

1 **Declaration of Donnelle Turner**

2 I, Donnelle Turner, hereby declare:

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

5 2. I am currently a student at Castlemont High School in Oakland. I have attended  
6 Castlemont during the 1999-2000, 2000-2001, and 2001-2002 school years.

7 3. The situation in my U.S. History class during the 2001-2002 school year makes  
8 me so angry. I was supposed to be placed in an advanced placement ("AP") U.S. History class  
9 this semester and on my schedule it says AP U.S. History. But instead of being given a  
10 permanent teacher for this class we have been given a substitute. This substitute told us that he  
11 was not certified to teach AP and that he was not our permanent teacher and did not know how  
12 long he would be staying with us. Three weeks later our permanent teacher finally arrived, but  
13 now the class is no longer going to be an AP class and I don't know why.

14 4. In my U.S. History class during the 2001-2002 school year it was really crowded  
15 during the first few weeks of school. The substitute brought in extra chairs but when I would  
16 look behind me I could see people standing in the corners and packing the entire back of the  
17 classroom. This situation improved on Friday, September 28<sup>th</sup> when they finally cut the class in  
18 half.

19 5. In my geometry class during the 2001-2002 school year, it was so crowded during  
20 the first weeks of school that students had to stand in the back and sit on the counter tops and the  
21 heaters that are mounted to the side of the walls. On Monday, September 24<sup>th</sup> the administrators  
22 finally cut this class in half.

23 6. Books were not available for any of my classes during the 2001-2002 school year  
24 until about two to three weeks into the semester, and then the administrators told us that we  
25 could not pick up our books without showing our class schedules. I have not been able to obtain  
26 books for any of my classes because I did not keep my class schedule and it is nearly impossible  
27 to get in to see the counseling secretary to get her to print out a new schedule. I am not alone.  
28 Many of the 10<sup>th</sup>, 11<sup>th</sup>, and 12<sup>th</sup> graders still do not have their books almost a full month into the

1 school year. In my U.S. History class because so many of the students still do not have books the  
2 teacher will leave during class to run down to the copy machine to make copies for us.

3           7.       In my English class during the 2001-2002 school year, the class has been  
4 completely hectic because many extra students were placed in our class even though they had  
5 already taken English during summer school. Now those students are being placed in other  
6 classes but it has made it very difficult for the teacher to know who is actually supposed to be in  
7 her classroom. Also, in the portable across from our portable classroom the students do not have  
8 a teacher and so on some days they will have substitutes in the classroom with them and then on  
9 other days when I have walked by the classroom at the time the bell has rung or moments after  
10 there is no adult in the classroom. It seems that when they do not have a teacher, the campus  
11 security guard will check in on them but when he leaves out of the classroom they have no adult  
12 in the classroom with them. The students are just in the portable without supervision and  
13 sometimes you can hear music coming from that portable and loud noise. It makes it difficult for  
14 the students in our class to concentrate because the students in the other class have no teacher.

15           8.       During the 2000-2001 school year I wanted to take Spanish but I was put into an  
16 art class instead. When I showed up on the first day of school for this art class the art teacher  
17 was angry because she had been given this art class during her conference period and she already  
18 had four other classes. On the first day the art teacher had the entire class follow her down to the  
19 counseling office to tell the counselors that we all needed to be placed in other classes. When we  
20 arrived at the counseling office it was already overflowing with students and so our teacher just  
21 turned us all around, walked us back to the classroom, and we stayed in that class for the first  
22 semester. The art teacher did not really teach us anything in that class because she really did not  
23 want us to be in her classroom and none of the students in the class were given a grade at the end  
24 of the semester so that whole semester was a complete waste.

25           9.       In my math class during the 1999-2000 school year, the class was extremely  
26 overcrowded. The class was held in a portable and the teacher had to bring in chairs and other  
27 desks for the students to sit on. It got to the point where students would just look into the class  
28 and see that it was too crowded and leave. Students were sitting on counter tops, writing on their

1 laps, or squished onto the corner of someone else's desk. This went on almost until the end of  
2 the first semester and then finally one of the administrators split the class. Even after the class  
3 was split there were still 32 students. I felt really bad for our teacher because he was new and so  
4 it made it extra hard for him that his class was so packed.

