

Plaintiffs' Exhibit #F

***Declaration of Fisher Committee Member
Dr. Lorraine H. Richardson***

DECLARATION OF DR. LORRAINE H. RICHARDSON

I, Dr. Lorraine H. Richardson, declare under penalty of perjury that the following statements are true:

- 1) That declarant has been an educator for most of her life, having earned her Doctoral Degree in Education, and having served as the former principal of Pueblo High School here in Tucson, Arizona, until her retirement;
- 2) That declarant also previously served as the Chairwoman of the African American Achievement Task Force from the time of its' original inception until its demise in recent years;
- 3) That declarant currently serves as a member of the *Fisher* Committee with respect to the present de-segregation and racial discrimination case involving Plaintiffs *Fisher* and *Mendoza* and Defendant TUSD#1;
- 4) That as a member of the *Fisher* Committee, declarant has the responsibility of meeting with *Fisher* Plaintiffs' counsel Rubin Salter, Jr., Esq. and other members of the *Fisher* Committee, as well as with TUSD #1 Superintendent Dr. Gabriel Trujillo and his varying topical guests for monthly and quarterly meetings, always with a pre-planned agenda, in an attempt to collaborate and make progress with respect to the implementation by the parties of the Unitary Status Plan or "USP";
- 5) That it is noteworthy that initially when Dr. Trujillo was first appointed as the TUSD#1 Superintendent, that the *Fisher* Committee would meet with Dr. Trujillo on a monthly basis, that the collaborative meetings were always held in the "Gray Room" at the District Headquarters located at 1010 E. 10th St. in Tucson, Arizona, that the "Gray Room" was relatively small and could not accommodate more than 10-15 people at a time, and that at no time was any food or refreshment served at the meetings;

- 6) That after a number of months meeting with Superintendent Trujillo on a monthly basis, Dr. Trujillo *unilaterally* decided to change the monthly collaborative meetings to quarterly meetings, however the meetings were still held in the Gray Room at the District Headquarters located at 1010 E. 10th St., Tucson, Arizona;
- 7) That it is noteworthy that declarant is hereby, and especially writing the present declaration substantially in response to TUSD's contention that the *Fisher* Representatives knew about and were notified of the "Community Meeting" held by the District at the Viscount Hotel on January 30, 2019;
- 8) That the monthly or quarterly meetings were never referred to as "Community Meetings", nor were they ever held at a non-district owned property with a dinner served as part of the meeting;
- 9) That the meetings and the dates/times for the meetings were planned a year in advance and were to commence at 1:30-3:00pm with an agreed upon agenda;
- 10) That the "community meeting" held by the District on January 30, 2020 did not resemble anything the *Fisher* Committee would have recognized as a quarterly meeting set by the parties to collaborate on implementing the Unitary Status Plan or USP;
- 11) That although declarant subsequently heard that the District had held this meeting, it was never described as one of the on-going monthly or quarterly meetings with Superintendent Trujillo, only as an exclusive dinner with pre-selected invitees;
- 12) That indeed, the *Fisher* Committee already had a quarterly meeting scheduled with Dr. Trujillo for February 26, 2020 from 1:30-3:00pm at the District Office, which, as herein described, is where all of our monthly or quarterly meetings were held over the past two years;
- 13) That it stretches one's credulity for the District to claim that the "Community Meeting" held on January 30, 2020 was indeed the

quarterly meeting scheduled for February 26, 2020 which was a previously agreed upon date by all parties;

- 14) That it doesn't make much sense to hold a meeting on January 30, 2020, four (4) weeks before it had been scheduled on February 26, 2020; and
- 15) That while declarant had heard about the meeting 2-3 days after it was held, she was never invited or even notified of the meeting in advance, and did not even know the date, time or place at which it was being held until after the fact.

DATED this 4th day of April, 2020.

