

STATE BOARD OF EDUCATION  
CHARTER SCHOOL APPEAL COMMISSION

AMERICAN ACADEMY OF PALM BEACH  
K-8 CHARTER SCHOOL,

Applicant/Appellant,

vs.

THE SCHOOL BOARD OF  
PALM BEACH COUNTY, FLORIDA,

School Board/Appellee.

---

**THE SCHOOL BOARD OF PALM BEACH COUNTY, FLORIDA'S  
RESPONSE TO AMERICAN ACADEMY OF PALM BEACH K-8  
CHARTER SCHOOL'S INITIAL BRIEF REGARDING THE APPEAL  
OF DENIAL OF CHARTER SCHOOL APPLICATION**

THE SCHOOL BOARD OF  
PALM BEACH COUNTY, FLORIDA  
Office of General Counsel  
3300 Forest Hill Boulevard, Ste. C-331  
West Palm Beach, Florida 33406-5869  
Telephone: (561) 434-8748  
Sean Fahey, Esq.  
[sean.fahey@palmbeachschools.org](mailto:sean.fahey@palmbeachschools.org)  
A. Patricia Morales, Esq.  
[anna.morales@palmbeachschools.org](mailto:anna.morales@palmbeachschools.org)

## TABLE OF CONTENTS

	Pages
<b>I. Introduction</b> .....	1
<b>II. Standard of Review</b> .....	2
<b>III. Argument</b> .....	3
A. <u>The timeliness issue is beyond the scope of this appeal, but, even if considered, it should not result in the application being deemed approved regardless.</u> .....	3
B. <u>The School Board did not deprive American Academy of due process, as it did provide formal written notice, and American Academy was not entitled to an opportunity to correct substantive deficiencies.</u> .....	9
C. <u>The School Board had good cause to deny the application.</u> .....	10
1. <i>American Academy’s Budget (Section 20) did not contain a realistic assessment of projected sources of revenue and expenses because its projected enrollment was unsupported and unrealistic.</i> .....	12
2. <i>American Academy’s Exceptional Students section (Section 6) contained several significant deficiencies that American Academy has not meaningfully addressed in its Brief.</i> .....	17
3. <i>Other deficiencies in the application contributed to good cause for denial.</i> .....	19
<b>IV. Conclusion</b> .....	20

Appellee, the School Board of Palm Beach County, Florida (School Board), files this Response to the appeal of the denial of American Academy of Palm Beach K-8 Charter School's (Applicant or American Academy) application to open a charter school in the School District of Palm Beach County. For the reasons provided herein, the School Board respectfully requests the Charter School Appeal Commission recommend that the State Board of Education uphold the decision of the School Board to deny the application as being supported by competent, substantial evidence that meets the "good cause" legal standard in section 1002.33(6), Florida Statutes, and that the State Board of Education accept that recommendation.

## **I. Introduction**

American Academy describes itself as presenting a "uniquely themed sports, arts, and classical education (language) charter school" that it believes will be welcomed by the community. Exhibit A, p. 1. The School Board, of course, supports that. As the School Board has made clear through Policy, however, it will only approve applications that meet all of the governing standards, present a quality plan with no material weaknesses, and demonstrate the capacity to operate a quality charter school. Exhibit B, p. 4. That is why the School District has repeatedly encouraged American Academy to correct the deficiencies in its application and return to the School District when it has done

so. Exhibit D, p. 2. Unfortunately, American Academy chose to proceed on this application, which the School Board denied for good cause due to deficiencies in its Educational Plan and its Business Plan that just could not be swept aside or disregarded.

Now, on appeal, American Academy mostly ignores the School Board's good cause. It first tries to avoid the good cause altogether, making technical and legally dubious arguments about the timeliness of the School Board's vote, a non-existent right to make corrections, and the alleged failure to consider the "attachments" to the application. When we finally reach the arguments about why the School Board actually denied the application, however, American Academy has nothing. As betrayed by its refusal to meaningfully address the reasons its application was denied on appeal, American Academy's application was in fact deficient in all of the ways identified in the letter of denial. The School Board respectfully requests that its denial of the application be upheld.

