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

MAE M., through her guardian ad litem
Anthony M., SUSAN C., through her
guardian ad litem Sabrina C., GWEN S.,
through their guardian ad litem Ramona S.,
CARSON L., through his guardian ad litem
Nancy L., DAVID P., through his guardian
ad litem RACHEL P., VIOLET B., through
her guardian ad litem INEZ B., STELLA B.,
through her guardian ad litem INEZ B.,
TEMECULA VALLEY EDUCATORS
ASSOCIATION, AMY EYCHISON,
KATRINA MILES, JENNIFER SCHARF,
and DAWN SIBBY,

Plaintiffs,

v.

JOSEPH KOMROSKY, JENNIFER
WIERSMA, DANNY GONZALEZ,
ALLISON BARCLAY, and STEVEN
SCHWARTZ, in their official capacities as
members of TEMECULA VALLEY
UNIFIED SCHOOL DISTRICT BOARD OF
TRUSTEES, TEMECULA VALLEY
UNIFIED SCHOOL DISTRICT, and DOES
1 – 100,

Defendants.

Case No.: CVSW2306224

**DECLARATION OF PLAINTIFF
SUSAN C.**

Judge: Honorable Irma Poole Asberry

Dept.: 5

DECLARATION OF SUSAN C.

I, Susan C., 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 17-year- old Black student and a senior at one of Temecula Valley Unified School District’s (“TVUSD”) three comprehensive high schools. I have attended TVUSD schools since kindergarten, and I dream of going to Howard University. Because I like working with children and helping others, I would like to pursue a career as a nurse or teacher.

3. I am frustrated by the Resolution’s denial of systemic racism. What bothers me is that they say we can’t talk about racism being ordinary or how society normally works. But systemic racism is part of my direct experience. At my high school, I have seen how teachers treat me differently because I am a Black girl. If other students could only hear about the experiences of their peers of color, they would realize that racial discrimination continues to exist.

4. I do not understand the claim that, prior to the Resolution, our history teachers were attempting to indoctrinate us. The content we learned in my history classes was fact-based, not opinion-driven. For example, I learned about how *Plessy v. Ferguson* used the doctrine of “separate but equal” to justify racial segregation. That isn’t my teacher’s opinion. It is history.

5. Before the Board’s actions, I heard from teachers that my high school was considering offering an A.P. African American Studies course. I was so excited to study aspects of Black history omitted from my A.P. U.S. history course, such as the Black Arts Movement, the contributions of Black women like Ella Baker and Fannie Lou Hamer to the struggle for equal rights, and Black Americans’ support for colonial independence in Africa. I now know that the current Board will not approve the course because it could lead to violations of their Resolution.

6. Outside of the classroom, I am involved with my school’s Black Students Union (“BSU”). I believe young people should use our voices to advocate for the change we wish to

1 see in our schools and communities. I value the BSU because it is a space to discuss Black
2 history and support peers who experience racist abuse. When I was in middle school, a fellow
3 student called me the n-word. When my school’s administrators took no action, I was deeply
4 disheartened. A BSU would have given me the support I needed. In high school, I have
5 continued to witness students using racist and anti-LGBTQ slurs and calling people of color
6 “dirty.” My classmates have touched my hair without my permission. I was even a member of
7 the cheer team until fellow cheerleaders used the n-word and posted racist comments on
8 TikTok. Throughout all of these experiences, the BSU has been a place of comfort and
9 connection.

10 7. I have devoted significant time to opposing the Resolution. I helped organize a
11 walkout, and I gave a speech describing how the Resolution’s ahistorical approach to systemic
12 racism contradicts my own lived experience. I made similar comments at the February 21 Board
13 meeting.

14 8. This spring, as the BSU leader responsible for the organization’s social media
15 presence, I used Instagram as a platform to advocate against the Resolution. For example, I
16 posted information about the January 13 protest, which my principal asked me to take down. I
17 also shared publicly available information about Moms for Liberty, an extremist group that
18 Trustee Jennifer Wiersma listed among her endorsements.

19 9. In response to my advocacy, my school administrators have threatened me with
20 discipline. In early February, an administrator removed me from class to tell me that school
21 administrators had received a complaint about the BSU’s Instagram posts. The administrator
22 warned me to “be cautious” when posting information about the Resolution on Instagram and
23 asked me not to refer directly to local officials. I felt silenced. The Board members and City
24 Council members ran for public office, and they should be accountable to the students and
25 residents they are supposed to be serving.

26 10. Adults have directly targeted me as well. They have taken and posted pictures of
27 me, along with derogatory captions, on the internet. One adult confronted me during a Board
28 meeting and tried to take the conversation outside. Although this man and his allies claim to be

1 acting in defense of children, they consistently fail to treat me and other Black students like the
2 minors we are.

3 11. As a result of the Resolution, I have noticed a new boldness in people's
4 disparagement of Black and LGBTQ people. I have seen community members boo during a
5 Board meeting at the mention of National Coming Out Day and refer to the devil when
6 referencing LGBTQ students. One of my classmates even pointed and laughed at our BSU table
7 during my school's club rush day. The racism is frustrating and humiliating. The Board's
8 actions have caused me to lose hope in my community. In my senior year, I feel on edge about
9 my public-facing roles and worry for my safety amidst the turmoil and tension all around me.

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

12 Executed on November 14, 2023.

13 *Susan C.*

14 _____
15 Susan C.
16 *Declarant*