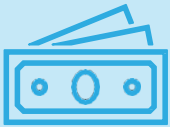


Revenue
Impact
Analysis

- Due to higher levels of participation in programs like special education, compensatory education and bilingual education, the western portion **would receive more state and local M&O revenues per student** after a potential split compared to the eastern portion.
- However, **this would not be additional funding above what the students are generating currently.**
- State law would require that this higher share of funding **be used to support the additional level of services** students in the western portion would be eligible for.



Disclosures



Revenue
Impact
Analysis

- This analysis does not address the impact a potential split would have on **federal revenues**.
- This analysis does not address **expenditures that may occur or efficiencies that may be realized** as a result of a potential split.
- This analysis does not address how **capital assets or debt service** would be allocated between the entities after a potential split.

As a result, this analysis also does not address revenues to support debt service. **Revenues are less equalized on the debt side** (i.e. no recapture, lower levels of state aid).



Assumptions | Total

ADA



Revenue
Impact
Analysis

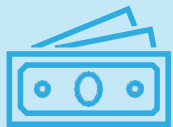
| | ADA | Percent |
|-------------------------|--------|---------|
| Combined | 30,824 | 100.0% |
| Western Portion* | 21,718 | 70.5% |
| Eastern Portion* | 9,105 | 29.5% |

**Projected*

Note: This analysis relies on campus-level ADA ratios as reported to TEA through PEIMS for the 2022-23 school year. Those ratios were then applied to 2023-24 district-wide figures.



Assumptions | Property Values



Revenue
Impact
Analysis

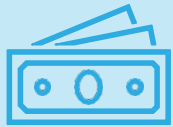
| | Dollars | Percent |
|-------------------------|----------------|---------|
| Combined | \$23.7 billion | 100% |
| Western Portion* | \$13.0 billion | 55% |
| Eastern Portion* | \$10.7 billion | 45% |

**Projected*

Note: This analysis relies on data from the 2023-24 school year (2023 tax year). Property values were allocated according to city taxing jurisdictions. Detailed data regarding exemptions, tax ceiling, etc. was not available for this analysis.



Revenue



Revenue
Impact
Analysis

| | Combined | Eastern Portion | Western Portion |
|-------------------------------------|------------------|--------------------|--------------------|
| M&O Tax Rate | \$0.7575 | \$0.7575 | \$0.7575 |
| M&O Collections | \$176.3 M | \$79.3 M | \$96.9 M |
| M&O State Aid | \$131.6 M | \$9.0 M | \$123.2 M |
| Recapture | (\$2.0 M) | (\$2.9 M) | \$0.0 M |
| Total M&O Revenue | \$305.8 M | \$85.5 M | \$220.2 M |
| M&O Revenues per ADA | \$9,920 | \$9,244 | \$10,204 |

Note: Totals may not sum due to rounding.

WORTH REPORT

WORTH REPORT



Question

&

Comment



MOAKCASEY

PROVEN LEADERS ADVANCING TEXAS SCHOOLS

Team Members

Justin Barlow
Jodi Duron, Ed.D.
Terry Fauchaux
Addie Gomez
Julia Grizzard
Gretchen Hoffman
Lauren Kulbeth
Amber Lasseigne, Ed.D.
Kathy Mathias
Toni Riester-Wood, Ph.D.
Larry Taylor
Mimi Vidaurri, Ed.D.

Executive Team

Buck Gilcrease, Ed.D., CEO
Dan Huberty, COO
Leo Lopez, CFO
Greg Gibson, Ed.D., CSO
Ginger Averitt
Lloyd W. Graham
Josh Haney

Board

Buck Gilcrease, Ed.D.
Dan Huberty
Leo Lopez

Consultants

Daniel Casey
Ronnie Kincaid
Mary McKeown-Moak, Ph.D.
Lynn Moak
Kelly Pickle
Don Rabalais

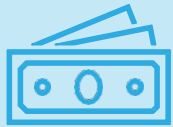
Administrative Staff

Kari Ruehman
Missy Dvorak
Ross Gilcrease
Brianna Huberty
Susan Moak

1001 Congress Avenue, Suite 250 | Austin, TX 78701
Phone (512) 485-7878 Fax (512) 485-7888
www.moakcasey.com



Demographic Data



Revenue
Impact
Analysis

| | Special Ed. FTEs | Percent | Compensatory Ed. | Percent |
|-------------------------|------------------|---------|------------------|---------|
| Combined | 1,484.41 | 100.0% | 11,414 | 100.0% |
| Western Portion* | 1,176.35 | 79.2% | 9,980 | 87.4% |
| Eastern Portion* | 308.06 | 20.8% | 1,434 | 12.6% |

**Projected*

Note: This analysis relies on campus-level ADA ratios as reported to TEA through PEIMS for the 2022-23 school year. Those ratios were then applied to 2023-24 district-wide figures.

