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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 – 20,

Defendants.

Case No.: CVSW2306224

**DECLARATION OF THOMAS DEE,  
Ph.D. AS EXPERT WITNESS**

Judge: Honorable Irma Poole Asberry

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**DECLARATION OF THOMAS DEE, Ph.D**

I, Thomas Dee, declare that if called as a witness I would and could testify competently as follows:

**Background**

1. I am the Barnett Family Professor at Stanford University’s Graduate School of Education (GSE). I am also a Senior Fellow at the Stanford Institute for Economic Policy Research and Research Associate at the National Bureau of Economic Research, a nonprofit organization dedicated to conducting and disseminating nonpartisan economic research. I received my Ph.D. and M.A. in Economics from the University of Maryland and my B.A. in Economics from Swarthmore College.

2. My research employs quantitative methods to inform public policy issues in education, including culturally relevant pedagogy, civic education, and absenteeism during the COVID-19 pandemic. I have twice received the Raymond Vernon Memorial Award, which awards outstanding scholarship published in the *Journal of Policy Analysis and Management*. I have been consistently named to Education Week’s Edu-Scholar Public Influence Rankings, a list highlighting the top 200 education scholars in the nation whose work influences educational practice and policy.

3. I have co-authored three peer-reviewed quantitative studies that examine the causal effects of education interventions that feature culturally relevant pedagogy. These studies consistently provide evidence of positive and statistically significant effects of these academic initiatives on important student outcomes.

4. My initial 2017 study, co-authored with Dr. Emily Penner, examined the effect of San Francisco Unified School District’s Ethnic Studies pilot program on near-term academic outcomes (e.g., attendance, course grades, and credit accumulation).<sup>1</sup> For this work we received the 2020 Community Outcomes and Impact Award from the International Association for Research on Service-Learning & Community Engagement.

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<sup>1</sup> Dee, T. S., & Penner, E. K. (2017). The causal effects of cultural relevance: Evidence from an ethnic studies curriculum. *American Educational Research Journal*, 54(1), 127-166.

1           5.       In our 2021 follow-up study, co-authored with Dr. Sade Bonilla, we found that  
2 these academic gains were sustained resulting in increased high-school graduation rates. This  
3 study featured a pre-registered research design and was published in the *Proceedings of the*  
4 *National Academy of Sciences*.<sup>2</sup>

5           6.       A third study focused on the African American Male Achievement program in  
6 the Oakland Unified School District.<sup>3</sup> We found that this “My Brother’s Keeper” initiative  
7 reduced the number of Black boys who dropped out of high school and generated smaller  
8 spillover benefits for Black girls.

9           7.       A copy of my curriculum vitae is attached as Exhibit A.

10       **Resolution 21 Denies Minority Students Access to Effective Educational Strategies.**

11           8.       Resolution 21 prevents implementation of “culturally relevant pedagogy” (CRP),  
12 including Ethnic Studies courses, which have been demonstrated to improve minority student  
13 engagement and educational attainment.

14           9.       CRP encompasses a range of instructional practices that incorporate three  
15 distinctive features. The first is to prioritize the educational success of all students. The second  
16 is to encourage the classroom use of valid cultural referents that promote student engagement.  
17 The third is to promote critically engaged social awareness among students. Ethnic Studies  
18 courses are a core example of CRP. Ethnic Studies courses focus on the experiences of racial  
19 and ethnic minorities, with an honest and frank emphasis on their historical experiences and on  
20 developing students’ capacities to understand and critique social and political issues. Ethnic  
21 studies courses also often feature community engagement and service.

22           10.      CRP is highly effective. My team’s quantitative study of San Francisco Unified  
23 School District’s (SFUSD) Ethnic Studies pilot program demonstrated large, positive effects on  
24 student outcomes, increasing student attendance by 21 percentage points, ninth-grade GPAs by  
25 1.4 grade points, and credits earned by 23 credits (the equivalent of four courses). Importantly,

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26           <sup>2</sup> Bonilla, S., Dee, T. S., & Penner, E. K. (2021). Ethnic studies increases longer-run  
27 academic engagement and attainment. *Proceedings of the National Academy of Sciences*,  
118(37).

28           <sup>3</sup> Dee, T. S., & Penner, E. K. (2021). My brother’s keeper? The impact of targeted  
educational supports. *Journal of Policy Analysis and Management* 40(4), 1171-1196.

1 our study supports the conclusion that Ethnic Studies participation *caused* such improvements:  
2 Because some SFUSD schools used a cut-off to determine eligibility for Ethnic Studies, we  
3 were able to compare students who were just eligible with those who were just ineligible,  
4 controlling for all other factors.

5 11. These results persisted throughout students' high school experience. Students  
6 who took the Ethnic Studies course in ninth grade graduated at rates 16 to 19 percentage points  
7 higher than their peers who did not. They also earned more credits, and were more likely to  
8 enroll in college within a year or two of graduation by between 10 and 16 percentage points.<sup>4</sup>

9 12. My team has also documented impressive effects from other CRP-based  
10 curriculum. Oakland Unified School District's African-American Male Achievement Initiative,  
11 which added classes emphasizing Black history and culture taught by Black male educators for  
12 Black boys, significantly reduced the dropout rate by 43 percent and increased the high school  
13 graduation rate.<sup>5</sup>

14 13. In my experience as an educational researcher, educational interventions with  
15 such significant and long-lasting effects are vanishingly rare. Yet, instead of encouraging  
16 adoption of CRP, Temecula Valley Unified School District actively prevents teachers from  
17 using these effective pedagogical strategies.

18 14. I believe a well-supported and likely explanation for the educational impact of  
19 CRP is that it positively reshapes the subjective psychological experience of the classroom,  
20 particularly for historically underserved groups of students who often experience these  
21 educational spaces as unwelcoming. In particular, the key elements of CRP has strong parallels  
22 with experimentally validated social-psychological interventions that focus on student-centered  
23 factors such as promoting school belongingness, reducing anxiety about stereotypes, and  
24 believing in one's academic capacity.

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26 <sup>4</sup> Bonilla, S., Dee, T. S., & Penner, E. K. (2021). Ethnic studies increases longer-run  
27 academic engagement and attainment. *Proceedings of the National Academy of Sciences*,  
118(37).

28 <sup>5</sup> Dee, T.S. & Penner, E. (2021). My brother's keeper? The impact of targeted  
educational supports. *Journal of Policy Analysis and Management* 40(4), 1171-1196.

