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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF ORANGE**

17 LOUIS D. BRANDEIS CENTER FOR
18 HUMAN RIGHTS UNDER LAW, a nonprofit
19 organization; and SOUTHERN
20 CALIFORNIANS FOR UNBIASED
21 EDUCATION, a membership organization of
22 the Louis D. Brandeis Center for Human Rights
23 Under Law,

22 Petitioners and Plaintiffs,

23 v.

24 SANTA ANA UNIFIED SCHOOL DISTRICT
25 BOARD OF EDUCATION; SANTA ANA
26 UNIFIED SCHOOL DISTRICT; and DOES
27 1-50, inclusive,

27 Respondents and Defendants.

Case No.: 30-2023-01349344-CU-JR-CJC

Honorable Erick L. Larsh – Dept. C20

**DECLARATION OF ILANA
MEIROVITCH IN SUPPORT OF
PETITIONERS’ AND PLAINTIFFS’
PETITION FOR WRIT OF MANDATE
AND COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

Petition and Complaint Filed: September 8,
2023

First Amended Petition and Complaint Filed:
October 24, 2023

Hearing Date: September 19, 2024
Time: 1:30 pm

1 **DECLARATION OF ILANA MEIROVITCH**

2 I, Ilana Meirovitch, declare and state as follows:

3 1. I am a resident of Coto de Caza, Orange County, California. I have personal
4 knowledge of the facts stated in this Declaration and would testify to them if called to do so.

5 2. I am a member of Petitioner Southern Californians for Unbiased Education
6 (“SCUE”). SCUE is an organization based in Southern California that advocates for removing bias,
7 discrimination, and hate from K-12 public schools, including in school curricula.

8 3. I am Jewish, and as a Jewish person, I am gravely concerned about rising
9 antisemitism in my community.

10 4. As both a Jewish person and a member of SCUE, I am concerned about antisemitic
11 content in school curricula, especially ethnic studies curricula. I therefore track activity and attend
12 local school board meetings where content related to Jews, Judaism, or Israel arises.

13 5. Until this litigation, I was not aware that the Santa Ana Unified School District
14 (“SAUSD”) created a separate, standalone Ethnic Studies Steering Committee to develop and
15 implement its ethnic studies curriculum.

16 6. Until this litigation, I was also unaware of the actions taken by the Steering
17 Committee to substantively create, review, and implement ethnic studies courses, including the
18 Ethnic Studies World Histories, Ethnic Studies World Geography, and Ethnic Studies Honors:
19 Perspectives, Identities, and Social Justice courses.

20 7. I have not seen public notices of the upcoming meetings of the Ethnic Studies
21 Steering Committee.

22 8. I have not seen public notice of agendas for upcoming Steering Committee meetings.

23 9. Had I been aware of the Steering Committee’s development of ethnic studies
24 curriculum through public agendas or advance notice of meetings, I would have been able to attend
25 the Steering Committee meetings and/or involve other stakeholders in the district.

26 10. Had the Steering Committee allowed the general public to participate in its meetings,
27 and had I seen advance notice of those meetings and their agendas, I would have attended relevant
28

1 Steering Committee meetings and made other communities members aware of the meetings to
2 provide input.

3 11. I only learned about the Ethnic Studies World Histories and Ethnic Studies World
4 Geography courses, on April 24, 2023, just one day before the general board meeting held on April
5 25, 2023. I attended the April 25 meeting but did not have the opportunity to fully review the
6 content of the courses or the instructional materials before the meeting.

7 12. Only one member of the Jewish community presented a public comment about the
8 Ethnic Studies World Histories and Ethnic Studies World Geography courses at the board meeting
9 held on April 25, 2023. The Jewish community member addressed the courses' antisemitic content
10 and urged the Board not to approve the courses at that time in order to allow more time for the
11 Jewish community to provide feedback.

12 13. The SAUSD board voted to approve both courses with no further substantive
13 discussion.

14 14. I also attended the SAUSD board meeting held on May 23, 2023 to support the
15 Jewish community members advocating for the reversal of the board resolutions approving the
16 Ethnic Studies World Histories and Ethnic Studies World Geography courses approved by the
17 SAUSD board at the April 25, 2023 meeting.

18 15. At the SAUSD general Board meeting held on May 23, 2023, I witnessed Jewish
19 attendees being harassed and intimidated by other members of the audience, including heckling and
20 other disruptions.

21 16. For example, I heard audience members hiss as the names of Jewish attendees were
22 called for public comment. I also heard attendees shout, "you're racists" and "you're killers" during
23 a public presentation by two Jewish high school students.

24 17. The Board did little to stop or control this harassment and intimidation of Jewish
25 attendees, and the harassment and disruptions persisted throughout the duration of the May 23rd
26 meeting.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 23rd of August, 2024, at Coto de Caza, California.

3 By:



4 Ilana Meirovitch

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