2023-24 Summary of Finances
 KELLER ISD
 220-907

| | | ALLIANCE ISD | | NEW KISD | | CURRENT KISD | |
|--|---|--------------|----------------------|------------|---------------------|--------------|----------------------|
| | | HB 1 | HB 1 | HB 1 | HB 1 | HB 1 | HB 1 |
| Funding Elements | | From | From | From | From | From | From |
| Students | | Date Entry | Date Entry | Date Entry | Date Entry | Date Entry | Date Entry |
| 1. | Refined Average Daily Attendance (ADA) | | 21,576,676 | | 9,247,147 | | 30,823,823 |
| 2. | Regular Program ADA (Line 1 - Line 3 - Line 4) | | 18,386,644 | | 8,007,225 | | 26,393,869 |
| 3. | Special Education FTEs (Link to Detail Report) | | 1,128,152 | | 356,258 | | 1,484,410 |
| 4. | Career & Technology FTEs | | 2,061,881 | | 883,663 | | 2,945,544 |
| 5. | Weighted ADA (WADA) (Link to Detail Report) | | 29,274,893 | | 11,351,993 | | 40,626,885 |
| Property Values | | | | | | | |
| 6. | 2022 State Certified Property Value ("T2" value) | | | | | | \$23,592,498,281 |
| 7. | 2023 State Certified Property Value ("T2" value) | | \$13,037,784,413 | | \$10,667,278,156 | | \$23,705,062,569 |
| Tax Rates and Collections | | | | | | | |
| 8. | 2023-24 M&O Tax Rate | | \$0.75750 | | \$0.75750 | | \$0.75750 |
| 9. | 2023-24 Tier I M&O Tax Rate | | \$0.61920 | | \$0.61920 | | \$0.61920 |
| 10. | 2023-24 Maximum Compressed Tax Rate | | \$0.61920 | | \$0.61920 | | \$0.61920 |
| 11. | 2023-24 M&O Tax Collections (Link to Detail Report) | | \$96,945,642 | | \$79,319,161 | | \$176,264,803 |
| 12. | 2023-24 I&S Tax Rate | | \$0.33000 | | \$0.33000 | | \$0.33000 |
| 13. | 2023-24 I&S Tax Collections | | \$42,233,745 | | \$34,554,882 | | \$76,788,627 |
| 14. | 2023-24 Total Tax Collections | | \$139,179,387 | | \$113,874,044 | | \$253,053,430 |
| 15. | 2023-24 Total Tax Levy | | N/A | | N/A | | N/A |
| Funding Components | | | | | | | |
| 16. | District Basic Allotment | | \$6,160 | | \$6,160 | | \$6,160 |
| 17. | ASF ADA (Prior-year ADA) | | | | | | 31,281,880 |
| 18. | Per Capita Rate | | \$423,747 | | \$423,747 | | \$423,747 |
| Program Intent Codes - Allotments | | | | | | | |
| Tier I Subchapter B & C Allotments | | | | | | | |
| 19. | 11-Regular Program Allotment 48.051 | | \$113,261,725 | | \$49,324,508 | | \$162,586,233 |
| 20. | Small and Mid-size Allotment 48.101 | | \$0 | | \$0 | | \$0 |
| 21. | 23-Total Special Education Adjusted Allotment 48.102 (Spend 55%) | | \$26,886,605 | | \$8,418,724 | | \$35,410,241 |
| 22. | 37-Dyslexia Allotment 48.103 | | \$1,506,613 | | \$645,891 | | \$2,152,304 |
| 23. | 24-Total Comp Ed Allotment 48.104 (Spend 55%) | | \$14,395,963 | | \$2,048,714 | | \$16,444,677 |
| 24. | 25-Total Bilingual Education Allotment 48.105 (Spend 55%) | | \$2,362,497 | | \$0 | | \$2,362,497 |
| 25. | 22-Total Career & Technology Allotment 48.106 (Spend 55%) | | \$17,337,229 | | \$7,430,242 | | \$24,767,472 |
| 26. | 11-Public Education Grant 48.107 | | \$614 | | \$263 | | \$877 |
| 27. | 36-Early Education Allotment 48.108 | | \$1,912,962 | | \$819,841 | | \$2,732,803 |
| 28. | 21-Gifted & Talented Allotment 48.109 | | \$461,005 | | \$195,180 | | \$660,374 |