## **II. Standard of Review**

"If an application is denied, the sponsor shall, within 10 calendar days after such denial, articulate in writing the specific reasons, based upon good cause, supporting its denial of the application[.]" § 1002.33(6)(b)3.a., Fla. Stat. "[T]he State Board reviews de novo whether the school board's determination was supported by competent, substantial evidence that meets this 'good cause'

legal standard.” *Sch. Bd. of Palm Beach County v. Florida Charter Educ. Found., Inc.*, 213 So. 3d 356, 361 (Fla. 4th DCA 2017). “Good cause” means a “legal basis” or “legally sufficient” reason for denial. *Id.* Competent, substantial evidence is “such evidence as will establish a substantial basis of fact from which the fact at issue can be reasonably inferred; that is, such relevant evidence as a reasonable mind would accept as adequate to support a conclusion.” *Washington v. State*, 162 So. 3d 284, 289 (Fla. 4th DCA 2015) (quoting *Pauline v. Lee*, 147 So. 2d 359, 362 (Fla. 2d DCA 1962)).

### **III. Argument**

A. The timeliness issue is beyond the scope of this appeal, but, even if considered, it should not result in the application being deemed approved regardless.

The first issue raised by American Academy concerns the Board’s not voting on its application within 90 days. That issue is beyond the scope of this appeal from the School Board’s notice of denial of the application on its merits. As explained in the Rule governing this appellate process, the Applicant’s “written argument” is to be “limited to due process and the reasons for denial identified in the district school board’s notice of denial.” Fla. Admin. Code R. 6A-6.0781(1)(a). The timeliness argument does not fall into either of those categories and is therefore beyond the scope of this appeal, so it should not be considered.

Even if the timeliness argument is considered, there is no support for American Academy's contention that the outcome would be that the application is deemed approved. The charter school statute provides, in pertinent part, "A sponsor shall by a majority vote approve or deny an application no later than 90 calendar days after the application is received, unless the sponsor and the applicant mutually agree in writing to temporarily postpone the vote to a specific date, at which time the sponsor shall by a majority vote approve or deny the application." § 1002.33(6)(b)3.a., Fla. Stat. The statute also provides what should happen if a timely vote does not occur: "If the sponsor fails to act on the application, an applicant may appeal to the State Board of Education as provided in paragraph (c)" of the statute. *Id.*

The parties agree that the original 90-day period expired without a majority vote by the School Board on the application. The application was submitted on or around April 4, 2024, while the School Board voted on the application at a meeting on September 4, 2024. Exhibit D.

Exhibit C contains correspondence from American Academy to the State Board of Education dated July 9, 2024. Presumably, American Academy includes this document to suggest that it preserved its rights on the 90-day issue by timely appealing to the State Board of Education. American Academy ignores what happened next, however, that it at least tacitly agreed to the School

Board voting on the application at a later date after it sent its letter to the State Board. What happened is memorialized in two letters from the School Board's Director of Charter Schools, Dr. Annmarie Dilbert, dated July 29, 2024 and August 8, 2024, and made Exhibits A and B to the Denial Letter (which is Exhibit D to the appeal).

In the July 29th letter, Dr. Dilbert wrote to American Academy that her Department was prepared to take the application to the School Board on August 14th, but wanted to work with the Applicant to amend the application because the recommendation would not be for approval. Exhibit A to Exhibit D, p. 1. Importantly, Dr. Dilbert noted in her July 29th letter that it was "the District's understanding from our conversation on July 24, that you welcome the opportunity to improve your application." *Id.* She asked that the Applicant review the feedback for each section of the application and amend within 30 days. *Id.* She also asked whether the Applicant would agree to the Board voting on the application at its September 4, 2024 Special Meeting. *Id.* Finally, the letter went on to summarize, extensively, the issues with the application in the same areas where the application would ultimately be determined to not meet or only partially meet the standard when it was denied. *Id.* at pp. 1-2.

Then, in the August 8th letter, Dr. Dilbert noted that School District staff had met with American Academy to review its application on July 31st. Exhibit

B to Exhibit D, p. 1. She reiterated that the District was happy to work with American Academy and asked whether it would be revising its application. *Id.* She also explained that, otherwise, the District would bring the application to the School Board for a vote on September 4, 2024 with a recommendation of denial. *Id.* She also asked that American Academy let the District know if it wanted to withdraw its application or have an extension of time to revise the deficient sections. *Id.* The August 8th letter again summarized the issues with the application in the same areas where the application would ultimately be determined to not meet or only partially meet the standard when it was denied. *Id.* at pp. 1–8.

