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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  
 DAWN SIBBY**

Judge: Honorable Irma Poole Asberry

Dept.: 5

**DECLARATION OF DAWN SIBBY**

I, Dawn Sibby, 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 history teacher at Temecula Valley High School. Presently, I teach 10th grade World History and 12th grade U.S. Government. In the past, I have also taught U.S. History, Geography, Child Development, A.P. Psychology, and Psychology.

3. I have been a resident in Temecula for over 30 years and have taught within the Temecula Valley Unified School District for 28 years. My four children have all attended District schools.

4. I earned my Master of Arts in Education, Curriculum, and Instruction from Chapman University and my Bachelor of Science in Child Development from California State University, Fullerton. During my graduate education, I developed an expertise in human psychological, sociological, and biological development. I have subsequently applied this knowledge to my teaching pedagogy to create safe, supportive, and engaging learning environments for my students—some of whom have returned to teach in the District.

5. My professional teaching experience spans both elementary and high school levels. While I currently teach high school courses, I have worked with the District’s elementary school students. For five years, I taught a child development program focused on mentoring elementary school students. For 12 weeks each year, I also worked directly with students across multiple elementary sites.

6. I have read Resolution 21 multiple times and attended Board meetings to try to understand what it permits. Despite my efforts to gain more clarity on the Resolution’s restrictions, I have been unable to discern what specific topics and conduct will be found to violate them.

7. Due to the Resolution’s lack of clarity on what is prohibited from being taught, I am forced to broadly self-censor during my instruction to avoid coming into potential conflict with the law. The need for self-censorship is reinforced by the uncertain scope of the ban. For

1 instance, despite being phrased primarily in terms of race, the Resolution also places restrictions  
2 on non-racial topics such as discrimination based on sex. The Resolution has forced me to alter  
3 my teaching approach and lesson plans, and it is obstructing my ability to meet my professional  
4 responsibility to teach State-mandated history and social science content standards.

5 8. Classroom discussions about historical events regularly lead into discussions  
6 about modern corollaries. As a result, I am not able to properly teach 10th grade World History  
7 because of the Resolution's restrictions. For example, Resolution 21 prohibits me from  
8 discussing how societal elites had special rights that ordinary people did not have, because  
9 modern examples might provoke conversations about institutional racism. Additionally, it is  
10 impossible to teach, as California standards require, that "customs of social order were  
11 hierarchal, meaning that . . . some people were higher and considered better than ordinary  
12 people" without considering subsets of society including class, religion, sex, gender, and race.  
13 The California History-Social Science Framework also expects 10th graders to learn how  
14 European powers "justified their conquests by asserting arguments of racial hierarchy and  
15 cultural supremacy, offering a vision of civilization in contrast to what they argued were  
16 'backward' societies." Knowing this may cause some students to feel discomfort, I have tried to  
17 avoid using the term "white" when discussing European imperialism, unless curriculum and  
18 supplemental materials explicitly use the same language. I worry that if I use the "wrong"  
19 language or if a student misinterprets my words, someone may report me to school officials and  
20 subject me to discipline.

21 9. Similarly, the Resolution interferes with my teaching responsibilities for 12th  
22 grade Government. For example, the California History-Social Science Standards expect high  
23 school seniors to be able to "[e]xplain the controversies that have resulted over changing  
24 interpretations of civil rights," including in *Plessy v. Ferguson* and *United States v. Virginia*. I  
25 do not know how to meet this requirement without teaching that individuals have experienced  
26 discrimination on the basis of race and sex. These discussions have to engage with topics of  
27 racism and sexism, which some students have directly experienced. Without clear guidelines,  
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1 there is no way to determine what I can or cannot say and what questions I can or cannot  
2 answer in these discussions.

3 10. The Resolution has created a tense and hostile work environment for my  
4 colleagues and me. Board members calling for increased policing and surveillance of teachers  
5 on national television has only worsened the already chilling effects of the Resolution. My  
6 students are aware of the rising tensions and new policies, and many have asked questions  
7 about the legality of the Board’s decision to censor their curriculum. These types of questions  
8 are the kind that I typically encourage from my 12th grade Government students—and mirror  
9 those set out in State content standards—but I am concerned that responding honestly and  
10 accurately will lead to repercussions. I thus go out of my way to deflect such inquiries in order  
11 to comply with the Resolution. From my 28 years of professional experience, I know that my  
12 reticence to responding to my students’ questions will discourage further engagement from  
13 them. But what else can I do?

14 11. The Resolution’s lack of clear enforcement standards makes the danger of a  
15 misstep even greater. For example, it is unclear how the school or the Board will handle  
16 accusations that I or other teachers have violated the Resolution. Without clear standards, I  
17 know that any decision about the future of my career will be entirely discretionary. And the  
18 Resolution itself provides no information on how the Board will decide what penalties to  
19 impose for purported violations.

20 12. During the first few months of this school year, the Board has continued to target  
21 Temecula’s LGBTQ students through decisions that deteriorate the dynamics between my  
22 students and me. For example, the outing Policy has led to LGBTQ students distrusting our  
23 staff. As a supportive parent of a transgender child, I know how difficult school can be for  
24 transgender and gender nonconforming students, and I see how the Policy has exacerbated  
25 those challenges. To avoid outing any students, I am simply avoiding the issue of gender in my  
26 class discussions to mitigate the chances that one of my students comes out as transgender or  
27 gender nonconforming. But even this harms students, who can no longer see and discuss gender  
28 diversity in the classroom.

1           13.     In September, the Board voted to ban all flags from District campuses except  
2 U.S. and California flags. After seeing the ban on the Board’s agenda, I proactively took down  
3 a rainbow pride flag and a transgender pride flag from my classroom walls. I had the flags so  
4 my LGBTQ students would feel seen and respected in my classroom. That is particularly  
5 important now as the Board is silencing and taking power away from LGBTQ students. As a  
6 sign of solidarity to these students, I have hung rainbow curtains to avoid conflicting with the  
7 regulation.

8           14.     The Board’s decisions have led to increased hostility towards LGBTQ students  
9 in school. At a recent demonstration on campus, students at Temecula Valley High School  
10 talked about their experiences being bullied by other students due to their LGBTQ identities. I  
11 witnessed opposing students display rude and homophobic behavior towards their peers in ways  
12 that simply had not occurred before the Board’s recent decisions targeting LGBTQ students.  
13 Even teachers have made trans students feel uncomfortable, and one of my students had to  
14 change one of their other classes because they did not feel safe.

15           15.     The Board’s decisions have caused me to experience significant anxiety, not  
16 only for myself but also for newer teachers. I mentor several fellow teachers in the District. One  
17 of my mentees is a second-year teacher whose school administration made her remove a poster  
18 of civil rights leader Harvey Milk—the first openly gay elected official in California—from her  
19 classroom. Junior teachers have expressed fear and come to me seeking advice regarding the  
20 Resolution and its enforcement, but I do not know how to guide them through this new hostile  
21 environment.

22           16.     As the parent of a transgender child, I understand the importance of inclusive  
23 language and instruction and how that can transform one’s experiences inside and outside the  
24 classroom. The Board’s hyper-partisan actions, vague pronouncements, and politicization of our  
25 local school board bring me to tears. I fear that the continued censorship will have a lasting  
26 impact on my students, especially students of color and LGBTQ students.

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

Executed on November 28, 2023.

*Dawn R. Murray-Sibby*

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Dawn Sibby  
*Declarant*