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1 materials to fill the gaps. The administration found another teacher to fill the vacancy second  
2 semester, but the students in that class could not have learned as much as they should have  
3 because they had two different teachers, no books, and a bunch of substitute teachers.

4         5.       Too many of the teachers at Locke do not have their full credentials.  
5 Approximately 40 to 47 percent of the teachers at Locke do not have their full credentials. This  
6 really affects students learning because teachers who have no prior classroom experience often  
7 have a difficult time managing the classroom and creating a year-long learning plan.  
8 Additionally, the district does not give emergency credentialed teachers sufficient training before  
9 they begin teaching. I have been told by new teachers that the district provides only a crash  
10 course and that when the teachers enter the classroom they feel unprepared and they really  
11 struggle. Also, when I have observed several emergency credentialed teachers, I have found that  
12 they often do not know how to create an effective lesson plan or how to manage the classroom.  
13 Additionally, when new teachers arrive at Locke, the administrations at the district and school  
14 levels do not provide them with sufficient support. For example, many of the new teachers do  
15 not have mentors or if they have been assigned mentors they do not know who they are or have  
16 not been contacted by them. Additionally, new teachers are not given sufficient information  
17 about where to get supplies, instructional materials, and other basic tools to teach the children.  
18 This can result in chaos. As a result, sometimes emergency credentialed or first-time teachers  
19 get so frustrated that they do not return to the school after their first year.

20         6.       The district must change its policies with regards to teacher placement. When I, a  
21 fully credentialed teacher, went to the district to submit my application and told the administrator  
22 there I wanted to work at Locke she attempted to discourage me from going to teach at that  
23 school and said that I should teach at a valley school. I have heard from another teacher at Locke  
24 who was a graduate of Stanford that she was also encouraged to teach at a valley school. The  
25 administrators at the district should place the teachers who are most qualified at the schools that  
26 need the most help, not the schools that need the least help.

27         7.       Locke has a huge textbook problem. For the last few years, as a result of the poor  
28 to nonexistent book tracking system at Locke High School, the math classes have not had enough

1 books for the students. For example, at the beginning of the 2000-2001 school year when I was  
2 the math department chair I arrived for the new school year to find that many of the math books  
3 for our department had been misplaced or lost. In some cases full classroom sets of books were  
4 missing from different teachers' classes. I met with the administrative assistant to the Vice  
5 Principal and he directed me to speak to the plant manager of the school who had moved the  
6 books over the summer. The plant manager had a really difficult time finding the books, and so I  
7 spent much of my time during the first few weeks of school searching through closets and  
8 different parts of the school to find books that the math teachers could use in their classrooms. In  
9 the meantime, many of the classes in the math department were without textbooks or had only a  
10 very small number of books. It is ridiculous that the school administration does not have a better  
11 system to keep track of textbooks. It would seem reasonable for the school to have a list of the  
12 books kept at the school or for the school to number the books that come in and out of the school  
13 or to create some way to keep track of textbooks so that each child has a textbook to use during  
14 class. Although I was able to find a class set of books for most of the math classes by about three  
15 weeks into the school year, I was not able to find enough books during the first semester for  
16 students in the math department to have a book to take home with them to do homework, to  
17 review, or to study for tests. The situation improved second semester as a result of an order  
18 being placed for additional textbooks. In the calculus and discrete math classes, however, there  
19 were not enough textbooks for the students in those classes for at least the first semester. I have  
20 also been told by teachers in the English and social studies department, as well as by the health  
21 teachers, that students in many of those classes do not have textbooks. In some classes, teachers  
22 have told me that they have had to ask students to buy their own textbooks because the books just  
23 were not provided. Again, we need a book tracking system. It is terrible that these students do  
24 not have basic materials like books. I have been told that in the coming year the system will be  
25 improved, which I believe is in part because of this lawsuit and in part because of the activism  
26 and organizing of outraged students at Locke High School.