American Academy reproduces an image of the July 29th letter in its Brief, but selectively cuts everything after the first sentence and a half reflecting communications between the parties. In its arguments on appeal, American Academy does not refute the representations in the July 29th and August 8th letters, including that it “welcome[d] the opportunity to improve [its] application,” met with District staff on July 31st, and was expressly advised of when the application would be brought forward for a vote if it did not withdraw or revise it. Even if American Academy did not expressly agree in writing to its application being voted on at the September 4th meeting (presumably as a strategy to preserve its present request for a default), it effectively agreed to that

course of action, even appearing at the September 4th School Board meeting seeking approval of the application. So American Academy should be precluded here from obtaining relief on appeal solely because the School Board did not vote on the application within 90 days.

That said, American Academy's suggested remedy—that the application is deemed approved—is devoid of legal support. The charter school statute nowhere provides that the result of a sponsor's failure to timely vote is that the application is deemed approved. Instead, the Legislature subjected failures to timely vote to the same appellate process as a denial. § 1002.33(6)(b)2.a., Fla. Stat. If the Legislature intended that sponsors' failures to timely vote on applications should result in automatic approvals, it could have just stated that in the statute, but it did not. Given the stakes of approving a charter school application, we should not presume the Legislature intended for applications to be granted by default absent an express indication to that effect.

American Academy offers no persuasive reason to conclude otherwise. It cites a different statute [section 120.60, Florida Statutes] and inapposite case law involving agency review of license applications that are subject to the Administrative Procedure Act (APA). Section 120.60, Florida Statutes, has never been applied to a school board's review of a charter school application, at least in any published opinion. American Academy has cited no such case. Nor

is there any binding authority providing that a charter school contract is a license or that a school board's review of a charter school application is subject to the APA more generally. *See Sch. Bd. of Seminole Cnty. v. Renaissance Charter Sch., Inc.*, 113 So. 3d 72, 77 (Fla. 5th DCA 2013) (“[I]n view of the time limitation set forth in the statute, it is doubtful that the APA applies to proceedings before individual school boards.”). Absent express incorporation of section 120.60 or any of its procedures or remedies into the charter school statute, there is no reason to conclude it applies here.

As a final, different way of considering the 90-day issue in this case, it is moot under our circumstances. The State Board, for its part, did not act within 90 calendar days on American Academy's July 9th appeal of the timeliness issue. *See* § 1002.33(6)(c)3.a., Fla. Stat. (“The State Board of Education shall by majority vote accept or reject the decision of the sponsor no later than 90 calendar days after an appeal is filed in accordance with State Board of Education rule.”). As a result, the School Board has now voted to deny the application and articulated its good cause for doing so. So that is what the Charter School Appeal Commission and State Board of Education should review in this new appeal, rather than basing its decision on the School Board's technical failure to vote on the application within 90 days.

B. The School Board did not deprive American Academy of due process, as it did provide formal written notice, and American Academy was not entitled to an opportunity to correct substantive deficiencies.

American Academy next contends that it was deprived of due process in the form of notice and an opportunity to be heard. The gist of the argument is that the District did not provide American Academy with the results of staff's evaluation of the application and provide an opportunity to make corrections. Read carefully, however, this is really just a reiteration of American Academy's first argument about acting within 90 days of the submission of the application. After all, as detailed above, Dr. Dilbert provided written notice to American Academy twice, on July 29th and August 8th, about District staff's evaluation of the application and its deficiencies. *See* Exhibits A and B to Exhibit D.

To the extent American Academy was not allowed to revise the application, the School Board Policy is clear that the opportunity to cure is limited to "technical and non-substantive corrections and clarifications," not those that would "materially alter the application." Exhibit B at 4–5. That is in accord with the charter school statute. *See* § 1002.33(6)(b), Fla. Stat. Even so, Dr. Dilbert's letters indicated that American Academy could revise its application, but it declined to do so.

In short, it is just not correct, as American Academy contends in its Brief, that it was not provided formal notice of the substantive deficiencies in the

application or that it was legally entitled to an opportunity to correct them. Even so, American Academy was given an opportunity to cure and refused.

C. The School Board had good cause to deny the application.

The School Board had good cause to deny the application based on deficiencies in four sections that, taken together, meant that American Academy's application failed to "demonstrate [its] capacity to open and maintain a high-quality charter school." Fla. Admin. Code R. 6A-7.0786, Form IEPC-M2 (Dec. 2019). Two preliminary points are in order before delving into the specific issues with the four sections.

