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The Deborah Project

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

THE DEBORAH PROJECT, INC., A Maryland non-profit corporation, *Petitioner-Plaintiff*, v. MOUNTAIN VIEW-LOS ALTOS UNION HIGH SCHOOL DISTRICT, *Respondent-Defendant*.	CASE NO. 23CV417072 **PETITION FOR WRIT OF MANDATE OR, IN THE ALTERNATIVE, COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

INTRODUCTION

1. Pursuant to Government Code §§ 7920.000 et seq., Petitioner-Plaintiff The Deborah Project petitions this court for declaratory relief and a writ of mandate requiring Respondent-Defendant Mountain View-Los Altos Union High School District ("MV-LAUHSD") to promptly and substantively respond to requests made by Petitioner for certain public records and provide responsive records as required under the California Public Records Act (Gov. Code § 7920.000 et seq.)("CPRA"). Petitioner also seeks issuance of a writ under those provisions of the California Constitution securing public access to government documents and records. *See* Cal. Const., Art 1 § 3(b)(1).

2. Petitioner-Plaintiff The Deborah Project ("TDP") is a public interest law firm which defends the civil rights of people victimized by antisemitism and anti-Zionism. TDP issued a Public Records Request to MV-LAUHSD seeking information about an overtly anti-Israel, antisemitic and anti-Zionist teaching program at MV-LAUHSD the use of which is, as more fully alleged below, explicitly barred by California law. In addition to its explicitly biased and discriminatory content, that program's promoters have publicly urged that teachers using these teaching materials hide the materials, and their use in the classroom, from parents, the public, and School District supervisory employees who would put a stop to the materials' illegal use. Respondent-Defendant MV-LAUHSD has completely failed to make any substantive response to TDP's Public Record Request, thereby leaving TDP with no choice other than to initiate this legal action to enforce its right to, and MV-LAUHSD's obligation to provide, a complete response.

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NATURE OF THE ACTION

3. This Petition, and the Public Records Act requests enforced by this Petition, are brought to secure MV-LAUHSD's compliance with its duty publicly to disclose documents relating to teaching in MV-LAUHSD's publicly financed public schools about the subject of Ethnic Studies in general, and about Israel, Palestinian Arabs, as well as Zionism, and about Israeli-Americans,.

4. MV-LAUHSD signed a contract obliging it to pay tens of thousands of dollars of public money to an entity – the Acosta Educational Partnership ("AEP") – which promotes the teaching of a uniquely antisemitic view about the Jewish commitment to Zion. On March 20, 2023, a newspaper reported that MV-LAUHD had contracted to pay $45,000 to AEP.

5. Curtis Acosta, founder and executive director of AEP, reportedly contributes to a "pro-Palestine" blog founded by AEP employee Samia Shoman.[1]

6. Shoman served on the state's advisory committee for the state's 2019 draft Ethnic Studies Model Curriculum (hereinafter, "Draft Model Curriculum"). Shoman is also Co-Coordinator of the Teach Palestine project of the Middle East Children's Alliance, which promotes

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[1] Jennah Pendleton, *MVLA fires consultant amid ethnic studies curriculum debate*, LOS ALTOS TOWN CRIER (March 20, 2023), https://www.losaltosonline.com/news/mvla-fires-consultant-amid-ethnic-studies-curriculum-debate/article_10ebaa08-c76d-11ed-857f-cf45df898387.html.

inserting an antisemitic anti-Israel curriculum into kindergarten-through-twelfth-grade classrooms as the only correct view about the issues it discusses; and Co-Lead of Arab American Studies for the Liberated Ethnic Studies Model Curriculum Consortium ("LESMCC"), which promotes teaching the Draft Model Curriculum and also promotes the practice of *hiding* the teaching of these views from parents, the public, and any supervisory school employees who might be opposed to the teaching of this view.

7. Created in 2019, the Draft Model Curriculum was widely criticized by Jewish and non-Jewish organizations and leaders because it contained anti-Israel and antisemitic anti-Zionist material. The Draft Model Curriculum was ultimately vetoed by Gov. Gavin Newsom, who called it biased, bigoted, and discriminatory, as more fully alleged below.

8. The Draft Model Curriculum's teaching on these subjects is barred by California law: not only by its general provisions proscribing the teaching of bias on the basis of nationality, ethnicity and religion, but also by the specific provisions of A.B. 101, which was adopted by the California legislature, and signed by Governor Newsom, precisely because it had been modified explicitly to bar the teaching about the Jewish State which the Draft Model Curriculum advocates and for which Shoman was largely responsible.

9. Specifically, A.B. 101, the law adding ethnic studies to California's high school graduation requirements, prohibits using biased materials and states that it is the legislature's intent *not* to use the original draft model curriculum rejected in 2019, because of concerns that it is discriminatory:

> (v) Curriculum, instruction, and instructional materials for a course described in clause (ii) shall meet all of the following requirements:
>
> (I) Be appropriate for use with pupils of all races, religions, nationalities, genders, sexual orientations, and diverse ethnic and cultural backgrounds, pupils with disabilities, and English learners.
> (II) Not reflect or promote, directly or indirectly, any bias, bigotry, or discrimination against any person or group of persons on the basis of any category protected by Section 220.
> (III) Not teach or promote religious doctrine.
>
> (vi) It is the intent of the Legislature that local educational agencies, including charter schools, consider that, pursuant to Section 51226.7, the Instructional Quality Commission undertook a lengthy, thorough, deliberative, and inclusive process before submitting a model curriculum in ethnic studies to the state board. To the extent that local educational agencies, including

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> charter schools, choose to locally develop an ethnic studies program for approval by their governing board or governing body, *it is the intent of the Legislature that local educational agencies not use the portions of the draft model curriculum that were not adopted by the Instructional Quality* Commission due to concerns related to bias, bigotry, and discrimination.[2]

10. Gov. Newsom quoted this statutory language in his October 8, 2021 signing statement, which read:

> I appreciate that the legislation provides a number of guardrails to ensure that courses will be free from bias or bigotry and appropriate for all students. The bill also expresses the Legislature's intent that courses should not include portions of the initial draft curriculum that had been rejected by the Instructional Quality Commission due to concerns related to bias, bigotry, and discrimination.[3]

11. Regarding bias generally, Section 220 of the state's education code explicitly states:

> No person shall be subjected to discrimination on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code in any program or activity conducted by an educational institution that receives, or benefits from, state financial assistance or enrolls pupils who receive state student financial aid.[4]

12. Furthermore, the state's education code expressly prohibits teachers from teaching bias and prohibits school boards from adopting instructional materials that promote bias:

> 51500 A teacher shall not give instruction and a school district shall not sponsor any activity that promotes a discriminatory bias on the basis of race or ethnicity, gender, religion, disability, nationality, or sexual orientation, or because of a characteristic listed in Section 220.
>
> 51501 The state board and any governing board shall not adopt any textbooks or other instructional materials for use in the public schools that contain any matter reflecting adversely upon persons on the basis of race or ethnicity, gender, religion, disability, nationality, or sexual orientation, or because of a characteristic listed in Section 220.[5]

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[2] California Assembly Bill No. 101, § 51225.3(1)(G)(vi) (October 8, 2021) (amending Education Code §§ 51225.3 and 51226.7) (*emphasis added*), available online at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB101.

[3] Hon. Gavin Newsom, Governor of California, Signing Statement for Assembly Bill 101 (Oct. 8, 2021), available at https://www.gov.ca.gov/wp-content/uploads/2021/10/AB-101-Signing-Message-PDF.pdf.

[4] Cal. Educ. Code § 220, available at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=EDC&division=1.&title=1.&part=1.&chapter=2.&article=3.

[5] Cal. Educ. Code §§ 51500 and 51500, available at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51500&lawCode=EDC and

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13. LESMCC, of which AEP employee Shoman is Co-Lead of Arab American Studies, has publicly admitted its opposition to the state's decision to oppose teaching of the Draft Model Curriculum. LESMCC's *raison d'être* is to promote the teaching of the contents of the Draft Model Curriculum, including specifically the material that the legislature and governor found to be biased, bigoted, and discriminatory. *See, e.g.*, Liberated Ethnic Studies Model Curriculum website, "LESMC Story" (attached hereto as Exhibit "A").[6]

14. The LESMCC, of which AEP employee Shoman is Co-Lead of Arab American Studies, explicitly teaches that the decision made by the California government to alter the ethnic studies curriculum that they drafted is wrong and was caused by "[t]he state's submission to rightwing demagogues and lobbyists." *See* LESMC Story at A-000004 (Exhibit "A").

15. AEP-employee Shoman reportedly played a leading role in developing the anti-Israel component of the Draft Model Curriculum. Her public statements make clear that she believes that all Zionist ideas, history and claims are false, immoral, and should never be presented as credible in any classroom.[7]

16. During a webinar held February 7, 2021, AEP-employee and Draft Model Curriculum lead Shoman reportedly displayed a slide that expressly stated, "Zionists have no place in the classroom!"[8]

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https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51501.&nodeTreePath=2.3.4.5.1&lawCode=EDC.

[6] Available at https://www.liberatedethnicstudies.org/lesmc-story.html, archived at http://web.archive.org/web/20230321181825/https://www.liberatedethnicstudies.org/lesmc-story.html.

[7] *See, e.g.*, CAMERA Education Institute Staff, *Under the Radar: Ethnic Studies Activists Push Anti-Israel Content Into Schools*, COMMITTEE FOR ACCURACY IN MIDDLE EAST REPORTING AND ANALYSIS (CAMERA) (January 12, 2023), https://www.camera.org/article/under-the-radar-ethnic-studies-activists-push-anti-israel-content-into-american-schools/; Gabe Stutman, *Bay Area lawmaker hears community concerns on ethnic studies draft*, J. THE JEWISH NEWS OF NORTHERN CALIFORNIA (September 17, 2019), https://jweekly.com/2019/09/17/bay-area-lawmaker-hears-community-concerns-on-ethnic-studies-curriculum/.

[8] The slide is pictured on the Alliance for Constructive Ethnic Studies (ACES) website, "Jewish Community Concerns" webpage, at https://www.calethstudies.org/ethnic-studies-jewish-community.

17. LESMCC, of which AEP employee Shoman is Co-Lead of Arab American Studies, explicitly instructs teachers using its curriculum and teaching materials to hide what they are doing from the public, parents, and School District supervisors. LESMCC teaching materials advise teachers to ask themselves: "if you tell [others] about your plans," is the teacher's "administration likely to be supportive?" If not, teachers are advised that they may well be "better off trying to fly under the radar." *See* Preparing to Teach Palestine: A Toolkit (hereinafter "Teach Palestine")[9] at B-08 (attached to this Petition-Complaint as Exhibit "B").[10]

18. Similarly, the materials put out by LESMCC, of which AEP employee Shoman is Co-Lead of Arab American Studies, advise teachers to teach Liberated Ethnic Studies in secret if that is the course most likely to allow such teaching at all: "Be Strategic!" Teach Palestine at B-07 (Exhibit "B"). Perhaps, LESMCC recommends, teachers should take as role models other "teachers who shut their doors and teach their students liberatory [*sic*] curriculum." Teach Palestine at B-12 (Exhibit "B").

