LCR | LAWYERS FOR CIVIL RIGHTS BOSTON

July 1, 2025

The Honorable Andrea Joy Campbell
The Commonwealth of Massachusetts
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Carrie Benedon
Director, Division of Open Government
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Liza Hirsch
Director, Children's Justice Unit
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Re: Civil Rights Complaints

Dear Attorney General Campbell, Attorney Benedon, and Attorney Hirsch:

Lawyers for Civil Rights ("LCR") appreciates your leadership in enforcing civil rights at the national level. We respectfully request your intervention and oversight to address racial harassment in Brookline and Melrose.

Recent federal actions have significantly narrowed civil rights enforcement, including the March 2025 closure of the U.S. Department of Education's Office for Civil Rights ("OCR") in Boston. The federal government's full-scale retreat from civil rights enforcement has left children of color across the Commonwealth without meaningful redress. For these reasons, we need your intervention and oversight to fill the gap and address racial harassment in Massachusetts's public schools.

Background and Jurisdiction

Between June and July 2024, LCR filed OCR complaints involving school districts in Brookline and Melrose. The complaints raise serious racial bullying concerns and outline the repeated failures of school officials, who have not provided appropriate support to affected students and families.

In both cases, the families attempted to resolve their concerns locally, directly with school officials, before seeking federal relief. Since the closure of the OCR office in Boston, neither of

our clients have received updates or notifications regarding the status of investigations or whether their cases will be transferred to other offices. Given these significant barriers to securing relief—and continued uncertainty surrounding the adjudication of these matters—LCR is withdrawing these complaints from OCR and transferring and re-filing them with your office.

Your office has jurisdiction over claims brought under Massachusetts law, including Massachusetts General Laws Chapter 151C, which prohibits discrimination in public schools based on race. Similarly, pursuant to the Massachusetts Civil Rights Act ("MCRA"), G.L. c. 12, §§ 11H and 11I, the Attorney General can pursue civil enforcement where rights secured by law are interfered with through threats, intimidation, or coercion. Given the federal government's clear and deliberate retreat from civil rights enforcement in education, we urge your office to exercise its authority under state law to protect students in Massachusetts. The following is a summary of these cases.

Complaints

I. M.C. Henry et al. v. Public Schools of Brookline et al.

On July 22, 2024, LCR filed an OCR complaint on behalf of M.C., a Black then-eighth-grade student at Amos A. Lawrence School in Brookline, who was subjected to repeated racial harassment during the 2023–2024 school year. Specifically, classmates directed racist slurs at M.C., including the N-word and "cotton picker." This harassment escalated when a white classmate placed his knee on M.C.'s neck while shouting "George Floyd" in front of other students.

School officials failed to report the incident to M.C.'s parents, failed to launch a formal investigation, and failed to impose disciplinary consequences. Despite multiple attempts by M.C.'s family to engage school and district leaders, the district took no meaningful corrective action. M.C. graduated from eighth grade and ultimately withdrew from the district. Due to OCR's failure to investigate and resolve this complaint, M.C. withdrew the OCR complaint in May 2025 and now asks your office to investigate and adjudicate.

II. Palacios et al. v. Melrose Independent School District et al.

On June 3, 2024, LCR filed an OCR complaint on behalf of David Palacios, a Black then-seventh-grade student in Melrose Public Schools, who endured persistent and egregious racial harassment. Between April 2023 and January 2024, classmates called David the N-word on multiple occasions. School officials failed to intervene or take corrective action. In January 2024, a classmate physically assaulted David near the school entrance while again using the N-word. The district refused to impose consequences on the students involved, implement preventative measures, or offer David academic or emotional support. As a result, David transferred to another school district.

Melrose Public Schools has a documented pattern of racial discrimination, including a 2015 federal civil rights investigation by OCR into racially hostile behavior. David's harassment during the 2023–2024 school year reflects this ongoing pattern. Due to OCR's failure to

investigate and resolve this complaint, David withdrew his OCR complaint in May 2025 and now asks your office to investigate and adjudicate.

Conclusion

Across both districts – Brookline and Melrose – students of color reported repeated incidents of racial harassment, ranging from verbal abuse to physical violence. Yet, school officials consistently failed to take appropriate remedial or preventative action. Despite multiple reports from the families, the responses remained inadequate, and no meaningful supports were provided to the affected students. After months of engagement with school districts and federal processes, these families are still waiting for meaningful action and relief.

We urge your office to step in where the federal government failed to take an active role in addressing racial harassment in Massachusetts schools. More specifically, we are requesting that your office launch investigations into each of these matters and pursue appropriate enforcement, including corrective measures such as adopting clear identity-based and anti-discrimination policies and procedures; training staff to identify and respond to identity-based harassment; and ensuring that students have access to culturally responsive and trauma-informed supports. In both of these matters, the districts' failure to respond to racial harassment and take appropriate corrective action clearly violates G.L. c. 151C and the MCRA.

We are available to provide additional information and would welcome the opportunity to meet with your office at your earliest convenience to discuss these matters. Thank you for your continued partnership and commitment to protecting students of color across the Commonwealth.

Sincerely,

Erika Richmond Walton, Esq.
Mirian Albert, Esq.
Lawyers for Civil Rights
61 Batterymarch Street, 5th Floor
Boston, MA 02110
erichmond@lawyersforcivilrights.org
malbert@lawyersforcivilrights.org
Counsel for Complainants