First, American Academy claims that the School Board did not review the entire application, and that such is supposedly "concede[d]" in the denial letter. American Academy does not quote the letter or provide a specific citation to one of its 11 pages or its attachments, however, to identify this alleged concession. *See Exhibit D.*

The denial letter explains that the District reviewers used the Florida Charter School Application Evaluation Instrument, which requires the assessment of 22 sections of the application for whether they meet the standard (as the Applicant here did not have any addenda). *See Fla. Admin. Code. R. 6A-6.0786(2) & Form IEPC-M2 (Dec. 2019).* If that is what American Academy is relying upon, it is in no way a concession that the full application was not

reviewed; it is merely an accurate statement about the number of sections in the evaluation instrument.

If American Academy is contending that the School Board did not consider the attachments because they do not clearly appear in the agenda item corresponding with the Board's vote, Exhibit D, Attachment 4, they have still not shown any basis for rejecting the School Board's decision here. The School Board's obligation was to approve or deny the application, which was brought to it on the recommendation from the Superintendent based on the detailed analysis by School District staff. *See* Exhibit, p. 2. American Academy does not contend, let alone show, that the District staff who made the recommendation to the School Board reviewed less than the whole application. So their technical argument about what was or was not uploaded to the public-facing Board agenda item should be rejected.

Second, American Academy refers to what it calls "mandatory requirements for charter schools" in its Brief, in service of its unsupported arguments that the noted deficiencies did not relate to such "mandatory requirements." What the case law provides, however, is that a school board's reason for denial is not based on good cause if it does not concern a requirement in the standard application or in the charter school statute itself. *See Sch. Bd. of Volusia Cnty. v. Acads. of Excellence, Inc.*, 974 So. 2d 1186, 1191 (Fla. 5th DCA

2008). As explained below, that principle is not in play here, because the School Board's grounds for denial were legally sufficient, as they were tied directly to requirements in the evaluation instrument that the reviewers were required to utilize by law. *See Fla. Admin. Code R. 6A-6.0786(2)*. And American Academy has not come close to showing that the noted deficiencies were not supported by competent substantial evidence.

1. *American Academy's Budget (Section 20) did not contain a realistic assessment of projected sources of revenue and expenses because its projected enrollment was unsupported and unrealistic.*

American Academy's Budget did not meet the standard. The Evaluation Instrument provides that one of the criteria for the Budget is whether it contains "[a] realistic assessment of projected sources of revenue and expenses that ensure the financial viability of the school." Fla. Admin. Code R. 6A-6.0786, Form IEPC-M2 (Dec 2019), p. 21. The Budget section is part of the "Business Plan" of the application, which "should present a clear picture of the school's financial viability including the soundness of revenue projections; expenditure requirements; and how well the school's budget aligns with and supports effective implementation of the educational program." *Id.*, p. 17. Under this standard, then, it is not enough that an applicant's budget is correct because it works out on paper as presented; it must also be realistic. *Cf. Sch. Bd. of Indian River County v. Somerset Acad., Inc.*, 232 So. 3d 383 (Fla. 4th DCA 2017) (school

board had sufficient evidence that budget in high-performing replication application was deficient where, among other things, school board found applicant's "figures unworkable in that the calculated salaries for some positions were unrealistic and below market value").

The deficiency with American Academy's Budget section was that it did not represent a realistic assessment of the projected sources of revenues and expenditures, specifically with regard to the estimated enrollment of 288 students. Exhibit D at 9–10. American Academy has not shown any error in the District's review of its application or that the decision was not supported by competent substantial evidence.

American Academy first argues that the evaluation instrument "does not require justification of the initial enrollment estimate of students," but only a "realistic assessment of projected sources of revenue and expenses." Applicant's Brief at 9. Such an argument confirms the "substantial concerns about the applicant's understanding of the issue in concept or ability to meet the requirement in practice" that the application raised. Fla. Admin. Code R. 6A-6.0786, Form IEPC-M2 (Dec 2019), p. 1. Under Florida's system of funding public schools, a realistic assessment of projected revenue necessarily requires a realistic projection about enrollment. A charter school's funding will be driven

primarily by the school's enrollment.<sup>1</sup> *See* § 1002.33(17)(b)1, Fla. Stat. It follows that District reviewers should scrutinize the application's enrollment projections to determine how realistic its corresponding revenue projections are.

