

**COMPLAINT**

**of**

**CALIFORNIANS FOR EQUAL RIGHTS FOUNDATION**

**v.**

**Poway Unified School District**

**FOR UNLAWFUL RACIAL DISCRIMINATION IN  
COMMUNITY & PARENT ENGAGEMENT**

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**Submitted to:**

**Poway Unified School District**  
**Ronald Little, Associate Superintendent, Business Support Services**  
15250 Avenue of Science  
San Diego, CA 92128

**Assistant Superintendent, Human Resources or his/her Designee**  
**San Diego County Office of Education**  
6401 Linda Vista Road, Room 404  
San Diego, CA 92111-7399

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**June 2022**



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## **PREFACE AND STATEMENT OF INTEREST**

Californians for Equal Rights Foundation (CFER) is a non-partisan and non-profit organization dedicated to promoting equal rights and merit through public awareness building, legal advocacy, civic engagement, public policies monitoring, research and alliance building. Headquartered in San Diego, the leaders of CFER and its supporting groups are scholars, educators, community leaders, business leaders, parents and students. In this discrimination and civil rights violation complaint against the Poway Unified School District, CFER represents a school district student and the parent. The constituents of CFER are directly affected and injured by the race-based treatment and blatant racial discrimination complained of herein.

As one of the top-performing school districts in California, the Poway Unified School District enrolls 36,450 students and serves the educational needs of all the families of these students. It is imperative that the school district uphold its mission to inspire passion and prepare “every student to thrive in college, career, and life by providing personalized, rich, and rigorous learning experiences.” To accomplish this mission, the school district has pledged to “engage parents, business, and community partners to foster shared responsibility and accountability.” However, leaders in the school district have resorted to silencing different opinions and discriminating against a dissenting parent on the basis of his race and sex. The parent, represented by CFER in this complaint, has been repeatedly targeted and subjugated to discrete treatment on the basis of race, in his attempts to engage the school district to share his concerns about the school district’s teaching paradigms and materials. Such paradigms and materials, pertaining to the school district’s ethnic studies curriculum and its “Racial Equity and Inclusion” programs, also constitute race-based treatment of school district students, parents, employees and taxpayers.

Race-based treatment in public education violates the Fourteenth Amendment to the U.S. Constitution, Title VI of the 1964 Civil Rights Act, Article I Section 31 (a) of the California Constitution, as well as a slew of state anti-discrimination laws and existing Board policies. Ultimately, the race-based treatment will be trickled down to classroom instruction, as in many previous cases elsewhere, to hijack civics education and harm our students by stoking and exaggerating racial tensions.

The contact persons for this Complaint, authorized to represent CFER with respect to this Complaint, are:

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## **I. INTRODUCTION**

Californians for Equal Rights Foundation (“CFER”), on behalf of its constituents, hereby files this Complaint against the Poway Unified School District (“PUSD”), and alleges that PUSD is engaged in unlawful discrimination against a parent seeking information and dialogues regarding its Ethnic Studies course offering and its Racial Equity and Inclusion programs. PUSD’s race-based treatment of the affected parent violates the First and Fourteenth Amendments to the U.S. Constitution, Title VI of the 1964 Civil Rights Act, Article I Section 31 (a) of the California Constitution, as well as a slew of state anti-discrimination laws and Board policies.

As ample evidence herein shows, PUSD leadership and leadership at Del Norte High School have refused to address the student and her parent’s concerns regarding the racially divisive nature of PUSD’s various programs and teaching materials. On the contrary, on two separate occasions, PUSD belittled the parent for daring to challenge “the oppression of a black female (PUSD’s Director of Equity and Improvement),” and encouraged others “not to listen to a white male perspective.” Such outlandish attacks on viewpoint diversity and free speech exposes the deep irony and unavoidable intolerance in PUSD’s unapologetic commitment to the equity orthodoxy.

