

1 I, Sarah Usmani, declare and state:

2 1. I am a teacher at John C. Fremont Senior High School in Los Angeles,
3 California. I have personal knowledge of the matters set forth in this
4 declaration, and if called upon to do so, I could and would competently testify
5 to the matters set forth herein.

6 2. The purpose of this declaration is to describe the conditions at
7 Fremont High School, where I currently teach 11th and 12th grade English on
8 track "A," which began its session on August 29, 2001.

9 3. Fremont High School lacks basic educational materials, such as
10 textbooks and access to photocopied materials, for its students. Many classes
11 at the school do not have enough books to assign to each student to use in class
12 and to take home. For example, math, science and social studies classes
13 typically do not have enough books for the students to take home for
14 homework. Instead, these classes provide textbooks for in-class use only.
15 During each of the past two years, I have had to buy books with my own money
16 to provide a complete set of English books for my students to use. I expect to
17 have to do the same this year.

18 4. It is often necessary for me to buy books for my classes because the
19 school rarely provides enough copies of the same English or literature book for
20 each student in my class to use without sharing. I would rather spend my own
21 money to provide books for my students than try to teach a class where each
22 student does not have a copy of his or her own book. Last year, I also spent
23 approximately \$400 of my own money to buy books for a newly created film
24 class, for which the school provided no books, nor a TV or VCR on which I
25 could have played films.

26 5. The teachers' ability to photocopy materials for the students' use is
27 also severely limited at Fremont. The administration places strict limits on the
28 amount of photocopies we can make to use with our students. And, the

1 photocopy machine located in the library is very old and frequently breaks
2 down. As a result, I am often unable to copy multiple-page handouts, such as
3 short stories, to use with my large classes. When I cannot provide enough
4 photocopies, my students are forced to share handouts or copy material by hand
5 from an overhead projection.

6 6. Overcrowding is also a severe problem at Fremont High School. The
7 school is operated on a year-round, multi-track schedule, where two "tracks" of
8 students and teachers attend school at once, while a third track is off session.
9 Even though Fremont runs year-round in an attempt to accommodate all the
10 students who attend the school, it is still severely overcrowded.

11 7. The classes I teach are often overcrowded to the point where it
12 becomes very difficult for me to teach and for the students to learn. For
13 example, all of the 12th grade English classes I have taught during the past
14 three years have been severely overcrowded, with approximately 38 to 40
15 students in each class. This year, I am teaching three 12th grade English
16 classes with enrollments of 45, 37 and 35 students per class. Such serious
17 overcrowding makes it difficult for me to differentiate the gifted students from
18 those who can barely read, let alone to teach to their individual needs.

19 8. Although two of the English classes I am teaching this year have more
20 than 35 students per class, my classroom has only 35 sets of desks and chairs,
21 so some students must stand or work without a desk. In general, *if* there are
22 enough desks and chairs to accommodate my large classes, I must place the
23 desks so closely together that there barely is enough room to walk between
24 desks to the back of the room.

25 9. Last year, I taught a film course called "integrated art," which was
26 created by the administration one week after my track's session started as an
27 "overflow class." Many of the students assigned to this film class should have
28 been placed in Fremont's reading intervention program (because they read at a

1 third-grade level or below) but were instead placed in my class because the
2 reading program lacked space for them. I had 46 students enrolled in that film
3 class, no textbooks or a TV/VCR to show films, and not enough chairs or desks
4 for all of my students. Even after I told an assistant principal that there was no
5 more space in the class, the administration kept adding students to my class
6 roster. It took the school until mid-year to split the class and place some of my
7 students in another room.

8 10. Severe overcrowding is not only obvious in Fremont's classrooms:
9 During passing periods, the hallways are so crowded that it is very difficult to
10 walk through the halls without bumping into students. The school has erected
11 more than 20 temporary bungalows on school grounds to accommodate classes.
12 Lines in the cafeteria are so long during lunch period that students spend the
13 majority of their lunch period waiting for their food.

14 11. The restrooms at Fremont are regularly locked and inaccessible to
15 the students. There are usually only two restrooms accessible to students,
16 which are on the first floor of the three-story main building. The restrooms on
17 the second and third floors of the main building are always or almost always
18 locked. I do not know of any restroom that is available for the students' use in
19 or around any of the bungalows.

20 12. Fremont High and its facilities are in a disgraceful, run-down state.
21 The restrooms that are accessible are in terrible condition. Toilets often back
22 up or do not flush. There is very rarely any toilet paper, and the restrooms are
23 so filthy that they can be smelled from far down the hall.

24 13. My classroom has several broken desks and chairs; almost all
25 classes in the school have some broken desks. Graffiti is etched into the desks
26 in my classroom. Because the school is being used on a year-round basis (as
27 well as in the evenings for adult education classes), everything in the school is
28 very dirty and overused. I have to spend days at the beginning of each school

1 year cleaning my classroom. I have also seen rats, roaches and other insects at
2 Fremont. Due to the problem with vermin, no food is allowed in the main
3 building or any of the classrooms.

4 14. Fremont High also lacks accessible elevators for disabled students
5 to use to attend their classes. During the past two years, I had several
6 permanently disabled students enrolled in my classes on upper floors of the
7 three-story main building. These students were unable to climb the stairs to my
8 classroom, and on several occasions, were prevented from attending my class
9 because the building's elevator frequently broke down. This year, my
10 classroom is on the second floor of building "B," which does not even have an
11 elevator.

12 15. Many classrooms in the school also lack an operative telephone
13 system to call for help in an emergency. While six teachers in the bungalows
14 have been provided with cell phones for emergency use, I know of no free-
15 standing telephone in the bungalows. This presents a serious safety hazard for
16 both students and teachers at the school.

17 I declare under penalty of perjury that the foregoing is true and correct,
18 and that this declaration was signed on the 30 day of August 2001, in Los
19 Angeles, California.

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23 Sarah Usmani
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