



**OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS**

**KWAME RAOUL**  
ATTORNEY GENERAL

May 18, 2022

**VIA EMAIL AND FIRST CLASS MAIL**

Dr. Lisa Small  
Township High School District 211 Superintendent  
1750 South Roselle Road  
Palatine, IL 60067-7336  
[lsmall@d211.org](mailto:lsmall@d211.org)

**Re: Request for Information: Student Discipline and Ticketing**

Dear Dr. Small:

I write on behalf of the Office of the Attorney General of Illinois (“OAG”) to request information from Township High School District 211 (“District 211”) regarding its policies and practices governing student discipline and the issuance of tickets to students accused of school misconduct. The OAG has authority to investigate violations of state laws protecting civil rights and prohibiting discrimination, and to take action to enforce these laws where appropriate.<sup>1</sup>

As set forth in recently issued statewide guidance issued by the OAG and the Illinois State Board of Education (“ISBE”),<sup>2</sup> school district practices may violate Illinois civil rights laws if they impose an unjustified disparate impact based on race or other protected characteristics. Based on recently-published reporting about the impact of tickets and fines issued by local police departments, including the Palatine Police Department (“PPD”), to District 211 students accused

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<sup>1</sup> Such authority includes, but is not limited to, the Attorney General Act, 15 ILCS 205/4 and 205/10, the Illinois Human Rights Act, 775 ILCS 5/1 *et seq.*, the Civil and Equal Rights Enforcement Act, 15 ILCS 210/1, and the Attorney General’s common law authority to enforce state law. *People ex rel. Barrett v. Finnegan*, 378 Ill. 387, 393, 38 N.E.2d 715, 717 (1941).

<sup>2</sup> OAG & ISBE, Guidance to School Districts: Legal Standards and Enforcement of Civil Rights Laws Related to School Discipline in Illinois (December 17, 2021), at <https://illinoisattorneygeneral.gov/rights/2021%20OAG-ISBE%20School%20Discipline%20Guidance.pdf>.

of minor school-related infractions such as truancy or disorderly conduct, the OAG is exercising its authority to seek information as to whether these practices violate civil rights laws.<sup>3</sup>

Pursuant to the OAG's authority, we request that District 211 produce the following information by **June 30, 2022**. Unless otherwise indicated, all requests relate to the period from August 1, 2018 through the present. Please refer to Appendix A of this letter for additional definitions and instructions.

1. Data or documents sufficient to show the number of **tickets issued** for school-related conduct or truancy to District 211 students and/or their parents or guardians by school year, disaggregated by:
  - a. Race;
  - b. Gender;
  - c. Disability or IEP Status;
  - d. School;
  - e. Entity issuing the ticket;
  - f. Reason for ticket; and
  - g. Total cost of fine or fee amount.
  
2. Data or documents sufficient to show the number of District 211 **referrals of students** to local law enforcement by school year, disaggregated by:
  - a. Race;
  - b. Gender;
  - c. Disability or IEP Status;
  - d. School;
  - e. Law enforcement agency;
  - f. Reason for referral; and
  - g. Outcome of the referral.
  
3. Data or documents sufficient to show the number of District 211 **calls for service concerning students to local law enforcement** by school year, disaggregated by:
  - a. Race;
  - b. Gender;
  - c. Disability or IEP Status;
  - d. School;
  - e. Law enforcement agency;
  - f. Reason for call; and
  - g. Outcome of the call.
  
4. Data or documents sufficient to show the number of **out-of-school suspensions** in District 211 by school year, disaggregated by:
  - a. Race;

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<sup>3</sup> Jodi S. Cohen, ProPublica, and Jennifer Smith Richards, Chicago Tribune, "The Price Kids Pay: Schools and Police Punish Students With Costly Tickets for Minor Misbehavior" (April 28, 2022), at <https://www.propublica.org/article/illinois-school-police-tickets-fines>; District 211 data at <https://projects.propublica.org/illinois-school-police-tickets-fines/districts/50162110170000/>.

- b. Gender;
  - c. Disability or IEP Status;
  - d. School;
  - e. Reason for suspension; and
  - f. Length of suspension.
5. Data or documents sufficient to show the number of **transfers to alternative schools** in District 211 by school year, disaggregated by:
  - a. Race;
  - b. Gender;
  - c. Disability or IEP Status;
  - d. School students transferred from;
  - e. School students transferred to; and
  - f. Reason for transfer.
6. Data or documents sufficient to show the number of **expulsions** in District 211 by school year, disaggregated by:
  - a. Race;
  - b. Gender;
  - c. Disability or IEP Status;
  - d. School;
  - e. Reason for expulsion; and
  - f. Length of expulsion.
7. All documents relating to referrals or calls for service made by District 211 to PPD regarding students, including:
  - a. Documents reflecting the reason for the referral or call for service;
  - b. Documents sufficient to show the race, gender, disability or IEP status, and school for each student referred;
  - c. For all truancy referrals, documentation of the appropriate and available supportive services and other school resources offered to students and their parents or guardians, pursuant to 105 ILCS 5/26-12(c);
  - d. Tickets issued by PPD following such referrals or calls for service; and
  - e. Hearing decisions and related documents.
8. Student-parent handbooks for each school in District 211.
9. All policies, procedures, and protocols in effect at any point in any District 211 school concerning any of the following topics:
  - a. Ticketing of students or their parents or guardians;
  - b. Referrals or calls for service to local police departments;
  - c. Student discipline and behavioral concerns;
  - d. Truancy and/or tardiness; or
  - e. The role of police officers on school property.

