

This document was provided, as is, to the California Department of Education (CDE) by the **Eagle Collegiate Academy**. This document is posted to the CDE website to meet the legal requirements of California *Education Code* Section 33009.5.

For more information regarding the content of this material, please contact the Charter Schools Division by phone at 916-322-6029 or by mail at charters@cde.ca.gov.

TAB 2A:

AADUSD Board Resolution and Staff Report



**BEFORE THE GOVERNING BOARD OF THE
ACTON-AGUA DULCE UNIFIED SCHOOL DISTRICT**

Resolution No. 19-20.06

Resolution to Deny the Eagle Collegiate Academy Charter Petition

WHEREAS, the approval or denial of charter school petitions is governed by the Charter Schools Act of 1992, as subsequently amended, Education Code sections 47600 et seq.;

WHEREAS, the Acton-Agua Dulce Unified School District ("District"), received the proposed charter petition ("Petition") for the Eagle Collegiate Academy ("Charter School");

WHEREAS, consistent with Education Code section 47605 subdivision (b), at a meeting on October 30, 2019, a public hearing was held on the Petition, at which time the Governing Board of the Acton-Agua Dulce Unified School District ("Governing Board") considered the level of support for the Petition by teachers employed by the District, other employees of the District, and parent/guardians;

WHEREAS, approval or denial of a charter petition is governed by the standards and criteria set forth in Education Code section 47605;

WHEREAS, Education Code section 47605 subdivision (b) prohibits the Governing Board from denying a charter petition unless it makes factual findings, specific to the particular charter school, setting forth facts to support one or more findings;

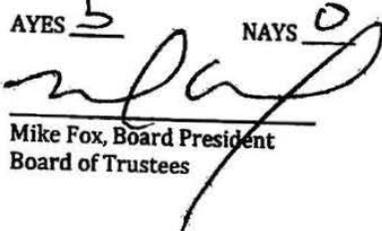
WHEREAS, the District's staff has reviewed the Petition and supporting materials submitted by the Petitioners, and prepared and submitted a Staff Report and Recommendation, attached as Exhibit A; and

WHEREAS, the Governing Board has reviewed the Petition and supporting materials, and the Staff Report and Recommendation.

THEREFORE BE IT RESOLVED, that the Governing Board of the Acton-Agua Dulce Unified School District adopts the findings contained in the Staff Report and Recommendation in their entirety.

BE IT FURTHER RESOLVED, that based upon these findings, the Governing Board of the Acton-Agua Dulce Unified School District denies the Petition for the establishment of Eagle Collegiate Academy because (1) the Petitioners are demonstrably unlikely to successfully implement the program set forth in the Petition, (2) the Petition does not contain the number of signatures required by Ed. Code § 47605(a), and (3) the Petition fails to include reasonably comprehensive descriptions of five of the 15 elements identified in Ed. Code § 47605(b)(5) as set out more fully in the findings in the attached Staff Report, adopted in their entirety as the findings of the Governing Board.

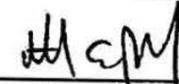
APPROVED, PASSED AND ADOPTED by the Governing Board of the Acton-Agua Dulce Unified School District on this 14th day of November 2019, by the following vote:

AYES 5 NAYS 0


Mike Fox, Board President
Board of Trustees

ABSTAIN 0

ABSENT 0



Ken Pfalzgraf, Clerk
Board of Trustees

EXHIBIT A
To Resolution 19-20.##

To: Governing Board, Acton- Agua Dulce Unified School District
From: Lawrence King, Superintendent
Date: November 8, 2019
Re: Staff Report and Recommendation to Deny Eagle Collegiate Academy
Charter Petition

California Education Code § 47605(b) states: The governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings:

- 1) The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
- 2) The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
- 3) The petition does not contain the number of signatures required by Ed. Code § 47605(a).
- 4) The petition does not contain an affirmation of each of the conditions described in Ed. Code § 47605(d).
- 5) The petition does not contain reasonably comprehensive descriptions of all of the 15 elements identified in Ed. Code § 47605(b)(5).
- 6) The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Govt. Code § 3540 *et seq.*

I. Recommendation:

The Superintendent of Schools recommends that the Board of Trustees adopt the findings contained in this Staff Report and on that basis deny the Eagle Collegiate Academy charter petition based on a finding that the Petitioners are demonstrably unlikely to successfully implement the program set forth in the Petition, the Petition does not contain the number of signatures required by Ed. Code § 47605(a), and the Petition fails to include reasonably comprehensive descriptions of all of the 15 elements identified in Education Code § 47605(b)(5).

II. History of Previous Petitions and Comparison to the Current Petition

Petitioners have made four unsuccessful attempts to obtain approval of a charter petition. Their petitions have been identical or nearly identical and were previously denied once by the Sulphur Springs Union School District on December 7, 2016, and three times by the Acton-Agua Dulce Unified School District on May 11, 2017, April 26, 2018, and November 8, 2018.

Petitioners appealed three of the District's denials to the Los Angeles County Board of Education. The County Board denied the first petition appeal on December 12, 2017. On July 24, 2018 the County Board took no action on the second appeal, noting that the petition was identical or nearly identical to the petition appeal it denied in December 2017. Similarly, the County Board took no action on the third appeal, noting that the petition was identical or nearly identical to the petition appeal it denied in December 2017. The County Board noted that by declining to take any action, Petitioners could immediately appeal to the State Board of Education.

Petitioners appealed that most recent petition denial to the State Board of Education. On May 9, 2019, the State Board of Education unanimously denied Petitioners' appeal on the same grounds as the District had denied the petition in November 2018.

The current Petition now before the Board is nearly identical to those previously denied petitions. The only significant changes are in the proposed starting enrollment. The current Petition proposes to begin operating with fewer students than previous petitions, but as described below, Staff finds that the Petition's enrollment projections are still unreasonable.

III. The Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

Staff has completed an extensive review of the Petition and concludes that the Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition because the Petition presents an unrealistic financial and operational plan, and an unrealistic plan for the proposed educational program.

- A. The proposed financial and operational plan is unreasonable because (1) it relies on aggressive initial enrollment and aggressive growth to cover its projected expenditures, (2) it projects a reserve that will not meet requirements if enrollment does not materialize or start-up costs prove to be under-budgeted, (3) it relies on borrowing based on ADA to manage cash flow for three years, (4) it contains expenditures that appear to be unreasonably low, and (5) facility costs are underestimated and the intended facility is dangerous for children without extensive improvements.**

After a thorough review, Staff conclude that the Petition and supporting materials set forth an unrealistic financial and operational plan. This includes:

1. Enrollment projections are unreasonable and too aggressive.

The Petition assumes first year enrollment of 168 students and ADA of 159.6, followed by annual increases in enrollment of 72, 73, 75, and 50 students with an attendance to enrollment rate of 95% for ADA driving revenue projections. The

budget narrative states "a number of contingency budgets will also be prepared to provide guidance in the event of an unexpected increase in expenses or a decrease in revenue," but the District must assess the Petition as-is and Staff have serious concerns about the Petition's enrollment projections.

This Petition's initial enrollment projections are lower than the projections in previous petitions (168 vs. 355 students in year one). However, the year-over-year growth projections are even more aggressive in absolute and relative terms, and once again this Petition's viability hangs on whether or not these aggressive growth targets could actually be met. By comparison, the petitions previously denied by the District projected annual increases of 50 students equaling increases of 9% to 14% each year. This Petition projects annual growth of up to 43%. This is highly unrealistic for a traditional, seat-based program that intends to locate in a remote location.

The Petition's revenue projections appear to align with the enrollment projections, but it is highly unlikely that the Petitioners can hit their enrollment projections.

As a comparison, the Albert Einstein Academy Agua Dulce Partnership previously operated a traditional, seat-based charter school like Eagle Collegiate Academy. Agua Dulce Partnership was located in the center of Agua Dulce. It enrolled 134 students in its site-based program of which only 95 were in grades K-3. (Petitioners' projected first year enrollment of 168 is only for grades TK-3.)