27 8. At Locke many of the books are in poor condition. I have seen books with many  
28 of the pages missing, and during the 2000-2001 school year I saw that the students in the U.S.

1 History classes were using the exact same American Pageant book that I used when I went to the  
2 school 12 years ago. When I went to Locke, the American Pageant books were out of date. This  
3 year (2001-2002), for the first time, I saw students carrying new American Pageant books. Also,  
4 during my first year of teaching (the 1997-1998 school year), I found in my stack of math books  
5 the geometry book that my younger brother had used when he was a student at Locke. That  
6 means that some of the geometry books in my class are at least 13 years old if not older.

7 9. The coaches at Locke are not given basic materials, such as soccerballs and  
8 softballs, to coach their teams, but yet they are asked to teach students how to play these sports.  
9 This is wrong. During the 1998-1999, 1999-2000, and 2000-2001 school years I coached girls  
10 soccer, which many of the students take instead of taking P.E. For the first two years that I  
11 coached soccer the coaches donated items such as balls and shin guards to our team so that we  
12 would have basic supplies. Because the administration did not provide our team with any  
13 money, the students had to pay for their own uniforms if they wanted to play. During the 2000-  
14 2001 school year, I was finally given a \$600 budget and so now my team members don't have to  
15 buy their uniforms. However, I still purchase soccer balls and other equipment for the team.

16 10. At the beginning of the 2000-2001 school year, practically all of the classes in the  
17 bungalow area where I taught were not stocked with enough desks for all of the students in the  
18 classrooms. Again, as a result of mismanagement, desks were missing, had been stored away  
19 and not taken out, or were not purchased. I spent most of the first month of school searching for  
20 desks for my students and the students of the teachers in other classes. I personally aided 9  
21 teachers in the math department and 2 teachers from other departments with obtaining enough  
22 desks for their classroom. I also saw other teachers hustling to find desks for students. For the  
23 students the desk shortage meant that many students had to stand in the back of the classroom or  
24 had to sit on chairs without desktops to write on. In some of the classes I went into there were  
25 only 15 desks and the average class size at Locke is between 30 and 35. I know that the teachers  
26 I helped had enough desks for their students by about one month into the school year, but I am  
27 not certain about what happened in the other classes. It is extremely hard to teach when you don't  
28 have the very basics for your students. Trying to teach a class where students are standing or

1 have no hard surface to write on is terribly difficult.

2 11. At the beginning of the 2000-2001 school year, the math department lacked the  
3 basic supplies that teachers needed to teach because of poor planning and mismanagement. The  
4 school lost teachers' overheads and as of the month of September of 2001 these overheads have  
5 not been replaced. Teachers came into classes that did not have chalk, markers, or paper. The  
6 math department did not have the supplies it needed. As a result, I spent approximately \$300 out  
7 of my own pocket to supply the math department in the short term while a new order was placed.  
8 The new supplies did not arrive until the following semester.

9 12. There are not enough teachers at Locke who speak Spanish. I know of students  
10 who speak only Spanish who are in classes with teachers who speak only English. For example,  
11 currently, the 2001-2002 school year, there are only two bilingual math teachers and a significant  
12 number of students at Locke who are ESL. In one of the geometry classes, there are several  
13 children who do not speak English and we are working on trying to get these students transferred  
14 into my class because I speak Spanish. It is horrible, that students are sitting in classes where  
15 they cannot understand what is happening. These children are being deprived of a basic  
16 education.

17 13. During the 2000-2001 school year, and during previous years, there has been at  
18 least one teacher vacancy in every department at Locke. This means that during the school year  
19 students in classes without a permanent teacher will have rotating substitutes throughout the year.  
20 Sometimes these students will have a security guard standing in front of their class for the day or  
21 more. Other times a substitute may not show up at all and so the students will just stand outside  
22 of their classroom without an adult there to supervise them. When this happens often students  
23 will, on their own initiative, disperse to other teachers' classes where they know the teacher or  
24 where they have friends. I have had a student come into my class once every other week because  
25 no substitute showed up for the class that the student was supposed to be in. I have had personal  
26 experiences where a substitute has confirmed that he or she would be coming to teach my class  
27 on a day when I had to be absent, and the next day I would find out that the substitute did not  
28 show up. Teachers in the cafeteria often talk about the substitute shortage and how substitutes

1 just do not show up to teach the classes they have been assigned to teach.

