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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.

No. 312236

**DECLARATION OF AISHA  
BLANCHARD YOUNG**

Hearing: October 1, 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 Aisha Blanchard Young**

2 I, Aisha Blanchard Young , 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 a fully credentialed Kindergarten teacher at Woodworth Elementary School  
6 (“Woodworth”) in the Inglewood Unified School District. I have been teaching at the school for  
7 six years. I teach on Track C.

8 3. There are water leaks in the ceilings in many classrooms at Woodworth. Many  
9 teachers, including myself, are concerned that the water leaks create mold in our classrooms and  
10 that it might be a health hazard for teachers and students. I am aware of the problems at  
11 Woodworth because I am the Union Representative at my school and many teachers often come  
12 to me with their concerns and grievances. In my classroom, the ceiling has brown rusty stains  
13 and the tiles are damaged. A ceiling tile fell down in October and was not replaced until  
14 February. Each time it rained between October and February, I had to put a trash can under the  
15 leak to prevent water from soaking the floor and rugs. If it rained over the weekend or in the  
16 evening after school, water would get all over the floor and I had to prevent my students from  
17 going to the wet area of the room on the next school day. Whenever it rained, kids that were  
18 seated on the carpet in the last two rows had to move because water leaked onto the area where  
19 they sat. In March, in another class, the leaks were so bad that many ceiling tiles were missing  
20 and the class had to move to the computer lab for two days because of the water damage. Many  
21 books were damaged and ruined, including new textbooks, and a series of books about the  
22 September 11<sup>th</sup> tragedy, many of which were autographed. In the classroom next to mine the  
23 problem is worse. There has been a leak in the classroom at least since I arrived at the school six  
24 years ago. I am aware of this because I have been in the same classroom for five years and I go  
25 into the two classrooms next to my classroom on a daily basis. Until April, almost every time it  
26 rained there would be puddles of water on the ground and on the rugs. In February and March of  
27 this school year the problem was very bad. In February the carpet got wet because the rain was  
28 leaking into the wall and then onto the floor of the classroom. After that rainstorm the classroom

1 smelled moldy and musty for days until the water dried out. In March there were heavy rains  
2 which caused a major leak in the classroom and the carpet was soaked. The district came to  
3 check the leak in the wall but was unable to find the source of the problem. The head  
4 maintenance person from the district who came to fix the wall told me that the district did not  
5 have the money to fix the leak in the wall and replace the wall. Because the district couldn't  
6 afford to fix the wall they decided to pull up the carpet and put down tiles so if the wall leaked  
7 again it wouldn't be as much of a problem. In the process of pulling up the carpet in the room  
8 next to mine the district discovered asbestos under the carpet. As a result the teacher was asked  
9 to move to another classroom for approximately three weeks. Even after the district discovered  
10 the asbestos, the teachers had to remove the belongings themselves. The district did not remove  
11 the asbestos until seven weeks after the discovery. My classroom is connected through a  
12 bathroom door to the classroom where they found asbestos. There are a couple inches between  
13 the floor and the bottom of the door and the room was not sealed off. Because students use the  
14 restroom that is connected to the classroom where there was asbestos, I was concerned during the  
15 time that because the room was not sealed off that the particles could travel through the bottom  
16 of the door. I also had to go into the closet which is in the same location as the bathroom and  
17 connected to the classroom where the asbestos was. I was concerned about my students' health  
18 as well as my own health. The district removed the asbestos during the time that children were in  
19 class and while they were playing outside. There was a tube that led from inside the classroom to  
20 the playground and it is my understanding that the tube was connected to the area where they  
21 were removing the asbestos. The district did not seal off the room or mark the room with a do not  
22 enter sign until the district began to clean up the room. There is a possibility that someone could  
23 have entered the room because there was no marking that indicated that the room had asbestos.

24 4. Woodworth is infested with cockroaches and mice. The traps that are set in the  
25 classrooms don't get picked up regularly and stay in plain view for days. Through conversations  
26 with other teachers I am aware that the traps in other classrooms don't get picked up regularly. I  
27 filmed my classroom for a workshop at UCLA. The video footage shows dead pests in traps in  
28 the corners of my classroom in plain view of the children. I regularly see mouse droppings in my

1 classroom closets, on bookshelves, and in my desk drawers.

2           5.       I have been teaching in the same classroom for five years. Basic furniture such as  
3 chairs and desks and bookcases are in poor condition. The chairs are wobbly, the desks are old  
4 and the bookcases are chipping and missing shelves. The chalkboard in my classroom is old and  
5 not usable. I have had to cover it up because it is falling off its hinges away from the wall.  
6 The rugs in my classroom are filthy and rarely cleaned which is a big concern for me because my  
7 students sit and play on the rugs. In the classroom next to mine, room 2, the carpet and rugs are  
8 badly stained and in dire need of replacement. I am aware of this because on an almost daily  
9 basis I speak with the teacher in room 2.

10           6.       Woodworth is overcrowded with almost 1100 students on campus and operates on  
11 a four-track schedule which means three tracks are on while one track is off. The overcrowding  
12 is obvious on the playground and in the bathrooms. Although the school has two full-time  
13 janitors, this number is not sufficient in order to maintain a school the size of Woodworth. The  
14 janitors often do not have time to fully clean the classrooms, bathrooms, yard, and common  
15 areas, pick up pest traps, etc. Due to the multi-track schedule there is only a little over a week  
16 between when one school year ends and the new school year begins. This year the school year  
17 ends on June 25th and the new year school begins on July 8th. On July 1st, 2nd, and 3rd all  
18 teachers are required to attend professional development for at least two to four hours each day.  
19 Although July 4th is a national holiday many teachers will be coming into school to prepare for  
20 the new school year because beside July 7th which is a pupil free day, July 4th is almost the only  
21 day that teachers have to prepare their classrooms for their new students. Having a week between  
22 school years is very hard and affects my ability to teach because I am trying to prepare for the  
23 next group of students in a week and there is not enough time to plan, prepare and do such things  
24 as buy materials, organize lesson plans, make name cards or make flash cards for a particular  
25 unit, and go to the library and get books. I try my best to be ready for the first week of class but it  
26 is difficult to make such a large transition in a short period of time. For the students it is also a  
27 difficult transition because they only have one week between school years.