Between late 2020 and the summer of 2021, PUSD presented a series of initiatives under the banner “Racial Equity and Inclusion,” with a stated goal to fight racism and systemic inequity, and value “the diversity that exists amongst our students, staff, families, and community members.” In a concurrent attempt to provide “racially and culturally diverse curriculum resources and course offerings for students,” PUSD also introduced two new high school courses – Ethnic Studies and Ethnic Literature. In March and April 2022, the student and parent duo reached out to PUSD administrators with questions regarding the teaching materials in the Ethnic Studies courses. Not only has PUSD failed to address their concerns on the validity and lack of evidential support for the ways ethnic studies is being instituted, PUSD leaders but also took the opportunity to verbally assault the parent, who appears to be a white male.

By this Complaint, CFER requests that the Poway Unified School District and the San Diego County Office of Education investigate the evidence of racial discrimination prevalent in the facts outlined herein and take all necessary measures to vindicate the constitutional and legal rights of all PUSD parents and students and to bring an end to such unlawful discrimination.

## **II.**

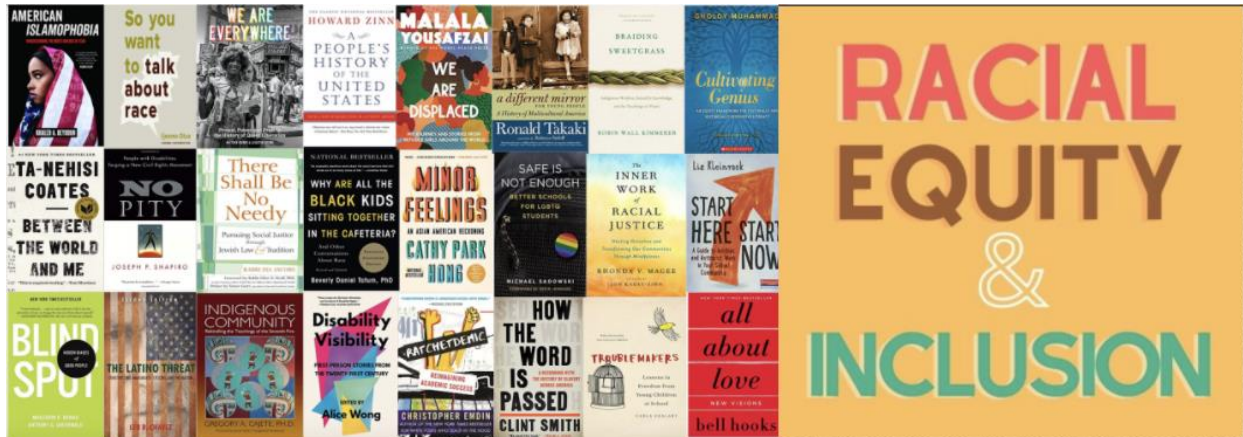


## BACKGROUND FACTS

### A. PUSD’s Racial Equity & Inclusion Programs and Ethnic Studies Courses

PUSD first publicized its first version of “Racial Equity and Inclusion” plan<sup>1</sup> in October 2020. This original blueprint explicitly outlines PUSD’ vision to be an “anti-racist” institution, hire more diverse staff of color, and correct systemic inequity. This ground-breaking document also features a joint message from PUSD Black Student Union Presidents who urge PUSD to “actively denounce racist discrimination and be accepting of those regardless of their race, gender identity, sexual orientation, religious affiliation, etc.” PUSD Superintendent Dr. Marian Kim Phelps also pledges the school district to “strengthening discipline procedures to ensure any use of racial slurs is addressed directly with consequence and intervention.”

Alarming, the entire document is steeped in ideologically biased, incendiary, and controversial language such as “BIPOC (Black, Indigenous, & People of Color),” “POC (People of Color),” “CRP (Culturally Responsive Teaching),” “intersectional nature of racial injustice,” “implicit bias” and “restorative justice.” More alarmingly, every single resource referenced in the plan is authored by adherents to the doctrine of critical race theory (CRT), a worldview that filters all human enterprise, sociopolitical processes and outcomes through the narrow prism of race. Among these resources are CRT’s media debut *The 1619 Project*, “The Intersection of White Supremacy and the Education System,” “Dismantling White Supremacy in Our Classrooms,” *White Fragility*, and *How to be an Antiracist*. On the flip side, there is an intentional dearth of information from competing perspectives and non-progressive scholars such as *The 1776 Unites Project*, Thomas Sowell, John McWhorter, Shelby Steele, Glenn Loury and the late Walter Williams. It seems that PUSD is only interested in promoting “equity and inclusion” from a particular ideological brand.