Petitioners propose to locate in a much more remote location on Sierra Highway, making it harder to attract students. They propose to open with a first year enrollment equal to 175% of Agua Dulce Partnership's enrollment for the same grade levels, and in a few short years triple the Agua Dulce Partnership's enrollment. This is not realistic or feasible.

2. Reserve requirements cannot be met and the ending fund balance will be negative if aggressive enrollment projections are not met.

The Petition's proposed budget leaves almost no room for missing these aggressive enrollment numbers. Missing ADA projections by 4 would cause the school to miss its reserve requirement. Missing ADA projections by 13 would result in a negative ending fund balance with no apparent way to return to fiscal health. This leaves the school with no room for error.

Missing enrollment projections would require significant cuts elsewhere in the budget, preventing the Petitioners from implementing the program described in the Petition. Additionally, significant fixed costs for a start-up charter school will be difficult to reduce. This makes it even more essential that Petitioners hit their enrollment projections.

3. The budget requires Petitioners to sell receivables for three years.

Petitioners plan to sell receivables through the third year of operations. Once again, the failure to hit aggressive growth targets can seriously jeopardize their ability to finance operations without taking on additional debt. The Petitioners have no margin for error and can easily fall into a debt trap in which they must continually take on new loans and obligations to pay off existing debts.

4. The Petitioners underestimate various costs.

Budgeted expenses in various categories are too low to provide the described program and are not reasonable compared to costs incurred by other schools and districts in the area, including:

- Transportation for students who cannot walk to school and students receiving special education;
- Food services – it is unclear how costs will be covered, but the Petition promises that breakfast and lunch will be provided;
- Special education encroachment – the amount budgeted for providing SPED services is low relative to average expenses for the District;
- Professional services;
- Furniture and equipment for start-up – in particular, the amounts budgeted to establish a school office and specialty rooms detailed in the educational program are inadequate; and
- Custodial services.

5. Facility costs are underestimated and the intended facility is dangerous for children without extensive improvements.

Petitioners also underestimate facility costs. A proposed lease (the offer has since expired) for a former church at 13136 and 13284 Sierra Highway was included with the Petition.

The proposed lease would cost Petitioners \$96,000 a year and make Petitioners liable for maintenance and clean-up, including heating, air conditioning, electrical, plumbing, water systems, windows, doors, roofs, foundations, exterior walls, common areas, and brush clean-up of the surrounding property. Petitioners only budget \$2,500 to \$2,800 annually for building repairs and maintenance and \$10,000 to \$29,466 annually for "housekeeping" services. This dramatically underestimates the Petitioners' likely expenses in maintaining an active, working campus with aging facilities.

The proposed lease leaves the Petitioners to make necessary improvements before the school opens. The property needs significant work to become ADA compliant, safe, and secure for elementary-age children. It sits on a two-lane highway with no sidewalk and a speed limit of 55 mph. A wash and culvert sits on the property next to a small parking area. The site has no fencing to separate children from the highway, keep them out of the culvert, or keep them from wandering into the scrub

brush behind the site. Petitioners included a letter (Exhibit L) from an engineer estimating that \$100,000 will be needed to "have the building ready for occupancy within three months." This is a very low estimate in light of Staff's investigation of the site and experience with school construction projects. In any event, nothing appears to have been budgeted for any site improvements.

The proposed budget also does not allocate any expenses for facilities in the 2019/2020 school year, meaning the school would need to be prepared for opening in a few short weeks in July and August of 2020. However, the Petitioners own engineer estimated that three months would be needed just to physically prepare the site for occupancy. Once construction work was complete, additional time would be needed to furnish the site and prepare for students.

Finally, the site appears incapable of housing almost 500 students (as the Petition projects in year five) regardless of how many portable classrooms are added. Even if two-story portables were used, there is insufficient space on the property to house that many students. Even if, as Staff expects, enrollment projections are not met, there is very little parking space and it is unclear how traffic and parking on Sierra Highway could be managed.

For these reasons, Staff has determined that the proposed site is not feasible and unsafe for children, and the Petition's proposed budget is insufficient to cover the cost of making the site safe and suitable for children. Even if the site were safe, the site is not large enough to accommodate enough students to let Petitioners hit the aggressive enrollment projections on which their Petition depends.

B. The Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition because they present an unrealistic educational plan.

Petitioners propose to implement an International Baccalaureate (IB) program, but the Petition does not demonstrate enough familiarity with the IB program, or enough detail about implementation, to give Staff confidence that the Petitioners will be successful.

No current research is noted in the Petition to support its proposed educational program. Supporting research noted in the Petition is for International Baccalaureate (IB) programs based on trial implementation of the Primary Years Program (PYP) and Middle Years Program (MYP) without mention of teacher qualifications or the rigorous teacher training necessary to obtain IB certification. The Petition lacks focus regarding the teaching methodologies to be used with the intended student population, with language for instruction that is based on IB pedagogy, with a lack of concrete methods for the instruction of subject scope and sequence of skills.

Minimal information is provided regarding addressing the needs of English Language Learners, students below grade level, and other at-risk students. It is not

clear how this IB program will support the needs of academically at-risk students. The Petition proposes 25 minutes of English Language Development for EL students, but this falls far short of what the District and surrounding school districts have found is necessary to meet local EL students' needs. Multi-tiered Systems of Support (MTSS) is mentioned, but vague.

The Petition does not identify the steps and provide a plan for hiring fully credentialed teachers and ensuring that all teachers are certified in the IB program. As discussed below, the Petition was not signed by a sufficient number of teachers actually credentialed to teach elementary grades.

For these reasons, Staff concludes that the Petitioners are demonstrably unlikely to successfully implement the program outlined in the Petition and the Petition should be denied.

IV. The Petition does not contain the number of signatures required by Ed. Code § 47605(a)

A petition for the establishment of a charter school is required to be accompanied by signatures from teachers or parents. Education Code § 47605 (a)(1)(B) states that a "petition may be submitted . . . [if it] is signed by a number of teachers equivalent to at least one-half of the number of teachers that the charter school estimates will be employed at the school during its first year of operation." Section 47605 goes on to require, in paragraph (a)(3), that the signature must "mean[] that the teacher is meaningfully interested in teaching at the charter school."

If the Petition were approved, Eagle Collegiate Academy teachers would be required to hold a teaching credential or other teaching permit "equivalent to that which a teacher in other public schools would be required to hold." (Ed. Code § 47605(l).) Charter schools approved by a school district currently have some credentialing flexibility when it comes to non-core, non-college preparatory courses, but this flexibility is being phased out of the law beginning January 1, 2020.

In any case, as the Petition proposes to begin by serving grades Pre-Kindergarten through Third, there are no non-core, non-college preparatory courses offered by the school that could be staffed with non-credentialed employees. Preschool requires a Child Development Permit or Multiple Subject Teaching Credential, and teaching in elementary grades, including Kindergarten, requires a Multiple Subject Teaching Credential. The Multiple Subject Teaching Credential qualifies a person to teach all subjects in a self-contained classroom.

The Petitioners have opted to submit teacher signatures instead of parent signatures. The Petition proposes to have eight classrooms in the school's first year of operation (one Pre-Kindergarten class and seven TK-3 classes), meaning the Petition requires signatures from at least four teachers.

The Petition is accompanied by signatures of only three teachers with Multiple Subject Credentials. A review of publically available licensing information shows that one of these three teachers has an expired teaching credential. The Petition should have been accompanied with signatures from at least four teachers with Multiple Subject Teaching Credentials.

The other teachers who signed the Petition hold Single Subject credentials for teaching at the secondary level (Art, English, Math, Science, Korean) or Education Specialist Instruction Credentials for teaching students in special education. They are not credentialed to teach in grades TK-6.

All eight of the school's classrooms must be staffed with properly credentialed teachers, but the Petitioners have not submitted the required minimum of four signatures from such teachers.

For these reasons, Staff concludes that the Petition does not contain the number of signatures required by Ed. Code § 47605(a) and the Petition should be denied.