19. According to minutes from the November 17, 2022, meeting of its Board of Trustees, Mountain View-Los Altos Union High School District unanimously voted to approve a contract with Acosta Educational Partnership to "provide support to ethnic studies teachers for the 2022-2023 school year." *See* November 17, 2022, meeting minutes at C000006 (attached to this Petition-Complaint as Exhibit "C").[11]

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[9] Shoman is also Co-Coordinator of the Teach Palestine project of the Middle East Children's Alliance.

[10] This material was removed from the LESMCC website some time during 2022, but was retrieved using the Wayback Machine, a digital archive of the World Wide Web. It was previously located at http://www.liberatedethnicstudies.org/teach-palestine.html, http://www.liberatedethnicstudies.org/teach-palestine1.html, http://www.liberatedethnicstudies.org/teach-palestine2.html, http://www.liberatedethnicstudies.org/teach-palestine3.html, http://www.liberatedethnicstudies.org/teach-palestine4.html, and http://www.liberatedethnicstudies.org/teach-palestine5.html.

[11] The minutes were found online at https://www.mvla.net/documents/Governance/Board%20Meeting%20Minutes%202022-2023/Approved-MVLA-Board-Meeting-Minutes-2022-11-17-Signed.pdf. The reference to the contract with Acosta Educational Partnership is found on page 6.

20. On March 20, 2023, the Los Alton Town Crier, a community newspaper, disclosed that MV-LAUHS entered into a $45,000 ethnic studies contract with AEP, and that MV-LAUHS had since terminated its contract after completing payment to AEP.[12]

21. The March 20 newspaper article did not provide a reason for MV-LAUHS's termination of the AEP contract, but did include the following:

> recently some local residents and statewide organizations have voiced opposition to both the curriculum and Acosta Educational Partnership, the consulting agency the district hired to train ethnic studies teachers.
>
> Advocates attended board meetings last month to express their outrage at the district's relationship with AEP, which MVLA [Mountain View Los Altos High School District] hired in November, because of the organization's alleged history of antisemitism. A letter to Superintendent Nellie Meyer and the board penned by MVLA parent Lia Rensin urged the district to end its contract with AEP and postpone implementation of the full ethnic studies course until administrators reassess the curriculum. Hundreds of people from within and outside the MVLA community co-signed the letter…
>
> The allegations of antisemitism mainly stem from AEP's association with Samia Shoman, a San Mateo-based educator who served on the state's advisory committee for the Ethnic Studies Model Curriculum draft created in 2019 that was publicly panned by Jewish groups for containing anti-Zionist material. Gov. Gavin Newsom ultimately vetoed the draft, calling it offensive.

22. As more fully alleged below, Petitioner served upon Respondent a set of Public Record Act requests which, among other things, include within their scope records relating to the terms of the contract between MV-LAUHSD and AEP; the formation of that contract; and the actions taken by MV-LAUHSD and AEP pursuant to that contract. The above facts make clear that MV-LAUHSD necessarily has documents responsive to Petitioner's requests.

23. Indeed, while the contract was apparently terminated, no public information discloses whether AEP completed the work it was retained to do; what AEP work product and/or information was imparted to MV-LAUHSD; and how that work product and/or information is being used or what plans MV-LAUHSD may have for its future use.

24. Santa Clara County is home to a substantial population of Jewish-Americans and a substantial population of Israeli-Americans. These citizens of California are fully entitled to ensure

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[12] Pendleton, *supra*, at https://www.losaltosonline.com/news/mvla-fires-consultant-amid-ethnic-studies-curriculum-debate/article_10ebaa08-c76d-11ed-857f-cf45df898387.html.

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that the public schools of this County do not preach bias against them on the basis of their nationality, ethnicity, or religion. And they are fully entitled to know whether that right is being fulfilled by the public schools of this County.

25. As more fully alleged below, Respondent acknowledged its receipt of Petitioner's PRA requests, but failed to respond to them, and has produced absolutely no documents, thereby preventing Petitioner, and the public—including the parents of children enrolled in MV-LAUHSD—from learning what MV-LAUHSD is actually teaching on these topics, and whether MV-LAUHSD is complying with the mandates of California law barring the teaching of antisemitic material and material that discriminates against Israeli-Americans and against the commitment to Zionism.

PARTIES

26. Petitioner-Plaintiff The Deborah Project, Inc., is a non-profit, tax-exempt organization, recognized under Section 501(c)(3) of the Internal Revenue Code and organized under the laws of the state of Maryland, which is dedicated to uncovering, publicizing, and dismantling antisemitic abuses in educational systems.

27. The Deborah Project is a member of the public under the CPRA, Gov. Code § 7920.520. 17.

28. The Deborah Project is beneficially interested in the outcome of these proceedings and has a clear, present, and substantial right to the relief sought herein and has no adequate remedy at law apart from that sought in this Petition.

29. Respondent-Defendant MV-LAUHSD is and at all relevant times has been a "local agency" as that term is defined in California Government Code § 7920.510. MV-LAUHSD operates public schools in (part of) Santa Clara County, California. Respondent-Defendant MV-LAUHSD is the legal custodian of the records at issue in this lawsuit. MV-LAUHSD maintains its primary administrative offices at 1299 Bryant Avenue Mountain View, California, 94040, is a legal resident of Santa Clara County, California, and is amenable to service of process in Santa Clara County.

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JURISDICTION AND VENUE

30. This Court has jurisdiction over this matter pursuant to Section 10 of Article VI of the California Constitution, Code of Civil Procedure sections 1085 and 1060, and California Government Code sections 7923.000 through 7923.115.

31. Venue is proper in this Court as Respondent-Defendant and the public records at issue are located within the County of Santa Clara, and events giving rise to the claims occurred in the County of Santa Clara.

DISCLOSURE REQUIREMENTS UNDER THE CALIFORNIA PUBLIC RECORDS ACT

32. The State of California enacted its Public Records Act for the explicit purpose of increasing freedom of information by giving the public access to information in possession of public agencies. See *CBS, Inc. v. Block*, 42 Cal 3d. 646,651 (1986). The California legislature proclaimed that "[i]mplicit in the democratic process is the notion that government should be accountable for its actions. In order to verify accountability," the legislature continued, the public "must have access to government files. Such access permits checks against the arbitrary exercise of official power and secrecy in the political process." *CBS*, 42 Cal.3d at 651.

33. The CPRA requires that all records "containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency" must be made publicly available for inspection and copying upon request, unless those records are exempt from disclosure. Gov. Code §§ 7922.525(a)-(b); 7920.530. If a Respondent claims that some documents are exempt from disclosure, it must disclose all non-exempt material. Gov. Code § 792.525.

34. "All public records are subject to disclosure unless the Legislature has expressly provided to the contrary." *Sierra Club v Superior Court*, 57 Cal.4th 157, 165-66 (2013).

35. If a Respondent claims that any request is completely or in part denied, that must be in writing and must set forth the names and titles or position of each person responsible for the denial. Gov. Code §§ 7922.540 (a)-(b).

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36. Should the CPRA requestor prevail in litigation, "the court shall award court costs and attorney fees to the requestor." Gov. Code §7923.115(a).

37. The California Constitution also guarantees that the records of public agencies be open to the public. Laws such as the CPRA must be "broadly construed" if it furthers the people's right to access and "narrowly construed" if it limits the right of access. Cal. Const. Art. 1, §3(b)(2).

FACTUAL ALLEGATIONS

38. On February 23, 2023, The Deborah Project submitted a written CPRA request to Respondent-Defendant MV-LAUHSD by email, seeking the disclosure of four (4) categories of public records. (A copy of Petitioner-Plaintiff's February 23 cover email and request letter are attached to this Petition-Complaint as Exhibits "D" and "E", respectively.)

39. As set forth in the request letter (Exhibit "E"), the request sought the following documents from January 1, 2018, until the present:

a. All public records relating to teaching about or preparing to teach about, any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs," "Arab-Americans" in your school district, including but not limited to all training materials presented (including but not limited to those handed out) to those attending the Ethnic Studies training by Acosta Educational Partners on January 9 and January 30, 20223.

b. Public records sufficient to show the identity of all persons responsible in whole or in part for determining the content of your district's teaching materials about or relating to any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans," and how those persons were selected for this task, including their connection to and knowledge about the field of ethnic studies.

c. All public records relating to the consultation by your district and/or employees of your school district with any non-school district employees regarding the teaching of or preparing to teach about any of the following: "Ethnic Studies," "Zionists," "Zionism," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans."

d. All public records relating to the consultation by your district and/or employees of your school district with any non-school district employees regarding the teaching of or preparing to teach about any of the following: "Ethnic Studies," "Zionists," "Zionism," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans."

40. As set forth below, the CPRA requires local agencies to determine, within not more than ten (10) days from receipt of a CPRA request, whether the records sought are disclosable public records in its possession, to notify the requestor promptly of its determination and the

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reasons therefore, and to state the estimated date and time when the records will be made available. *See* Cal. Gov't Code § 7922.535(a)-(b) (previously codified at § 6253(c)). "In unusual circumstances," the agency may request and obtain a fourteen (14) day extension, "setting forth the reasons for the extension and the date on which a determination is expected to be dispatched. No notice shall specify a date that would result in an extension for more than 14 days." *Id*.

41. Respondent-Defendant MV-LAUHSD failed to provide any response whatsoever within ten days of The Deborah Project's request submission.

42. On March 29, 2023, or 34 days after Petitioner-Plaintiff had submitted its CPRA request, MV-LAUHSD sent The Deborah Project an email that failed to state whether it had disclosable records, let alone to identify when those records would be produced. Instead, the letter asserted that MV-LAUHSD "hopes" it will be "able to determine whether it is in possession of public records by April 7, 2023." (A copy of Respondent-Defendant's March 29 email is attached to this Petition-Complaint as Exhibit "F".)

43. Citing the previous statute (Government Code section 6253(c), which has been recodified at Cal. Gov't Code § 7922.535(a)-(b)), MV-LAUHSD's March 29 letter asserted also that its response time "may be extended up to fourteen (14) days," but failed actually to request the extension – which time frame MV-LAUHSD had already exceeded in any case.

44. April 7, 2023, came and went with no further response and no documents forthcoming from Respondent-Defendant MV-LAUHS to Petitioner-Plaintiff The Deborah Project.

45. It has been more than 14 weeks since Petitioner delivered its set of CPRA requests to MV-LAUHSD. That period is well beyond the length of time in which a public agency such as MV-LAUHSD is required to respond to a request made pursuant to the CPRA. The Deborah Project has received no communication whatsoever from MV-LAUHSD since its March 29, 2023 email.

46. In addition to having a statutorily-mandated right to a response to its requests, there is strong reason to believe MV-LAUHSD has responsive documents.

47. The documents referenced above, in particular, the meeting minutes (Exhibit "C") and Pendleton article (cited in footnote 1, *supra*), demonstrate that MV-LAUHSD indeed has records responsive to each of the four categories requested, including but not limited to: the contract

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or contracts with AEP, any change orders, and payment records; records of MV-LAUHSD's actual consultation with AEP (and any other consultants), including assistance in the development of lesson plans, curriculum content and source material; records identifying all persons responsible for determining the content of MV-LAUHSD's teaching materials about ethnic studies, Israel, Zionism, Palestine, and/or the Palestinians; and most likely also records relating to the curriculum MV-LAUHSD has developed or bought that teaches about Israel, Zionism, Palestine, and/or Palestinians, and actual course syllabi.