<sup>1</sup> “Poway Unified School District’s Comprehensive Plan for Prioritizing Racial Equity & Inclusion,” PUSD, <https://cferfoundation.org/wp-content/uploads/2021/03/PUSDRacial-Equity-and-Inclusion-Plan.pdf>.



Having met resistance and scrutiny, PUSD has taken down this initial plan from its website and gotten rid of the obvious references to controversial CRT readings. But its watered down version of “Racial Equity & Inclusion” initiative<sup>2</sup> is still thoroughly informed by a politicized vision of anti-racism, restorative justice and other CRT-related concepts that perpetuate race-based thinking and racial stereotyping. Notably, its latest newsletter on the topic, issued in March/April 2022, criticizes the equality paradigm as one that drives “a pedagogy of sameness” and rams down the lenses of equity and justice “to correct the system that is continually and predictably producing inequitable results.”<sup>3</sup>

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## LEADING FOR EQUITY & IMPROVEMENT

Committed to Addressing Diversity, Equity, Inclusion & Belonging

**UPDATES!**

*Learning Walks with an Equity Lens*

As we visit schools, equity is the lens we are looking through, a way of thinking that we are engaging in but beyond equity is justice. Justice is what we are truly striving for. Our

The assertion of race-based systemic inequities is certainly not a well-established fact in the context of PUSD, an affluent community where students and families of all backgrounds can thrive and strive for excellence. Yet, PUSD’s “Racial Equity & Inclusion” programs are designed to oversell a racialized outlook of our education system and the society in general and push for equalized

<sup>2</sup> Poway Unified School District, “Racial Equity & Inclusion,” <https://www.powayusd.com/en-US/Departments/Learning-Support/Racial-Equity-Inclusion/Racial-Equity-Inclusion>.

<sup>3</sup> Poway Unified School District, “Leading for Equity & Improvement,” Mar/Apr 2022, Issue No. 4, [https://www.powayusd.com/PUSD/media/LSS/Equity-Inclusion/PUSD-Racial-Equity-Newsletter-Mar\\_Apr.pdf](https://www.powayusd.com/PUSD/media/LSS/Equity-Inclusion/PUSD-Racial-Equity-Newsletter-Mar_Apr.pdf).



outcomes to masquerade complex policy failures at the macro, familial, and community levels that have contributed to academic disparities.

A key component of the “Racial Equity & Inclusion” initiative is the implementation of “an Ethnic Studies Course at each high school.” At the Board Meeting on November 12, 2020, the PUSD Governing Board first proposed the district-wide adoption of Ethnic Studies and Ethnic Literature as new high school courses.<sup>4</sup> In summer 2021, PUSD finalized the curricula for both subjects, in which Ethnic Studies is branded as a course to examine “racialized peoples in the United States,” encourage students to be “politically conscious,” and “examine past and current examples of oppression.” By the same token, Ethnic Literature is introduced as a “deep analysis and examination of how systems of power in the United States have affected these groups” and one that examines “the intersectionality of gender and sexual orientation.” These overarching goals, obsessed with race, power, privilege and oppression, certainly betray the California State Legislature’s intent for ethnic studies to be taught to prepare students to be global citizens with appreciation for the contributions of different cultures and ethnicities throughout the United States (AB-2016). In addition to the substantive issue of ideological capture, the Ethnic Studies courses offered by PUSD are immersed in critical pedagogy and various CRT concepts such as “master and counter narratives,” “intersectionality,” and “lived experience.”

A particularly contested narrative in PUSD’s Ethnic Studies courses is named “The Four ‘Is’ of Oppression,” encompassing ideological, institutional, interpersonal and internalized oppression. This ideational vehicle serves to explain the inter-related, omnipotent and inescapable nature of an oppressive system. “Reverse racism” is reduced to a myth that doesn’t really exist.

