

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF LAUREL CLEMONS

I, Laurel Clemons, hereby declare:

1. I am a student at the John F. Kennedy High School ("Kennedy" or "school") in West Contra Costa County. I make this declaration based upon my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. The purpose of this declaration is to explain the poor conditions at Kennedy, including the lack of permanent teachers, unreasonable temperatures, lack of textbooks and other instructional materials, lack of basic supplies, and unsanitary bathrooms, all of which have adversely affected my education.

3. I am a senior at Kennedy and will be graduating this June.

4. There are a number of severe problems at the school that have denied me my right to an equal and adequate education.

Lack of Permanent Teachers

5. I have not had a full-time teacher for the past two years in Honors English 3 ("English 3") and Advanced Placement ("AP") English 4.

6. In the Fall of 1998, [redacted] was our English teacher for Honors English 3. [redacted] taught the class from September of 1998 through February of 1999 when he abruptly quit and was never heard from again. [redacted] failed to transfer his lesson plan or his records of grades back to the school, thus there was no available information to evaluate the students.

7. After [redacted] quit, a string of approximately ten substitute teachers taught my English 3 class for the remainder of the school year, February through June of 1999. Some of the substitutes taught for a single day and others taught for a couple of weeks. Only a couple of the substitutes actually assigned homework. However, the substitutes were usually not around long enough to collect the assignments. Other times, when the homework was collected, the substitute was usually not around long enough to grade and return the assignments. Thus, I received little feedback during the last four months of English 3. In fact, some of the teachers played movies during

1 class instead of teaching. I basically used my English 3 class for sleeping, gossip, and catching up on
2 homework from other classes.

3 8. One of my substitute teachers, Ms. Washington, was really inspiring. In the several
4 weeks that Ms. Washington was teaching English 3, we learned about American literature and poetry.
5 Ms. Washington made me realize what I could have learned if I had had the benefit of a teacher for
6 the entire year. I feel that a steady substitute, preferably one with a background in English, would
7 have provided me with the opportunity to learn something.

8 9. In the Fall of 1999, Ms. [redacted] was our AP English 4 teacher. During the first
9 week, Ms. [redacted] distributed the syllabus for the year, a recommended reading list, and distributed
10 Crime and Punishment and a book on the existentialism to the class. I was very excited to have an
11 AP English 4 teacher that appeared to be so together.

12 10. Within a couple of months, the teachers at Kennedy were working without a contract.
13 Due to some administrative issues, some of the teachers were not receiving their paychecks.
14 Ms. [redacted] could not afford to work without pay and eventually quit in October.

15 11. From October through December, AP English 4 was taught by a series of rolling
16 substitutes. None of the substitutes was actually an English teacher. Although the substitutes
17 assigned some homework, there was no consistency in the lesson plan.

18 12. In December of 1999, [redacted] was moved from my sister's freshman English class
19 to my AP English 4 class. [redacted] is 23 years old and graduated from the University of California
20 last year. Once [redacted] began teaching my AP English 4 class, my sister Romana did not have a
21 steady English teacher.

22 13. [redacted] prepared and distributed a syllabus and was really determined to get my
23 class back on track in preparation for the AP English exam. The syllabus was constructed from the
24 AP curriculum and we were reading the recommended works and learning the vocabulary.

25 14. Unfortunately, in late March, [redacted] injured her knee while working at her second
26 job and she left Kennedy. From that time until the end of April, a series of substitutes taught my
27 class.

28

1 15. In later April, Mr. [redacted], a social sciences teacher, began teaching the AP English 4
2 class. Mr. [redacted] is working very hard to teach us as much as possible for the remainder of the
3 school year but I know that it has been very difficult.

4 16. All of the students in my AP English 4 class have declined to take the AP exam
5 because we feel totally unprepared because we have not had a permanent English teacher for the past
6 two years. I do not understand how I am supposed to get an adequate education when the school
7 cannot provide a permanent teacher.

8 **Lack of Instructional Materials**

9 17. My education is additionally hindered by the constant shortages of books and
10 instructional materials.

11 18. There is always a shortage of textbooks. In fact, excepting the 1997-98 school year, I
12 have never had enough books for my English classes. Rather, the sets of books have been pieced
13 together from garage sales, bookstores, and old classes. The effect of this is that the students are
14 never reading from the same book. The books are from different publishers, different years and even
15 different versions, i.e. abridged vs. full.

16 19. My ninth grade conceptual physics class never received textbooks, thus the entire class
17 was taught with incomplete handouts. The handouts never included the instructions or the lesson so
18 it was very difficult to complete.

19 20. The school also does not have enough maps for the history classes. The maps that are
20 available are hopelessly outdated, reflecting "Czechoslovakia" and the "Soviet Union." Thus the
21 maps can only be relied upon to identify the continents.

22 21. I know that a lot of my teachers spend their own money to provide the classes with
23 adequate supplies. I don't think that this is fair because the State supposedly has enough money.

24 **Unreasonable Classroom Temperatures**

25 22. A new heating and cooling system was installed in the summer of 1998 but the system
26 does not always work.

1 23. In some of the classrooms, the temperatures are frequently an impediment to effective
2 learning. In those classrooms, the temperatures frequently rise into the 80's. We cannot even open a
3 window to ventilate the room because the first floor of Kennedy has no windows to open.

4 **Unsanitary and Inaccessible Bathrooms**

5 24. Kennedy has two floors and each floor has two boy's and two girl's bathrooms.
6 However, all of the bathrooms on the second floor are locked at all times and have been used as a
7 storage space for the last few years.

8 25. The available bathrooms are disgusting. The bathrooms always smell bad, the toilets
9 don't always work, and the doors do not lock. Additionally, the bathroom is often missing toilet
10 paper, soap and paper towels. Some of friends have gotten physically sick from refusing to go to the
11 bathroom.

12 26. The bathrooms in the cafeteria are in sparkling condition, but they are locked through
13 the school day. In fact, the cafeteria bathrooms are only open during school functions when parents
14 and other visitors are at the school.

15 27. The bathrooms in the gym are somewhat clean but again they are locked during the
16 day and only opened for games and other events.

17 **Conclusion**

18 28. I am a hard-working student and I have always wanted to learn. I strongly feel that the
19 State has done me and my fellow students a grave disservice by making us go to school in such poor
20 conditions. I want to go to college but I feel that the education I received at Kennedy has been
21 inadequate. Thus, I am planning to take some core courses at community college to better prepare
22 myself for enrollment in a four year university.

23 I declare under penalty of perjury of the laws of the State of California that the foregoing is
24 true and correct. Executed by me this ___ day of March, 2001 at _____, California.

25
26
27 _____
 Laurel Clemons