48. An article in the Mountain View High School student newspaper adds, "According to an email from MVLA Board President Phil Faillace, MVLA had received services from AEP and is making a final payment to the organization."[13] That article states further:

> Julie Yick, Ethnic Studies task force head and Ethnic Studies teacher, said the partnership between the MVLA district and AEP followed a heavy research process. The process, according to Yick, included follow up conversations, **emails, and documentation of those conversations and emails**.

49. Plainly, MV-LAUHSD has responsive documents.

50. For the reasons listed above, Mountain View-Los Altos Union High School District's failure to provide a timely, substantive response to The Deborah Project's February 23 PRA request set constitutes an unlawful and ongoing violation of the California Public Records Act.

FIRST CAUSE OF ACTION

(Writ of Mandate For Violation of Public Records Act,

Cal. Gov't Code §§ 7920.000 *et seq.*

51. The Deborah Project incorporates by reference the allegations contained in paragraphs 1 through 50 above as though fully set forth at length herein.

52. As noted above, the CPRA imposes a clear ministerial duty on Mountain View-Los Altos Union High School District to determine whether it is in the possession of responsive, disclosable documents within not more than ten (10) days from receipt of Petitioner-Plaintiff's request. A fourteen (14) day extension is permitted, but only if the Respondent-Defendant requests

[13] Juan Vazquez Gonzalez, *MVLA changes contractors amid alleged antisemitism*, ORACLE (May 31, 2023) (*emphasis added*), https://mvhsoracle.com/32694/uncategorized/mvla-changes-contractors-amid-alleged-antisemitism/.

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the extension, for an outside time limit of 24 days by which time MV-LAUHS was required to notify The Deborah Project whether it had disclosable responsive records and the reasons for the determination that some documents were non-disclosable, if any. *See* Cal. Gov't Code § 7922.535(a)-(b). Should Mountain View-Los Altos Union High School District determine that The Deborah Project's requests seek disclosable public records, the CPRA also imposes a clear duty on it to specify in its notification the estimated date and time when the requested records would be made available. *Id*.

53. Mountain View-Los Altos Union High School District has failed to perform its duties as required by the CPRA. Specifically, by its ongoing willful refusal to respond substantively to The Deborah Project's set of CPRA requests which MV-LAUHSD received on February 23, 2023, or to provide the disclosable responsive documents (or an estimated date and time when it would provide them), Respondent-Defendant has violated the California Constitution, Art. I, § 3, and the California Public Records Act, Cal. Gov't Code §§ 7920.000 *et seq.*, and thereby caused The Deborah Project to file suit to obtain the desired relief.

54. The Deborah Project has an immediate, vital, and beneficial interest in, and right to, the performance by MV-LAUHSD of the aforementioned duties. Petitioner-Plaintiff has no other plain, speedy, and adequate remedy at law. There are no material issues of fact necessary to the resolution of this matter that are or can be disputed.

55. Section 10 of Article VI of the California Constitution provides that superior courts and their judges have original jurisdiction in proceedings for extraordinary relief in the nature of mandamus, certiorari, and prohibition. California Government Code section 7923.000 (previously codified at section 6258) permits any person to institute proceedings for injunctive or declaratory relief or writ of mandate to enforce his or her right to inspect or to receive a copy of any public record under the CPRA. Code of Civil Procedure section 1085 authorizes the Court to issue a writ of mandate to Mountain View-Los Altos Union High School District to compel the performance of the aforementioned mandatory duties under the CPRA.

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SECOND CAUSE OF ACTION

(Declaratory Judgment and Injunctive Relief)

56. The Deborah Project incorporates by reference the allegations contained in paragraphs 1 through 55 above as though fully set forth at length herein.

57. An actual controversy exists between The Deborah Project and Mountain View-Los Altos Union High School District regarding MV-LAUHSD's mandatory duties under the CPRA.

58. Mountain View-Los Altos Union High School District's failure to perform its clear duties under the CPRA is a violation of that statute.

59. The Deborah Project is being irreparably harmed by Mountain View-Los Altos Union High School District's failure to perform its duties under the CPRA, and The Deborah Project will continue to be irreparably harmed unless MV-LAUHSD is compelled to comply with the law.

60. The Deborah Project has no plain, speedy, and adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, The Deborah Project respectfully prays this Court:

1. For issuance of a writ of mandate ordering Mountain View-Los Altos Union High School District to provide all records responsive to Petitioner-Plaintiff's CPRA requests as set forth above;

2. Alternatively, if the Court does not order immediate production of the records requested, that it order Respondent to show cause why the records should not be released and prepare a log of withheld records, and thereafter issue a writ of mandate and injunction ordering the requested records to be disclosed;

3. For an Order of declarative and injunctive relief, including but not limited to, declaring that the withheld materials are public records as defined by Government Code section 7920.530, subdivision (a) in that they contain information relating to the conduct of the people's business, prepared, owned and retained by Respondent-Defendant, and are subject to disclosure as writings of a public agency under Article 1, § 3(b) of the California Constitution; and declaring that Respondent-Defendant violated the CPRA by failing to promptly respond to The Deborah Project as

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it is required by law to so do, and also by failing to produce the requested responsive documents to The Deborah Project and the public; and enjoining MV-LAUHSD to provide the requested records;

4. For a finding that Petitioner-Plaintiff is the prevailing party in this action;

5. For an award of attorney fees and costs to Petitioner-Plaintiff pursuant to Government Code section 7923.115 or any other applicable law;

6. For judgment accordingly; and

7. For such other and further relief as the Court may deem just and proper.

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By:

DAVID A. DEGROOT

Attorneys for Petitioner-Plaintiff

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VERIFICATION

I am an officer of the Petitioner-Plaintiff in the above-entitled action.

I have read the foregoing Petition for Writ of Mandate, or, in the Alternative, Complaint for Declaratory and Injunctive Relief and know its contents. The same is true of my own knowledge, except as to those matters which are therein stated upon information or belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 6 day of June, 2023, at Penn Valley, Pennsylvania.

LORI LOWENTHAL MARCUS

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EXHIBIT A

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Our LESMC Story

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The LESMC Story

Liberated Ethnic Studies Model Curriculum Coalition

Ethnic Studies rose from the ashes of civil unrest. In the late 1960s, Chicana/o high school students echoed anti-Vietnam War activists, declaring "our struggle is not in Vietnam but in the movement for social justice at home," and joined with the Black, Native American and Asian American liberations movements to improve the quality of life for the nation's communities of color. Educational justice was a critical component of the movimiento. High school students and communities of color demanded a rapid, revolutionary, and liberatory reconstruction of the public education system, and called for their historical, cultural and linguistic knowledge to become a central part of the curriculum. For more than 50 years, communities of color have advocated for Ethnic Studies as a critical academic discipline, holding hunger strikes, rallies and sit-ins.

Numerous scholars have documented the importance of Ethnic Studies in K-12 education and explained that "standards-based curricula and test-driven teaching are missing the mark" (Tintiangco-Cubales, Kohli, Sacramento, Agarwal-Rangnath & Sleeter, 2014). When students of color see themselves in the curriculum, they have an improved sense of belonging, are better able to handle institutionalized racial microaggressions, and do better in school in measurable ways.(Cabrera, Milem & Marx, 2012; Camarota, 2017; Dee & Penner, 2017; Montiero, 2020; Sleeter, 2011). A historical study (Sleeter, 2011) commissioned by the NEA concluded that the academic achievement and social well-being of all students improves with the implementation of an "academically rigorous" Ethnic Studies curriculum. A Stanford study found that Ethnic Studies classes increased school attendance by 21 percent, GPA by 1.4 grade points and credits

earned by 23. An Arizona study found that students were more likely to graduate from high school and pass standardized exams (Cabrera, 2014).

In early 2019, Ethnic Studies activists were hopeful that California would develop and approve an authentic Ethnic Studies curriculum. AB 331 (Medina), which required the California Department of Education (CDE) to construct an Ethnic Studies framework, was seen as a prerequisite to the adoption of Ethnic Studies as a high school graduation requirement. To that end, the CDE selected 19 Ethnic Studies expert practitioners to draft the California Ethnic Studies Model Curriculum (ESMC). Many current members of the Liberated Ethnic Studies coalition joined that effort.

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The Controversy Erupts

The expert developers of the Ethnic Studies Model Curriculum Advisory Committee (ESMAC), who represented every region of California, met four times, laboring to develop a curriculum that captured the silenced, hidden, and often forgotten voices of Californians of color. Three educator-writers captured their wisdom and expertise. The developed a framework that included: an introduction and overview; course outlines including lesson plans (Introduction to Ethnic Studies, African American Studies, Chicanx and Latinx Studies, Asian American Studies, and Native American Studies); a listing of Ethnic Studies courses meeting A-G requirements; and a glossary. The ESMAC debated, discussed and developed, understanding that districts could use what they desired, add missing components, and develop relevant curriculum for their specific context. The framework was developed with fidelity to the field, situated in the struggles of people of color against racism and colonialism, and directed toward liberatory education.

The ESMAC was composed primarily of educators of color who spoke their truths. When that happens, privileged voices rise in opposition. In Summer 2019, rightwing political lobbyists organized an "all lives matter" movement, implicitly and explicitly attacking the Critical Race Theory that underlies Ethnic Studies as a discipline. The proposed ESMC was heavily attacked. The *Wall Street Journal* attacked the document for critiquing capitalism. *Breitbart* added its voice to the chorus. California Jewish Legislative Caucus argued against that the social vilified a social movements lesson that included the BDS (Boycott, Divestment and Sanctions) movement,

Other conservative members of the Jewish community argued against the inclusion of important Arab leaders (Edward Said, Rashida Talib, Ilhan Omar). Zionist organizations and media leveled accusations of antisemitism at ESMAC members.

Bowing to rightwing pressure, the CDE disbanded the ESMAC and shut them of the process. The ESMC that the state Board of Education approved in March 2021 bears so little relation to the original draft that every member of the ESMAC demanded that their name be removed. For example, the critical edge of Ethnic Studies has been sanitized by removing or redefining such critical terms as capitalism and revolution. The African American lesson on the Black Lives Matter movement fails to depict the true causes of police brutality, the significance of ongoing anti-racist struggle in African American communities and the impact BLM has had on all communities of color. All mention of Palestine has been erased. The current ESMC is a watered-down version of multicultural United States history.

Birth of the Liberated Ethnic Studies Model Curriculum Coalition

The state's submission to rightwing demagogues and lobbyists has emboldened the Ethnic Studies movement. More than 50 Ethnic Studies educators and activists from throughout California, committed to contesting white supremacist notions of academic knowledge, convened to develop and implement a Liberated Ethnic Studies Model Curriculum (LESMC).