Dr. Lorraine H. Richardson

Dr. Lorraine H. Richardson

From: Lorraine Richardson <lrichardson2000@yahoo.com>
To: Rubin Salter <rsjr3@aol.com>
Subject: Re: TUSD Cummunity Meeting Declaration
Date: Sun, Apr 5, 2020 4:02 pm

It's fine for you to sign it.

Lorraine H. Richardson

On Sunday, April 5, 2020, 03:50:55 PM MST, Rubin Salter <rsjr3@aol.com> wrote:

Hi Dr. Richardson,

Rubin was wondering if it is okay given Corona Virus for us to sign with your permission using computer font for signature, or you could always sign with computer font yourself and forward to us if you like.

Could you please send or copy me on your e-mail (along w/ Rubin @ rsjr3@aol.com) to my aol account as well which is coppenfpr@aol.com.

Happy Palm Sunday, and thank you very much for your wonderful assistance.

Kind regards,

Patrick Coppen

On Sat, Apr 4, 2020 at 9:14 PM lrichardson2000 <lrichardson2000@yahoo.com> wrote:
That looks fine. Do I need to stop by the office to sign it?

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Rubin Salter, Jr." <rsjr3@aol.com>
Date: 4/4/20 8:03 PM (GMT-07:00)
To: lrichardson2000@yahoo.com
Cc: rsjr3@aol.com
Subject: Re: TUSD Cummunity Meeting Declaration

Dear Dr. Richardson,

Attached please find your proposed Declaration from Rubin in the Fisher case. Thank you very much for your kind assistance. Please review same and make any changes you believe necessary.

Best regards,

Patrick Coppen, Esq.

Plaintiffs' Exhibit #G

***Declaration of Tucson Urban League
Interim Director Clarence Boykins***

DECLARATION OF CLARENCE BOYKINS

I, Clarence Boykins, declare under penalty of perjury that the following statements are true:

- 1) That declarant has been a leader in the Tucson African American community for decades, having previously served as the former President of the Tucson, Arizona Chapter of the NAACP for eighth years, and Arizona State President for two years, Grand Master of Prince Hall Mason A/FM for four years, a 33 degree Scottish Rite Mason and is currently the *interim* CEO of the Tucson Urban League;
- 2) That declarant also previously worked as the Director of the Tucson Community Center for a substantial period of time before his most recent retirement, and had previously served in and retired from the U.S. military after 12 years of military service, having received an honorable discharge;
- 3) That it is noteworthy that even though declarant has been a leader within the local African American community for an extended period, the declarant was never made aware of the TUSD #1 Viscount Hotel African American “community meeting” until after it had already taken place some 2-3 days following the event being held at the end of January 2020 at the Viscount Hotel;
- 4) That while declarant belatedly had heard about the meeting, he was never invited or even notified of the meeting by phone call, text message, email or mail correspondence from the District, and further did not previously even know the date, time or place at which it was held;
- 5) That the TUSD #1 Viscount Hotel dinner event was not described to declarant as a “Community Meeting, yet as “hand-picked” by the Tucson Unified School District (hereafter “the District”) itself,

the “hand-picked” or select members of the so-called African American “community” in attendance, declarant did not recognize the named individuals as persons he, declarant, knew to be actual leaders within the Tucson African American community itself;

- 6) That subsequent to learning of the District’s claim that the Viscount Hotel dinner held on January 30, 2020 was an “African American Community Meeting”, and learning of some of the names of those who were invited and were in actual attendance, declarant had the opportunity to personally read the attached lists of African American individuals both invited by the District to the the 1/30/20 Viscount Hotel dinner event and those who actually were in attendance;
- 7) That declarant was quite surprised that he, declarant, *did not even know* the vast majority of those listed by the District as invited or in attendance at the Viscount Hotel 1/30/20 Dinner to actually be leaders within the Tucson African American community itself, nor may declarant state, given his numerous years of experience and participation with the local community in general that those individuals listed as having been invited or in attendance at said dinner are actually considered to be leaders within the broader community of the City of Tucson or its immediate surrounding areas;
- 8) That declarant further questions, according to the lists of those invited and in attendance at the Viscount Hotel 1/30/20 dinner representing various African American groups in the Tucson area, whether those individuals actually had authority and/or truly represented the groups purported by the District to be in attendance;
- 9) That for example, although a Ms. Coker had been apparently represented by the District as being invited to attend the 1/30/20 “community meeting” as a representative of the Tucson Urban League, such was actually not the case, as Ms. Coker, who may have previously worked for Tucson Urban League in a lesser