10. All documents relating to training provided to teachers, staff, and/or police officers working in District 211—including, without limitation, the dates of training, the name and title of the trainer(s), the location of training, lists of attendees, and copies of all materials used and/or distributed at the training—relating to any of the following topics:
  - a. Ticketing of students or their parents or guardians;
  - b. Referrals or calls for service to local police departments;
  - c. Student discipline and behavioral concerns;
  - d. Truancy and/or tardiness; or
  - e. The role of police officers on school property.
  
11. All contracts, intergovernmental agreements, and any other formal or informal agreements between District 211 and the Village of Palatine, including any agreements relating to:
  - a. The role of PPD members in District 211 schools, including the role of school resource officers, Police Consultants, or other members stationed in or responding to calls for service at District 211 schools;
  - b. Information-sharing between PPD and District 211; and
  - c. Tickets issued by PPD to District 211 students or their families, including tickets for truancy, tickets based on referrals by District 211, and/or tickets issued for school-related conduct.
  
12. A list of all complaints and/or charges submitted to District 211 or filed with any court, state or federal agency, or other administrative body concerning ticketing or student discipline in District 211. Please provide any and all documentation relating to the complaints and outcome.

Thank you for your anticipated cooperation. If you have questions, please contact our office at the contact information listed below.

Respectfully,

KWAME RAOUL  
Attorney General of the State of Illinois

By: /s/ Patricia Jjemba  
Patricia Jjemba  
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## Appendix A Instructions and Definitions

### INSTRUCTIONS

1. These Requests shall be considered continuing through June 30, 2022, and District 211 is requested to supplement its answers in a timely manner.
2. If District 211 is unable to respond to any request in full or maintains that all or portions of responsive materials are privileged, please provide all available responsive information and a detailed explanation as to what documents were not produced and why a more complete response is not possible.

### DEFINITIONS

For the purposes of these requests, the following definitions apply:

1. “**District 211**” or “**Dist. 211**” or “**211**” refers to Illinois Township High School District 211 including any and all of its schools: Schaumburg High School, Palatine High School, William Fremd High School, Conant High School, Hoffman Estates High School, and North Campus unless where explicitly limited.
2. The “**Village of Palatine**” includes all units, departments, agencies, managers, supervisors, employees, representatives, officials, agents, and any other persons or entities acting or purporting to act on behalf of the municipal corporation of Palatine.
3. “**Palatine Police Department**” or “**PPD**” refers to all units within the Palatine Police Department and its Chief, managers and supervisors, sworn personnel, rank and file employees, civilian employees, representatives, agents, and any other persons or entities acting or purporting to act on its behalf.
4. “**Document**” or “**documents**” means the original and all non-identical copies and drafts, regardless of origin or location, or any information, writing or data stored in paper, electronic, tape or any other format, including without limitation written or printed matter, video or audiotapes, image-bearing film, photographs and images, and electronically stored information. It further includes without limitation letters, telegrams, telexes, facsimiles, correspondence, memoranda, email, video, voicemail, reports, contracts, studies, calendar or diary entries, minutes, pamphlets, handwritten notes, charts, tabulations, records of meetings, conferences, digital or electronic messages or communications, telephone or other conversations or communications, and tapes or slides, as well as computer files, directories, and programs in whatever form.
5. “**Tickets**” refers to citations issued for alleged municipal ordinance violations..
6. “**School-related conduct**” includes, without limitation, conduct occurring on a school campus, on a school bus, and off-campus if with a school sanctioned extracurricular

activity such as sports, competitions, or events in which discipline might be issued to a student.

7. **“Relating to”** or **“concerning”** means constituting, containing, concerning, discussing, describing, analyzing, identifying, or stating.
8. **“Alternative schools”** refers to any educational institutions other than the one the student is attending at the time of the discipline and may include any of the following: county community schools, community day schools, and continuation schools.
9. **“Parent or guardian”** includes any person having custody or control over the student.
10. **“IEP”** refers to an individualized education plan, which is a plan developed to meet the specific educational needs of a student with a disability.