V. The petition does not contain reasonably comprehensive descriptions of all of the 15 elements identified in Ed. Code § 47605(b)(5).

Staff finds that the Petition fails to include reasonably comprehensive descriptions of the following required elements:

A. Educational Program (Ed. Code § 47605(b)(5)(A))

The Petition fails to include a reasonably comprehensive description of the proposed educational program in that it lacks or has insufficient descriptions of:

- How the curriculum will align to student performance standards;
- The proposed teaching methodologies with a clear rationale relating them to the intended pupil population;
- How the school will address the needs of English Language Learners, at-risk students, and students performing below grade level; and
- How the implementation of the instructional program will be informed by the monitoring of pupil subgroups' academic progress.

As described previously when discussing the unlikelihood that Petitioners will successfully implement the proposed educational program, no current research is noted in the Petition. Supporting research noted in the Petition is for International Baccalaureate (IB) programs based on trial implementation of the Primary Years Program (PYP) and Middle Years Program (MYP) without mention of teacher qualifications or definitive teacher training to obtain IB certification. The Petition lacks focus regarding the teaching methodologies to be used with the intended student population, with language for instruction that is based on IB pedagogy, with a lack of concrete methods for the instruction of subject scope and sequence of skills.

B. Measureable Student Outcomes (Ed. Code § 47605(b)(5)(B))

The Petition fails to include a reasonably comprehensive description of measureable pupil outcomes in that it lacks or has insufficient descriptions of:

- School-wide student performance goals over a given period of time; and
- Projected attendance, dropout, or graduation rate goals.

C. Employee Qualifications (Ed. Code § 47605(b)(5)(E))

The Petition fails to include a reasonably comprehensive description of employee qualifications in that it lacks or has insufficient descriptions of:

- The key staff positions within the charter school;
- A definition of what constitutes core, college preparatory courses and an affirmation that appropriately credentialed teachers will teach such courses;
- Key qualifications of teachers and other key positions; and
- How the charter school will recruit fully credentialed teachers with appropriate IB certifications.

D. Health and Safety (Ed. Code § 47605(b)(5)(F))

The Petition fails to include a reasonably comprehensive description of the health and safety element in that it lacks or has insufficient descriptions of:

- Assurances that the school's facilities will comply with state building codes and ADA access requirements, or evidence that the school's intended facilities comply;
- Earthquake preparedness; and
- References to or the inclusion of more detailed health and safety policies and procedures for the charter school.

Staff has serious concerns about the Petitioners' ability to transform their intended site into a safe, secure, ADA-compliant school site as discussed previously.

E. Employee Rights (Ed. Code § 47605(b)(5)(K))

The Petition fails to include a reasonably comprehensive description of employee rights in that it makes no mention of whether employees could carry leave balances or service credit to any other school, or any process for doing so.

VI. Based on the preceding concerns and conclusions, Staff recommends that the Board deny the Petition.

Staff has reviewed the Petition and its supporting documents and found that grounds exist to deny the Petition because:

- 1) The Petitioners are demonstrably unlikely to successfully implement the program set forth in the Petition;
- 2) The Petition does not contain the number of signatures required by Ed. Code § 47605(a); and
- 3) The petition does not contain reasonably comprehensive descriptions of five of the 15 elements identified in Ed. Code § 47605(b)(5):
 - A. Educational program;
 - B. Measureable student outcomes;
 - C. Employee qualifications;
 - D. Health and safety; and
 - E. Employee rights.

Financial difficulty is the leading causes of charter school closures in California. Therefore, a reasonable financial and operational plan that adequately budgets for unforeseen expenses and realistic enrollment figures is crucial to a new charter school's success. Based on the Staff's concerns and conclusions set forth in this Staff Report and Recommendation, the Staff finds that the Eagle Collegiate Academy's financial and operational plan is not reasonable, and for that reason the Eagle Collegiate Academy Petitioners are demonstrably unlikely to successfully implement the program set forth in the Petition.

Academic programs and structures which support the educational needs of all students are a key component of a highly performing charter school. Staff is concerned that the educational program outlined in this petition does not provide the necessary opportunities for all students to be academically successful.

The Petition is not supported by a sufficient number of teachers in light of the projected first year enrollment.

The Petition also fails to include reasonably comprehensive descriptions of all of the 15 elements identified in Education Code § 47605(b)(5).

The Staff recommends that the Acton-Agua Dulce Unified School District Governing Board adopt this Staff Report's findings as its own, and deny the Eagle Collegiate Academy Petition for these reasons.

TAB 2B:

ECA Response to AADUSD Findings



Eagle Collegiate Academy
A proposed Pre-K to 12th College Preparatory Charter School
P. O. Box 803234 Santa Clarita, CA 91380 Phone: (661) 347-6016
www.eaglecollegiateacademy.org e-mail: eaglecollegiate@gmail.com

November 12, 2019

Via: Email

Lawrence King, Superintendent
Acton-Agua Dulce Unified School District
32248 Crown Valley Road
Acton, CA 93510

RE: Eagle Collegiate Academy Response to Acton-Agua Dulce Unified School District Staff Findings for Denial of Establishment Charter Petition

Dear Mr. Lawrence King, President Michael Fox and Acton-Agua Dulce Unified School District Board of Trustees:

The purpose of this letter is to respond to Acton-Agua Dulce Unified School District's ("AADUSD") Staff Findings and Recommendation for Denial ("Findings") of the Eagle Collegiate Academy ("ECA" or the "Charter School") establishment charter petition, and to demonstrate that the Findings do not constitute sufficient legal grounds to deny the ECA charter petition.

Legal Standard

At the outset, we point out that the Education Code provides specific guidance to governing boards to approve the establishment of charter schools. Education Code Section 47605(b) states:

In reviewing petitions for the establishment of charter schools, the chartering authority shall be guided by the intent of the Legislature that charter schools are and should become an integral part of the California educational system and that establishment of charter schools should be encouraged. (Emphasis added.)

Education Code Section 47605(b) provides the legal basis for the denial of a charter petition as follows:

The governing board of the school district shall grant a charter for the operation of a school under this part if it is satisfied that granting the charter is consistent with sound educational practice. The governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings:

- (1) The charter school presents an unsound educational program for the pupils

- to be enrolled in the charter school.
- (2) The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
 - (3) The petition does not contain the number of signatures required by subdivision (a) [of Education Code Section 47605].
 - (4) The petition does not contain an affirmation of each of the conditions described in subdivision (d) [of Education Code Section 47605].
 - (5) The petition does not contain reasonably comprehensive descriptions of [the 15 required elements].
 - (6) The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school [].
- (Emphasis added.)

Accordingly, the law dictates that the default position is for an authorizer to *approve* a charter petition, unless it makes written factual findings to support a denial.

AADUSD's Findings do not meet the legal standard for denial of a charter petition. Moreover, the findings are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, show a lack of understanding of the International Baccalaureate (IB) program, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

Eagle Collegiate Academy Responses to AADUSD Statements and Findings for Denial of the Charter Petition

Below, please find the summary of the Statements and Findings (in *italicized text*), in the order in which they were presented, immediately followed by the Charter School's response (in plain text).

AADUSD Assertion:

History of Previous Petitions and Comparison to the Current Petition

Petitioners have made four unsuccessful attempts to obtain approval of a charter petition. Their petitions have been identical or nearly identical and were previously denied once by the Sulphur Springs Union School District on December 7, 2016, and three times by the Acton-Agua Dulce Unified School District on May 11, 2017, April 26, 2018, and November 8, 2018.

Petitioners appealed three of the District's denials to the Los Angeles County Board of Education. The County Board denied the first petition appeal on December 12, 2017. On July 24, 2018 the County Board took no action on the second appeal, noting that the petition was identical or nearly identical to the petition appeal it denied in December 2017. Similarly, the County Board took no action on the third appeal, noting that the petition was identical or nearly identical to the petition appeal it denied in December 2017. The County Board noted that by declining to take any action, Petitioners could immediately appeal to the State Board of Education.