American Academy's next argument for why its figures were realistic is that the School Board had previously approved other charter schools with larger projected first-year enrollments, citing examples from 2017 and 2020. Applicant's Brief at 10. That is not an explanation of how American Academy itself provided a realistic assessment of its projected sources of revenue, however. Further, the approvals of other schools also are not probative without any contextual information about those schools and how they justified their figures within their applications, or how they might be similar enough to American Academy to justify comparing them. American Academy has shown no error in or lack of evidentiary support for what the District reviewer stated, that American Academy's enrollment estimate "exceeds comparable charter schools in Palm Beach County" and that recently opened charter schools averaged an enrollment of approximately 105 students. Exhibit D at 9.

---

<sup>1</sup> On that point, the District reviewer noted that American Academy had identified other income in the application in the form of a donation amount of \$25,000, but it provided insufficient proof of such a donation. Exhibit D, p. 10. American Academy does not challenge or show any error in that part of the District reviewer's analysis.

American Academy's third argument relates to the District reviewer's comment that it had not provided any basis for its enrollment projections. It contends that it supported its projected enrollment with Attachment T to its application, a survey of community members. But American Academy did not cite Attachment T or discuss the survey in section 20 of its application. *See* Exhibit A, pp. 86–92. It also did not cite the survey in the separate section of the application where it was to provide enrollment projections and “[p]rovide a brief explanation of how the enrollment projections were developed.” *Id.*, p. 6. So American Academy can hardly fault the District for not relying upon the survey in its analysis of the projected enrollment.

Even accepting American Academy's reliance on the survey, it fails to ground the enrollment projection in reality. The question to parents was as follows, “If you are the parent of a **future** K-8 student, would you **consider** sending your child to a quality K-8 Sports, Arts, and Classical Education Charter School?” Exhibit A, p. 79 (emphasis added). It seems from the application's discussion of the survey that 402 surveys were collected from parents, 90% of whom (363) responded favorably to that question. Exhibit A, pp. 78–79.

The biggest problem is with the information the survey gathered. What the survey results show is that 363 parents of “**future**” students—that is, students who might enroll in school at some unspecified point in the future—would

“**consider**” sending their child to a generically described “quality” charter school with sports, arts, and classical education, serving grades Kindergarten through 8th. It is quite the strain to connect such fuzzy representations from 363 parents about a K-8 school to a first-year enrollment of 288 students only in grades Kindergarten through third. *See* Exhibit A, p. 7. For that matter, while conducted in Palm Beach County, those who responded to the survey were apparently not all residents of Palm Beach County. *See id.*, pp. 78–79. American Academy did not close the loop in the application, connecting its data gathering in the survey to the enrollment projection it landed on.

American Academy’s final argument about the Budget section is truly puzzling. It contends that the School Board “physically chang[ed] the initial enrollment projections and subsequent budget numbers ... in order to justify ‘failing’ the applicant for an unsustainable budget.” Applicant’s Brief at 11. That is just not what happened.

The District reviewer concluded that the assessment of projected revenues was not realistic because the projected enrollment was unattainable. Exhibit D, pp. 9–10. The District reviewer then proceeded to explain what that meant in connection with the budget. She did so by showing the effect that a realistic enrollment projection would have on the budget: that there would be a deficit for two years. *Id.* at 10. Notably, American Academy does not actually grapple

with the District reviewer's analysis or show any error in it, instead making the needlessly incendiary contention that it was an act of "fraud." But what happened was explanation, not alteration. The application failed because of its faulty enrollment projection, the number that American Academy gave. The exercise in adjusting the enrollment projections was merely a detailed explanation by the District of why the Budget was deficient as a result.

In sum, American Academy has not demonstrated that the School Board's stated reasons for finding the Budget section failed to meet the standard were legally insufficient or not supported by competent, substantial evidence.

*2. American Academy's Exceptional Students section (Section 6) contained several significant deficiencies that American Academy has not meaningfully addressed in its Brief.*

American Academy's Exceptional Students (ESE) section also did not meet the standard. The deficiencies are noted in detail in the denial letter. *See* Exhibit D, pp. 3–9. American Academy does not even bother to respond to the stated issues with the Application in its Brief.