| 29. | 38-College, Career, or Military Readiness Outcomes Bonus 48.110 | | \$1,446,900 | | \$620,100 | | \$2,067,000 |
| 30. | Fast Growth Allotment 48.111 (Link to Detail Report) | | \$0 | | \$0 | | \$0 |
| 31. | Teacher Incentive Allotment 48.112 | | \$31,358 | | \$13,439 | | \$44,797 |
| 32. | Mentor Program Allotment 48.114 | | \$0 | | \$0 | | \$0 |
| 33. | School Safety Allotment 42.168 (includes \$15K per Campus; 48.115) | | \$620,767 | | \$302,471 | | \$923,238 |
| Tier I Subchapter D Allotments | | | | | | | |
| 34. | 99-Total Transportation Allotment 48.151 | | \$1,573,612 | | \$674,405 | | \$2,248,017 |
| 35. | 99-New Instructional Facilities Allotment (NIFA) 48.152 | | \$0 | | \$0 | | \$0 |
| 36. | Dropout Recovery and Residential Placement Facility Allotment 48.153 | | \$9,842 | | \$4,218 | | \$14,060 |
| 37. | Tuition Allotment for Districts Not Offering All Grade Levels 48.154 | | \$0 | | \$0 | | \$0 |
| 38. | College Preparation Assessment Reimbursement 48.155 | | \$90,391 | | \$38,739 | | \$129,130 |
| 39. | Certification Examination Reimbursement 48.156 | | \$72,997 | | \$31,285 | | \$104,282 |
| 40. | Total Cost of Tier I (Link to Tier I Detail Report) | | \$181,971,081 | | \$70,567,820 | | \$252,648,003 |
| 41. | Less: Local Fund Assignment | | \$80,729,961 | | \$66,051,786 | | \$146,781,747 |
| 42. | Per Capita Distribution from the Available School Fund (ASF) | | \$9,143,052 | | \$3,918,451 | | \$13,061,503 |
| Foundation School Program (FSP) State Funding | | | | | | | |
| 43. | FSP State Share of Tier I (Line 40 - Line 41 - Line 42) | | \$92,098,068 | | \$597,583 | | \$92,804,753 |
| 44. | Tier II State Aid (Link to Tier II Detail Report) | | \$19,563,836 | | \$2,873,156 | | \$21,642,552 |
| 45. | Other Programs (Link to Detail Report) | | \$2,436,497 | | \$1,655,212 | | \$4,089,456 |
| 46. | Total FSP Operating Fund | | \$114,098,401 | | \$5,125,951 | | \$118,536,762 |
| State Aid by Fund Code / Object Code - Funding Source | | | | | | | |
| M&O State Aid | | | | | | | |
| 47. | 199/5812 - Foundation School Fund | | \$114,098,401 | | \$5,125,951 | | \$118,536,762 |
| 48. | 199/5811 - Available School Fund | | \$9,143,052 | | \$3,918,451 | | \$13,061,503 |
| I&S State Aid | | | | | | | |
| 49. | 599/5829 - Existing Debt Allotment (EDA) (Link to Detail Report) | | \$0 | | \$0 | | \$0 |
| 50. | 599/5829 - Instructional Facilities Allotment (IFA) (Bond) (Link to Detail Report) | | \$0 | | \$0 | | \$0 |
| 51. | 599/5829 - Instructional Facilities Allotment (Lease Purchase) (See Link Above) | | \$0 | | \$0 | | \$0 |
| 52. | I&S Hold Harmless (ASAHE for Facilities on TEA's Report) (Link to HH2324-Calcs tab) | | \$6,018,026 | | \$2,686,741 | | \$8,955,803 |
| 53. | TOTAL 2023-24 FSP/ASF STATE AID | | \$129,259,479 | | \$11,731,142 | | \$140,554,067 |
| Local Revenue in Excess of Entitlement | | | | | | | |
| 54. | Local Revenue in Excess of Entitlement (Link to Cost of Recapture Report) | | \$0 | | \$2,878,881 | | \$2,090,705 |
| FSP Allocations and Adjustments Report (Link to Detail Report) | | | | | | | |

