



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

March 22, 2024

Dr. Nettie Collins-Hart, Superintendent
Hazelwood School District
15955 New Halls Ferry Rd.
Florissant, MO 63031
via email to: ncollinshart@hazelwoodschoools.org

**RE: Notice of Investigation - Hazelwood School District and the
Hazelwood Board of Education**

Dear Ms. Collins-Hart:

I am disturbed that it appears Hazelwood School District (“HSD”) has ignored long-standing Missouri law and elevated political narrative above student safety. In 2020, the HSD Board of Education adopted a “Statement of Solidarity” compelling the district to, among other things: categorize and treat students differently based on race; “recruit, hire and promote” staff based on race; and “reevaluate” the district’s relationship with local police.¹ Beginning with the 2021 school year, after unsuccessfully trying to subject its school resource officers (“SROs”) to the district’s diversity, equity and inclusion programing, Hazelwood removed uniformed police officers from its schools.² To date, SROs are still not present in Hazelwood East schools.³

Two weeks ago, on March 11, 2024, during the middle of the school day, a Hazelwood East High School student, Kaylee Gain, was viciously assaulted on a street near school property by another student. As of this writing, Ms. Gain remains in critical condition in a St. Louis area hospital. Notably, during the attack on Ms. Gain, which was captured on video by other students, not a single school resource officer was on the scene to protect Ms. Gain or restore order. The absence of SROs on the scene is

¹ Hazelwood School District Board of Education – Statement of Solidarity, available at <https://www.hazelwoodschoools.org/site/default.aspx?PageType=3&DomainID=4&ModuleInstanceID=43&ViewID=6446EE88-D30C-497E-9316-3F8874B3E108&RenderLoc=0&FlexDataID=19903&PageID=1>

² <https://www.ksdk.com/article/news/local/hazelwood-sro-program-paused-diversity-inclusion-training/63-2d9424eb-f044-4ac7-b81b-c29c2198d723>

³ <https://fox2now.com/news/fox-files/police-and-school-admin-cant-agree-on-training-forcing-sros-out-of-most-schools/>

directly attributable to Hazelwood’s insistence on prioritizing race-based policies over basic student safety. By its actions, HSD has endangered not only Ms. Gain, but the general school community writ large.

Raced-based policies are anathema to Missouri law. The Missouri Human Rights Act (“the Act” or “MHRA”) guarantees every Missouri resident the right to be free from discrimination and the right to full enjoyment of places of public accommodation.⁴ The Act also vests the Missouri Attorney General’s Office with enforcement authority where, as here, the attorney general has reasonable cause to believe a violation of the Act has occurred implicating a matter of public importance.⁵

By this letter, I am notifying you of my office’s investigation into HSD for violations of the MHRA. I demand HSD and its Board of Education turn over the following records to my office immediately, as required by Missouri law:⁶

1. All records constituting the District’s or Board’s bullying, anti-bullying, harassment, or anti-harassment policies in effect from August 1, 2022 to present.
2. All records constituting the District’s or Board’s policies concerning teacher or staff intervention into incidents of student-involved violence, harassment, or bullying in effect from August 1, 2022 to present.
3. All records concerning any decision to exclude uniformed law enforcement from any Hazelwood school from August 1, 2020 to present, including records of any such decision, internal or external communications about such decisions, and records containing reasons for any such decisions.
4. All requests from any individual (whether student, staff, member of the public, law enforcement agency, or government employee) requesting the presence of security personnel or law enforcement at any school in the District from August 1, 2020 to present.
5. All records of the District or Board denying a request for security personnel or law enforcement at any school in the District from August 1, 2020 to present.

⁴ Chapter 213, RSMo.

⁵ § 213.126, RSMo.

⁶ See Chapter 610, §§ 213.075, and 213.126, RSMo.

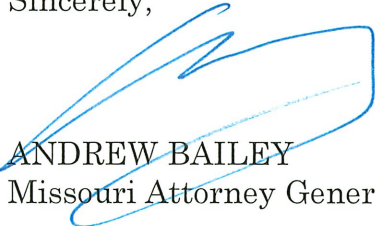
6. The District or Board's discrimination or anti-discrimination policies concerning employment or employees in effect from August 1, 2022 to present.
7. The District or Board's discrimination or anti-discrimination policies in education or for students in effect from August 1, 2022 to present.
8. All draft and final versions of the Diversity, Equity, and Inclusion Action Plan (for reference, the public version is currently available at: <https://www.hazelwoodschools.org/domain/3419>), as well as all correspondence and documents relating to the development of the Plan.
9. All records concerning complaints or feedback about the Diversity, Equity, and Inclusion Action Plan from the time of the Plan's finalization through present.
10. All draft and final versions of the "Racial Equity Policy" (for reference, the public version is currently available at: https://drive.google.com/file/d/1_idvktG8bSpN5xNLZXqD4CAZR Cw3Q_7/view), as well as all correspondence and documents relating to the development of the Racial Equity Policy.
11. All records concerning complaints or feedback about the Racial Equity Policy from the time of the Policy's finalization through present.
12. Any records showing statistics of the District from August 1, 2020 to present of the number of current employees by race at any point during that timeframe; number of applicants for employment by race at any point during that timeframe; number of hires by race at any point during that timeframe; number of employment terminations by race at any point during that timeframe; and number of adverse employment actions (such as suspensions or performance plans) by race at any point during that timeframe.

This investigative demand and request for public records is submitted in the public interest and is likely to contribute significantly to public understanding of the operation or activities of the District and the Board. The Attorney General's Office seeks to understand the topics contained in the records above and provide

information to the public about the same. As a governmental agency, this Office is acting in the public interest in submitting this request.

If access to any record is denied, I request a statement of the grounds for denial containing all information required under Section 610.026.4.

Sincerely,



ANDREW BAILEY
Missouri Attorney General

Cc: Kristina Allen, custodian of records and Board Secretary,
kallen2@hazelwoodschoools.org