People of color can have prejudices against and anger towards white people, or individual white people. They can act out those feelings in destructive and hurtful ways towards whites. But in almost every case, this acting out will be severely punished. The force of the police and the courts, or at least a gang of whites getting even, will come crashing down on those people of color.<sup>5</sup>

## **B. PUSD Leaders’ Racial Discrimination**

It is under the general context of PUSD’s district-wide promotion of dogmatically hegemonic concepts, teaching and programs, in the name of Racial Equity & Inclusion and under the banner of Ethnic Studies, that the concerned parent took steps to engage PUSD leadership and administrators. Between March 30, 2022 and May 24, 2022, the parent contacted PUSD Superintendent Dr. Mariam Phelps, Associate Superintendent Carol Osbourne, and Director of Equity and Improvement Dr. Shawntanet Jara regarding PUSD’s Ethnic Studies courses. Particularly, the parent questioned the empirical validity, approval process and negative impacts

<sup>4</sup> Poway Unified School District, “11-12-2020 Board Minutes,” <https://www.powayusd.com/PUSD/media/Board-Images/BoardMinutes/2020/11-12-2020-Board-Minutes.pdf>.

<sup>5</sup> “The Four I’s of Oppression,” [https://www.grcc.edu/sites/default/files/docs/diversity/the\\_four\\_is\\_of\\_oppression.pdf](https://www.grcc.edu/sites/default/files/docs/diversity/the_four_is_of_oppression.pdf).



of teaching “Four I’s of Oppression.” In an email to Ms. Osbourne dated April 8, 2022, the parent mentioned PUSD’s lack of response to his concerns:

I was told by Shawntanet that she was part of the approval process for ES (Ethnic Studies), and I wanted to know from her (Dr. Shawntanet Jara) what reference material she reviewed that gained her approval for this curriculum and the 4 I’s, as many of the claims made in the 4 I’s are sensationally negative. Even though she said she had the information available and that students had access, I still haven’t been shown anything. Even my daughter at Del Norte sent an email to her, but still nothing. No one even sent me a link so that I could go and view the information for myself.

The parent also tried to offer an alternative to the lens of oppression in another email to both Dr. Jara and Ms. Osbourne dated April 18, 2022:

Shouldn’t PUSD show kids there are various viewpoints, and have them investigate and research on their own? Obviously ES and the 4 I’s don’t show that other viewpoints exist. The one sided confusing 4 I’s is disseminated all over the school, with the express intent of creating activists for one monolithic viewpoint on oppression and racism. The ES teacher herself said that the course is designed to create activists, and the curriculum says it as well: I can show it to you if need me to and I can also provide witnesses to teacher comments.

Here are the links / files of prominent black people on racism and oppression: and it’s more than just one person (and there are many others). I look forward to your reply, and for answering my questions above.

<https://www.youtube.com/watch?v=2p92NBNrhaY>

[https://www.grcc.edu/sites/default/files/docs/diversity/the\\_four\\_is\\_of\\_oppression.pdf](https://www.grcc.edu/sites/default/files/docs/diversity/the_four_is_of_oppression.pdf)

[https://docs.google.com/document/d/1GCxGCBB6DPElpcM\\_W8CsIgEjgplz\\_bnCsPaArB CcKQ0/edit](https://docs.google.com/document/d/1GCxGCBB6DPElpcM_W8CsIgEjgplz_bnCsPaArB CcKQ0/edit)

Instead of engaging the parent in an objective manner to discuss the intellectual debates and controversy surrounding Ethnic Studies and the Four I’s of Oppression, PUSD Associate Superintendent Carol Osbourne dismissed the parent’s concerns and criticisms as invalid and even accused the parent of personal attacks. In an email response to the parent dated April 2, 2022, Ms. Osbourne reacted to the parent’s earlier description of his exchanges with Dr. Jara:

I was shocked that you questioned oppression to Dr. Jara, a Black woman. Her life experiences provide examples of oppression as do the experiences of thousands of African





Americans and other people of color. I am confident your life experiences have been very different from Dr. Jara and would not reflect the oppression she has experienced.