The LESMC coalition first convened in April 2020. Participants included former members of the ESMAC, other Ethnic Studies scholars and educators, teacher union activists and curriculum developers. Teachers from the following school districts attended: Los Angeles, San Diego, Oakland, Alhambra, Sacramento, San Mateo, Fresno, and Tucson (AZ). The higher education members of the team hailed from CSU Sacramento, CSU Northridge, Woodland Community College, and CSU Chico. The team included specialists in the following disciplines: African American Studies, Asian American Studies (including Pacific Islander, Pilipino and Arab American Studies), American Indian and Native American Studies, Chicanx/Latinx Studies, Southwest Asian and North African Studies, and Comparative Ethnic Studies. More recently, LESMC has added members from CSU San Marcos, San Jose Unified School District, Alisal

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School District, and San Lorenzo Unified School District, and added members from the Sikh, Korean, and other communities missing from the original ESMC team.

The Liberated Ethnic Studies Model Curriculum Vision

The purpose of the LESMC is to promote the advancement and implementation of well-designed Ethnic Studies courses and programs for the purpose of advancing students' academic achievement, educational equity, community activist scholarship, and community leadership skills.

We will accomplish our vision by:

1. Building our capacity to collaborate with educators, school districts, and teacher preparation programs committed to Ethnic Studies, social change and educational equity.
2. Providing the best learning practices for a standardized Ethnic Studies programs in public education rooted in the fields of African American Studies, Asian American Studies, Chicanx/Latinx Studies, and American Indian Studies.
3. Honoring ancestral knowledge, struggles, and friendship built in solidarity with educators, parents, and historically disenfranchised youth belonging to low-income communities.
4. Equipping Black, Chicanx/Latinx, Asian American, American Indian/Native American and low-income youth with skills to participate in community advancement, social justice, and transformative change.
5. Acting as a resource for educators to engage in professional development and implementation of Ethnic Studies that embeds models of social change with fidelity to the discipline.
6. Operationalize the tools, concepts and best teaching practices/curriculum development protocols in order to effectively implement well-designed Ethnic Studies programs in public education.

LESMC Definition of Ethnic Studies

Ethnic Studies is the interdisciplinary study that centers Asian Americans & Pacific Islanders, Chicanx/Latinx , American Indians/Native Americans, and Africana/Black/African Americans

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who have experienced, survived, and resisted settler colonialism, racism, and hegemonic systems and structures of oppression. Using Ethnic Studies epistemology, content and pedagogy, Ethnic Studies aims to educate students to be socially, politically, and economically conscious of their personal connections to local and (trans)national histories. Students in these courses study topics through the intersectional lenses of race, ethnicity, culture, gender, sexuality, ability, language, immigrant status, and class. They analyze indigeneity, white supremacy, oppression, privilege, and decolonization, and work toward empowering themselves as anti-racist leaders who engage in social justice activism. Reflection, Naming, Dialogue and Action drive the learning and support the belief that each person has important narratives, stories, and a voice to share. Students will have the opportunity to cultivate intersectional solidarity with groups of people, locally and (trans)nationally, to foster active community responsiveness, social engagement, radical healing, and critical hope.

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Chapters

The LESMC curriculum is divided into six chapters:

- Introduction to Ethnic Studies (History, Definition and Pedagogy)
- Black Studies
- Asian American Studies (including Pacific Islander, SWANA and Arab American Studies)
- American Indian and Native American Studies
- Chicanx/Latinx Studies
- Intersectionalities and Comparative Ethnic Studies

Guiding Principles: "The Seven C's"

These Guiding Principles are foundational concepts and pedagogical practices embedded in all LESMC lesson plans and units. They lay the basis for Ethnic Studies as a discipline distinct from multicultural education. Based on work by ESMAC cochairs Allyson Tintingco-Cubales and R. Toltecka Cuauhtin and modified by the ESMAC, they have been adopted by the LESMC:

1. **C**ultivate empathy, community actualization, cultural perpetuity, self-worth, self-determination, and the holistic well-being of all participants, especially Native People/s and people of color (POC).
2. **C**elebrate and honor Native People/s of the land and communities of color by providing a space to share their stories of struggle and resistance, along with their intellectual and cultural wealth.
3. **C**enter and place high value on pre-colonial, ancestral, indigenous, diasporic, familial, and marginalized knowledge.
4. **C**ritique empire and its relationship to white supremacy, racism, patriarchy, cisheteropatriarchy, capitalism, ableism, anthropocentrism, and other forms of power and oppression at the intersections of our society.
5. **C**hallenge imperialist/colonial hegemonic beliefs and practices on the ideological, institutional, interpersonal, and internalized level.
6. **C**onnect ourselves to past and contemporary resistance movements that struggle for social justice on the global and local levels to ensure a truer democracy.
7. **C**onceptualize, imagine, and build new possibilities for post-imperial life that promotes collective narratives of transformative resistance, critical hope, and radical healing.

Themes: "The Five S's"

Each chapter develops lessons on the following themes:

1. Self: The story of my racialized intersectional identity.
2. Stories: The collective narratives of my people.
3. Systems:
   - The experiences of my people with systems of power and oppression.
   - The analysis of systems of oppression as a vehicle to imagine a better world.
4. Social Movements: The resistance and resilience of my people in organizing against injustice.
5. Solidarity: The transformative solidarity between my people and other communities in constructing a better world.

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Professional Development and Support

The LESMC Coalition's scholars, activists and practitioners are available for professional development, curriculum development and guidance on course/district implementation of Ethnic Studies. Our goal is to provide access to quality, aligned and liberatory Ethnic Studies to as many educators as humanly possible. At the same time, we continue to advocate for an anti-racist, anti-colonial, liberatory Ethnic Studies for all students in California and throughout the United States.

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EXHIBIT B

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Understanding Zionist Backlash

Given the attacks on teaching about Palestine, it's important for us as

http://www.liberatedethnicstudies.org/teach-palestine.html
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4 Aug 2021 – 29 Jan 2022

Given the attacks on teaching about Palestine, it's important for us as educators to understand the nature of the attacks and where they're coming from. These aren't spontaneous protests from random individuals; they are led, organized and financed by Zionist organizations in the United States and Israel.

[redacted]

Zionism is a nationalist, colonial ideology that, from the late 19th century on, has called for the creation and expansion of Israel as a Jewish state in historic Palestine by any means necessary. As support for Palestine and criticism of Israel's apartheid policies have grown in the US and internationally, Zionist organizations have stepped up their efforts to silence discussion of Palestine/Israel in movement circles, on college campuses, and now in K-12 education.

The Anti-Defamation League (ADL), the Jewish Community Resource Council (JCRC), and Simon Wiesenthal's Museum of Tolerance are some of the most active Zionist organizations fighting against Palestine curriculum

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the most active Zionist organizations fighting against Palestine curriculum K-12. All three organizations have tried to position themselves as advocates and experts on anti-bias education.

Both the ADL and the Museum of Tolerance have enormous influence in the construction and dissemination of what they call anti-bias curriculum in California's public schools. However, as Zionist organizations, their primary goal is to stunt the development of authentic anti-racist curriculum to ensure an Israel-friendly analysis. They want to prevent teachers and students from making connections between the US and Israel as white settler states, or apartheid-era South Africa and the current apartheid in Israel. They also want to prevent an understanding of Islamophobia that reveals the connections between anti-Arab racism, Islamophobia, and US imperial wars in Southwest Asia and North Africa. Attacks on teachers who bring Palestine into their classrooms or advocate for staff development on the history of Palestine and Israel usually take the form of accusations of antisemitism. Zionists argue that any discussion of Palestine or critique of Israel creates an "unsafe climate" for Jewish students.

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http://www.liberatedethnicstudies.org/teach-palestine.html
LS candidates
9 Aug 2021 - 29 Jan 2022

Palestine or critique of Israel creates an "unsafe climate" for Jewish students.

It's important to be clear:

- Critical pedagogy about Israel's role in Palestine is not antisemitic.
- Antisemitism is discrimination against, violence towards, or stereotypes of Jews for being Jewish. Criticism of Israel's policies of apartheid and oppression of Palestinians is not antisemitism.
- False accusations of antisemitism that rely on the conflation of the State of Israel with Jewish identity are an explicit strategy of Zionists, who portray Palestinians as motivated by antisemitism or irrational hatred rather than resistance to oppression.
- Zionists claim to speak for all Jews, but Zionism is distinct from Judaism. Growing numbers of Jews are critical of Israel's settler colonialism and support teaching Arab-American studies and Palestine.
- Claims that discussion, or even mention, of Palestine makes

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- Claims that discussion, or even mention, of Palestine makes classrooms "unsafe" for Jewish or Israeli American students are racist, just like claims that discussion of slavery or Jim Crow makes classrooms unsafe for white students. Students are empowered by exploring accurate history, looking beneath rightwing myths to face what's really going on in the world. Recognizing patterns of continuing colonialism and the long history of resistance and resilience is freeing for all of us. That's how our youth will be able to build the relationships and strategies necessary to create a better world.
- Safety comes through solidarity. Antisemitism—like anti-Asian, anti-Black, anti-Palestinian, and Islamophobic attacks and rhetoric—exists in every community, but it is fostered and exploited by rightwing movements in the US and around the world that gain power by keeping us divided.

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http://www.liberatedethnicstudies.org/teach-palestine1.html
3 captures
2 Aug 2021 - 9 Aug 2021

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Be Strategic!

If you've taught controversial curriculum—LGBTQ history and rights, sex-positive sex ed, prison abolition, US imperialism/militarism, anti-racist resistance, reproductive justice—the issues around planning aren't very different. You want to be a courageous educator, but you also want to be strategic and think long-term. Here are a few factors to consider:

- Are there other teachers at school or in your union you can strategize and collaborate with? Even one or two other teachers who will have your back and help you think things through makes an enormous difference.
- Think about who you are and the situation you're in. When issues come up, it's not all equal. For example, white privilege provides protection. If you're tenured, you're more protected, especially if you're in a public school and you're in a union. Those factors may give you the ability—and the responsibility—to take more risks to do the right thing.
- Who is in your classroom? If your classroom is a mirror and window, if you're giving students tools that they can see are useful to them—

http://www.liberatedethnicstudies.org/teach-palestine1.html
3 captures
7 Aug 2021 - 9 Aug 2021

- Who is in your classroom? If your classroom is a mirror and window, if you're giving students tools that they can see are useful to them—they are going to be your strongest allies, especially in middle and high school. Are there student clubs where progressive students are already organized?
- What about parents and other members of the community? If there's a PTA, does it support social justice teaching? Are parents or the local community organized in support of progressive causes that will make them likely to support your work? On the other hand, are the JCRC, the ADL, the Jewish Federation and/or other Zionist organizations active and likely to create problems? If so, how can you build support before you begin so you're in a strong position to withstand potential attack?
- Is the administration likely to be supportive if you tell them about your plans? Or are you better off trying to fly under the radar or growing strong enough as a group to pressure them? You know your situation best, but administrators usually hate controversy, so it's a lot easier for them to say no or institute a process that delays your work forever rather than support you moving forward. On the other hand, if you have grassroots support and are doing teaching that

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http://www.liberatedethnicstudies.org/teach-palestine1.html
3 captures
3 Aug 2021 - 9 Aug 2021

they are going to be your strongest allies, especially in middle and high school. Are there student clubs where progressive students are already organized?

