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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
CARSON L.**

Judge: Honorable Irma Poole Asberry

Dept.: 5

DECLARATION OF CARSON L.

I, Carson L., 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 an Asian-American student at one of TVUSD’s three comprehensive high schools. A senior, I have attended TVUSD schools since kindergarten.

3. I want to be a civil rights lawyer, and hope to argue one day in state and federal courts. My goal is to major in English before attending law school.

4. In high school, my favorite classes have been in the humanities and social sciences. I love studying English, and I am an active member of my school’s mock trial and speech and debate teams. In particular, I like these classes because unlike in science and math, where you have to do things in a specific way to find one right answer, the humanities and social sciences are less structured. There is more room to think creatively, to examine topics from different viewpoints, and to develop and express my own opinions. The classes feel very relevant, often addressing current events.

5. Since Resolution 21 was passed, I have heard teachers at my school talk about how scared they are of the Board retaliating against or firing them for teaching materials that touch on racial or gender injustice. In my junior year, for example, my I.B. English class read Toni Morrison’s *Beloved*, a novel that deals with the traumas of slavery. The Resolution passed halfway through our unit on *Beloved*, and I noticed a change in how my teacher approached the book. Before the Resolution, we discussed the themes of racism and how racism continues to affect our communities. After the Resolution, our discussions of racism were limited to the book, and we stopped having discussions that connect to the present. It is impossible to have a meaningful discussion about *Beloved* without talking about the history and impacts of racial oppression in the United States, but our class had to adjust to the Resolution.

6. I enjoy participating in classroom debates, but after Resolution 21 went into effect, I noticed my English teacher’s cautious approach. They were less willing to ask us to weigh the merits of competing viewpoints or to draw connections to contemporary racial issues.

1 I am worried that the Resolution will prevent teachers from fully explaining racial issues and
2 answering questions about institutional racism out of fear that ideologically motivated students
3 will report them.

4 7. I am taking A.P. U.S. Government and A.P. U.S. History this year. I know that
5 an important part of both of these subjects is making connections between past events and
6 current issues. I also know that people have different perspectives on the significance of
7 historical moments, like the framing of the U.S. Constitution. I am troubled by the Resolution's
8 requirement that teachers present only one side of historical events, and by the fact that the
9 Board immediately acted to erase parts of history that they do not like. I worry that the Board's
10 actions will deny me the opportunity to develop the disciplinary skills and content knowledge
11 that will be foundational to my future work in the social sciences.

12 8. I am interested in American politics and current events. Recently, I have been
13 following news about censorship in Florida, including the State's rejection of the A.P. African
14 American Studies curriculum. As a student taking multiple advanced classes, I worry that the
15 Resolution's curriculum restrictions could cause these classes to lose their certifications. But
16 my primary concern is college readiness: I want to be able to meaningfully engage in complex
17 discussions after I graduate from high school.

18 9. I am surprised by how many adults in my community believe, for example, that
19 systemic racism no longer exists. Systemic racism—such as the repeated incidents of police
20 brutality against Black people—is an obvious feature of life in the United States.

21 10. I also know that Critical Race Theory is not taught in Temecula schools. But I
22 have heard Board members repeatedly mischaracterize the term by, for example, using it as a
23 synonym for the 1619 Project, which is a completely separate thing. I am frustrated that Board
24 members are using Critical Race Theory as a buzzword to activate Temecula conservatives and
25 get praised on Fox News.

26 11. I was an organizer of the student walkouts that occurred after the Resolution, and
27 I prepared a public comment that I was not allowed to deliver at either the December 13 or
28 January 18 Board meetings. After one meeting, I called on Board members to create an

1 advisory panel to give students a voice in decisions impacting their education. The Board has
2 not taken any action.

3 12. The Board has recently started targeting our LGBTQ classmates, and it even
4 forced our teachers to take down flags other than the American flag or California flag. One of
5 my teachers took down their Pride flag because of this new rule, and students have actively
6 opposed it.

7 13. Because of the rising communal strife and tense environments at school board
8 meetings, I helped to form a civic engagement group to share ideas suppressed by the Board.
9 Few teachers have been willing to talk with students about the Board's actions, so the group
10 gives us a space to engage in independent study and conversation on topics the Board has
11 censored. We have discussed the outing policy, classroom censorship, Critical Race Theory,
12 and the flag policy. We have collaborated with other student groups, including the GSA, to
13 inform our classmates about the issues in our community.

14 14. The Board's decisions exemplify the intolerance I have witnessed in the
15 District, such as students at my high school mocking Asian transfer students. I simply want the
16 censorship to stop at my school.

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

19 Executed on November 27, 2023.

20 *Carson L*

21 _____
22 Carson L.

23 *Declarant*
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