Petitioners appealed that most recent petition denial to the State Board of Education. On May 9, 2019, the State Board of Education unanimously denied Petitioners' appeal on the same grounds as the District had denied the petition in November 2018.

The current Petition now before the Board is nearly identical to those previously denied petitions. The only significant changes are in the proposed starting enrollment. The current Petition proposes to begin operating with fewer students than previous petitions, but as described below, Staff finds that the Petition's enrollment projections are still unreasonable.

ECA Response:

ECA team's and families' courage, equanimity and perseverance in seeking school choice for our children are the virtues on display in this long arduous ordeal.

Sulphur Springs Union School District ("SSUSD") Findings:

SSUSD staff stated in their findings that the District lacked expertise in overseeing high schools; specifically, their report stated, "the Charter School's choice to include high school students is questionable and potentially problematic in light of the District's status and expertise in serving elementary school children." (Emphasis added.) It is important to note that SSUSD found our educational program presented in the petition to be sound.

AADUSD Findings:

ECA took this statement to heart as we reflected on next steps. At the same time, our realtor notified us of a reasonably priced property on Sierra Highway in Agua Dulce that just became available then. Since AADUSD is the only K-12 school district in the area where we wished to establish ECA, and since the location is central for all the families from Antelope, San Fernando and Santa Clarita Valleys that have showed interest in ECA, our team met with AADUSD staff over several months prior to submitting our charter petition to AADUSD. It is important to note that AADUSD found our educational program to be sound on each of the three occasions.

Thus, with the understanding that ECA had a strong educational program, we engaged with District staff, and later, with County staff, to make revisions and address the concerns that the respective Boards raised regarding the ECA petition showing our responsiveness to both the District and County staff despite the inconsistency in the charter policy and procedures of the District.

Exhibit 1 depicts the District's inconsistent charter policy (Previously submitted).

AADUSD's staff assertion that "the current Petition now before the Board is nearly identical to those previously denied petitions" is conclusory and factually incorrect. Following the July 24, 2018 and December 18, 2018 votes by the LACOE Board resulting in a non-action on the ECA petition, and the State Board of Education's May 9, 2019 denial of ECA petition, ECA made significant and substantive changes to the petition prior to submitting to AADUSD on September 26, 2019. Also, in order to continue to be responsive to AADUSD, ECA team requested and met with AADUSD Charter School Office director on June 12, 2019 as we were reworking our petition prior to submission. It is factually misleading to assert that the State Board of Education "*denied Petitioners' appeal on the same grounds as the District had denied the petition in November 2018*" because the supporting evidence used by the CDE staff report only indicated that element 5 did not contain a comprehensive description while AADUSD listed elements 1, 2, 3,5, 6 and 8.

Finding 1: The petitioners are demonstrably unlikely to successfully implement the proposed educational program. [EC 47605(b)(2)]

AADUSD Finding:

Staff have completed an extensive review of the Petition and conclude that the Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition because the Petition presents an unrealistic financial and operational plan, and an unrealistic plan for the proposed educational program.

A. The proposed financial and operational plan is unreasonable because (1) it relies on aggressive initial enrollment and aggressive growth to cover its projected expenditures, (2) it projects a reserve that will not meet requirements if enrollment does not materialize or start-up costs prove to be under-budgeted, (3) it relies on borrowing based on ADA to manage cash flow for three years, (4) it contains expenditures that appear to be unreasonably low, and (5) facility costs are underestimated and the intended facility is dangerous for children without extensive improvements.

After a thorough review, Staff conclude that the Petition and supporting materials set forth an unrealistic financial and operational plan. This includes:

1. Enrollment projections are unreasonable and too aggressive.

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This Petition's initial enrollment projections are lower than the projections in previous petitions (168 vs. 355 students in year one). However, the year-over-year growth projections are even more aggressive in absolute and relative terms, and once again this Petition's viability hangs on whether or not these aggressive growth targets could actually be met. By comparison, the petitions previously denied by the District projected annual increases of 50 students equaling increases of 9% to 14% each year. This Petition projects annual growth of up to 43%. This is highly unrealistic for a traditional, seat-based program that intends to locate in a remote location.

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traditional, seat-based charter school like Eagle Collegiate Academy. Agua Dulce Partnership was located in the center of Agua Dulce. It enrolled 134 students in its site-based program of which only 95 were in grades K-3. (Petitioners' projected first year enrollment of 168 is only for grades TK-3.)

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2. Reserve requirements cannot be met and the ending fund balance will be negative if aggressive enrollment projections are not met.

The Petition's proposed budget leaves almost no room for missing these aggressive enrollment numbers. Missing ADA projections by 4 would cause the school to miss its reserve requirement. Missing ADA projections by 13 would result in a negative ending fund balance with no apparent way to return to fiscal health. This leaves the school with no room for error.

Missing enrollment projections would require significant cuts elsewhere in the budget, preventing the Petitioners from implementing the program described in the Petition. Additionally, significant fixed costs for a start-up charter school will be difficult to reduce. This makes it even more essential that Petitioners hit their enrollment projections.

3. The budget requires Petitioners to sell receivables for three years.

Petitioners plan to sell receivables through the third year of operations. Once again, the failure to hit aggressive growth targets can seriously jeopardize their ability to finance operations without taking on additional debt. The Petitioners have no margin for error and can easily fall into a debt trap in which they must continually take on new loans and obligations to pay off existing debts.

4. The Petitioners underestimate various costs.

Budgeted expenses in various categories are too low to provide the described program and are not reasonable compared to costs incurred by other schools and districts in the area, including:

- Transportation for students who cannot walk to school and students receiving special education;*
- Food services – it is unclear how costs will be covered, but the Petition promises that breakfast and lunch will be provided;*
- Special education encroachment – the amount budgeted for providing SPED services is low relative to average expenses for the District;*

- *Professional services;*
- *Furniture and equipment for start-up – in particular, the amounts budgeted to establish a school office and specialty rooms detailed in the educational program are inadequate; and*
- *Custodial services.*

5. Facility costs are underestimated and the intended facility is dangerous for children without extensive improvements.

Petitioners also underestimate facility costs. A proposed lease (the offer has since expired) for a former church at 13136 and 13284 Sierra Highway was included with the Petition.

The proposed lease would cost Petitioners \$96,000 a year and make Petitioners liable for maintenance and clean-up, including heating, air conditioning, electrical, plumbing, water systems, windows, doors, roofs, foundations, exterior walls, common areas, and brush clean-up of the surrounding property. Petitioners only budget \$2,500 to \$2,800 annually for building repairs and maintenance and \$10,000 to \$29,466 annually for “housekeeping” services. This dramatically underestimates the Petitioners’ likely expenses in maintaining an active, working campus with aging facilities.

The proposed lease leaves the Petitioners to make necessary improvements before the school opens. The property needs significant work to become ADA compliant, safe, and secure for elementary-age children. It sits on a two-lane highway with no sidewalk and a speed limit of 55 mph. A wash and culvert sits on the property next to a small parking area. The site has no fencing to separate children from the highway, keep them out of the culvert, or keep them from wandering into the scrub brush behind the site. Petitioners included a letter (Exhibit L) from an engineer estimating that \$100,000 will be needed to “have the building ready for occupancy within three months.” This is a very low estimate in light of Staff’s investigation of the site and experience with school construction projects. In any event, nothing appears to have been budgeted for any site improvements.

The proposed budget also does not allocate any expenses for facilities in the 2019/2020 school year, meaning the school would need to be prepared for opening in a few short weeks in July and August of 2020. However, the Petitioners own engineer estimated that three months would be needed just to physically prepare the site for occupancy. Once construction work was complete, additional time would be needed to furnish the site and prepare for students.

Finally, the site appears incapable of housing almost 500 students (as the Petition projects in year five) regardless of how many portable classrooms are added.

Even if two-story portables were used, there is insufficient space on the property to house that many students. Even if, as Staff expects, enrollment projections are not met, there is very little parking space and it is unclear how traffic and parking on Sierra Highway could be managed.