- What about parents and other members of the community? If there's a PTA, does it support social justice teaching? Are parents or the local community organized in support of progressive causes that will make them likely to support your work? On the other hand, are the JCRC, the ADL, the Jewish Federation and/or other Zionist organizations active and likely to create problems? If so, how can you build support before you begin so you're in a strong position to withstand potential attack?
- Is the administration likely to be supportive if you tell them about your plans? Or are you better off trying to fly under the radar or growing strong enough as a group to pressure them? You know your situation best, but administrators usually hate controversy, so it's a lot easier for them to say no or institute a process that delays your work forever rather than support you moving forward. On the other hand, if you have grassroots support and are doing teaching that your students love, the administrator can see that they will have problems if they shut you down.

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http://www.liberatedethnicstudies.org/teach_palestine2.html
7 captures
9 Aug 2021 - 5 Sep 2021

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Base Strong Curriculum in Strong Pedagogy

- As always with social justice curriculum, start by building community in your classroom. Your students need to know it's safe for them to speak from their hearts, tell their stories, be vulnerable, have feelings, and make mistakes—that your classroom is a nurturing place for opening up and changing.
- Think carefully as you create your curriculum. Start with your students' lives. What issues are most resonant for them? How can you connect Palestine? You might want to center gentrification and forced relocation, criminalization of youth, or hip-hop as resistance. Maybe you want to take a deep dive into the Native American history in your area and connect that to settler colonialism in Palestine.
- Take advantage of resources and curriculum that already exist. See the resources list at the end of this toolkit.
- Integrate Palestine into your curriculum so it's not a "multicultural add-on" but an illuminating comparison. A few examples: impact of continuing colonial control on water resources at the US/Mexico border and in Gaza, using statistics to look at forced removals in your city and East Jerusalem, impact of ideology comparing Manifest

- Integrate Palestine into your curriculum so it's not a "multicultural add-on" but an illuminating comparison. A few examples: impact of continuing colonial control on water resources at the US/Mexico border and in Gaza, using statistics to look at forced removals in your city and East Jerusalem, impact of ideology comparing Manifest Destiny to the Promised Land, efforts to bury history and the struggles to resurface those histories.
- Then, make sure you can justify your curriculum with your state standards.

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http://www.liberatedethnicstudies.org/teach-palestine3.html
7 captures
9 Aug 2021 - 10 Mar 2022

Organize Your School! Organize Your District!

There have always been teachers who shut their doors and teach their students liberatory curriculum. That's an incredibly important contribution to the emotional health of our students and to the struggle for racial and social justice. Many of us trace our own politics back to one of those teachers. Other teachers are interested in organizing on a schoolwide, districtwide, statewide or national level.

If you're interested in broader organizing in your educational setting, it will be important to create a support system for this incredibly important collective work. Locate a space to be visible, encourage one another, strategize and be your authentic selves. Make sure you have a mix of activism and healing on your school site, in your union and with your community.

Never take on this work alone; make time to meet with others on a regular basis to collectively strategize your plans for education and action. Many unions have racial justice and/or human rights committees already actively engaged in issues like Defunding the Police, Black Lives Matter, Immigrant

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http://www.liberatedethnicstudies.org/teach-palestine3.html
7 captures
9 Aug 2021 - 16 Mar 2022

engaged in issues like Defunding the Police, Black Lives Matter, Immigrant Rights and other just causes. Connect with these union activists.

You may want to form a Palestine affinity caucus. Forming a caucus will help in educating union members and passing important initiatives in support of Palestine. However, if the existing racial justice or human rights committee is open to explicit support of Palestine, a separate caucus may not be necessary.

Either way, create a space inside your school and within the union to engage in this critical work. Remember, it is important to educate. Often even your most seasoned activists are not well-versed on the subject of Palestine or prepared for Zionist backlash. Build community, folks.

Inevitably, you will need to engage with activists outside of the union to support, co-sponsor, engage in mutually supportive projects and also, to help one another negotiate the treacherous waters of white supremacy. The community can help you with resources, pedagogical tools, and help secure people to assist in your endeavors. Community is important, whether you are organizing in your classroom, your school site, in the union, or in the district. Community members engaged in this work are

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http://www.liberatedethnicstudies.org/teach-palestine3.html
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2021 – 16 Mar 2023

Inevitably, you will need to engage with activists outside of the union to support, co-strategize, engage in mutually supportive projects and, also, to help one another negotiate the treacherous waters of white supremacy. The community can help you with resources, pedagogical tools, and help secure people to assist in your endeavors. Community is important, whether you are organizing in your classroom, your school site, in the union, or in the district. Community members engaged in this work are unafraid, experienced, knowledgeable and, the level of solidarity and unity from joining with community members is healing, spirit-uplifting and awesome. Always remember, you are not alone.

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http://www.liberatedethnicstudies.org/teach-palestine4.html
14 captures
2 Aug 2021 - 5 Sep 2021

Introduction

The past year has seen an enormous shift in the landscape for teachers who want to include Palestine in their curriculum. In California, attacks by Zionist and other right wing organizations on the inclusion of Arab American studies—and specifically Palestine—in the CA Ethnic Studies Model Curriculum (ESMC) have shone a spotlight on Palestine and importance of including it in ethnic studies curriculum. Many educators who have taught ethnic studies for years without thinking about Arab American history are reflecting on their curriculum, learning new content, and making revisions. Discussions about the pedagogical importance of comparing and contrasting settler colonialism in the US and Palestine have been central to that process. The vicious attacks that equate any mention of Palestine with antisemitism have pushed teachers, unions, and districts to understand that honest discussion of Israel's role in the oppression of Palestinians is not antisemitism.

Another factor has been the shift in public opinion in light of Israel's May 2021 bombing attacks on Gaza, their efforts to forcibly expel longtime Palestinian residents of Sheikh Jarrah and Silwan in Jersualem, and their

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http://www.liberatedethnicstudies.org/teach-palestine4.html
Captures
3 Feb 2021 – 5 Sep 2021

Another factor has been the shift in public opinion in light of Israel's May 2021 bombing attacks on Gaza, their efforts to forcibly expel longtime Palestinian residents of Sheikh Jarrah and Silwan in Jerusalem, and their violent suppression of Palestinian resistance. Even media as blindly loyal to Israel as the New York Times have carried front page stories on the children murdered by Israeli bombs in Gaza and home demolitions in Silwan. As the violence dominated the news, students pushed their teachers to explain what was happening, and to make space for classroom discussion of the issues.

So we are seeing an upsurge in interest in learning about and teaching Palestine, often within an ethnic studies framework. At the same time, Zionists are organizing to police curriculum on Palestine. They often try to isolate and attack individual teachers to scare other educators away.

That's not a reason not to teach about Palestine, just as attacks on Black Lives Matter in Schools isn't a reason not to teach Black history. Teaching the truth about the history of the US is a liberatory act, for teachers and for students. Teaching the truth about Palestine is also a liberatory act, for teachers and for students. It's a political decision. But, as much as possible,

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http://www.liberatedethnicstudies.org/teach-palestine4.html
14 captures
2 Aug 2021 - 5 Sep 2021

That's not a reason not to teach about Palestine, just as attacks on Black Lives Matter in schools isn't a reason not to teach Black history. Teaching the truth about the history of the US is a liberatory act, for teachers and for students. Teaching the truth about Palestine is also a liberatory act, for teachers and for students. It is a political decision. But, as much as possible, you want to be strategic. The goal is for your anti-racist teaching to be sustainable, and to be part of a larger movement. This is a road we're making by walking, but this toolkit provides a brief framework for thinking about how to approach teaching about Palestine.

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http://www.liberatedethnicstudies.org/teach-palestine5.html
10 captures
9 Aug 2021 - 7 Oct 2021

A Few Resources

Understanding Zionism and Zionist Organizations #Drop the ADL. The ADL Is Not An Ally: A Primer. 202

Jewish Voice for Peace. "Our Approach to Zionism."

Sokolower, Jody. "Promoting Zionism Is Not 'Education to End Hate,'" Mondoweiss, September 29, 2020.

International Jewish Anti-Zionist Network. The Business of Backlash: The Attack on the Palestinian Movement and Other Movements for Justice. 2015.

"Jewish Educators Say Yes to Liberatory Ethnic Studies" (webinar)

Curriculum Resources

Liberated Ethnic Studies Model Curriculum Institute

Middle East Children's Alliance. Teach Palestine Project

Visualizing Palestine 101

US Campaign for Palestinian Rights. Together We Rise: Palestine As a Model of Resistance.

"Arab American Studies, Palestine, and the Fight for Ethnic Studies" (webinar)

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EXHIBIT C

MVLA
HIGH SCHOOL DISTRICT

Mountain View-Los Altos Union High School District
Minutes for the Regular Meeting of the Board of Trustees
Thursday, November 17, 2022; 6:00 p.m. Closed Session/7:00 p.m. Open Session
District Office Board Room, 1299 Bryant Avenue, Mountain View, CA 94040

1.0 Call to Order

1.2 Mountain View Los Altos High School District Trustee Sanjay Dave will Participate via Teleconference from the Lobby of Hotel Royal Hsinchu, No. 227, Section 1, Guangfu Road, East District, Hsinchu City, Taiwan 300

Mountain View Los Altos High School District Trustee Sanjay Dave will participate via teleconference from the lobby of Hotel Royal Hsinchu, No. 227, Section 1, Guangfu Road, East District, Hsinchu City, Taiwan 300.
Recommendation: For information.

2.0 Public Comment

2.1 Public Comment on Items Scheduled for Discussion in Closed Session

This time is reserved for any person to address the Board of Trustees on items scheduled for discussion during Closed Session only. These presentations are limited to three minutes each, or a total of thirty minutes for all speakers or the three-minute limit may be shortened. Speakers are not allowed to yield their time.
Recommendation: Listen to public comment.

3.0 Closed Session Agenda

3.1 Public Employee Appointment Pursuant to Government Code §54957 Personnel Action Report – Handouts in Open Session

Recommendation: Approve the Personnel Action Report.

3.2 Conference with Legal Counsel – Anticipated Litigation: Significant Exposure to Litigation Pursuant to Government Code §54956.9 - One Potential Case

Recommendation: Information/action.

4.0 Adjourn to Closed Session at 6:00 p.m.

4.1 Adjourn to Closed Session

The Board of Trustees will adjourn to Closed Session to consider items listed on the Closed Session agenda.
Recommendation: Information/action.

The Board adjourned to Closed Session at *6:05 p.m.

5.0 Reconvene Open Session at 7:00 p.m.

The Board of Trustees reconvened to Open Session at *7:06 p.m.

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6.0 Preliminary Business

6.1 Pledge of Allegiance and Roll Call

The Board President will lead the Pledge of Allegiance and conduct Roll Call.
Recommendation: Information.

Vice-President Debbie Torok led the Pledge of Allegiance and conducted Roll Call noting that President Catherine Vonnegut departed the meeting during Closed Session:

Present: Sanjay Dave (via teleconference), Phil Faillace, Fiona Walter, DebbieTorok
Absent: Catherine Vonnegut

Student representatives Sadie Gracon and Ava Keshavarzi were present.