I also invite you to review the history of voting rights in America. White men were provided this right but white women had to advocate through the Suffragette movement which only secured the right to vote for white women in 1920. Not until 1965 did Black women receive this same right. This is oppression. Recently, the landmark decision supporting equal pay for the US Women’s Team reflects oppression as well.

Ms. Osbourne, in her official capacity as a top PUSD administrator, was directly responding to the parent’s email to Dr. Shawntanet Jara dated March 30, 2022. Nowhere in that email did the parent question Dr. Jara’s personal experience. In fact, he wrote:

My daughter and I were asking for some empirical data as to the accuracy of parts of the ethnic studies program, especially the 4 I’s of Oppression. The 4 I’s is an incredibly sensational document which has absolutely zero references or bibliography, but nevertheless is a major part of the ethnic studies program: and it is also widely disseminated on campus outside of the ethnic studies program.

When the parent pressed further in a calm and civil manner to challenge Four I’s of Oppression, Ms. Osbourne continued to deflect from the academic discussion and resort to belittling the parent’s views. She wrote in an email dated April 17, 2022:

Your request for data regarding the 4 I’s of Oppression appear to be cloaked in the interest of denying oppression exists. The video clip you sent me showed a man sharing his opinion which reinforces your opinion.

The video clip, referenced in the email, features a number of black celebrities including actors Morgan Freeman and Denzel Washington, radio hosts Larry Elder and David Webb among others on their views on race in America. These people have no agenda to “deny oppression exists,” but happen to profess a different viewpoint than what is reflected in PUSD’s Ethnic Studies paradigm. They believe that Americans should not be obsessed with race or the past of racism. For instance, when asked how we as a society can get rid of racism, Morgan Freeman answered: “Stop talking about it. I’m gonna stop calling you a white man. And I’m gonna ask you to stop calling me a black man.” In the same video, actor Anthony Mackie shared his frustration with the contemporary impulse to make race personal.

### **C. Community Discussion on Race at Del Norte High School**

PUSD’s attacks on the parent were escalated during a virtual community discussion on race for employees, students and parents from Del Norte High School in PUSD, between 6pm and 7:45pm on May 17, 2022. The meeting was attended by over 55 participants, including the parent, PUSD Associate Superintendent Carol Osbourne, and PUSD Director of Equity and Improvement Dr.



Shawntanet Jara. During the zoom discussion section of the meeting, the parent raised his hand and asked a question regarding PUSD’s direction in embracing social justice programming and diversity, equity, and inclusion (DEI). He asked “how do we know when we have too much of it and it starts becoming detrimental to academics.” Rather than answering the parent’s question, the School Vice Principal Scott Wild came to the defense of PUSD’s DEI paradigm and shouted down the parent, urging the audience not to listen to “white male perspectives.” PUSD leaders present at the meeting did not jump in to intervene when Vice Principal Wild was clearly making discriminatory, race-based remarks. Ironically, in the aforementioned You Tube Video the parent shared with the district, not single one interviewee was a stereotypical “white straight male.” The vilification of dissenting opinions and viewpoint diversity, by branding the person behind the opinions with racial and gender stereotypes, constitutes the basis of unconstitutional and unlawful race-based treatment.

### **III. LEGAL ARGUMENT**

#### **A. The District’s Trainings Violate State and Federal Law Prohibiting Race Discrimination**

Poway Unified School District (PUSD) is a large school district that take both federal and state funding. PUSD is therefore subject to federal and state laws, which it is violating by instituting race-based treatment.

##### **1. Federal Law**

Title VI of the Civil Rights Act of 1964 provides: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d.

PUSD receives federal financial assistance and funding. It can be deduced that PUSD administrators were acting in their official capacity when communicating with parents regarding school district teaching and programming. Accordingly, by discriminating against the parent represented by CFER, as described herein, PUSD has violated Title VI of the Civil Rights Act of 1964.