For these reasons, Staff has determined that the proposed site is not feasible and unsafe for children, and the Petition's proposed budget is insufficient to cover the cost of making the site safe and suitable for children. Even if the site were safe, the site is not large enough to accommodate enough students to let Petitioners hit the aggressive enrollment projections on which their Petition depends.

ECA Response:

This finding is materially misleading, inaccurate, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, and demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition because ECA's financial and operational plan is very reasonable, very adequate and covers all projected ECA expenses.

Enrollment

All new and established schools in California (district or charter) use projected enrollment and ADA to project funding. Therefore, ECA's enrollment and ADA projections must align with ECA's projected revenues. A budget narrative was not submitted with this petition budget. Thus this statement "*a number of contingency budgets will also be prepared to provide guidance in the event of an unexpected increase in expenses or a decrease in revenue,*" on page 238 of the petition refers to the description of ECA's proposed annual Budget process after the approval of the petition and not to the specific budget submitted with the petition. Hence, Staff's misinterpretation of ECA's annual budget process is irrelevant to the enrollment projections and is not a legal reason for denial of ECA petition.

Due to on-going and vigorous community outreach, ECA has received enrollment interest from PK-3 parents who are meaningfully interested in enrolling their child or children at our school translating to potential 396 students. ECA continues to receive student interest via our website and community events. ECA's proposed enrollment of 168 for grades TK-3 is definitely not unreasonable and aggressive considering that the total enrollment per grade level as clearly indicated in the petition ranges from 24 – 48.

It is misleading for Staff to compare Albert Einstein Agua Dulce Partnership Academy and iLEAD Agua Dulce hybrid programs which while "seat-based", both also offered or offer an independent study option for students as well, to ECA's solely seat-based proposed rigorous and college preparatory school with International Baccalaureate PYP and MYP vertical articulated programs. Seat-based programs in our outreach areas that offer similar college preparatory programs ECA proposes to offer have healthy and robust growth while maintaining over 700 students on a waitlist.

Location

AADUSD's Staff assertion that "*Petitioners propose to locate in a much more remote location on Sierra Highway, making it harder to attract students*" is factually misleading and a conjecture. ECA's proposed site is centrally located on Sierra Highway, a major alternate route for commuters and travelers between the Antelope Valley and the San Fernando Valley who want to avoid the excruciating traffic on CA Highway 14. The location is only about 5 minutes' drive from the CA Highway 14. Additionally, ECA at the request of some of our Agua Dulce and other families on May 31, 2018 requested via email to Superintendent King the possibility of leasing the former Albert Einstein Agua Dulce Partnership Academy facility. ECA never received a response from Mr. King. Later on ECA learned that the site has been taken over by iLEAD Agua Dulce which was approved hastily after AADUSD denied our petition. Nevertheless, ECA's proposed location is very accessible, will not negatively impact enrollment but will actually enhance enrollment.

Financial Plan

Budget reserves are not required by law for charter schools, but ECA has included these reserves to show its financial viability. ECA's financial projections exceed the required amounts for school districts, and AADUSD's own requirements, in every year of the charter term.

All new and growing schools in California (district or charter) have the same need for operating cash from the initial planning and opening until the State funds begin to be paid. As noted by Staff, ECA has already received a commitment letter from a funding partner to document that the cash needed to overcome this very common hurdle will be available (including during the startup period). The commitment letter has been included in the packet submitted for review.

In addition to a strong and viable financial and operational plan, ECA team has skilled grant writers who will consistently apply for all grants ECA is eligible for such as the Public Charter School Grant (PCSG).

Costs

Some of the costs listed in this section are repeat findings from previous petitions which have already been addressed.

ECA firmly believes that all its budgeted expenses are adequate to cover all the required expenses including special education services and transportation as evidenced in ECA's submitted budget. ECA's team and financial consultant conducted a thorough research into such costs for similar charter schools with similar size and population. AADUSD staff's conclusion that ECA's expenses would be comparable to regular schools and school districts such as AADUSD, despite the fact that AADUSD serves more than 3 times the number of students and oversees a significant amount of charter schools, is unreasonable.

The fact that Staff lacks adequate knowledge of facts and information in our Charter petition and supporting documents is not a reason for the denial of ECA petition. denial.

Transportation

ECA as a charter school, will be a school of choice. Hence, all our prospective families are aware that they are responsible for providing transportation for their children. If there becomes a need for transportation for ECA families, ECA will follow the District transportation protocol of charging parents for the transportation found on the AADUSD website at these links.

<https://www.aadusd.k12.ca.us/cms/lib/CA02214749/Centricity/Domain/33/Application%20Form%20School%20Bus%20Service%20%202019-2020.pdf>

<https://www.aadusd.k12.ca.us/cms/lib/CA02214749/Centricity/Domain/33/Bus%20Service%20Cost%20and%20information%20for%202019-2020.pdf>

<https://www.aadusd.k12.ca.us/cms/lib/CA02214749/Centricity/Domain/33/Transportation%20Guidelines.pdf>

Food Services

The budget includes revenues related to participation in the National School Lunch Program (NSLP) program. Please see Object codes 8220 and 8520 in the budget and the California Schools Accounting Manual (CSAM) guidance on pages 330-42 and 330-44 of the January 2019 CSAM Manual. We do not believe these codes have been changed in the past 2 CSAM editions, as such we are confused as to why you are unclear how we plan to pay for the expense in code 4700 Food Services. There is no difference in object codes used by Charters and districts in Standardized Account Code Structure (SACS) coding.

Special Education Encroachment

It appears that the Charter School Director and AADUSD staff has a lack of understanding of the term encroachment as it relates to Charter Schools and the Guidance in the CSAM related to the Object Codes 7141-7143. Encroachment is NOT related to the excess costs and deficit payments required from the unrestricted fund 01 in district accounting. Charter Schools are only allowed to use fund 62 which is an Enterprise fund and therefore do not report interagency transfers. SPED encroachment for Charter Schools is the fee that is charged by the SELPA for administrative and overhead costs. The amounts reported here are for administrative and overhead costs charged by the SELPA. The rate is based on the information publicly available on the El Dorado Charter SELPA website at <https://charterselpa.org/>

This is one of the basic and fundamental differences between district and charter school financial reporting that we would expect any individual evaluating a charter petition budget to know in order to properly evaluate financial information. As such we question the accuracy of the budget review comments due to an apparent lack of understanding of fundamental Financial Accounting Standards Board (FASB) Not For Profit (NFP) accounting principles and CSAM guidance.

The total budgeted special education cost clearly indicates ECA's commitment to serving the needs of its special education population. The fact that Staff lacks adequate knowledge of facts and information in our Charter petition and supporting documents is not a reason for the denial of ECA petition.

Professional Services

The budget includes professional fees in multiple accounts including Legal, Non-Educational and Educational Consultants. The comment lacks any substantive argument. We respectfully disagree with this subjective and vague comment.

Furniture and Equipment

The amount budgeted for furniture and equipment for start-up is consistent with other charter schools in the State with similar-sized populations based on ECA's Financial Management firm and similar Financial Management firms' data.

Custodial Services

The ECA budget included funds for all of the supplies needed for the Custodian to maintain a clean and safe environment. This amount is consistent with other charter schools in the State with similar-sized populations based on ECA's Financial Management firm and similar Financial Management firms' data.

The fact that AADUSD Staff repeated some exact findings from last petitions that have already been addressed indicates that Staff failed to review ECA's current petition accurately to support its findings. As described above, these are misleading unfounded findings for denial.

Facility

ECA would like to clearly point out that facility is not a reason to deny a petition by statute.

Therefore, it is unreasonable and an over-reach on the part of AADUSD Staff to call ECA's Realtor and question him about the property without notifying ECA's team. Despite ECA's realtor clearly confirming the information that we presented during the public hearing, staff still chose to assert unfounded and unsubstantiated conclusions about the facility in this report.