| ADDITIONAL INFO: (Not on TEA's Summary of Finances) | | | | | | | |
|--|--|--|----------------------|--|---------------------|--|----------------------|
| SUMMARY OF TOTAL STATE/LOCAL M&O REVENUE: | | | | | | | |
| 55. | M&O Rev From State (not including Fund 599 & I&S Hold Harmless) | | \$123,241,453 | | \$9,044,402 | | \$131,598,264 |
| 56. | Gross M&O Rev From Local Taxes | | \$96,945,642 | | \$79,319,161 | | \$176,264,803 |
| 57. | Tier 1 Recapture | | \$0 | | \$0 | | \$0 |
| 58. | Recapture - Copper Penny Level | | \$0 | | \$2,878,881 | | \$2,090,705 |
| 59. | Chapter 48 Funding Credit Against Recapture | | \$0 | | \$0 | | \$0 |
| 60. | Net M&O Revenue From Local Taxes | | \$96,945,642 | | \$76,440,280 | | \$174,174,098 |
| 61. | Less: Credit Balance Due State (only if Line 55 is less than zero) | | \$0 | | \$0 | | \$0 |
| 62. | Net 2023-24 TOTAL STATE/LOCAL M&O REVENUE | | \$220,187,094 | | \$85,484,682 | | \$305,772,362 |

| SUMMARY OF TOTAL RECAPTURE: | | | | | | | |
|------------------------------------|---|--|------------|--|--------------------|--|--------------------|
| 62. | Tier I Recapture | | \$0 | | \$0 | | \$0 |
| 63. | Recapture - Copper Penny Tier II Level | | \$0 | | \$2,878,881 | | \$2,090,705 |
| 64. | Total 2023-24 Recapture | | \$0 | | \$2,878,881 | | \$2,090,705 |
| 65. | Less: Chapter 48 Funding Credit Against Recapture (if applicable) | | \$0 | | \$0 | | \$0 |
| 66. | Total 2023-24 Recapture Payments Due TEA | | \$0 | | \$2,878,881 | | \$2,090,705 |

| | | |
|-------------|-------------|------------|
| \$10,204.87 | \$9,244.44 | \$9,920.00 |
| 1.3568 | 1.2276 | 1.3180 |
| 0.720101363 | 0.279569681 | |

