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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
INEZ B.**

Judge: Honorable Irma Poole Asberry

Dept.: 5

DECLARATION OF INEZ B.

I, Inez B., 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 Plaintiff Violet B. and Plaintiff Stella B.—both students in Temecula Valley Unified School District (“TVUSD”). Violet B. is a third-grade student, and Stella B. is a seventh-grade student. My husband and I moved to Temecula for the educational opportunities in its schools. We value the diversity of our children’s elementary and middle school, which has enabled our girls to learn about multiple points of view, develop empathy, and prepare for participation in today’s multicultural society.

3. I have been a member of the Parent Teacher Association since 2017, and I have become close friends with many of the elementary school teachers. They are worried about teaching subjects that touch on race or gender. I know teachers who are retiring early or leaving TVUSD due to the Board’s actions. Other teachers have told me directly that they have changed their approach in the classroom to avoid the semblance of conflict with Resolution 21. This will directly impact my daughters, and as a parent, I will need to fill in the gaps of their education because TVUSD refuses to give my daughters the same education as students from across the state of California—or even previous TVUSD students.

4. My daughters are of Mexican descent, and it is important to us that they learn about their family’s heritage and how it contributes to the Temecula community. I am particularly worried that the Resolution will prevent my daughters from learning about key historical figures such as Harriet Tubman or Jovita Idar who fought for a more racially just society because such topics may make white students uncomfortable.

5. My elementary school daughter, Violet B., has more than ten years remaining in TVUSD. Because of the Resolution, her ability to learn about American democracy and history and to connect her coursework with her own background and experiences will be severely restricted. For example, she will likely not be able to read *Roll of Thunder, Hear My Cry* by Mildred D. Taylor, which my eldest daughter recently read. I already know some teachers have

1 voluntarily stopped teaching this book because they are afraid of violating Resolution 21. The
2 Board’s delayed approval of social studies curriculum has already affected her classroom
3 experience. She did not have a social science textbook at the beginning of the school year, and
4 even though the books eventually arrived in late August, teacher training on the curriculum did
5 not occur until October.

6 6. My oldest daughter, Stella B., found *Roll of Thunder, Hear My Cry* incredibly
7 moving and powerful because of its honesty and its refusal to shy away from the topic of racial
8 injustice. While reading the book, she told me, “Mom, I think they are going to ban this book.”
9 Even at 12 years old, she has witnessed and understood the ramifications of Resolution 21. I am
10 very concerned that Violet B. will not have the same experiences as her older sister and
11 countless other California students across the state. That concern only increased after
12 witnessing the delayed approval of the elementary social studies curriculum.

13 7. Likewise, I am concerned that Stella B. will lose inclusive learning opportunities
14 that older TVUSD students and students across California have already enjoyed. She is
15 supposed to learn about world history in seventh grade, including the causes and effects of
16 cross-cultural interactions like the slave trade and the decimation of Native American
17 populations. Since teachers have already self-censored, Stella B. will not get the opportunity to
18 fully engage with these issues. Following recent developments in TVUSD, the Resolution is
19 encompassing and censoring an increasing amount of material and activity, and I particularly
20 worry that affinity clubs, such as Latinos United, will not exist when Stella B. and Violet B.
21 enter high school.

22 8. I have attended Board meetings since 2018, prior to the new Board’s election or
23 even the COVID-19 pandemic. The meetings had always been mundane affairs, perhaps even
24 boring and uninteresting. My husband and I still attend meetings. We opposed the Resolution
25 on December 13, 2022. We were worried that the Resolution’s ban on the teaching of “similar
26 frameworks” would deprive our children of a culturally responsive education, which we know
27 is essential to providing students of color with opportunities to learn that are equal to those of
28 their white peers. We continue to attend Board meetings to oppose and protest the Resolution,

1 and recently hate and partisan strife have filled the community. I have seen houses vandalized,
2 swastikas in our local park, and a Black educator getting told to leave the country. Recently,
3 outside provocateurs have come to our local Board meetings. I even watched Trustee Jennifer
4 Wiersma encourage folks to attend the TVUSD board meetings during an Instagram interview
5 posted by The Battle Cry US on June 22, 2023. I had to go through a metal detector just to get
6 into the next board meeting on June 27. The climate in the community is unsafe, and I am not
7 certain whether I will continue taking my children to these Board meetings.

8 9. We are afraid as we witness our community change. I simply want the return of
9 normalcy to our District.

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 10, 2023.

13 *Inez B*

14 _____
15 Inez B.
16 *Declarant*