

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 ROBERT GIN

I, ROBERT GIN, hereby declare:

1. I am the father of KELSEY GIN AND TIFFANY GIN, both of whom are plaintiffs in this action.

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

3. My daughter Kelsey is in seventh grade at Brightwood Elementary School, and my daughter Tiffany is in eleventh grade at Mark Keppel High School. I'm concerned about the deplorable conditions of the schools my daughters attend and that's why I joined the PTA. I have been involved with the PTA for 14 years at Brightwood and I served as the PTA President for seven years. Also, I have been involved with the Mark Keppel PTSA for three years and am currently President of the PTSA.

Mark Keppel High:

4. There are not enough bathrooms at Keppel, and the bathrooms the school does have are not kept clean. My daughter complains to me about how dirty the bathrooms are, and she says she holds it at school rather than using the bathrooms. Last December when I volunteered to paint at the school, I painted the nurse's bathroom. Lots of kids came in while I was painting to try to use that bathroom because the nurse's bathroom is clean and the bathrooms the kids are supposed to use are not.

5. The Mark Keppel Alliance, which is a parents' group, forced the school to put a portable bathroom structure on the school grounds in 1997. But the school still needs more bathrooms, and it doesn't look to me like the school is doing anything about it. There is no bathroom on the second floor of the school at all.

6. I've seen the gym ceiling, where a lot of ceiling tiles are missing. Kids talk about almost getting hit by falling tiles. I worry about the kids inside the gym because they might get hit in the head or breathe in dust from the falling ceiling material. We don't know if there is asbestos up there or not, so it seems dangerous to have the ceiling material exposed and falling.

7. The lighting in the classrooms is inadequate. It's too dim for kids to see to learn.

///

1 8. The school needs to be completely repainted. Parents from the Mark Keppel PTSA
2 volunteer to paint the school twice each year, so we make inroads on the problem. Each time we
3 parents paint, we paint three or four classrooms. The paint makes a huge difference in brightening
4 up the school. I know it must be better for the kids to go to school when they see those bright
5 classrooms, and I don't want the kids to have to wait for days when parents can volunteer to do the
6 work. Also, I worry that there might be lead paint in the classrooms we have not yet painted.

7 9. There is no handicapped access to the second floor of the building at Keppel. Kids
8 who are on crutches or in wheelchairs would have real difficulty getting around the school.

9 10. It makes me feel bad to send Tiffany to a school that is so dilapidated. I hope to
10 create a better learning environment for my kids than I had, but then Tiffany goes to Keppel, which
11 is in such disrepair. A school environment should be clean.


12 **Brightwood Elementary:**

13 11. Most of the classrooms at Brightwood have no air conditioning, and it always feels
14 about 10 degrees hotter in those classrooms than it is outside. Temperatures in Monterey Park get
15 really high for about three or four months of the school year, so the classrooms are unacceptably hot
16 for the kids at school without air conditioning. The ceiling fans in the classrooms don't do anything
17 but circulate hot air; they make no difference for the kids.

18 12. Kelsey will be in eighth grade next year, and the eighth grade classrooms have no air
19 conditioning. It upsets me that she won't have air conditioning and all I will be able to do will be to
20 tell her to take water and try to keep cool. I worry about the kids becoming dehydrated and
21 sweating, and I worry that they will feel too tired to learn in the heat.

22 13. There is no handicapped access to the second floor classrooms at Brightwood.
23 Someone in a wheelchair would have to go all the way around the campus and up the playground area
24 to get upstairs by entering on the side of the building where the second floor is level with the street.
25 I remember last December a kid broke his leg and somebody asked me to carry him up the stairs
26 because he couldn't get up the stairs on crutches and there is no ramp. I don't know how the kid got
27 down the stairs after his classes ended. I just happened to be there when he needed help up the stairs.
28 Those stairs are very steep.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct. Executed on May 10, 2000 at Monterey Park,
3 California.

4
5 
6 _____
7 Robert Gin

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28