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9 *Attorneys for Plaintiffs William Clark and Gabrielle Clark*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 GABRIELLE CLARK,
13 individually and as parent and
guardian of WILLIAM CLARK
14 and WILLIAM CLARK,
15 individually,

16 Plaintiffs

17 v.

18 STATE PUBLIC CHARTER SCHOOL
AUTHORITY, DEMOCRACY PREP
19 PUBLIC SCHOOLS, DEMOCRACY PREP
PUBLIC SCHOOLS, INC., DEMOCRACY
20 PREP at the AGASSI CAMPUS,
DEMOCRACY PREP NEVADA LLC,
21 SCHOOL BOARD of Democracy Prep at
the Agassi Campus, NATASHA TRIVERS
22 individually and in her official capacity as
Superintendent and CEO, ADAM
23 JOHNSON, individually and in his official
capacity as Executive Director and
24 Principal, KATHRYN BASS individually
and in her capacity as Teacher, JOSEPH
25 MORGAN, individually and in his official
capacity as Board Chair, KIMBERLY
26 WALL individually and in her capacity as
assistant superintendent, and John & Jane
Does 1-20

27 Defendants.

Case No. 2:20-cv-02324-RFB-VCF

18 **DECLARATION OF GABRIELLE**
19 **CLARK**

MARQUIS AURBACH COFFING

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DECLARATION OF GABRIELLE CLARK

I, Gabrielle Clark declares as follows:

1. I am over 18 years of age and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am William Clark’s mother. Democracy Prep tried to “unlearn” in my son what I spent my life raising in him—strong, independent character. The stand my son is taking is more than most grown men would dare to do and he’s not even out of high school. I’m so proud of him.

3. My son and I both knew you can’t just force people to tell you their race, sexual and gender identities again and again in public. When I found out in early September they tried to hide and lie about what they were doing. You certainly wouldn’t know about it from the syllabus they gave me, and they wouldn’t give me anything else about the class when I asked for it. After that defendants spent three months trying to crush my son and me. For three months they treated me like a stupid hood hoochie and my son like a racist, then they failed him. Now they hired an international corporate law firm against us. If they are so quick to label school age students privileged oppressors maybe they should look in the mirror.

4. They call other people names because their own house isn’t in order. I read the testimony of William’s teachers Ms. Tishkowitz and Ms. Bentheim. Democracy Prep got rid of all their older, more experienced teachers. They canceled the honors programs. All the parents saw that too. The school is still understaffed. I just went to the main office a while ago and felt unsafe. William’s strong and has been a student at Agassi Campus for six years, longer than Democracy Prep has been there, so I could deal with the situation until they put a bullseye on my son’s back.

5. We don’t have money and can’t just change schools. They won’t hand over transcripts if you try.

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6. My son had strong grades going into his senior year and could have been admitted to his dream school. That all changed after defendants exposed him to that class and failed him. The school's mission is social justice. They celebrate protesting but when we asked if he could take a different class they refused and failed him. We deserve justice and we're not asking for much: we're asking for the court to remove the grade and let William take another class or project for credits.

7. The Complaint filed December 22, 2020 is true and accurate based on my first hand experience and information and belief.

8. Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 15th day of January, 2021.



Gabrielle Clark

CERTIFICATE OF MAILING

I hereby certify that on the 15th day of January, 2021, I served a copy of the foregoing **DECLARATION OF GABRIELLE CLARK** upon each of the parties by depositing a copy of the same in a sealed envelope in the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and addressed to:

State Public Charter School Authority
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and that there is a regular communication by mail between the place of mailing and the place(s) so addressed.

/s/J. Case
an employee of Marquis Aurbach Coffing

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