5 10. In my math class during the 1999-2000 school year, everyone in the class had to  
6 share books for almost the entire first semester. The classroom only had about 20 books for  
7 about 50 students and so sometimes three students were sharing one book. The teacher would  
8 give us group assignments at times because that was really the only way we could do the work in  
9 class. I want to learn but I get frustrated because it seems like we are really given very little to  
10 learn with and it is just so maddening to try to learn in a class where you don't even have your  
11 own book.

12 11. In my physical science class during the 1999-2000 school year, it got very hot  
13 during the months at the beginning and end of the school year. We did not have any curtains or  
14 blinds in the classroom and so the students sitting near the window would move their desks away  
15 from the window because it got so hot with the sun beating down on them. These students told  
16 me that they felt sick and dehydrated.

17 12. We do not have enough foreign language teachers at Castlemont. The only  
18 language offered at the school is Spanish. My cousin took French during her first year at the  
19 school, but we no longer have a French teacher and so no French classes are offered. This means  
20 that my cousin now has to take two years of Spanish and the French class she took does not count  
21 toward her language requirement because you must have two years of the same language in order  
22 to graduate. As a result of there not being enough language teachers, Spanish classes are either  
23 overcrowded or you can't get into them. My Spanish class during the 1999-2000 school year did  
24 not have enough desks for all of the students to sit in. During the 2000-2001 and 2001-2002  
25 school years, I have tried to get my counselor to put me into a Spanish class but she says there is  
26 not enough room for me and so instead I have had to take ROTC for two years. I want to go to  
27 college and it is terrible that I am now in my junior year and I have only had one year of a foreign  
28 language and couldn't get into another Spanish class for either last year or this year, when most

1 colleges look to see if you have taken at least three years of foreign language.

2           13.     The bathrooms at Castlemont are disgusting and they are often locked. The  
3 bathrooms on the second floor of the one hundred, two hundred, and three hundred buildings  
4 have been locked every time I have tried to open them. On Friday, September 28<sup>th</sup> my friend and  
5 I had to go to the bathroom really badly during lunch time and we tried the doors on the  
6 bathrooms in the one hundred and two hundred buildings and they were both locked, and so we  
7 finally had to go the main office and wait about 5 to 10 minutes for them to get a janitor to take  
8 us to a bathroom and open it so we could use it. Not only is this extremely humiliating but it  
9 takes a lot of time and sometimes it is hard to hold it that long. On top of all this, the bathrooms  
10 at the school that are open are really gross. When you first walk in the bathroom there is a strong  
11 odor. Then when you try to use the toilet sometimes it does not flush. Often there is no toilet  
12 paper, soap, or paper towels. Sometimes the sinks are stopped up when you try to wash your  
13 hands. I often see janitors walk by the bathrooms but they must not be cleaned on a daily basis  
14 because there have been times when I have gone into a bathroom at night and the trash cans are  
15 overflowing and when I go into that same bathroom in the morning the same garbage is still  
16 there.

17           14.     We have had a different principal every year I have attended Castlemont. That  
18 means we have had three principals in three years. As a result of the high principal turnover, we  
19 have no consistency or continuity in the way the school is being run and each year the new  
20 principal institutes new programs which may or may not remain at the school but can really hurt  
21 students. For example, this year the new principal decided to have many of the best teachers only  
22 teach the ninth grade students. This means that many 10<sup>th</sup>, 11<sup>th</sup>, and 12<sup>th</sup> grade students have been  
23 left with substitutes or shoved into overcrowded classrooms.

24           15.     I never use the water fountains at Castlemont because many of them are wrapped  
25 with caution tape and the water does not actually come out so instead these water fountains have  
26 become trash cans.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 25 day of October, 2001 in Oakland, California.

  
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Donnelle Turner