2 14. When students have rotating substitutes for a semester or a year, as they often do  
3 at Locke, the situation is made worse because the administration does not step in to provide a  
4 lesson plan to those substitutes and so often the students will do little to nothing in class. For  
5 example, instead of sending the substitutes teaching classes with vacancies to the math  
6 department chair or someone else who might be able to provide a lesson plan for them, the  
7 administration sends the substitutes straight to the classroom. The administrators have direct  
8 contact with the substitutes when they enter the building and there is no system that I know of set  
9 up to ensure that these substitutes have the appropriate materials or lesson plans.

10 15. On most days, the administrators at Locke High School keep all of the bathrooms,  
11 except one bathroom for the girls and one bathroom for the boys, locked for the entire school  
12 day. There are lines to use the available bathroom and many students just opt to hold it for the  
13 day. It is terrible. The conditions at the school are like a prison.

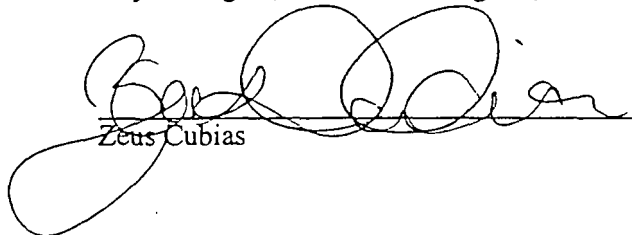
14 16. When you have a teacher shortage, like we do at Locke, and you couple that with  
15 poor management the result is often overcrowded classrooms. An example of the overcrowding  
16 problem at Locke is that there are at least two teachers I know of who have to travel to different  
17 classrooms throughout the day because there are no available classrooms for those teachers to  
18 teach in. The teachers who have to travel all over the school have a difficult time teaching  
19 because they must set up their materials when they get to a new classroom, they must cart their  
20 books around the school, and they are not able to get settled and to create a space for learning for  
21 the students.

22 17. I am concerned that there are not enough counselors at Locke. All too often  
23 children are placed in the wrong classes and are not given the classes they need to graduate. For  
24 example, I know of students in my department who have flunked Algebra 1A but are placed in  
25 Algebra 1B the following semester. It takes about three weeks for those students to be moved  
26 back to Algebra 1A, but by that time they are behind again. Additionally, I know of students  
27 who have passed a class such as geometry, but the very next year the counselors put those  
28 students back in the very same class.

1           18.     There are not enough computers at Locke. Most of the classrooms at Locke do not  
2 have computers that the students can use. I have one computer in my class and I allow students  
3 to use it to type their papers. There are technically three computer labs at the school, but two are  
4 used only for computer and typing classes. The last lab is only accessible to a small number of  
5 students -- students can only use it by request. It is horrible that students are not given the  
6 materials that are really required to be productive citizens in this computer age. Additionally,  
7 there are teachers at Locke who require students to type their assignments. However, many  
8 students at Locke do not have access to a computer and so they are at a great disadvantage.

9           19.     The terrible conditions at Locke are a clear result of the way this school is being  
10 managed on all levels. The administration is inefficient and poor. Many times supplies,  
11 materials, and other essential items do not reach the students or the teachers because of  
12 mismanagement. Things must change at Locke so that the children at the school receive the  
13 education they deserve.

14  
15 I declare under penalty of perjury of the laws of the State of California and the United States that  
16 the foregoing is true and correct. Executed this <sup>8</sup>~~28~~th day of <sup>Nov.</sup>~~August~~, 2001 in Los Angeles,  
17 California.

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