There is no evidence provided by Staff to show that the facility is dangerous nor that it needs extensive improvements. This building was most recently used as a church with all working utilities. ECA team and the owners of the property are still in negotiation about the lease of the property despite the standard 60 day timeline indicated on the lease proposal.

As a result, this finding is factually misleading and a conjecture. It is also conclusory because staff did not provide any substantiated evidence to support its assertions.

It is important to note that it is the responsibility of the owner to make sure that the property is leasable although ECA team is working closely with the owner to make sure the building is ready and meets the E occupancy standards.

Hence, AAUDSD staff based its conclusion under the assumption that ECA would be responsible for major structure replacements such as "roof, foundation, exterior walls". These items are outside of regular wear and tear that is included in the lease and as such, would be the responsibility of the landlord. The minimal repairs budgeted is to cover basic things such as common area maintenance, brush cleanup and basic repairs. The keyword in the Facility lease's term is **maintain**, "Tenant shall maintain the roof, foundation, exterior walls, common area, and brush clean up as needed." Prior to opening of school, the property owner will ensure the property meets all Los Angeles County Department of Public Works buildings and safety standards. The budget also includes a \$150,000 for tenant improvements and capital expenditures.

ECA team has notified AADUSD staff and Board on several occasions that it will provide a fence with a gate and video/audio call box around the school. We also notified Staff and Board that ECA has access to the acres of land in the property for parking and other needs of ECA as specified in the lease proposal. Hence, Staff's claim that the facility is not safe and adequate in size without any providing any corroborating evidence is misleading and puzzling.

ECA's reputable and locally based engineer's letter indicates that the building will be ready within three months and not that it will take three months to be ready. Therefore, Staff is misrepresenting the engineer's statement in the letter. ECA's engineering firm, the owners and our team are working with the Los Angeles County Department of Regional Planning to ensure that the building is E Occupancy ready which includes adjusting the speed limit to meet the speed limit in a school zone as is done in any area where there is a school.

This finding, therefore as already stated above, is factually misleading and a conjecture. It is also conclusory because staff did not provide any substantiated evidence to support its assertions. Most importantly, facility is an impermissible reason to deny a petition by statue.

AADUSD's finding 1A does not meet the legal standard for denial of a charter petition. Moreover, the enumerated findings in this section are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

AADUSD Finding:

B. The Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition because they present an unrealistic educational plan.

Petitioners propose to implement an International Baccalaureate (IB) program, but the Petition does not demonstrate enough familiarity with the IB program, or enough detail about implementation, to give Staff confidence that the Petitioners will be successful.

No current research is noted in the Petition to support its proposed educational program. Supporting research noted in the Petition is for International Baccalaureate (IB) programs based on trial implementation of the Primary Years Program (PYP) and Middle Years Program (MYP) without mention of teacher qualifications or the rigorous teacher training necessary to obtain IB certification. The Petition lacks focus regarding the teaching methodologies to be used with the intended student population, with language for instruction that is based on IB pedagogy, with a lack of concrete methods for the instruction of subject scope and sequence of skills.

Minimal information is provided regarding addressing the needs of English Language Learners, students below grade level, and other at-risk students. It is not clear how this IB program will support the needs of academically at-risk students. The Petition proposes 25 minutes of English Language Development for EL students, but this falls far short of what the District and surrounding school districts have found is necessary to meet local EL students' needs. Multi-tiered Systems of Support (MTSS) is mentioned, but vague.

The Petition does not identify the steps and provide a plan for hiring fully credentialed teachers and ensuring that all teachers are certified in the IB program. As discussed below, the Petition was not signed by a sufficient number of teachers actually credentialed to teach elementary grades.

For these reasons, Staff concludes that the Petitioners are demonstrably unlikely to successfully implement the program outlined in the Petition and the petition should be denied.

ECA Response:

This is a cut and paste repeat finding from the last petition submission which has already been addressed successfully. It is baffling why Staff keeps repeating a finding that is baseless, clearly in the petition, presented during the public hearing and easily accessible on the IB website on the internet. Additionally, ECA team has submitted several times a letter of support from the IB Regional Development Specialist based at the IB America's regional office in Maryland that unambiguously delineated the IB school development process and professional development.

Nevertheless, this finding is conclusory because it is based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore constitutes an impermissible basis for denial of the ECA establishment charter petition.

ECA's charter petition in meticulous details clearly documented the IB program and implementation. This information is found throughout the petition from the introduction to the conclusion. Additionally, during the Public Hearing, ECA Team shared that the team, including parents and teachers have attended IB forums and toured a successful IB charter school.

This finding is another troublesome example that Staff lacks adequate knowledge of facts and information in our Charter petition and supporting documents required to be able to review the petition with accuracy. Please see the letter of support from the IB Regional Development Specialist already in the petition.

Staff's statement that the petition lacks "*current research*" begs the question of whether Staff actually read our petition. There were many references to various ~~relevant~~ research from various years about ECA program throughout the petition and in the reference section such as the research just published this year, 2019 by Meloy, B., Gardner, M., and Darling-Hammond, L. (2019) found on page 33 of the petition. The fact that AADUSD Staff was unable to accurately use information easily found in our petition is troubling and therefore not a legal reason for denial.

Staff's assertion that "*Research for IB program is based on trial implementation of the IB Primary Years Program (PYP) and Middle Years Program (MYP)*" is unfounded and not existent in any ECA petition. There is no mention of any research on IB Trial Implementation in our petition. Hence, ECATeam wonders how Staff conjectured this finding. Also, the recruitment, hiring and professional development of teachers were discussed in details on pages 82 to 89 and in Element 5.

Staff's assertion that "*The Petition lacks focus regarding the teaching methodologies to be used with the intended student population, with language for instruction that is based on IB pedagogy, with a lack of concrete methods for the instruction of subject scope and sequence of skills*" is unclear, convoluted, vague and clearly demonstrates staff's lack of understanding of IB programs. The comment lacks any substantive argument. We respectfully disagree with this subjective and vague comment.

ECA's petition identified and described in great details the specific needs and challenges of all student groups "*English Language Learners, students below grade level, and other at-risk students*" including students with disabilities, homeless and foster youth, and socio-economically disadvantaged students, as well as strategies, including IB Inclusion Policy, to use to support these groups found on pages 89-139, "Addressing Special Populations".

The California Department of Education (CDE) does not have any required minutes for Designated ELD instruction. It is up to each LEA to determine the time allocated to Designated ELD. Our team consulted both the ELD specialists at the CDE and the curriculum specialists of the programs we propose to use for Designated ELD and confirmed that 25 minutes is adequate. However, as we implement the program, we will make any necessary adjustments needed to ensure that our students ELD needs are met. Hence, this is an impermissible reason for petition denial.

Please find below CDE's definition of Multi-tiered Systems of Support (MTSS) found on CDE's website at this link: <https://www.cde.ca.gov/ci/cr/ri/mtsscomprti2.asp>

CDE's Definition of MTSS

In California, MTSS is an integrated, comprehensive framework that focuses on CCSS, core instruction, differentiated learning, student-centered learning, individualized student needs, and the alignment of systems necessary for all students' academic, behavioral, and social success. California has a long history of providing numerous systems of support. These include the interventions within the RtI² processes, supports for Special Education, Title I, Title III, support services for English Learners, American-Indian students, and those in gifted and talented programs. MTSS offers the potential to create needed systematic change through intentional design and redesign of services and supports that quickly identify and match the needs of all students.

Based on the above definition, ECA's petition not only mentions MTSS but provided details how various aspects of MTSS will be provided at ECA throughout the petition such as the support for all student groups found on pages 89-139 "Addressing Special Populations" inclusive of SST and RTI, Positive Behavioral Interventions and Supports (PBIS), ECA's vertical articulation PK-8 structure, innovative IB Framework practices and ECA's Before and After School program.

This is information that someone who conducted a basic review of ECA's petition should know. Therefore, it is very troubling that Staff lacks knowledge of these ECA petition details and draws attention to the seriousness and the veracity of AADUSD staff's review of ECA's petition.

