

# Orange County Board of Education Response to JLAC Audit Request

## Schools Legal Service Letter – Summary, March 17, 2026

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### Purpose of Submission

- Submitted March 16, 2026, to **Assemblymember John Harabedian**, Chair of JLAC, in response to a requested audit by **Senator Umberg**.
- **Board Position:** Audit unnecessary and outside JLAC’s authority due to:
  - Lack of factual basis (no complaints or violations)
  - Statutory limitations
  - Existing legal/administrative remedies
  - Subjective nature of concerns

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### 1. Factual Basis

- **No Complaints Filed** in the last five years:
  - Civil rights (Title VI/IX, IDEA)
  - Brown Act
  - Public Records Act
  - Political Reform Act
  - Whistleblower protections
  - Procurement and fiscal oversight
- **Transcript Review:** 83 Board meetings (Jan 2021–Feb 2026) reviewed; no violations found.
- **Staff Declarations:**
  - **Renee Hendrick:** No statutory or ethical violations.
  - **Devon Atkinson:** Transcript review confirms compliance.
  - **Darou Sisavath:** Ethics training verified (Board Policy 200-8).
- **Voter Approval:** Since 2018, 8 elections, 0 losses – strong public support.

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### 2. Statutory & Procedural Limitations

Area	Deadline	Findings
Title VI / IX	Admin: 180 days, Civil: 2 yrs	No complaints
IDEA	Admin: 2 yrs, Civil: 90 days	No complaints
Brown Act	Violations: 90 days, Agenda: 30 days	Acts prior to Dec 24, 2025, barred
Public Records Act	Reasonable filing period	Acts prior to Dec 26, 2025, barred
Political Reform Act	Admin: 5 yrs, Civil/Crim: 4 yrs	Violations prior to 2021–22 barred
Misuse of Funds	Enforcement 3–5 yrs	No complaints filed prior to 2022–23
Charter Oversight	Discretionary immunity	Only 1 challenge in last 5 yrs; Board prevailed

- **Conclusion:** Most claims are time-barred, making the audit irrelevant.
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### 3. Governance & Compliance

- **Ethics Training:** All members compliant under Board Policy 200-8
- **Declarations:** No violations found in statutory duties or ethics
- **Immunity Protections:** Discretionary act, derivative, and legislative immunity apply to policy decisions
- **Transcript Review:** Confirms compliance with federal/state law
- **Public Confidence:** Strong electoral track record

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### 4. Audit Appropriateness

- **No factual basis** – No complaints or legal actions exist.
- **Independent remedies exist** – Issues fall under administrative/legal review.
- **Subjective concerns** – Not within JLAC mandate (e.g., best practices, fiscal prudence).
- **Precedent** – JLAC has never audited a county board of education.

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### 5. Conclusion

**Board Requests:** JLAC **decline the audit** due to:

- Absence of complaints or allegations
- Statutory/procedural limitations
- Existing remedies available
- Subjective concerns outside JLAC’s authority
- Strong evidence of ethics, governance, and transparency compliance

**Staff Note:** Submission is factually supported, legally rigorous, and procedurally sound.

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### Key Facts

ORANGE COUNTY BOARD – JLAC AUDIT REQUEST SUMMARY	
Category	Key Fact / Takeaway
<b>No Complaints</b>	5-year review: 0 complaints filed in civil rights, Brown Act, Public Records, Political Reform Act, procurement/fiscal oversight, whistleblower laws
<b>Transcript Review</b>	83 Board meetings (Jan 2021–Feb 2026) reviewed; no statutory violations found
<b>Statutory Limits</b>	Most claims are time-barred: Brown Act, PRA, Political Reform Act, IDEA, Title VI/IX, misuse of funds, charter oversight
<b>Immunity Protections</b>	Board members enjoy discretionary act, derivative, and legislative immunity for policymaking & charter oversight
<b>Ethics &amp; Training</b>	All Board members completed mandatory ethics training (Board Policy 200-8)
<b>Public Confidence</b>	Trustees won 8 elections since 2018; 0 losses
<b>Audit Appropriateness</b>	No factual basis; issues are subjective or already addressed by law; JLAC precedent: no county board audits

- **Takeaway for Staff:** Evidence strongly supports **rejecting the audit request**. No violations exist, claims are time-barred, and oversight protections and public accountability are in place.