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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF RIVERSIDE**

12 MAE M., through her guardian ad litem
13 Anthony M., SUSAN C., through her
14 guardian ad litem Sabrina C., GWEN S.,
15 through their guardian ad litem Ramona S.,
16 CARSON L., through his guardian ad litem
17 Nancy L., DAVID P., through his guardian
18 ad litem RACHEL P., VIOLET B., through
19 her guardian ad litem INEZ B., STELLA B.,
20 through her guardian ad litem INEZ B.,
21 TEMECULA VALLEY EDUCATORS
22 ASSOCIATION, AMY EYCHISON,
23 KATRINA MILES, JENNIFER SCHARF,
24 and DAWN SIBBY,

Plaintiffs,

v.

21 JOSEPH KOMROSKY, JENNIFER
22 WIERSMA, DANNY GONZALEZ,
23 ALLISON BARCLAY, and STEVEN
24 SCHWARTZ, in their official capacities as
25 members of TEMECULA VALLEY
26 UNIFIED SCHOOL DISTRICT BOARD OF
27 TRUSTEES, TEMECULA VALLEY
28 UNIFIED SCHOOL DISTRICT, and DOES
1 – 100,

Defendants.

Case No.: CVSW2306224

**DECLARATION OF PLAINTIFF
RACHEL P.**

Judge: Honorable Irma Poole Asberry

Dept.: 5

DECLARATION OF RACHEL P.

I, Rachel P., declare and state as follows:

1. I have personal knowledge of the facts in this declaration. If called upon to testify, I could and would testify competently to the following facts.

2. I am a Plaintiff in this case and the parent of a third-grade student at a Temecula Valley Unified School District (“TVUSD”) elementary school. My child, Plaintiff David P., is part of a Jewish family of Sephardic heritage. I want to ensure that David P.’s education will include full, robust discussions about important historical topics—like slavery and the Holocaust—and their modern-day impacts.

3. My child and I have witnessed a rising number of racist incidents in our community, including a swastika carved into a tree at one of our local parks. There were also racist words drawn on playground equipment at a popular park where we often meet other families. We stopped going to local parks around this time, because I did not want my son to encounter this graffiti. I am frustrated because I moved to my current home in Temecula in 2019 so David P. would be able to attend his current elementary school. We moved because of the school’s reputation as a top-tier, diverse elementary school. However, I am now concerned that my decision will have lasting negative impacts on my son. Partisan politics have divided our community and I have considered moving to a different city. However, I do not want my son to be far from local family, and the neighboring cities are struggling with some of the same issues in their school districts. It is not clear to me that there is a place nearby that would be free from these same frustrations.

4. I attended school Board meetings prior to the most recent election, and I was a member of the PTA for the first two years that David P. attended elementary school. I have witnessed changes since the most recent election. The District used metal detectors for at least one of the Board meetings. A Black educator was told to leave the country at a Board meeting.

5. On December 13, 2022, I attended the Board meeting when the new trustees adopted Resolution 21. I had intended to speak during the public comment portion of the meeting, but Resolution 21 was on the agenda for the very end of the meeting, which ran until

1 after midnight on a school night. I was not called to speak until after 11:00 pm. I could not stay
2 that late to speak against the Resolution, as I needed to put my son to bed.

3 6. Beyond the concerning racist and partisan attacks, my son’s academic
4 opportunities are being threatened. Before Resolution 21 passed, my child’s teachers taught
5 freely about different cultures and American history at his elementary school. I am concerned
6 that his teachers will no longer fully engage with these subjects after passage of Resolution 21.

7 7. Until 2023 I served as President for one year, and Historian for another, of the
8 Parent Teacher Association at my son’s school. I have close relationships with multiple
9 elementary school teachers in TVUSD. Teachers have now told me they are concerned about
10 how they present subjects that touch on race because it could inadvertently affect their
11 employment. They do not want to be misinterpreted or labeled activist teachers, and they are
12 changing their language to avoid any appearance of violating the Resolution. I am concerned
13 that the Resolution will result in unrealistic depictions of important historical events, like the
14 persecution of Jewish people during the Holocaust by white Germans. I am troubled my child—
15 who will be attending Temecula schools for the next decade—is being, and will continue to be,
16 deprived of a full and accurate educational foundation in history, the social sciences, and
17 English/Language Arts, among other subjects.

18 8. It is important to me that my son receives a culturally responsive education
19 untainted by partisan politics and intolerance. I know that classroom censorship threatens to
20 deprive my son of valuable experiences, discussions, and learning opportunities that motivated
21 us to move to Temecula in the first place.

22 9. In the short term, I am worried that David P. will receive inadequate history and
23 social science instruction when he starts fourth grade. The Board’s decision to censor part of the
24 curriculum will prevent my son from learning about important civil rights. Even though he will
25 have access to textbooks, which seemed unlikely at one point, the censored curriculum will put
26 him behind his peers in California. With the rising anti-LGBTQ decisions, I also worry about
27 increased bullying. One student has already called David P. “gay” as an insult, and he has
28

1 expressed concerns about bullying in his classroom. As a parent, the climate in Temecula is
2 increasingly concerning.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed on November 10, 2023.

6 *Rachel P.*

7 _____
8 Rachel P.

9 *Declarant*

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