28           7.       The air-conditioning system at the school works sporadically and is inconsistent.

1 It is centrally controlled and teachers cannot adjust the temperature in their classrooms. Although  
2 my classroom is temperate, the classrooms on either side of my classroom are often freezing or  
3 too hot. I know this because I go into the other classrooms to get materials or to speak with the  
4 teachers to ask a question and I experience the temperature extremes myself. In room 4, I have  
5 seen the teacher wearing a jacket or sweater because the classroom is extremely cold. Some  
6 classrooms had metal screen doors installed to allow for ventilation. Unfortunately they were not  
7 installed properly—they open in instead of out—and it is a hazard to have the door open and the  
8 screen door closed in case of a fire or other emergency.

9           8.       The Woodworth campus is in general disrepair. The paint inside and outside the  
10 buildings at Woodworth is chipping. In the six years that I have been at the school nothing has  
11 been repainted. The bathrooms are often nasty and filthy and there is often no toilet paper, paper  
12 towels, or soap and there is often water on the floor.

13           9.       During the 2002-2003 school year I was involved in the UCLA youth summit.  
14 Through the UCLA youth summit, 5th grade students at Woodworth and I investigated the  
15 conditions at the school. The students came up with their own student report card grading such  
16 things as school facilities. The students came up with a grading scale of 0.0 to 4.0. for each  
17 category. The average grade students gave Woodworth's facilities was .888. This demonstrated  
18 to me that students are aware of the poor conditions at the school. I have asked students how the  
19 conditions at the school make them feel and they have told me that the conditions make them  
20 feel "crappy," unworthy of basic necessities and as if the district doesn't care about their school.  
21 The conditions at Woodworth make the school undesirable and make it so that no one wants to  
22 come to the school. The students know that they do not have certain things such as toilet paper  
23 and resources that other schools have. There is a lot of research that shows the effects of a  
24 positive environment on a child and their ability to learn. If a student is worried about using the  
25 bathroom, the leaks in their classroom, cockroaches, etc. and the student's basic needs are not  
26 being met, the student is not going to feel comfortable and it is going to affect the student's  
27 learning. If it is not important for the school to be clean and it looks rundown it nonverbally  
28 communicates to the students that they are not important. It is hard to have pride in school when

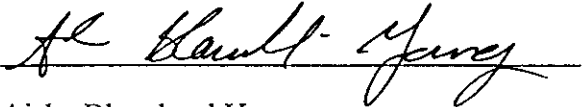
1 students do not feel wanted or respected by the school. The conditions at the school also affect  
2 the teachers' morale. Teachers don't feel as if they are being valued when they have to stay after  
3 school to sweep their own classroom, buy Raid to kill the cockroaches, and purchase supplies on  
4 a regular basis. If teacher morale is low, it's hard to motivate students and stay motivated  
5 yourself. Students are also aware that their teachers have to pay for things that they shouldn't  
6 have to pay for. A lot of students have expressed to me that their teacher shouldn't have to pay  
7 for materials because the teachers already don't have enough money, and that they feel bad for  
8 their teachers.

9           10.     I believe that the District received some funds from Measure K to repair and  
10 improve the facilities of some schools in Inglewood. Some schools have had some repairs but  
11 Woodworth seems to be at the bottom of the list and no repairs have occurred during my six  
12 years at the school. The school is known as the "W" school in the community, which means that  
13 it is at the bottom of the alphabet and also at the bottom of all priority lists. I think that it might  
14 be because many parents do not speak English and nobody listens to them.

15           11.     For the 2002-2003 school year, new math textbooks were delivered to the school  
16 in early November, many months into the school year since three of the four tracks start in July.  
17 In addition, many books are "workbooks" that the students are supposed to take home for  
18 homework. Teachers at Woodworth were told to instruct their students not to write in their  
19 workbooks and not to take them home. Instead the students copy the problems from the booklets  
20 or the teachers make copies because the workbooks need to be used again the following years.  
21 Over the past few years, including this year, other teachers have told me that in some classes  
22 students cannot take their textbooks home. Last year and until the new math textbooks were  
23 delivered this year, the majority of the teachers had to use photocopies and worksheets with their  
24 students because they did not have enough books for the students to use in class and to take  
25 home. The need for photocopies was so large that some of the copies were mass-produced by  
26 the district printing offices, including copying entire book chapters or units. This school year, a  
27 month before the end of school, on about May 25, 2003, the school collected all the books from  
28 all students who had non-consumable books meaning all students in grades 1st through 5th even

1 though the school year did not end until June 27th. The school collected the books because the  
2 school is bar coding the books so that students can take books home. I believe this takes away  
3 from student learning because the students do not have the books. There is a week between when  
4 the school year ends and the new school year begins and I believe the bar coding could and  
5 should have been done then.

6 I declare under penalty of perjury of the laws of the State of California and the United  
7 States that the foregoing is true and correct. Executed this 7 day of July, 2003 in Inglewood,  
8 California.

9   
10 Aisha Blanchard Young

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