

Declaration of Sweetie Williams

I, Sweetie Williams hereby declare:

1. I am the parent of Eliezer Williams ("Eli") who is a plaintiff in this action. 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 unacceptable conditions that my son endures at the Luther Burbank Middle School ("Burbank school" or "school"). Eli is 12 years old and is in seventh grade.

3. For over 20 years, I served in the United States Army as a technical inspector for helicopters. Given my work experience, I am very familiar with the Occupational Safety and Housing Act ("OSHA").

4. I have visited Burbank school on several occasions over the past two years.

5. The physical condition of Burbank school is dismal. If Burbank school was subject to OSHA, then, in my opinion, several of the substandard conditions of Burbank school would violate provisions of OSHA. For example, the basketball posts and the railings surrounding the playground are extremely rusty and dirty. If my son or any other student ran into the posts or the railings, he or she could be seriously injured. Additionally, the desks in the classrooms are bent and sometimes noticeably broken. This is a dangerous condition that could cause injury to my son or any other student.

6. Eli does not like to use the bathrooms at Burbank school because they smell bad, the toilets are often clogged, and most of the stalls are missing doors. Most of the time the bathroom is not supplied with soap, toilet paper, and paper towels. Eli usually waits to use the bathroom until he comes home from school.

7. Eli will not drink the water at school because he says that the water from the drinking fountains tastes funny. Eli needs to bring bottled water to school in order to have clean water to drink during the school day.

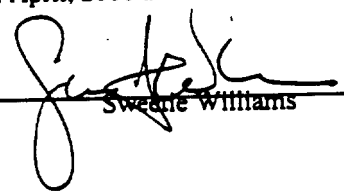
8. Finally, Eli does not have a set of textbooks to bring home. Without books, Eli's teachers have to create homework assignments. For example, Eli's teacher, Mr. Nawa, asks his

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students to discuss current events with their families on a weekly basis. While this weekly assignment allows for a small amount of parental involvement in Eli's education, I feel that this is not enough. If Eli had textbooks and homework, I would be able to work more closely with him. I believe that parental involvement is essential in a child's learning and I would like the opportunity to share in Eli's education.

9. I am worried that the conditions at Burbank Elementary School are interfering and will continue to interfere with my sons' ability to obtain an adequate education. I want Eli to have the option to attend college and to arrive at college well prepared. Although his teachers are wonderful, the conditions are unacceptable and are keeping my son from getting the education that he needs and deserves.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed by me this 27 day of April, 2000 at San Francisco, California.


Sweetie Williams