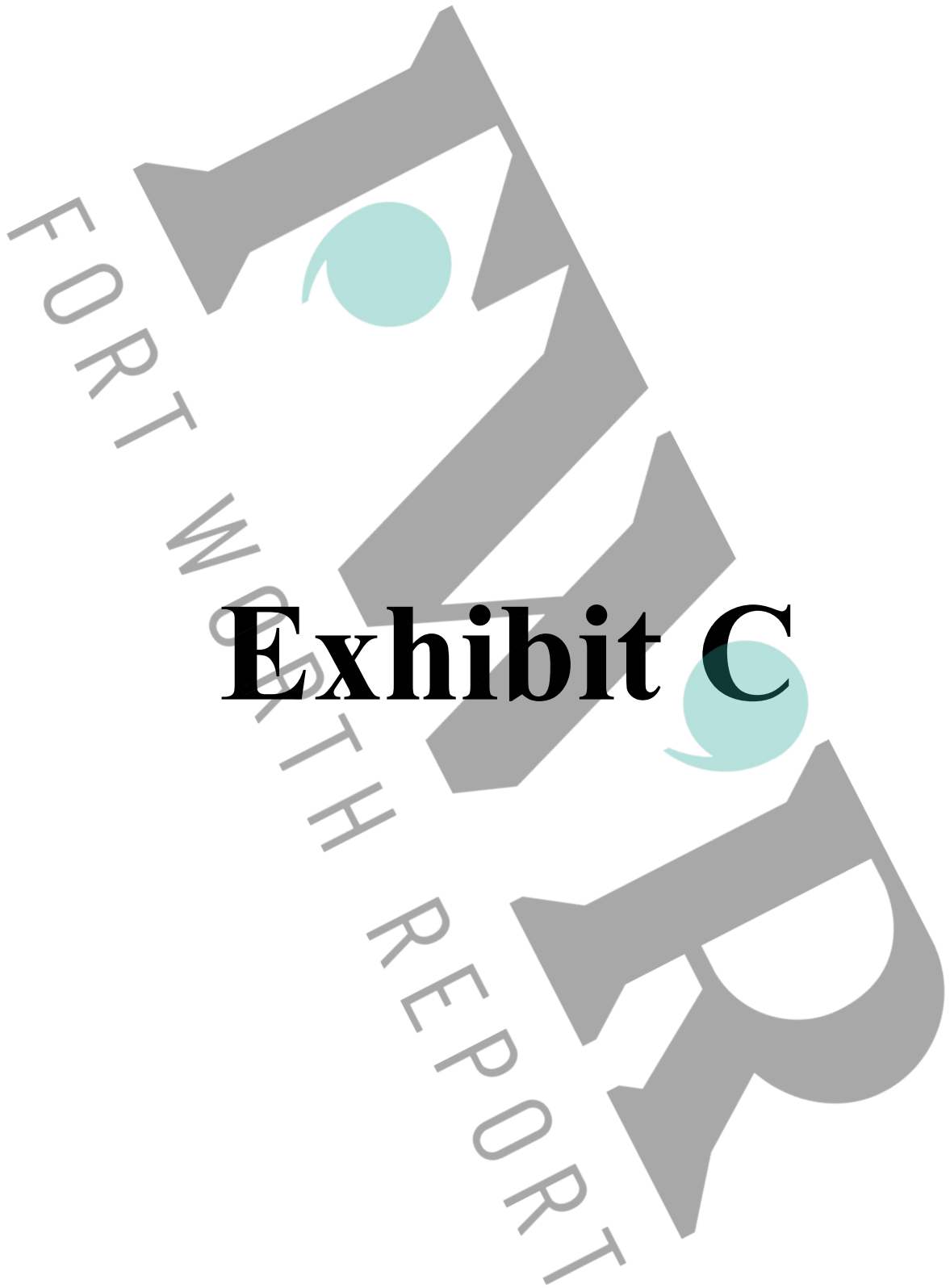


Exhibit C

View Options:

Show Everything

- Presenter
- Description
- Attachments
- Goals
- Policies

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December 19, 2024 at 5:00 PM - Regular Meeting

Agenda

1. CALL TO ORDER

2. PLEDGES OF ALLEGIANCE

3. PRAYER

4. AWARDS/ACHIEVEMENTS

Attachments: (2)

[Cover - 12December19 Coversheet Awards24](#)

12/5/2024 at 1:54 PM

[Attachment - 12Dec19 Awards](#)

12/12/2024 at 11:27 AM

5. COMMUNITY SPOTLIGHT

5.A. Keller Masonic Lodge

5.B. Milestone Church

6. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146, Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Superintendent), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).

7. BOARD PRESIDENT'S UPDATE

8. SUPERINTENDENT'S UPDATE

9. AUDIENCE WITH INDIVIDUALS

Description: To be eligible to speak, speakers must sign up using the [online form](#). Individuals may not sign up in person at the time of the meeting. To provide staff with sufficient time to run and organize a report of speakers for the presiding officer, the deadline to submit your request to speak is noon on the day of the meeting.

10. PUBLIC HEARING

10.A. Public Hearing - Financial Integrity Rating System of Texas (FIRST)

Attachments: (1)



[Cover - Public Hearing-FIRST](#)

12/11/2024 at 1:04 PM

11. CONSENT AGENDA



11.A. Approval of Minutes

Attachments: (2)

-
- | | |
|---|-----------------------|
|  Cover - Approval of Minutes 11.21.24 | 12/5/2024 at 2:42 PM |
|  Attachment - Written Board Minutes - 11-21-2024 | 12/10/2024 at 1:44 PM |
-


11.B. Approval of Budget Amendments

Attachments: (2)

-
- | | |
|--|----------------------|
|  Cover-Approval of Budget Amendments | 12/9/2024 at 1:03 PM |
|  Attachment-Approval of Budget Amendments | 12/9/2024 at 1:12 PM |
-

11.C. Approval of Bids/Bid Renewals

Attachments: (2)

-
- | | |
|---|----------------------|
|  Cover-Approval of Bids | 12/9/2024 at 1:17 PM |
|  Attachment-Approval of Bids | 12/9/2024 at 1:16 PM |
-

11.D. Approval of Revenue and Expenditure Budget Summary

Attachments: (2)

