

DECLARATION OF PATTI SHANNON

I, Patti Shannon, hereby declare:

1. I make this declaration based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. I was a teacher at Garfield Elementary School ("Garfield") in Oakland California for the 1997-1998 and 1998-1999 school years.

3. Garfield is a year-round, multitrack school with four tracks of students.

4. For the entire 1998-1999 school year, I did not receive most of the first grade instructional materials. After the first month of the 1998-1999 school year, my class was changed from a second grade Vietnamese bilingual class to a combination first and second grade sheltered English class. Sheltered instruction is instruction in English that is modified to be accessible to the students at their level of English proficiency. Although I had second grade materials, I never received all the materials to teach the first graders in my class. I had to try to borrow materials from other teachers, and I purchased materials myself just so that I could give the children grade-appropriate instruction. I was never reimbursed for my expenses.

5. During the 1997-1998 school year, one of the kindergarten classes had no permanent teacher. I have been told that the students had a new substitute about every thirty days or less. At least one of the substitute teachers, by her own admission, had not even passed the CBEST test, and was not qualified to teach. I found out about this situation during the 1998-1999 school year when my class included first graders who had come from the kindergarten class with no permanent teacher. These children overall had very low skills, and they had numerous behavioral problems. The lack of a permanent or regular kindergarten teacher had left them completely unsocialized into the school environment. They couldn't sit still or follow basic routines which made it very difficult for them to learn.

6. While teaching at Garfield, I had to provide toilet paper, paper towels, and soap for the students because the bathrooms hardly ever had these supplies. In addition, I had to provide tissues, paper towels, and soap for my classroom because these items were rarely, if ever, provided.

1 7. Garfield was also not cleaned properly. Teachers often have to buy their own cleaning
2 materials and clean their own classrooms. I even brought in my own vacuum cleaner to vacuum the
3 carpet in my classroom.

4 8. The roof in my previous classroom leaked when it rained, so the teacher using the room
5 had to put a bucket under the place where it leaked.

6 9. The physical and environmental conditions at Garfield are horrible. I taught in the newer
7 wing of the school that was annexed to the main building. The rooms in this wing are extremely
8 dusty and the ceiling tiles are very moldy. While I taught at Garfield, the HVAC ventilation system
9 did not work properly, so the air in the rooms was full of filth such as dust and mold particles.

10 10. Several children in my class became ill at school likely because of the mold and dust.
11 One little girl in my second grade class during the 1997-1998 school year had a green, snotty nose all
12 year. She often complained of headaches and felt that she was unable to work. The next year when
13 she was in third grade in the main building, her headaches and snotty nose were gone. A student of
14 mine during the 1998-1999 school year had to leave school on a number of occasions because she
15 was vomiting. When I spoke with her mother about her illness, her mother said that she was fine at
16 home. Another student of mine during the 1998-1999 school year often asked me if we could have
17 class outside because being in the classroom made him feel sick.

18 11. The mold and dust at Garfield were so bad that I developed chronic sinusitis and asthma.
19 These conditions worsened to the point that I could no longer go to work regularly. I began missing
20 work because of these illnesses. In August of 1999, my conditions and the classroom environment
21 had gotten so bad that my doctor put me on medical leave until I could work in a clean room with a
22 clean ventilation system and no carpeting. Because of my health problems caused by working in the
23 filthy environment at Garfield, and, I believe, because I spoke out against the deplorable
24 environmental conditions, the school initiated dismissal proceedings against me this past year.

25 12. I developed serious health problems from exposure to the mold and dust in my classroom.
26 I understand that children are much more susceptible to these environmental contaminants than
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1 adults. Because of the mold and dust in the school, I fear for the health and safety of the children
2 who attend Garfield.

3 I declare under penalty of perjury of the laws of the State of California that the foregoing is
4 true and correct. Executed by me this 11 day of August, 2000 at Rohnert Park, California.

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