It is also categorically untrue that ECA's petition was not "*signed by a sufficient number of teachers actually credentialed to teach elementary grades*" as discussed below.

AADUSD's finding 1B does not meet the legal standard for denial of a charter petition. Moreover, the enumerated findings are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, show a lack of understanding of the International Baccalaureate (IB) program, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

Finding 2: The Petition does not contain the number of signatures required by Ed. Code § 47605(a)

AADUSD Finding:

A petition for the establishment of a charter school is required to be accompanied by signatures from teachers or parents. Education Code § 47605 (a)(1)(B) states that a "petition may be submitted . . . [if it] is signed by a number of teachers equivalent to at least one-half of the number of teachers that the charter school estimates will be employed at the school during its first year of operation." Section 47605 goes on to require, in paragraph (a)(3), that the signature must "mean[] that the teacher is meaningfully interested in teaching at the charter school."

If the Petition were approved, Eagle Collegiate Academy teachers would be required to hold a teaching credential or other teaching permit "equivalent to that which a teacher in other public schools would be required to hold." (Ed. Code § 47605(l).) Charter schools approved by a school district currently have some credentialing flexibility when it comes to non-core, non-college preparatory courses, but this flexibility is being phased out of the law beginning January 1, 2020.

In any case, as the Petition proposes to begin by serving grades Pre-Kindergarten through Third, there are no non-core, non-college preparatory courses offered by the school that could be staffed with non-credentialed employees. Preschool requires a Child Development Permit or Multiple Subject Teaching Credential, and teaching in elementary grades, including Kindergarten, requires a Multiple Subject Teaching Credential. The Multiple Subject Teaching Credential qualifies a person to teach all subjects in a self-contained classroom.

The Petitioners have opted to submit teacher signatures instead of parent signatures. The Petition proposes to have eight classrooms in the school's first year of operation (one Pre-Kindergarten class and seven TK-3 classes), meaning the Petition requires signatures from at least four teachers.

The Petition is accompanied by signatures of only three teachers with Multiple Subject Credentials. A review of publically available licensing information shows that one of these three teachers has an expired teaching credential. The Petition should have been accompanied with signatures from at least four teachers with Multiple Subject Teaching Credentials.

The other teachers who signed the Petition hold Single Subject credentials for teaching at the secondary level (Art, English, Math, Science, Korean) or Education Specialist Instruction Credentials for teaching students in special education. They are not credentialed to teach in grades TK-6.

All eight of the school's classrooms must be staffed with properly credentialed teachers, but the Petitioners have not submitted the required minimum of four signatures from such teachers.

For these reasons, Staff concludes that the Petition does not contain the number of signatures required by Ed. Code § 47605(a) and the Petition should be denied.

ECA Response:

AADUSD's finding 2 does not meet the legal standard for denial of a charter petition. Moreover, the findings are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

First and foremost, AB 1505 which updated the charter law including the requirements for non-core teachers to be credentialed goes into effect on **July 1, 2020** by statute, not January 1, 2020 as stated by AADUSD staff.

When we submitted our petition on September 26, 2019, the **eleven** teachers who signed the petition had valid credentials. The teacher whose credential just expired on November 1, 2019 is in the process of renewing that credential.

It is also inaccurate that ECA will only employ grade level teachers with multiple subject credentials. Since ECA will be offering Art as stipulated on pages 45 and 76 of ECA petition, ECA will be hiring a part time Art teacher. This position was accounted for in ECA budget. Although, Art is a non-core subject and charter schools have flexibility with the credential requirements for non-core subjects, ECA Art teacher has a valid Art credential authorizing the teacher to provide instruction in classes in grade 12 and below including preschool.

Since ECA will be offering a special education program and services, ECA will hire special education teachers or education specialists. The Education Specialist credential authorizes the holder to provide instruction among other services to special education students in K-12.

This information could be found in the Administrators Assignment Manual found on the California Commission on Teacher Credentialing CTC website.

Hence, ECA submitted more than 4 valid teacher signatures from teachers who are meaningfully interested in teaching at the ECA and meets the requirements to do so by statute. The comment lacks any substantive argument. We respectfully disagree with this subjective and vague comment.

As already stated above, AADUSD's finding 2 does not meet the legal standard for denial of a charter petition. Moreover, the enumerated findings are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

Finding 3: The petition does not contain reasonably comprehensive description of all of the 15 elements identified in Ed. Code § 47605(b)(5).

ECA Response:

This is also a cut and paste repeat finding from the last petition submission which has already been addressed successfully as seen in finding 1 above. These findings are factually inaccurate, vague, misleading and unsubstantiated.

To save time, ECA Team placed below in BLUE next to each finding in this section the page numbers in the petition where the information is found and any other pertinent response.

AADUSD's finding 3 does not meet the legal standard for denial of a charter petition. Moreover, the enumerated findings are based on incorrect facts, conjectures, reveal a lack of knowledge of basic pertinent and required school administration procedures necessary for a charter petition review, show a lack of understanding of the International Baccalaureate (IB) program, demonstrate a lack of familiarity with or disregard of the information and facts evident in the petition and supporting documents, or go beyond the requirements set forth in law, and therefore the findings constitute an impermissible basis for denial of the ECA establishment charter petition.

AADUSD Finding: Staff find that the Petition fails to include reasonably comprehensive descriptions of the following required elements:

A. ***Educational Program (Ed. Code § 47605(b)(5)(A))*** **Pages 17-140**

The Petition fails to include a reasonably comprehensive description of the proposed educational program in that it lacks or has insufficient descriptions of:

- *How the curriculum will align to student performance standards;*
- *The proposed teaching methodologies with a clear rationale relating them to the intended pupil population;*
- *How the school will address the needs of at-risk students and students performing below grade level; and*
- *How the implementation of the instructional program will be informed by the monitoring of pupil subgroups' academic progress.*

B. Measurable Student Outcomes (Ed. Code § 47605(b)(5)(B))

Pages 141-170

The Petition fails to include a reasonably comprehensive description of measurable pupil outcomes in that it lacks or has insufficient descriptions of:

- *School-wide student performance goals over a given period of time;*
- *Projected attendance, dropout, or graduation rate goals;*

C. Employee Qualifications (Ed. Code § 47605(b)(5)(E)) **Pages 180-188**

The Petition fails to include a reasonably comprehensive description of employee qualifications in that it lacks or has insufficient descriptions of:

- *The key staff positions within the charter school;*
- *A definition of what constitutes core, college preparatory courses and an affirmation that appropriately credentialed teachers will teach such courses;*
- *Key qualifications of teachers and other key positions; and*
- *How the charter school will recruit fully credentialed teachers with appropriate IB certifications. (There is no prior training requirement for IB teachers. Training occurs after hiring. See Support Letter)*

D. Health and Safety (Ed. Code § 47605(b)(5)(F)) **Pages 189-195**

The Petition fails to include a reasonably comprehensive description of the health and safety element in that it lacks or has insufficient descriptions of:

- *Assurances that the school's facilities will comply with state building codes and ADA access requirements, or evidence that the school's intended facilities comply;*
- *Earthquake preparedness; and*
- *References to or the inclusion of more detailed health and safety policies and procedures for the charter school. Appendix N*

Staff has serious concerns about the Petitioners' ability to transform their intended site into a safe, secure, ADA-compliant school site as discussed previously. See Finding 1.

E. Employee Rights (Ed. Code § 47605(b)(5)(K)) **Pages 231**

The Petition fails to include a reasonably comprehensive description of employee rights in that it makes no mention of whether employees could carry leave balances or service credit to any other school, or any process for doing so.

This finding is vague. ECA is not in a position to dictate whether employees could carry leave balances or service credit to any other school, or any process for doing so because it is a decision that the other schools and districts have to make.

The findings in this area are further examples that Staff lacks adequate knowledge of facts and information in our Charter petition and supporting documents.