7.0 Approval of the Agenda

7.1 Approval of the Meeting Agenda

The Board will review and approve the meeting agenda.
Recommendation: Approve the meeting agenda.
ORIGINAL - Motion

Member **(Fiona Walter)** Moved, Member **(Phil Faillace)** Seconded to approve the **ORIGINAL** motion 'Approve the meeting agenda'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0.**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

8.0 Report Out Action Taken in Closed Session

8.1 Public Employee Appointment Pursuant to Government Code §54957 Personnel Action Report – Handouts in Open Session

Recommendation: Approve the Personnel Action Report.

No action was taken.

8.2 Conference with Legal Counsel – Anticipated Litigation: Significant Exposure to Litigation Pursuant to Government Code §54956.9 - One Potential Case

Recommendation: Information/action.

No action was taken.

9.0 Students of the Month

9.1 Students of the Month: Quinn Carbery, Los Altos High School; and Ana Avila Hernandez, Mountain View High School

The Board of Education will recognize Students of the Month, Quinn Carbery (Los Altos High School), and Ana Avila Hernandez (Mountain View High School).
Recommendation: For information.

Students of the Month Quinn Carbery and Ana Avila Hernandez were recognized by the Board of Trustees and Dr. Meyer.

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10.0 Recognitions and Resolutions

10.1 MVLA Special Spotlight: Lauren Camarillo, MVLA Teacher of the Year 2022/2023, and One of Five California Teachers of the Year 2023

The Board and Superintendent wish to recognize Lauren Camarillo, Mountain View High School teacher, as the MVLA Special Spotlight for her accomplishments as the district Teacher of the Year (2022/2023) and one of five California 2023 Teachers of the Year.

Public Comment was given by Alex Kobayashi.

10.2 Recognition and Celebration of Service of Retiring Board Trustees Debbie Torok and Fiona Walter

Retiring trustees Debbie Torok and Fiona Walter will be recognized and celebrated for their service to the students, families, and staff of the Mountain View Los Altos High School District.
Recommendation: For information.

Board trustees Sanjay Dave, Phil Faillace, and Dr. Nellie Meyer expressed their appreciation to Debbie Torok and Fiona Walter. Dr. Meyer presented commendations on behalf of County Supervisor Joe Simitian to Mrs. Torok and Mrs. Walter.

Public comment was given by Alex Kobayashi, Joe Mitchner, Dave Campbell, Michelle Bissonnette, and Sybil Cramer.

Vice-President Debbie Torok called for a recess at 8:12 p.m. The meeting resumed at 8:37 p.m.

11.0 Board Member Reports

11.1 Board Member Reports

Trustees may wish to give a report.
Recommendation: Information.

No reports were given.

12.0 Student Board Member Reports

12.1 Student Board Member Reports

Student Board members may wish to make a report.
Recommendation: Information.

Student representatives reported on events and activities at their schools.

13.0 Superintendent's Report

13.1 Superintendent's Report

The superintendent may wish to make a report.
Recommendation: Information.

Superintendent Dr. Nellie Meyer gave a report on district academics, school site highlights, and district-wide initiatives.

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14.0 Communications

14.1 District Organizations: At regular Board meetings, a single spokesperson of each recognized District organization (CSEA, DTA) may give a brief update. Items are limited to those which are informational.
Recommendation: For information.

No district organization representatives presented.

15.0 Public Comment

Public Comment was moved up in the agenda following 10.2.

15.1 Public Comment on Items Not on the Agenda
Anyone wishing to address the Board on any topic not listed on the agenda should make a request to the Board President by completing a request to be heard form and present it to the Superintendent's Executive Assistant. The President will recognize those who desire to speak either during the "Public Comment" section or during the particular agenda item. Each speaker is allocated a maximum of 3 minutes. The President may choose to limit any position or topic if substantial numbers of people wish to address the Board. If you wish to speak on an issue not on the agenda, please be advised that the Board may not take action on any item not specifically listed on the agenda. The Board members may ask brief questions for clarification, but may not otherwise discuss the issue. The Board values constructive community comments and suggestions and welcomes your participation in the democratic process.
Recommendation: Listen to public comment.

No public comment received.

16.0 Consolidated Motion

Items listed under Consolidated motion were voted upon by a single motion, thereby approving:

16.1 Personnel Report
Personnel Report
The Personnel Office reports the district's personnel changes at each meeting of the Board of Trustees.
Recommendation: Approve the Personnel Report.
ORIGINAL – Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the Personnel Report'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.2 Quarterly Report on Williams Uniform Complaints
The attached Quarterly Report on the Williams Uniform Complaints shows no complaints were received by any school in the district during the reporting period of July 1 through September 30, 2022.

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Recommendation: Approve the Quarterly Report on Williams Uniform Complaints for the reporting period of July 1 through September 30, 2022.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the Quarterly Report on Williams Uniform Complaints for the reporting period of July 1 through September 30, 2022'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.3 Mountain View High School's Trip to MIT Cambridge, Massachusetts, January 20-22, 2023 to participate in the Science Olympiad
This is the final request for 30 students to travel to MIT Cambridge, Massachusetts, January 20-22, 2023 to participate in the Science Olympiad. Initial estimate was 19 students and now planning to take 30 students since the second team was accepted to participate! Per Board Policy 6153, students will miss one to two school days.
Recommendation: Approve Mountain View High School's Trip to MIT Cambridge, Massachusetts, January 20-22, 2023 to participate in the Science Olympiad.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Mountain View High School's Trip to MIT Cambridge, Massachusetts, January 20-22, 2023 to participate in the Science Olympiad'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.4 Los Altos High School's ASI Trip to London, England, February 25-March 5, 2023, to Participate in an International High School STEM Conference
This is the final request for 20-25 students and 4-7 chaperones to travel to London, England, February 25-March 5, 2023, to participate in an International High School STEM Conference. Per Board Policy 6153, students will miss five school days.
Recommendation: Approve Los Altos High School's ASI Trip to London, England, February 25-March 5, 2023, to Participate in an International High School STEM Conference.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Los Altos High School's ASI Trip to London, England, February 25-March 5, 2023, to Participate in an International High School STEM Conference'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

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16.5 Mountain View High School's Cultural Exchange Trip to Iwata, Japan April 7-17, 2023

An initial request was received for 26 students from Mountain View High School to travel to Iwata, Japan, April 7-17, 2023, to promote global citizenship, teach leadership and organization skills, and share culture. Per Board Policy 6153, students will miss two school days.

Recommendation: Approve Mountain View High School's Cultural Exchange Trip to Iwata, Japan April 7-17, 2023

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Mountain View High School's Cultural Exchange Trip to Iwata, Japan April 7-17, 2023'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.6 Agreement Between Mountain View Los Altos High School District and Acosta Educational Partnership to Provide Support to Ethnic Studies Teachers for the 2022-2023 School Year

Acosta Educational Partnership is composed of highly experienced teachers and facilitators in culturally responsive ethnic studies education. Acosta provides professional development, mentoring, and collaboration to teachers and schools, which includes training for teachers on content and pedagogical approaches to implementing engaging lessons and supporting the building of the Ethnic Studies curriculum to support critical thinking and inclusivity.

Recommendation: Approve the agreement between Mountain View Los Altos High School District and Acosta Educational Partnership to support Ethnic Studies Teachers for the 2022-2023 school year.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the agreement between Mountain View Los Altos High School District and Acosta Educational Partnership to support Ethnic Studies Teachers for the 2022-2023 school year'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.7 Contract Amendment #6 Between Mountain View Los Altos High School District and Lucile Salter Packard Children's Hospital (LPCH) at Stanford to Provide Physician Consulting Services

Mountain View Los Altos High School District is requesting approval of the contract amendment #6 between Mountain View Los Altos High School District and Lucile Salter Packard Children's Hospital (LPCH) at Stanford to provide physician consulting services.

Recommendation: Approve contract amendment #6 between Mountain View Los Altos High School District and Lucile Salter Packard Children's Hospital (LPCH) at Stanford to provide physician consulting services.

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ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve contract amendment #6 between Mountain View Los Altos High School District and Lucile Salter Packard Children's Hospital (LPCH) at Stanford to provide physician consulting services'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.8 Independent Contractor Agreement Between Mountain View Los Altos High School District and Michelle Esparza

Independent Contractor Agreement, Michelle Esparza
This contract is for Michelle Esparza, School Psychologist, which will provide Psycho-educational evaluations, information to the IEP Team, and make recommendations to improve behavior and/or academic achievement of students.
Recommendation: Approve the agreement with Michelle Esparza for the 2022-2023 school year.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the agreement with Michelle Esparza for the 2022-2023 school year'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.9 Memorandum of Understanding with Palo Alto Unified School District to provide work training at Veterans Administration for the Life Skills students at Mountain View High School

Memorandum of Understanding, Palo Alto Unified School District
This annual Memorandum of Understanding is for Palo Alto Unified School District, which provides alternative hands-on experience with opportunity to explore specific career interests through direct observation at Palo Alto Veterans Administration (PAVA). MVLA will place a total of fifteen students.
Recommendation: Approve the Memorandum of Understanding between Mountain View Los Altos High School District and Palo Alto Unified School District for the 2022-2023 school year.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the Memorandum of Understanding between Mountain View Los Altos High School District and Palo Alto Unified School District for the 2022-2023 school year'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

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16.10 Mountain View High School Student Services Project and Los Altos High School Student Services Project Budget Revisions

Staff recommends increasing the Mountain View High School Student Services project budget by $750,000 and increasing the Los Altos High School Student Services project budget by $1,600,000. The cost increase at each site has arisen from the following: 1. Ongoing air monitoring required by BAAQMD—this is a requirement in order to be eligible for state funding through the Schools Facility Program (SFP) and was not part of the original budget because there was no such requirement when the budget was built. The cost will be recovered from the funds received under that program. 2. Building cost escalation in the Bay Area has been at the unforeseeable rate of approximately 13% per year for the last two years, compounding to a 28% total increase. 3. Parking lot repair/replacement at end of job—not included in original scope/budget and will be paid for with district maintenance funds. The budget increase is needed because the current project contingency has been used. Any unused contingency funds at the end of this project would go back to the overall Measure E Bond program budget. As noted, a significant amount of the increased budget is due to costs related to BAAQMD requirements . The District has spent over $3M in these costs across all projects. However, this is in order to be eligible for almost $30M in SFP funds. The first tranche of money, based on MVLA modernization projects soon to be reviewed by OPSC, is close to $4.5M, effectively reimbursing the entirety of the compliance costs. Although there is no firm date for when this first amount of funds will be received, the district's application is very close to being reviewed and the funds are released soon after. Even with the increased budgets for both student services projects, district staff anticipate the projects remaining on the Measure E bond program list will still be able to be completed.

Recommendation: Approve the revised project budget.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the revised project budget.' Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.11 Change Order #10A Between Mountain View Los Altos High School District and Beals Martin to Provide Services Related to the Mountain View High School Auxiliary Gym Project

Mountain View Los Altos High School District is requesting Change Order #10A with Beals Martin be ratified: - Four (4) concrete footings at fence posts are in conflict with building footings, therefore, the footings are deleted, and contractor shall furnish & install (weld) metal plates at posts to secure the fence. - Per flooring manufacturer requirements, the slab moisture should be below 85%, and after performing two tests (one by the sub-contractor and one by a 3rd party), it was determined that the moisture content is over the flooring manufacturers limit. This was an unforeseen condition, therefore, contractor is required to furnish and install a vapor barrier (Koster VAP-2000- thin layer of impermeable material to prevent moisture from damaging the flooring) over the slab, prior to installing wood flooring, to provide warranty.