The Fourteenth Amendment of the U. S. Constitution provides, in relevant part, that no person shall be denied “the equal protection of the laws.” The “central mandate” of equal protection is “racial neutrality” by the government or institution subject to the Fourteenth Amendment. *Miller v. Johnson*, 515 U.S. 900, 904 (1995). “Whenever the government treats any person unequally because of his or her race, that person has suffered an injury that falls squarely within the language and spirit of the Constitution’s guarantee of equal protection.” *Adarand Constructors, Inc. v. Pena*, 515 U.S. 200, 229-30 (2000).



PUSD receives government financial assistance and administer and participates in federally funded programs. Accordingly, by subjecting the parent represented by CFER to race-based treatment complained of herein, it is unlawfully treating the parent unequally because of his race.

## **2. Proposition 209**

Moreover, as a public school district in California, PUSD must strictly observe the California state constitution and state laws, which it is also violating. According to the California Constitution, “The State shall not discriminate against, or grant preferential treatment to, any individual or group on the basis of race, sex, color, ethnicity, or national origin in the operation of public employment, public education, or public contracting.” (Article I, SEC. 31. (a)).

Making assumptions and subscribing to stereotypes based on race is a form of race discrimination. In addition, allowing its employees and top officials to make accusations of a dissenting parent based upon racial assumptions and stereotypes is encouraging racial discrimination. The activities engaged in by PUSD were offensive not only to the parent who happens to be white, but to members of other racial groups as well, by promoting stereotypes and tropes of certain racial groups as perpetual victims who are dependent on white people to change their ways in order for them to be successful in society. The District’s actions violated the California Constitution and its constitutional principle of equal treatment in public education.

## **3. Education Code Section 220**

Education Code Section 220 provides: “No person shall be subjected to discrimination on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic...in any program or activity conducted by an educational institution that receives, or benefits from, state financial assistance, or enrolls pupils who receive state student financial aid.”

The actions and comments of PUSD administrators, as described herein, discriminated against the parent based on race, and encouraged all involved parties to treat PUSD stakeholders (students, parents, employees and others) differently based on race, thereby violated this statute.

In summary, PUSD has been engaged in race-based discrimination against the parent represented by CFER. Its use of race as a defining factor in the treatment of this parent violates the Fourteenth Amendment to the United States Constitution, Titles VI and VII of the Civil Rights Act of 1964, Article I Section 31(a) of the California Constitution, and Chapter 2, Article 3 of California’s General Education Code and PUSD’s nondiscrimination policy. These discriminatory practices, documented herein, create a hostile environment based on race and cannot be justified under any relevant rulings by the United States Supreme Court.



## **B. Race-based Treatment Violates and Is Contrary to Existing Board Policies**

It is important that PUSD’s engagement with its stakeholders be consistent with existing District policy, as well as state and federal law. Unfortunately, much of the actions and comments, referenced above is directly contrary to existing District policy, as outlined below:

### **1. Board Policy 0410 – Nondiscrimination in District Programs and Activities**

According to this policy, “District programs, activities, and practices shall be free from unlawful discrimination, including discrimination against an individual or group based on race, color, ancestry, national origin, immigration status, ethnic group identification, age, religion, marital status, pregnancy, parental status, physical or mental disability, sex, sexual orientation, gender, gender identity or expression, or genetic information.”

By treating the parent represented by CFER discretely on the basis that he is a white male, PUSD officials violated this policy.

### **2. Board Policy 6044 – Controversial Issues**

The parent’s concerns and criticisms regarding Ethnic Studies and DEI undoubtedly cover controversial issues. Board Policy 6044 provides that when discussing controversial issues, educators must present the material in a “balanced manner” and must address “all sides” of an issue “without bias or prejudice” and “without promoting any particular point of view.” Based on the clear language of this policy, District personnel are not permitted to dismiss criticisms without further discussion. Rather, to the extent that these sorts of concepts including DEI and Four I’s of Oppression are discussed, they must be discussed in an unbiased manner, and provide alternative viewpoints. Many Americans find racial stereotyping and race-based teaching offensive. It is almost condescending for top PUSD administrators to put down, ridicule and minimize a parent for his objections to controversial programs implemented in the school district.