capacity related to its youth membership, did ***not*** have any authority or actually represent the Tucson Urban League itself at said dinner meeting, especially given the fact that declarant was never sent an invitation, email or ever invited to attend the event as the *interim* CEO of the Tucson Urban League or “TUL” (from which capacity he may have considered same or granted authority or legitimacy to Ms. Coker’s attendance as a TUL representative), nor was he ever so advised by anyone, let alone Ms. Coker, that the Tucson Urban League had been asked to attend a “community meeting” being sponsored by the Tucson Unified School District; and

- 10) That given the above referenced circumstances, it is highly questionable whether any legitimacy should be given to the Tucson Unified District’s apparent claim that its 1/30/20 Viscount Hotel dinner was actually a “community meeting” of African American individuals from the local Tucson community or surrounding residential/urban areas.

DATED this 6th day of April, 2020.



**Clarence Boykins, *Interim* CEO of
The Tucson Urban League**

EXHIBIT 3

Invitation list for Superintendent Meeting

Case 4:74-cv-00090-DCB Document 2452-1 Filed 04/01/20 Page 9 of 87

Name	Company/Affiliation
Alexander, Sharon	Community Member/ Kens' BBQ
Baker, Bennie	Community Member, works at Raytheon
Ball, Jaborius	African-Am Student Affairs - U of A
Boykins, Clarence	Community Member - Interim CEO of Tucson Urban League
Broughton, Teniqua	Executive Director- The State of Black Arizona
Cephers, Marie	TEEM President & CEO
Clardy, Tommie	Business Owner
Clarke, Ray	Community Member
Cockrel-Coleman, Trehon	Engineer/Youth Pastor - Raytheon/Rising Star
Coker, Ashley	Tucson Urban League, Young Professionals - President
Cook, Desiree	IAMYOU 360 Owner
Davis, Jimmy	Community Member & Retiree
Dawson, Misha	Manager/President - Raytheon/Jack & Jill
Dawson, Wesley	Vice President - Citi Card
Dollard, Chavar	President - Alpha Phi Alpha Fraternity
Dunlap, Pam	Community Member
Edwards, Doug	Raytheon Employee
Elliott, Beverly	Elliott Accounting
Elliott, Bob	CEO - Elliott Accounting
Freeman, Mona	Community Member
Freeman, Sam	President of Buffalo Soldiers, GSAAC
Green-Hunley, Stephanie	Retired TUSD Teacher
Hale, Curry	Basils for Omega Psi Phi
Hill, Styne	Ret. VP/Community - The Links
Hodge, Michael	Right Worship - Deputy Grand Master
Holt, Da'Mond	Pastor/Mentor - Pilgrim Rest Missionary Baptist Church
Hundley, Stephanie	Retired TUSD teacher
Jenkins, Daisy	Daisy Jenkins & Associates LLC
Jones-Face, LaCretia	Tucson Police Department
K. Higgins	President of Raytheon Black Employees Network
Levy, Laura	SW Fair Housing Activist
Liggins, Donna	Member - NAACP
Luttery, Kiysha	Community Member
Madison, Bill	Business Owner & Community Member
Meeks, Lance	Program Manager - Goodwill Industries
Miller, Frances	Equity Specialist Coordinator. - NAACP/WEEAC
Mosley, Barbara	Vice President - TEEM
Murray, Barney	Men's Christian Fellowship President, Music Teacher
Ponder, Bill	Dunbar Pavilion Board President
Portela, Andres	Community Activist, Housing Advocate, SW Fair Housing
Price, Adrian	Community Member
Richardson, Constance	Retired TUSD teacher
Sanders, Elvin	Retired Airforce Officer - Tucson Business Owner
Snowden, Doris	President - NAACP
Sparks, Vertie	Community Member
Spencer, Mike	President - Lambda Kappa Sigma Phi Beta Sigma Inc.
Spencer, Patricia	AZ State Director - Zeta Phi Beta Inc.
Stingley, Paul	Community Member, Sam Levitz Management

