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ELIEZER WILLIAMS, etc., *et al.*

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA

18 COUNTY OF SAN FRANCISCO

19 UNLIMITED JURISDICTION

20 ELIEZER WILLIAMS, a minor, by SWEETIE
WILLIAMS, his guardian ad litem, *et al.*, each
21 individually and on behalf of all others similarly
situated,

22 Plaintiffs,

23 v.

24 STATE OF CALIFORNIA, DELAINE EASTIN,
State Superintendent of Public Instruction,
25 STATE DEPARTMENT OF EDUCATION,
STATE BOARD OF EDUCATION,

26 Defendants.

ENDORSED
FILED
San Francisco County Superior Court

JUN 10 2003

GORDON PARK-LI, Clerk
BY: KEVIN M. LEE
Deputy Clerk

No. 312236

DECLARATION OF JULIO C. VELEZ

Hearing: August 25, 2003
Time: 3:30 p.m.
Department: 20, Hall of Justice
Judge: Hon. Peter J. Busch
Date Action Filed: May 17, 2000
Trial Date: August 30, 2004

1 **Declaration of Julio C. Velez**

2 I, Julio C. Velez, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am 17 years old and I am a student at South Gate High School ("SGHS") in the
6 11th grade. SGHS is located in South Gate, California.

7 3. SGHS has a major problem with textbook shortages and books being in poor
8 condition.

9 4. I do not have a textbook in my Advanced Placement ("AP") Spanish Literature
10 class. My AP Spanish Literature teacher told my class that she tried to buy textbooks in the
11 beginning of the year, but was told by the publisher that it would not sell more textbooks to
12 SGHS because it had an outstanding debt. Thus, our class does not have textbooks and my
13 teacher has resorted to making photocopies of materials at Kinko's. Several of my teachers have
14 told me that SGHS has one xerox machine for the teachers and it is always breaking down. They
15 have also told me that when the xerox machine is functioning, teachers have to wait a long time
16 to use the xerox machine or if they put in xeroxing requests, it takes a long time for them to get
17 the order filled. As a result, teachers have to either make xeroxes using the student xerox
18 machine in the school library or outside of school. In both instances they have to pay for the
19 xeroxing out of their own pocket.

20 5. There is also a book shortage in my English class. All students in my level
21 English class have to read *The Great Gatsby* and *The Sun Also Rises* their Junior year. However,
22 SGHS only owns one class set of *The Great Gatsby* and my English teacher told our class that
23 the teacher that possesses the set is not willing to share with the other classes. So, most students,
24 including myself, have to either buy the book or go to the library in order to read the book, but
25 the school library only has a few copies. I bought both books with my own money. The two
26 books cost me about \$20 total. Most students in my class opted to buy the books because of the
27 difficulty of getting access to the book in the school library. My English teacher frequently
28 brings in different books that she checks out from the book room and shows them to our class.

1 An overwhelming majority of these books are falling apart. They are missing pages, are written
2 in, and some are missing covers.

3 6. My English teacher told our class about an American Literature class at SGHS
4 that only has one class set of books. Students cannot take these books home. The students are
5 only able to read the book when they are in class.

6 7. Bathrooms at SGHS frequently run out of supplies. Although there is always at
7 least one bathroom open during school hours, bathrooms close immediately after school.
8 Students like myself who stay after school for extracurricular activities usually do not have
9 access to bathrooms. The only times I have access to a bathroom after school is when the
10 auditorium is open and we can use the auditorium bathroom. The auditorium is usually only
11 open when the drama class is rehearsing. SGHS has one bathroom in the academic building that
12 has been closed since last year. Although it is closed to students, the door was open one day
13 when I was walking by it and I was able to see inside. Administration says that the bathroom is
14 closed because it was destroyed by students, but from what I have seen, the bathroom looks to be
15 clean and in working condition. I think this bathroom should be open for students to use.

16 8. SGHS has a trash problem and does not have a recycling program. Although
17 janitors clean the campus after school, the school has a problem with lots of trash during the
18 school day and more needs to be done to keep the campus clean during the school day.

19 9. There is a problem with lots of substitutes at SGHS. Last year, in my World
20 History class, I had about 16 substitutes through out the year. My World History class started
21 with a regular teacher, who left after the first month of school. After that, my class had
22 substitutes who would last for as little as a week and the longest one stayed for about two
23 months. I really didn't learn anything in this class.

24 10. SGHS is overcrowded. This problem is most notable during break periods in
25 between classes. It is a very frequent occurrence for me to get pushed into my locker because the
26 hallways are so crowded during breaks. The hallways are so congested during the breaks that it
27 looks like a "parade" because students cannot move freely down the hallways; they have to move
28 in groups and people are constantly getting pushed and shoved.

1 11. SGHS's overcrowding problem is at its worse in the beginning of the school year
2 when there are not enough desks in my classes to accommodate all the students. My math and
3 Honors History teacher had to transfer out students during the first couple of days of the semester
4 because the classroom could not physically accommodate any more desks. My Honors History
5 class currently has approximately 43 students and 43 desks. My friend was transferred out of
6 Honors History and put in a regular History class even though she should have remained in
7 Honors History because there were no available seats in the class.

8
9 I declare under penalty of perjury of the laws of the State of California and the United
10 States that the foregoing is true and correct. Executed this 27th day of May, 2003 in Los
11 Angeles, California.

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Julio C. Velez