Recommendation: Ratify Change Order #10A between Mountain View Los Altos High School District and Beals Martin to provide services related to the Mountain View High School Auxiliary Gym project.

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ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Ratify Change Order #10A between Mountain View Los Altos High School District and Beals Martin to provide services related to the Mountain View High School Auxiliary Gym project'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.12 Change Order #10A Between Mountain View Los Altos High School District and Beals Martin to Provide Services Related to the Mountain View High School Student Services Building Project

Mountain View Los Altos High School District is requesting Change Order #10A with Beals Martin be ratified: - Provide and install approximately 200 linear feet of studs at the parapet area to increase parapet height, per Request for Information #321. - Per Division of the State Architect review, it was determined the railing glass thickness shall be changed and up sized. Due to the change, there will be more labor involved as the glass is heavier (to carry to the second floor, and to install), and there is a material cost difference for the glass and railings. - Per structural request, a metal plate shall be fabricated and installed at the intersection of a beam and column to improve structural integrity as shown on Architect Supplemental Instruction #55 and Construction Change Directive #27. - Per structural request, a metal (bent) plate shall be fabricated and installed at the trash enclosure (room) to support the deck and maintain structural integrity per Request for Information #369. - Due to an unprecedented increase in inflation in a brief time; For steel, electronics, freight and other components, there have been significant increases in material and labor costs. Therefore, following is additional cost for elevator material based on mentioned factors.

Recommendation: Ratify Change Order #10A between Mountain View Los Altos High School District and Beals Martin to provide services related to the Mountain View High School Student Services Building project.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Ratify Change Order #10A between Mountain View Los Altos High School District and Beals Martin to provide services related to the Mountain View High School Student Services Building project'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.13 Change Order #2B Between Mountain View Los Altos High School District and Duran & Venables to Provide Services Related to the Mountain View High School Auxiliary Gym Project

Mountain View Los Altos High School District is requesting Change Order #2B with Duran & Venables be ratified: - Install concrete rings (for raising manhole ring up to grade from underneath.) and raise (5) existing utility boxes to grade and prepare for asphalt work. This is needed to make sure the new asphalt is flush with the boxes. Work to be done on time and materials, not to exceed $16,000. - Existing asphalt at the tennis court is in poor condition (in

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some locations it has failed). Per District request, demolish approximately 5750 square feet of existing asphalt, dispose and off haul properly, and install new asphalt and prepare for final coating.

Recommendation: Ratify Change Order #2B between Mountain View Los Altos High School District and Duran & Venables to provide services related to the Mountain View High School Auxiliary Gym project.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Ratify Change Order #2B between Mountain View Los Altos High School District and Duran & Venables to provide services related to the Mountain View High School Auxiliary Gym project'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.14 Contract Amendment #2 Between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to Provide Services Related to the Los Altos High School Facility Repair Master Agreement

Mountain View Los Altos High School District is requesting Contract Amendment #2 with Quattrocchi Kwok Architects, Inc. be approved. - The design fee is dependent upon the construction cost basis, per the Owner Architect Agreement. The current construction estimate has increased to $6,231,860 from 4,705,600 resulting in an increase to the design fee in the amount of $152,527.

Recommendation: Approve Contract Amendment #2 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Los Altos High School Facility Repair Master Agreement.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Contract Amendment #2 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Los Altos High School Facility Repair Master Agreement'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.15 Contract Amendment #2 Between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to Provide Services Related to the Mountain View High School Facility Repair Master Agreement

Mountain View Los Altos High School District is requesting Contract Amendment #2 with Quattrocchi Kwok Architects, Inc. be approved. - The design fee is dependent upon the construction cost basis, per the Owner Architect Agreement. The current construction estimate has increased to $8,382,098 from 6,103,000 resulting in an increase to the design fee in the amount of $227,910.

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Recommendation: Approve Contract Amendment #2 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Mountain View High School Facility Repair Master Agreement.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Contract Amendment #2 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Mountain View High School Facility Repair Master Agreement'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.16 Contract Amendment #1 Between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to Provide Services Related to the Los Altos High School Facility Repair Sitework Master Agreement

Mountain View Los Altos High School District is requesting Contract Amendment #1 with Quattrocchi Kwok Architects, Inc. be approved. - The design fee is dependent upon the construction cost basis, per the Owner Architect Agreement. The current construction estimate has increased to $1,530,605 from $830,400 resulting in an increase to the design fee in the amount of $77,871.

Recommendation: Approve Contract Amendment #1 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Los Altos High School Facility Repair Sitework Master Agreement.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Contract Amendment #1 between Mountain View Los Altos High School District and Quattrocchi Kwok Architects, Inc. to provide services related to the Los Altos High School Facility Repair Sitework Master Agreement'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.17 Change Order #4C Between Mountain View Los Altos High School District and Robert A. Bothman to Provide Services Related to the Los Altos High School Student Services Building Project

Mountain View Los Altos High School District is requesting Change Order #4C with Robert A. Bothman be ratified: - Temp water line removal and replace to new stub-out location as per plan on the west side of the site. This was removed to over excavate the building site per consultant recommendations. - Remove and reinstall 6" storm drain due to as-builts not being correct and the lines being not per code under the concrete pathways. Cost is to rework these to a lower depth to allow baserock and concrete per the detail. - Provide labor, equipment, and materials as needed to remove and offhaul 6" of baserock spoils, recompact, and install a 6" section of asphalt paving at all underground utility trenches in the existing parking lot adjacent to the new building as shown on the utility plan mark-up. It is critical that this work is completed ASAP as we are approaching rainy season and the open utility trenches pose a risk to

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stormwater control. - Provide power washing, street sweeping, and labor to remove all dirt and debris that has accumulated in the parking lot (adjacent to the new building) throughout the past several months of construction activity as needed to maintain compliance with stormwater control measures. Cleaning of the parking lot is also needed before asphalt paving of the underground utility trenches can be completed. - Provide and install a base rock pad with (4) 8'x10' rumble plates for a wash out station in the undeveloped, active construction area to prevent dirt track out into the parking lot and storm drainage system as an effort to maintain a clean and SWPPP compliant job site through winter.
Recommendation: Ratify Change Order #4C between Mountain View Los Altos High School District and Robert A. Bothman to provide services related to the Los Altos High School Student Services Building project.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Ratify Change Order #4C between Mountain View Los Altos High School District and Robert A. Bothman to provide services related to the Los Altos High School Student Services Building project'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.18 Change Order #4A Between Mountain View Los Altos High School District and Sausal Corporation to Provide Services Related to the Los Altos High School Student Services Building Project
Mountain View Los Altos High School District is requesting Change Order #4A with Sausal Corporation be ratified: - Extra form work on West side of building pad due to low building pad established and caused by McGuire & Hester, the solution is to add another form board on top of the existing ones approx. 6". - Roof screen canopy material cost escalation. - Refabricate (3) hollow metal door frames that were originally made too large for the door openings due to conflicting information in the contract drawings. - Remove and reinstall framing at the 2nd floor deck as needed to align the wall with the 1st floor curb below. - Remove and reinstall framing as needed to accommodate the additional bent plate that is required at the roof to extend the metal stud framing. - Remove and reinstall framing to accommodate the bent plate modification at the roof. - Structural steel framing revisions at edge of deck conditions. - Provide additional engineering to produce shop drawings and calculations for the airfoil sunshade blades as requested by DSA. This is an added requirement by DSA that was not included in the contract drawings or specifications.
Recommendation: Ratify Change Order #4A between Mountain View Los Altos High School District and Sausal Corporation to provide services related to the Los Altos High School Student Services Building project.

ORIGINAL - Motion
Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Ratify Change Order #4A between Mountain View Los Altos High School District and Sausal Corporation to provide services related to the Los Altos High School Student Services Building project'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

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Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.19 Declaration of Sale or Disposal of Surplus Property

Education Code sections 17545-17546 authorize school districts to sell or dispose of district property that is not required for school purposes or is no longer suitable for school use. Surplus property may be sold at a publicly noticed auction conducted by district employees. Items for which no qualified bid is received, or that are less than $2,500 in value, may be sold at private sale without advertising. Property of insufficient value to defray the cost of sale may be donated to a charitable organization or disposed of. Money received from the sale of surplus property may be placed in the district's general or reserve fund. The District owns the following items that are beyond their useful life and now need to be surplused. The following individual items have been determined to be valued at less than $2,500: Dell tower computer Sound system w microphone 4 old macbooks 3 wireless mics 1 pantex camera 1 cannon video recorder 1 samsung screen 2 keyboards pencil sharpener storage device mouse various cables

Recommendation: Approve declaration of sale or disposal of surplus property and authorize the Superintendent to sell or otherwise dispose of the property consistent with Education Code sections 17545-17546.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve declaration of sale or disposal of surplus property and authorize the Superintendent to sell or otherwise dispose of the property consistent with Education Code sections 17545-17546'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

16.20 Warrants, September, 2022

Education Code 42631 requires that the Board of Trustees approve District expenditures. A copy of the warrants are available at the District Office and can be reviewed by any interested person during regular business hours.

Recommendation: Approve the warrants for the month of September, 2022.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the warrants for the month of September, 2022'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

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16.21 Resolution 22/23-09: AB 361 State and Local Agencies: Teleconferences

AB 361 extends the flexibilities provided in the Governor's prior executive order to local and state bodies to hold public meetings electronically beyond the executive order's September 30, 2021 expiration date. Approval of this item allows for remote Board of Trustees meetings for the next 30 days.

Recommendation: Approve Resolution No. 22/23-09: Resolution Continuing Board of Trustees Authority to Hold Virtual Meetings Pursuant to AB 361.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve Resolution No. 22/23-09: Resolution Continuing Board of Trustees Authority to Hold Virtual Meetings Pursuant to AB 361'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

17.0 Items Pulled from Consolidated Motion for Discussion

There were no items pulled from Consolidated Motion.

18.0 Business/Action Items

18.1 Proposed New Courses of Study

The New course proposal process starts in the fall and includes dialog between site teachers and administrators, a proposal presented to the site leadership team in which they engage in dialogue, asking questions, and end the end voting on their endorsement. The new course proposal is then sent to the Associate Superintendent of Educational Services and if approved, sent to the Board. Mountain View High School is proposing the following new courses: Business Management, Work Exploratory, and Health Careers. The Business Management course develops academic and analytical skills that will enable students to succeed in college and at the same time provides students with experience managing a small business. This course will be a CTE course and will be the connector course to Business Management II to complete a CTE pathway. The Work Exploratory course will provide students with a course on exploring careers and how to gain professional experience to explore opportunities in their chosen field. This aligns with our District goals to offer more CTE courses on campus. In a survey given to students, this course was rated very high in student interest. The third new course proposal from MVHS is for an Architectural Design II class. This class will be a capstone class to Architectural Design I. Adding in Architectural Design II will make a complete CTE pathway. This aligns with our District goals to offer more CTE courses on campus. The last new course MVHS is proposing is Health Careers. Their goal is to develop a full pathway for the Health Careers Pathway. Health Careers will be a first/concentrator course in the Pathway. This course aligns with our district goals. Include specific references to CCSS, CA-NGSS, State and College Board Frameworks, and District goals as appropriate.