-
- | | |
|---|-----------------------|
|  Cover-Approval of Revenue-Expenditure Budget Summary | 12/11/2024 at 1:08 PM |
|  Attachment-Approval of Revenue-Expenditure Budget Summary | 12/11/2024 at 1:10 PM |
-

11.E. Approval of 791 Purchasing Cooperative Master Interlocal Agreement & Board Resolution

Attachments: (3)

-
- | | |
|--|----------------------|
|  Cover-Approval of Resolution 791 Cooperative | 12/9/2024 at 1:21 PM |
|  Attachment-Approval of Resolution 791-Texas Interlocal Agreement | 12/9/2024 at 1:21 PM |
|  Attachment-Approval of Resolution 791-Coop Board Resolution | 12/9/2024 at 1:21 PM |
-

11.F. Fossil Hill Middle School Emergency Declaration

Attachments: (1)

-
- | | |
|--|-----------------------|
|  Board Cover Fossil Hill Middle School Emergency Declaration December 12 2024 | 12/11/2024 at 1:24 PM |
|--|-----------------------|
-

11.G. Approval of 2025 Local Calendar for Public Information Act Purposes

Attachments: (2)

-
- | | |
|--|-----------------------|
|  Cover - Approval 2025 of Local Calendar for Public Information | 12/5/2024 at 10:02 AM |
|  File_2025 Public Information Act Calendar-draft | 12/5/2024 at 10:03 AM |
-



11.H. Approval of Memorandum of Understanding (MOU) Between Keller ISD and Harvard for the Strategic Data Project Fellowship

Attachments: (2)

-
- | | |
|--|-----------------------|
|  Cover - Harvard MOU - 2024-2025 | 12/11/2024 at 2:39 PM |
|  Attachment - Harvard SpEd Fellowship | 12/11/2024 at 2:09 PM |
-



11.I. Approval of the 2024-2025 Texas Teacher Evaluation and Support System (T-TESS) Teacher Appraisers

Attachments: (2)

| | |
|---|----------------------|
|  Cover - Consent - T-TESS Certified Appraisers - 2024-2025 | 12/2/2024 at 2:45 PM |
|  Attachment - December T-TESS Certified Appraiser List - 2024-2025 | 12/2/2024 at 2:45 PM |

11.J. Adoption of Revision to Local Board Policy EFA



Attachments: (2)

| | |
|---|------------------------|
|  Cover - Adoption of Revisions to Local Board Policy EFA | 12/16/2024 at 11:46 AM |
|  EFA(LOCAL) Revised 241219 | 12/16/2024 at 11:46 AM |

12. ACTION

12.A. Approval of 2025-2026 Instructional Calendar

Attachments: (2)

| | |
|--|-----------------------|
|  Approval of Instructional Calendar 2025-2026 December 2024 | 12/10/2024 at 1:46 PM |
|  2025-2026 Instructional Calendar | 12/5/2024 at 9:58 AM |

12.B. Consideration of Items Pulled from Consent Agenda (if applicable)

Attachments: (1)

| | |
|---|-----------------------|
|  Cover - Consider Items Pulled From Consent Agenda | 12/5/2024 at 10:04 AM |
|---|-----------------------|

13. WORK SESSION/DISCUSSION

13.A. Scheduling and Upcoming Events

13.A.1. December 23, 2024 - January 3, 2025 - Winter Break

13.A.2. January 15, 2025 - First Day to File for Application for Place on the Ballot (May Trustee Election)

13.A.3. January 20, 2025 - District Holiday

13.A.4. January 23, 2025 Regular Board Meeting

13.A.5. February 14, 2025 - Last Day to File for Application for Place on the Ballot (May Trustee Election)

14. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Level 3 Grievances), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).

14.A. Receive Level 3 Grievance by submission, pursuant to Tex. Gov't Code § 551.074, 551.082

14.B. Conduct Level 3 Grievance Hearing, pursuant to Tex. Gov't Code 551.074, 551.082

14.C. Deliberation and Legal Consultation Regarding Level 3 Grievances, pursuant to Tex. Gov't Code 551.071, 551.074, 551.082

15. RECONVENE INTO OPEN SESSION

16. CONSIDER LEVEL 3 GRIEVANCES DELIBERATED IN EXECUTIVE SESSION

16.A. Take Action, if any, on Level 3 Grievances

17. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with Attorney), Section 551.074 (Personnel Matters - Appointment, Employment, Evaluation, Reassignment, Duties, Discipline, Dismissal, Complaint, Superintendent), Section 551.076 (Deliberation Regarding Security Devices - Deployment, Implementation of Security Personnel or Devices), Section 551.082 (School Children: School District Employees; Disciplinary Matter or Complaint), and Section 551.0821 (Personally Identifiable Information about Public School Student).

