

# The Brague Law Firm

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February 18, 2020

***Via Email: lora.delacruz@loswego.k12.or.us***

Dr. Lora De La Cruz  
Lake Oswego School District  
2455 Country Club Road  
PO Box 70  
Lake Oswego, OR 97034

Re: Student  
Oregon Tort Claim Act Notice

Dear Superintendent De La Cruz:

I write on behalf of \_\_\_\_\_ and \_\_\_\_\_.

As you may be aware, \_\_\_\_\_ has been the subject of hazing, harassment, and racist attacks at Lakeridge High School.

\_\_\_\_\_ plays on the junior varsity \_\_\_\_\_ team. Her teammates have their own social media accounts in which they ridicule, haze, and harass \_\_\_\_\_. These teammates ostracize \_\_\_\_\_. They have taken \_\_\_\_\_ photograph from games and edited into other photos where it appears that \_\_\_\_\_ is being harmed. These teammates have targeted \_\_\_\_\_ to such a degree that \_\_\_\_\_ is ostracized throughout campus and the school day.

The current hazing and harassment resurfaced in January 2020. One school year prior, Principal Desiree Fisher received a complaint from \_\_\_\_\_ concerning similar hazing/harassing conduct. Principal Fisher did nothing to address this earlier complaint, which endorsed and condoned a hostile education environment. It was foreseeable that one term later, the same hazing and harassing conduct continued.

Lakeridge's Principal Desiree Fisher, Vice Principal Noah Hurd, and Athletic Director Nathan Stanley have failed to address the students' self-labeled "Caucasian Invasion" at Lakeridge High School. This is the term the girls' \_\_\_\_\_ program uses in hazing and harassing \_\_\_\_\_.

Failure by your administration at Lakeridge High School to address acts of hazing, harassment, and racism is an unqualified endorsement of it.

Lakeridge's administration appears to be untrained and ill equipped to recognized, much less respond to incidents of hazing, harassment, and racism.

When the incidents of hazing and harassment came to light, Lakeridge's coaches and administration allowed the reporter to be ostracized, which in turn further alienated Lakeridge only addressed a few of the students involved and not the entire team.

LOSD has a history of hazing, harassment, and racism. The last few times LOSD endorsed and condoned this kind of environment male and female students were hazed and assaulted by coaches and other students (dance team, volleyball team, football team).

It is appalling that Principal Fisher apologized to the perpetrators of the hazing, harassment and racist acts. Vice Principal Hurd told to "just not to talk to anyone."

On Friday, February 14<sup>th</sup> Marylyn Pelkey and Greg Chupp had their children and friend harass and call her daughter "nigger" throughout the game, as well as swearing at . LOSD did nothing to correct these students' egregious behavior, and failed to provide appropriate student supervision required at a school event. When asked them to stop, Ms. Pelkey and her family/friends submitted complaints to the Athletic Director. LOSD failed to investigate pursuant to its own policies JFCF and JFCF-AR.

Clearly, the message from Lakeridge is to apologize to the perpetrators of hazing, harassment, and racism for the inconvenience of the farce of an inquiry, and then direct the target of hazing, harassment, and racism to shut up.

has begun self-injurious behavior as a result of the hazing, harassment, racism, negligence, and deliberate indifference endorsed and condoned by LOSD at Lakeridge High School.

A claim for damages will be asserted against LOSD.

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Demand for Preservation of Evidence

Please take all necessary steps to preserve all documents, emails, electronic files, working files, photographs, cell phone data and texts, and personal files of teachers, administrators, aides, and any employees, agents, parents, students, or volunteers of LOSD concerning these incidents from being intentionally or accidentally destroyed. Failure to preserve all documents and records may result in penalties or sanctions being entered against LOSD in a court of law.

Very truly yours,



Kevin C. Bague

cc: Desiree Fisher, Principal  
desiree.fisher@loswego.k12.or.us