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Name	Company/Affiliation
Alexander, Sharon	Community Member/ Kens' BBQ
Stubbs, Charita	U of A Volleyball coach
Sykes, Yvette	Black Women's Task force & Community Member
Tinsley, Olympia	Member - Sigma Gamma Rho
Tinsley, Sean	Member - Kappa Alpha Psi Fraternity
Vasquez, Lee	Contractor - Tucson Business Owner
Washington-White, Kendal	President - Delta Sigma Theta
Wells, Arika	President - Alpha Kappa Alpha Sorority
Williams, Barbea	Barbea Willims Performing Company
Williams, Tim	Edward Jones Advisor, Male Leadership program @PVHS
Young-Bassey, Cheryl	Retired from Pima County

EXHIBIT 5

List of Attendees at Superintendent Meeting

Name	Company/Affiliation
Baker, Bennie	Community Member, works at Raytheon
Cephers, Marie	TEEM President & CEO
Clardy, Tommie	Business Owner
Cockrel-Coleman, Trehon	Engineer/Youth Pastor - Raytheon/Rising Star
Coker, Ashley	Tucson Urban League, Young Professionals - President
Cook, Desiree	IAMYOU 360 Owner
Dawson, Wesley	Vice President - Citi Card
Freeman, Mona	Community Member
Hale, Curry	Basils for Omega Psi Phi
Hodge, Michael	Right Worship - Deputy Grand Master
Holt, Da'Mond	Pastor/Mentor - Pilgrim Rest Missionary Baptist Church
Jenkins, Daisy	Daisy Jenkins & Associates LLC
K. Higgins	President of Raytheon Black Employees Network
Liggins, Donna	Member - NAACP
Murray, Barney	Men's Christian Fellowship President, Music Teacher
Sanders, Elvin	Retired Airforce Officer - Tucson Buiness Owner
Snowden, Doris	President - NAACP
Spencer, Mike	President - Lambda Kappa Sigma Phi Beta Sigma Inc.
Spencer, Patricia	AZ State Director - Zeta Phi Beta Inc.
Sykes, Yevette	Black Women's Task force & Community Member
Vasquez, Lee	Contractor - Tucson Business Owner
Williams, Barbea	Barbea Willims Performing Company

Plaintiffs' Exhibit #H

Defendant TUSD #1 Response Exhibits 3 and 5.

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 10 Tucson, Arizona 85719
 Phone: (520) 225-6040
 11 *Attorneys for defendant*
Tucson Unified School District No. 1

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF ARIZONA**

14 Roy and Josie Fisher, et al., Plaintiffs, 15 v. 16 Tucson Unified School District No. 1, et al., 17 Defendants.
18 Maria Mendoza, et al., Plaintiffs, 19 v. 20 Tucson Unified School District No. 1, et al., 21 Defendants.

4:74-cv-0090-DCB
 (Lead Case)

4:74-cv-0204 TUC DCB
 (Consolidated Case)

22
 23
 24
 25 **RESPONSE IN OPPOSITION TO**
FISHER PLAINTIFFS' MOTION FOR SANCTIONS (ECF 2450)

26
 (Response Exhibits #3 + 5)

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