18. ADJOURNMENT

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FORT
WORTH
REPORT

Exhibit D



Joni Smith, Keller ISD Board of Trustees, Place 2

January 9 · 🌐

...

After much prayer and thoughtful consideration, both Chelsea and myself, believe that it is essential to publicly address the pending action of the Board regarding the potential detachment of Keller ISD. It is our sincere hope that the Board will pause this process and establish an orderly, transparent approach that prioritizes collaboration, community input, and careful consideration before any final decision is made. Below is my statement, and Chelsea has also shared a statement on her page.

You want answers. You deserve answers. Trustee Chelsea Kelly and I do, too.

The rumor is true.

On December 19, a plan to detach a portion of Keller ISD and form a new school district was revealed by President Randklev, Vice-President John Birt and Trustee Micah Young. To say that Trustee Kelly and I were blindsided and shocked is an understatement. An action like this carries significant implications for our community, our schools, and most importantly, our students. As a board member, I must express my concern that this proposal has not been part of any long-range plan previously discussed by the Board. To our knowledge there has been no reliance of district input of the realities of this being able to happen in the timeline being requested. I have not even seen a resolution to even have input for myself and my constituents. Furthermore, as a parent and resident, I am concerned that no public discussions or community engagement have taken place regarding this matter. I've never had a discussion previously about splitting the district with another board member and, honestly, it was never even a thought that had crossed my mind.

Decisions of this magnitude require robust debate, community input, and careful consideration. The detachment of part of the district will inevitably have lasting impacts on property values, school funding, district resources, and the educational opportunities for current and future students. Yet, there has been no task force, committee, or public forum to explore this proposal and these questions, or a plan for one. For an action like this to be made successful and viable, it must be based on careful research, data, and collaboration, not speculation, in haste or decided upon in closed-door sessions to ensure that every voice is heard before moving forward.

This is unprecedented and never been done before.

In past major initiatives, such as bond elections, there was a structured and transparent process, including months of planning, stakeholder engagement, and collaborative discussions. This issue demands the same level of attention and care, if not more.

There are numerous unanswered questions about the financial, legal, and logistical aspects of this proposal, including:

- How would bond debt, district assets, and revenue be divided?
- What would happen to shared facilities, such as KCAL and other district resources?
- How would the new district fund itself, and what would be the impact on taxes and property values?
- What legal challenges could arise from this process, and how would they affect both districts?

These questions deserve to be fully explored in public meetings, with input from the entire Board and our community. Without a clear and collaborative process, we risk making hasty decisions that could lead to unintended and possibly dire consequences for our students, families and community. I'm not ok with how this process has been handled, with ambiguity and speed, which is why I am calling for the formation of a task force or committee to thoroughly examine this proposal, its viability and its implications.

When I joined the board for Keller ISD, I did so out of love for this district and a commitment to its success. I chose KISD for my two boys because I believed this was a true Destination for Excellence. And a district of excellence requires a celebration of diversity and embraces a community that allows students to succeed on a global level. Our students deserve that and my mission hasn't changed to ensuring that.

My dedication to this district and this community has only grown stronger. I love our teachers. I love our students. I love this community. And I want to continue to be a defender and protector of this District. I know Chelsea feels the same way. She has the same heart and passion for this District, as I do. We both have two kids in this district that depend on whatever happens to only be a success.

This is a pivotal moment for Keller ISD. Chelsea and I are committed to ensuring that our community has the information, voice, and opportunity to guide this process. Together, through transparency and collaboration, we can make decisions that reflect the best interests of our students, our schools, and our future.

And we are taking the high road.

WORTH REPORT

FORT
WORTH
REPORT

Exhibit E



Chelsea Kelly, Keller ISD School Board Trustee Pl. 3

January 9 · 🌐



After prayer and thoughtful consideration, both Joni and myself believe that it is essential to publicly address the pending action of the Board regarding the potential splitting of Keller ISD into two districts. It is our sincere hope that this Board will pause this process and establish an orderly, transparent approach that prioritizes collaboration, community input, and careful consideration before any final decision is made. Below is my statement and Joni has also shared a statement on her page.