Instead, American Academy again contends that the School Board conceded to not reviewing the attachments relating to this section of the Application. Applicant's Brief at 11. But American Academy, again, does not explain where this concession was allegedly made, nor does it appear in the analysis of Section 6 in the Denial Letter. For that matter, American Academy

provides nothing in the way of an explanation about which attachments refuted the points noted by the District reviewer or how they did so.

American Academy's next argument is, in essence, that its staff were presumptively qualified to design a program that would serve the needs of ESE students because of their backgrounds. Applicant's Brief at 11–12. That does nothing for American Academy here. The application is evaluated for its content, not its authors.

From there, American Academy does not grapple with the actual reasons provided within the review of the ESE section. Instead, it asserts in conclusory fashion that it provided “proven data calculations, staffing ratios based on Palm Beach School District ESE student percentages, ESE staffing, current IEP practices which are currently in use by the Palm Beach School District ESE personnel and charter school personnel, and instructional strategies for ESE students including Gifted Services.” Applicant's Brief at 12. This hand waving is not an argument that the District's review was not supported by competent substantial evidence, let alone a persuasive one.

Putting the right words on the page, such as a reproduction of what is purportedly done in the School District already, is not enough. The application must do more so as not to leave concerns about “the applicant's understanding of the issue in concept or ability to meet the requirement in practice.” Fla.

Admin. Code R. 6A-6.0786, Form IEPC-M2 (Dec 2019), p. 1. And those concerns about the Applicant’s understanding of the procedures involved were precisely what was noted by the District reviewer, in addition to certain critical services just not being addressed at all. *See Exhibit D*, pp. 3–9. The conclusion that the Exceptional Students section did not meet the standard was comfortably supported by competent substantial evidence.

*3. Other deficiencies in the application contributed to good cause for denial.*

Finally, American Academy ignores that two other sections of its application were also rated as only partially meeting the standard. According to the Evaluation Instrument, a responses partially meet the standard when they “address[] most of the criteria, but the responses lack meaningful detail and require important additional information.” Fla. Admin. Code R. 6A-6.0786, Form IEPC-M2 (Dec. 2019), p. 1.

Section 2, Target Population and Student Body, was rated as only partially meeting the standard, with the specific issue being a lack of updated data showing a need for the school. *Exhibit D*, pp. 2–3. Section 5, Student Performance, required a statement of the expected baseline and the school’s goals for academic growth and improvement. *Exhibit D*, p. 3. The issue was with the Applicant’s statement about Biology, that “[a]t least 80% of the students in Biology will make learning gains in Biology as measured by the results on the

Biology EOC.” *Id.* While admittedly only one issue, the District reviewer’s unchallenged response raises concerns: “There are no learning gains in Biology....” *Id.*

The deficiencies noted in Sections 2 and 5 provide additional support for the School Board’s determination that there was good cause to deny American Academy’s application.

#### **IV. Conclusion**

For the reasons stated in this Response, the School Board respectfully requests the Charter School Appeal Commission recommend that the State Board of Education uphold the decision of the School Board to deny the application and deny the appeal, and that the State Board of Education accept that recommendation.

## CERTIFICATE OF SERVICE

I hereby certify that one (1) electronic copy and five (5) hard copies of this Response were submitted to the Agency Clerk for the Department of Education, 325 W. Gaines Street, Suite 1520, Tallahassee, Florida 32399-0400, on October 25, 2024, at christian.emerson@fldoe.org and by overnight delivery via Federal Express. I also certify this Response is being served on this day on Peter D. Del Toro, Esq., DEL TORO LAW, 514 Camden Avenue, Stuart, Florida 34994, Counsel for Applicant/Appellants, on October 25, 2024, at peter@deltoro.law & sandra@deltoro.law; and by overnight delivery via Federal Express.

/s/ Sean Fahey  
THE SCHOOL BOARD OF  
PALM BEACH COUNTY, FLORIDA  
Office of General Counsel  
3300 Forest Hill Boulevard, Ste. C-331  
West Palm Beach, Florida 33406-5869  
Telephone: (561) 434-8748  
Sean Fahey, Esq.  
[sean.fahey@palmbeachschools.org](mailto:sean.fahey@palmbeachschools.org)  
A. Patricia Morales, Esq.  
[anna.morales@palmbeachschools.org](mailto:anna.morales@palmbeachschools.org)