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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 EYTCHISON,
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
MAE M.**

Judge: Honorable Irma Asberry

Dept.: 5

DECLARATION OF MAE M.

I, Mae M., 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 second grade, following my family’s move to Temecula for its excellent school system. My goal is to attend Howard University and study business. With my education, I plan to follow in my grandmother’s footsteps and become a real estate broker.

3. I serve as a leader in my school’s Black Student Union (“BSU”). I joined the BSU as a sophomore—after cheerleaders from my school referred to Black cheerleaders from another school as monkeys and the “N” word—to get involved and learn about concepts, perspectives, and experiences missing from my classrooms. The BSU functions as a space for Black students to develop friendships and learn, not just with each other but with students from all backgrounds who wish to know more about Black history and other cultures. Additionally, the BSU offers a community of supportive peers when students are subject to racist harassment, such as being called the n-word or other racial slurs. Through the BSU, I have been able to develop my leadership skills while also providing a safe space for younger students.

4. Since the passing of Resolution No. 2022-23/21 (the “Resolution”) in December 2022, I have dedicated a lot of time and energy into student advocacy to address the Resolution’s devastating aftermath on students. I have spoken at Board meetings, worked with other student leaders to coordinate demonstrations against the Resolution’s restrictions, and more. Often, I find myself having to serve as a spokesperson not only for fellow Black students, but also for other students of color and LGBTQ students who are harmed by the Resolution. Additionally, the BSU has had to dedicate nearly all of our meetings to dealing with the impacts of the Board’s censorship.

5. Due to my involvement and leadership in Temecula’s student movement, my parents and I have become targets of significant harassment and retaliation by the Resolution’s

1 supporters. After the December 13 Board meeting, a right-wing Facebook group publicized the
2 names and identities of students who spoke against the Resolution, including myself.
3 Anonymous adults also created a website and Instagram account, “We the Parents of
4 Temecula,” which they have used to vilify me and my family. The adults managing the account
5 repeatedly post photos of me and my family members with hateful captions. Supporters of the
6 Resolution have also yelled at and threatened my parents at Board meetings.

7 6. I have faced hostility and harassment from other students following my
8 advocacy. On January 11, I posted a flyer announcing a protest against the Resolution.
9 Immediately after, a male student tore the flyer from the wall, called me a “fucking retard,” and
10 threw the flyer in the trash. The next day, I received an anonymous file transfer of the flyer with
11 “Bitchass” written across it. On the day of the protest, students threw food—including
12 applesauce, fruit cups, sandwiches, and juice bags—at me and other protesting students. My
13 parents and I have reported these incidents of harassment to District officials, but the school has
14 still not taken any action.

15 7. Prior to the enactment of the Resolution, the vast majority of my history and
16 literature classes centered on white perspectives and experiences. In U.S. history, for example, I
17 received thorough instruction on the Cold War and manifest destiny. When Black American
18 history was discussed, it primarily only focused on American slavery and Jim Crow,
19 specifically related to prominent white figures. I know that there is a long and rich history of
20 Black resistance to slavery; however, my U.S. History class mostly studied the contributions of
21 white abolitionists like William Lloyd Garrison and Harriet Beecher Stowe. Black history *is*
22 American history. With the Resolution in place, however, my teachers will almost certainly
23 never explore it.

24 8. The Resolution has already had an immediate impact on my classroom learning
25 experience. In my A.P. U.S. History class, topics of social discrimination against racial
26 minorities have come up. However, instead of students engaging thoughtfully with the subject
27 matter when it arose, my teacher instructed the class to just read silently on our own. As a
28

1 result, we did not thoughtfully engage with the Women’s Rights Movement, the 19th
2 Amendment, and the Zoot Suit Riots.

3 9. As a senior, the Resolution will compromise my ability to adequately learn about
4 essential topics in U.S. Government. I do not understand how my teacher can lead the course’s
5 unit on applied civics, which aims to teach students to “identify and analyze a community
6 problem,” “propose solutions,” and then “take civic actions to implement those solutions”—
7 because I have already been threatened with discipline for these acts.

8 10. I have suffered constant stress and pressure to represent my community
9 following the daily experience of hostility and harassment. Due to the significant time demands
10 and strain of opposing the Resolution, I briefly gave up dance. I am in constant fear that
11 supporters of the Resolution, who already know my name and image from social media, will
12 physically assault me. They have already threatened my family with violence. More recently,
13 one of the supporters came to my workplace twice in one day and made me uncomfortable by
14 staring directly at me. I had to call my parents so my dad could walk me to my car. We live in a
15 constant state of vigilance and concern for our physical safety.

16 11. The climate at school has also become significantly worse. Our BSU table
17 during my school’s club rush was mocked and laughed at by other students. Students online
18 bullied me in the comments of an image posted by a school account. During a protest in support
19 of our LGBTQ classmates, students harassed LGBTQ students—calling them the “F” slur.
20 Before the new flag regulation, students repeatedly took down and crumpled an inclusive pride
21 flag in one of my classrooms. That professor has since taken the flag down permanently. Our
22 community continues to be divided.

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

25 Executed on November 14, 2023.

26 DocuSigned by:

27 _____
28 Mae M.
Declarant