There's been talk in the community about the board discussing splitting Keller ISD to create two school districts. Unfortunately, this rumor is true. The Board has only had one closed-session meeting about it, and this was the first time I heard about it.

I am not ok with this. I am not ok with the way this has been rolled out or that our community has had no input on this idea.

I think it's important for the Board to slow down and give us all time to think about this issue and its potential effects. As a board member, I believe our community needs to be fully informed and involved in this process. Decisions like this should be made with transparency, collaboration, and careful thought.

The idea of splitting off part of Keller ISD raises many questions: How would this affect property taxes and school funding? What would it mean for maintaining existing buildings? How would feeder patterns and student assignments change? How will this effect our property values? What stadium would we use? What about KCAL??? These are important concerns that NEED ANSWERS before any decisions are made.

In the past, when Keller ISD faced major decisions like bond elections, we followed a careful, transparent process. This included committees, community surveys, and town halls to make sure all voices were heard. Any decision about splitting off part of the district should follow a similar approach. Why hasn't it?

I grew up in Keller ISD, so I have a deep connection to this community and its schools. I understand the uncertainty and anxiety this proposal has created for our students, families, and staff. I feel it too. It's imperative that any decisions reflect our community's values and priorities. To do this, we must move forward in a way that ensures everyone has a voice.

Our strength as a district lies in our unity and diversity. By working together, we can address the questions and concerns about this proposal and ensure the process is transparent. I'm committed to advocating for a process that allows our community to fully engage in this conversation, making sure that every voice is heard.

To reiterate, I am against this proposal. We will get through this together and get to the bottom of it. I encourage our community to stay informed and actively participate as we work through these discussions. I encourage my fellow trustees to pause, listen and hear the community.

FORT
WORTH
REPORT

Exhibit F

View Options:

[Show Everything](#)

- Presenter
- Description
- Attachments
- Goals
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[Hide Everything](#)

January 16, 2025 at 5:00 PM - Special Meeting

Agenda

1. CALL TO ORDER

2. PLEDGES OF ALLEGIANCE

3. PRAYER

4. AUDIENCE WITH INDIVIDUALS

Description: To be eligible to speak, speakers must sign up using the [online form](#). Individuals may not sign up in person at the time of the meeting. As this is a Special Meeting, comments made in the Audience with Individuals portion of the meeting will be limited to items on the Special Meeting Agenda only.

To provide staff with sufficient time to organize a report of speakers for the presiding officer, the deadline to submit your request to speak is noon on the day of the meeting.

5. PRESIDENT'S REPORT

6. EXECUTIVE SESSION may be called for the purposes permitted by the Texas Open Meetings Act, Texas Government Code Section 551.001 through 551.146. Section 551.071 (Consultation with attorney on district boundaries and process of creation of district by detachment under Chapter 13 of the Texas Education Code and discussion on trustee duties and responsibilities pursuant to Chapter 11 of the Texas Education Code.)

7. RECONVENE INTO OPEN SESSION

8. BOARD REMARKS REGARDING DISTRICT BOUNDARIES AND PROCESS OF CREATION OF DISTRICT BY DETACHMENT UNDER CHAPTER 13 OF THE TEXAS EDUCATION CODE (NO ACTION TO BE TAKEN)

9. ADJOURNMENT

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| Alli Allman | | aallman@jw.com | 3/3/2025 2:06:47 PM | SENT |
| Bethany Pickett | | bpickett@jw.com | 3/3/2025 2:06:47 PM | SENT |
| Timothy Davis | | tdavis@jw.com | 3/3/2025 2:06:47 PM | SENT |
| Alexandra MarieWilliams | | amwilliams@jw.com | 3/3/2025 2:06:47 PM | SENT |
| Juana Saucedo | | jsaucedo@jw.com | 3/3/2025 2:06:47 PM | SENT |
| Matthew Mucker | | Keller-isd-lawsuit@companies.mucker.net | 3/3/2025 2:06:47 PM | SENT |
| Kelly Pence | | kelly.pence@kellyhart.com | 3/3/2025 2:06:47 PM | SENT |
| Joseph D.Austin | | joseph.austin@kellyhart.com | 3/3/2025 2:06:47 PM | SENT |
| Dee Kelly | | dee.kelly@kellyhart.com | 3/3/2025 2:06:47 PM | SENT |
| Matthew Francis | | matthew.francis@kellyhart.com | 3/3/2025 2:06:47 PM | SENT |