Recommendation: Approve the new courses of study: Business Management, Work Exploratory, Architectural Design II, and Health Careers.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve the new courses of study: Business Management, Work Exploratory,

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Architectural Design II, and Health Careers'. Upon a roll call vote being taken, the vote was: Aye: **4** Nay: **0**. The motion **Carried. 4 - 0**

Sanjay Dave Yes
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

18.2 and 18.3 were pulled by staff.

18.4 Regular Meeting Dates for Board of Trustees Meetings in the 2023 Calendar Year - First Reading

Meeting dates for January through December, 2023, are proposed and presented at this time for a first reading.
Recommendation: Information.

18.5 Board District Goals for 2023-2028 - First Reading

Every six years, our Board of Education develops goals to frame our efforts as we work toward academic excellence, equity, and engagement. Over the last year, we have reviewed and created updated goals incorporating our top priorities. The proposed Board District Goals for 2023-2028 are presented for a first reading.
Recommendation: For information at this time. This item will return to the Board of Trustees at a subsequent meeting.

19.0 Board Operations

19.1 Communications/Correspondence

The Board of Trustees may wish to share communications/correspondence.
Recommendation: Information.

There were no communications/correspondence.

19.2 Date, Time and Place of Next Meeting

The Board of Trustees will meet next: Regular Board Meeting - Monday, December 12, 2022, at MVLA District Office, Board Room
Recommendation: For information.

19.3 Board Suggestions for Future Board Reports/Meetings

Trustees may wish to share suggestions for future Board reports/meetings.
Recommendation: For information.

There were no suggestions for future Board reports/meetings received.

20.0 Resume Closed Session if Needed

The Board did not resume Closed Session.

21.0 Reconvene Open Session and Report Out Action Taken in Second Closed Session

N/A

22.0 Adjournment

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22.1 Adjourn Meeting

The meeting of the Board of Trustees of the Mountain View Los Altos High School District will adjourn.

Recommendation: Approve to adjourn the meeting.

ORIGINAL - Motion

Member **(Phil Faillace)** Moved, Member **(Fiona Walter)** Seconded to approve the **ORIGINAL** motion 'Approve to adjourn the meeting'. Upon a roll call vote being taken, the vote was: Aye: **3** Nay: **0** Absent: **1**. The motion **Carried 3 - 0**

Sanjay Dave Absent
Fiona Walter Yes
Phil Faillace Yes
Debbie Torok Yes

The meeting adjourned at *9:04 p.m.

The Deborah Project

MVLA
HIGH SCHOOL DISTRICT

Mountain View-Los Altos Union High School District
Minutes for the Regular Meeting of the Board of Trustees
Thursday, November 17, 2022; 6:00 p.m. Closed Session/7:00 p.m. Open Session
District Office Board Room, 1299 Bryant Avenue, Mountain View, CA 94040

Minutes approved: December 15, 2022

Nellie Meyer, Ed.D.
Secretary

Catherine Vonnegut
President

Phil Faillace
Clerk

The Deborah Project

The Deborah Project

EXHIBIT D

Download From the Desk of Lori....eml Info | 1 / 2 |

From: Tiye Wisdom <twisdom@deborahproject.org>
Sent on: Thursday, February 23, 2023 9:56:55 PM
To: Superintendent.office@MVLA.Net; Teri.Faught@MVLA.Net
CC: Lori Marcus <lorilowenthalmarcus@deborahproject.org>
Subject: From the Desk of Lori Lowenthal Marcus, Esq.: Public Records Request
Attachments: MVLA PRA Request.pdf (48.61 KB)

Good Afternoon,

My name is Tiye Wisdom, and I am the administrative assistant at The Deborah Project. We are requesting public records for the items attached to the letter in this email. The requested documents can be returned to our Legal Director, Lori Lowenthal Marcus, via email at lorilowenthalmarcus@deborahproject.org.

If you have any questions regarding this request, please get in touch with Lori Lowenthal Marcus directly at the contact information listed above and in the letter.

Thank you for your time and assistance.

Sincerely,

Tiye Wisdom
Administrative Assistant
The Deborah Project

The Deborah Project

The Deborah Project

EXHIBIT E

February 23, 2023

To: Supt. Nellie Meyer Superintendent.office@MVLA.Net
Assoc. Supt of Educational Services Teri Faught Teri.Faught@MVLA.Net

Subject: California Public Records Act Request for Mountain View-Los Altos School District

Dear Supt. Meyer and Assoc. Supt. Faught,

Pursuant to the California Public Records Act ("CPRA"), Cal Gov't Code §§ 7920.000 *et seq*. (previously codified at §§ 6250.00 *et seq*), The Deborah Project hereby requests copies of the records identified below from January 1, 2018 to the present:

• All public records relating to teaching about or preparing to teach about, any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs," "Arab-Americans" in your school district, including but not limited to all training materials presented (including but not limited to those handed out) to those attending the Ethnic Studies training by Acosta Educational Partners on January 9 and January 30, 20223.

- Public records sufficient to show the identity of all persons responsible in whole or in part for determining the content of your district's teaching materials about or relating to any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans," and how those persons were selected for this task, including their connection to and knowledge about the field of ethnic studies.

- All public records relating to the consultation by your district and/or employees of your school district with any non-school district employees regarding the teaching of or preparing to teach about any of the following: "Ethnic Studies," "Zionists," "Zionism," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans."

- All public records relating to the determination of and any compensation or financial consideration paid or transferred to any entity or individual relating to the development of materials used in, or consultation services regarding, teaching or training teachers to teach about any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs," and "Arab-Americans."

Please note that under the CPRA, the definition of *"*all public records*" includes*

> *"any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical forms or contacts,"* §7920.530.

And "writing" is defined as:

> *"means any handwriting, typewriting, printing, photostating, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."* §7920.540.

The Deborah Project

Please also note that while The Deborah Project is seeking the production of names and titles where relevant, we are not seeking phone numbers, social security numbers, or other personal identifying information, the disclosure of which would constitute an invasion of privacy.

As required by law, please provide a response to this request within ten days of your receipt of this letter.

Thank you for your time and attention to this matter.

Sincerely,

Lori Lowenthal Marcus, Esq.
lorilowenthalmarcus@deborahproject.org
Legal Director
The Deborah Project
P.O.Box 212
Merion Station, PA 19066

The Deborah Project

The Deborah Project

EXHIBIT F

From: Office, Superintendent's <superintendent.office@mvla.net>
Sent on: Wednesday, March 29, 2023 10:12:45 PM
To: Tiye Wisdom <twisdom@deborahproject.org>
CC: Teri.Faught@mvla.net; Lori Marcus <lorilowenthalmarcus@deborahproject.org>; Nellie Meyer <nellie.meyer@mvla.net>
Subject: Re: From the Desk of Lori Lowenthal Marcus, Esq.: Public Records Request

Hello Tiye Wisdom,

On behalf of the Mountain View-Los Altos Union High School District ("District"), this email constitutes the District's initial and final response to your February 23, 2023, request for records pursuant to the California Public Records Act ("PRA"), Government Code section 6250 et seq. Your request seeks the following:

- All public records relating to teaching about or preparing to teach about, any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs," "Arab-Americans" in your school district, including but not limited to all training materials presented(including but not limited to those handed out) to those attending the Ethnic Studies training by Acosta Educational Partners on January 9 and January 30, 20223.
- Public records sufficient to show the identity of all persons responsible in whole or in part for determining the content of your district's teaching materials about or relating to any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," Palestine," "Palestinians," "Arabs" and "Arab-Americans," and how those persons were selected for this task, including their connection to and knowledge about the field of ethnic studies.
- All public records relating to the consultation by your district and/or employees of your school district with any non-school district employees regarding the teaching of or preparing to teach about any of the following: "Ethnic Studies," "Zionists," "Zionism," "Israel," "Palestine," "Palestinians," "Arabs" and "Arab-Americans."
- All public records relating to the determination of and any compensation or financial consideration paid or transferred to any entity or individual relating to the development of materials used in, or consultation services regarding, teaching or training teachers to teach about any of the following: "Ethnic Studies," "Zionism," "Zionists," "Israel," "Palestine," "Palestinians," "Arabs," and "Arab-Americans."

The District understands its obligation under the PRA to assist you with making a focused and effective request that would facilitate the identification of responsive records. (Gov. Code, § 6253.1.) If, at any time, you believe that the District has improperly interpreted your requests or you would like to clarify your requests, please contact our office to explain your position, and the District will take it under consideration and/or should you desire District assistance in clarifying your requests.

At the outset, please be advised that the PRA does not require public agencies to make disclosable documents available within a certain time frame or by a set date established by the requester. Rather, Government Code section 6253(c) merely requires that a public agency make an initial

The Deborah Project

determination of whether it has disclosable records in its possession that are responsive to the request within ten (10) days of receipt of a request. Further, the PRA exempts certain categories of records and some of those exceptions may apply directly to your request. (See Gov. Code §§ 6252 and 6254.) To the extent that any responsive records fall within any of the categories covered by one or more of the exemptions, please be advised that the District will not produce those records as they are exempt from disclosure under the PRA.

Although the PRA requires a public agency to communicate its initial determination of whether it has disclosable records that are responsive to a request for reasonably identifiable records within ten (10) days of receipt of such request, a public agency may extend this deadline to make its initial determination in certain circumstances. (Government Code section 6253(c).) Specifically, the time limit to provide a requester with a determination of whether the public agency has responsive, disclosable records may be extended up to fourteen (14) days by written notice setting forth the reasons for the extension and when a determination is expected.

Please be advised that the District will require additional time to fully respond as authorized by Government Code sections 6253(c)(1) and (c)(2) because of the scope and broadness of the Request. The District hopes that it will be able to determine whether it is in possession of public records by April 7, 2023. The District will notify you if it is able to complete its search within the specified time.

The Deborah Project

Sincerely,

Debbie Maher
Executive Assistant
Office of the Superintendent
Mountain View Los Altos Union High School District
1299 Bryant Avenue
Mountain View, CA 94040
(650) 940-4650, X0011
superintendent.office@mvla.net

On Thu, Feb 23, 2023 at 1:57 PM Tiye Wisdom <twisdom@deborahproject.org> wrote:
>
> Good Afternoon,
>
> My name is Tiye Wisdom, and I am the administrative assistant at The Deborah Project. We are requesting public records for the items attached to the letter in this email. The requested documents can be returned to our Legal Director, Lori Lowenthal Marcus, via email at lorilowenthalmarcus@deborahproject.org.
>
> If you have any questions regarding this request, please get in touch with Lori Lowenthal Marcus directly at the contact information listed above and in the letter.
>
> Thank you for your time and assistance.

>
> Sincerely,
>
>
> Tiye Wisdom
> Administrative Assistant
> The Deborah Project
>

The Deborah Project