### **3. Board Policy 5020 (a) – Parent Rights and Responsibilities**

This policy provides that “Parents/guardians shall have the opportunity to work with schools in a mutually supportive and respectful partnership and to help their children succeed in school. (Education Code 51100)”

While the parent represented by CFER made genuine attempts to discuss his child’s educational needs, PUSD administrators have once and again chosen to ignore his concerns and questions.

### **4. Board Policy 5137 – Positive School Climate**



This policy provides in relevant part: “The district's curriculum shall include age-appropriate culturally relevant educational opportunities which include, but are not limited to, the principles of equality, human dignity, mutual respect, fairness, honesty, and citizenship. Teachers are encouraged to employ cooperative learning strategies that foster positive interactions in the classroom among students from diverse backgrounds.” It also provides: “The school environment should be characterized by positive interpersonal relationships among students and between students and staff.”

PUSD’s Racial Equity & Inclusion programs and its Ethnic Studies course are inconsistent with this policy, to the extent that all relevant materials do not teach principles of “equality.” Rather, the materials tried to indoctrinate participants into concepts of “equity,” “social justice,” “white supremacy” and inherent racism and victimization, based on the individuals’ skin color. They encourage participants to be suspicious and judgmental of each other, and themselves, based on skin color. The materials also encourage viewing people as “other” and potential adversaries based on skin color, and promote a large variety of assumptions and stereotyping based on skin color that in all likelihood will not foster, but rather inhibit positive interactions amongst students and staff from diverse backgrounds.



#### **IV. CONCLUSION**

Between March and May 2022, Poway Unified School District (PUSD) communicated with a concerned parent on multiple occasions. When challenged to explain the validity and repercussions of its teaching paradigm for Ethnic Studies and its Diversity, Equity, and Inclusion programs, PUSD top administrators responded with unlawful racial discrimination.

By discriminating against the parent, PUSD has actively violated federal and state civil rights and non-discrimination laws. As a public school district receiving federal financial assistance, PUSD violated Title VI of the Civil Rights Act of 1964 and the Fourteenth Amendment to the United States Constitution with its hostile and race-based teacher training program. As a state public educational entity, PUSD has also breached the California State Constitution and other state-level non-discrimination laws, not to mention existing board policies. PUSD's discriminatory practices then created a hostile school environment based on race that not only hurts the parent represented by CFER, but also stymies its relationships with other parents and community stakeholders.

Such discrimination and violations of equal protection harm a sizable number of PUSD's stakeholders and cause them to feel targeted, harassed or less worthy because of their skin color. If PUSD promotes this ideology in the classroom, the impact of the illegal discrimination will worsen, since teachers and administrators are being actively encouraged to stereotype based on race, and treat students differently based on race. Self-doubt, loss of faith in American values and ideals, and racial animosity follow as negative consequences of race-based treatment.

For all the reasons set forth above, we demand that PUSD and the San Diego County Office of Education immediately investigate these concerns pursuant to applicable policy. We ask that the county and local agencies charged with protecting the civil rights of Americans, intervene to stop the ongoing racial discrimination and reverse the hostile work environment that results from such discrimination.



**V.  
PRAYER FOR RELIEF**

Complaints request that Poway Unified School District and the San Diego County Office of Education grant and enforce the following remedies:

- 1) Immediately launch thorough and objective investigations into the racial discrimination complained of herein.
- 2) Establish oversight committees to ensure the objectivity of the investigations, including parents and delegates from Californians for Equal Rights Foundation to represent the discriminated-against parent.
- 3) Require Poway Unified School District to immediately cease and desist from employing racial biases, negative stereotyping, race-based treatment and other discriminatory means in all of its programs and initiatives.
- 4) Require Poway Unified School District to immediately reevaluate its protocols of teaching and training Ethnic Studies, Racial Equity and Inclusion to ensure that blatant race-based treatment and racial discrimination are eliminated from its training materials.
- 5) Take all necessary measures to ensure that Poway Unified School District stop discriminating on the basis of race and imposing a hostile school environment based on race.

Respectfully submitted,

Californians for Equal Rights Foundation

Date:  
06/13/2022

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