* * *

As demonstrated herein, the Eagle Collegiate Academy establishment charter petition meets or exceeds the legal requirements for approval, and AADUSD's Findings are impermissible bases for denial of the charter petition. Eagle Collegiate Academy team reiterates that it has been responsive to AADUSD's findings.

We urge AADUSD Board of Trustees to consider the Legislative intent behind the Charter Schools Act, that "charters schools **are and should become an integral part** of the California educational system and that **establishment of charter schools shall be encouraged.**" (Education Code Section 47605(b), emphasis added.) and approve ECA petition.

The Eagle Collegiate Academy team is committed to providing a high quality education for its students and seeks approval of this establishment charter petition to serve its students for the term of July 1, 2020 through June 30, 2025. Should you have any questions about the contents of the letter, please do not hesitate to contact us via email (eaglecollegiate@gmail.com) or phone 661-347-6016 if you have any questions.

Sincerely,
Board of Directors
Eagle Collegiate Academy

EXHIBIT 1



October 10, 2019

The parties, the Acton-Agua Dulce Unified School District, and *Eagle Collegiate Academy*, agree to extend the date by which the School Board takes action to grant or deny the charter to establish *Eagle Collegiate Academy* by up to an additional 30 days. (Education Code 47605(b)).

By statute, the 60-day timeline for Board action on the petition is November 25, 2019. The 30-day extension will require the Acton-Agua Dulce Unified School District Board to take action on or before December 25, 2019.

By signing below, the parties indicate their agreement to the extension and to the timeline.

Ken Higginbotham, Lead Petitioner
Eagle Collegiate Academy

Acton-Agua Dulce Representative

Date

Date



Eagle Collegiate Academy

A proposed Pre-K to 12th College Preparatory Charter School
Excellence * Authentic-Audacity * Globalism * Leadership * Empowered-Egalitarianism

October 17, 2019

Ogo Okoye-Johnson, Ph.D.
Chief Executive Officer

**Eagle Collegiate
Academy
Board of Directors**

Ken Higgingbotham
President

Amaka Donn
Vice President

Prest Oshodi
Secretary

Ben Geronimo
Treasurer

Angela Hill

Don Rimac, Ed.D.

Mark T. Young, Esq.

Mr. Lawrence King, Superintendent
Acton-Agua Dulce Unified School District
32248 Crown Valley Road
Acton, CA 93510

Dear Superintendent King,

Re: 30-Day Extension for Petition Review

I am writing this letter in response to Ms. Pattison's request for a 30-Day extension to review our charter petition. Our team never requested an extension and will not be requesting an extension due to the following:

1. We met with Ms. Pattison on June 12, 2019 to notify her about Eagle Collegiate Academy's (ECA) plan to submit a charter school petition to Acton-Agua Dulce Unified School District (AADUSD), and to discuss how we can work together with AADUSD to serve families and what AADUSD would like to see us do. She directed us to the AADUSD website to access AADUSD's Charter School Policy, or "the Policy". When we notified Ms. Pattison that the Policy on the website was from 2005, she handed us pages 5-9 of what she told us were pages from the updated and board approved Charter School Policy which supersedes any other charter policies. She stated that pages 5-9 are the relevant pages we should focus on as we prepare our petition. She emphasized that we should adhere to the information on pages 5-9 regardless of what may have been done or said during our previous submissions.

2. On August 29, 2019, following the directions in pages 5-9 of the Policy pages Ms. Pattison gave us, I emailed ECA's letter of intent to submit a charter petition to Ms. Pattison so that the District will work with us to determine the "timeline for submission, review and decision" as specified in the Policy.

3. On August 30, 2019, Ms. Pattison acknowledged receipt of the letter of intent and asked which Board meeting date ECA team wanted to submit our charter petition.

4. On September 3, 2019, I notified Ms. Pattison via email that we plan to submit ECA charter petition during the September 26, 2019 Board meeting.

5. We did not receive any other communication or directives from Ms. Pattison or AADUSD about "timeline for submission, review and decision" as specified in the Policy.

On Thursday September 26, 2019, using the Policy we received from Ms. Pattison on June 12, 2019 as a guide, ECA's vice president of Board of Directors submitted a binder with our petition during the AADUSD Board meeting. When additional petition binders were requested by the Superintendent, our vice president stated that we will provide more petition binders as needed although the Policy we received from Ms. Pattison **never** indicated how many petition binders were to be submitted.



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That same evening, Ms. Pattison sent ECA an email with a document entitled “Charter Submission Procedures” requesting 7 petition binders total, an electronic version of the entire charter petition, and an electronic version of the budget for Ms. Lynn David, Assistant Superintendent for Business Services.

6. On Friday September 27, 2019, we submitted 6 extra petition binders to the district that were received by the receptionist on behalf of Ms. Pattison. We also emailed the electronic version of our charter petition to both Ms. Pattison and Ms. David, although the Policy we received from Ms. Pattison **never** indicated that any electronic versions of the petition should be submitted.

7. Ms. David acknowledged the receipt of the electronic documents that same day. Ms. David requested that she would like the FCMAT Calculator version of our budget because that is what she “request[s] for every petition and from every charter that is authorized by AADUSD.”

Although the Policy given to us on June 12, 2019 and even the “Charter Submission Procedures” emailed by Ms. Pattison on September 26, 2019 **never** indicated that Ms. David and AADUSD prefers or requests that the FCMAT calculator be used to develop our petition budget, and although our Financial Consultant used an acceptable LCFF calculator that has been used in other charter petition budgets to develop our budget, we asked our financial consultant to redo our budget using the FCMAT calculator.

8. On Monday September 30, 2019, within 24 work hours of Ms. David’s request, we submitted the updated FCMAT version of our budget to Ms. Pattison and Ms. David noting that ECA revenue increased by \$750.

9. On the same day, Ms. Pattison sent an email acknowledging the receipt of the petition binders and a timeline of submission (September 26, 2019), public hearing (October 10) and vote (November 14).

10. Although, the budget in the petition binders submitted was feasible, we decided to submit hard copies of the updated FCMAT version of our budget to be given to the Board of Trustees. However, Ms. Pattison was not in the office all day Monday to approve the replacement of the hard copy of the budget using the FCMAT calculator in the petition binders, which were still in her possession.

11. On October 1, 2019, Dr. Okoye-Johnson called at 10:35 am and received a verbal permission from Ms. Pattison to come and replace the hard copy of the budgets in the petition binders.

At 11:35 am, Ms. Pattison called ECA and notified Dr. Johnson that the timeline for public hearing (October 10) and vote (November 14) she had emailed to ECA on September 30, 2019 will not be changed.

12. On October 3, 2019, at 8:19 am, Ms. Pattison called ECA and informed Dr. Okoye-Johnson that AADUSD has decided to move ECA’s public hearing to October 24th.



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At 8:46 am, Ms. Pattison called ECA again and notified Dr. Okoye-Johnson that AADUSD may need a 30-day extension to review the petition. Dr. Okoye-Johnson enquired if AADUSD would hold a Capacity Interview with our team since Capacity Interview was listed in the Policy as a possibility but not included in the timeline we received from Ms. Pattison. Ms. Pattison indicated that a Capacity Interview would be held for ECA. She also stated that she prefers electronic documents with the petition and appendices merged as one file.

Although the Policy given to us on June 12, 2019 and even the "Charter Submission Procedures" emailed by Ms. Pattison on September 26, 2019 **never** indicated that both the petition and the appendices should be merged, and although Ms. Pattison stated that we do not have to send her the merged documents, at 3:44 pm, Dr. Okoye-Johnson emailed Ms. Pattison, Ms. David and Ms. McCauley the link with the electronic version of the merged petition and appendices.

13. On October 4, 2019, Ms. Pattison at the request of Dr. Okoye-Johnson emailed the dates she is available to hold a Capacity Interview. She also indicated in the email that a 30-day extension letter needed to be signed by our lead petitioner, and returned to her prior to the public hearing now scheduled on October 24, 2019.

14. On October 9, 2019, I emailed ECA team's chosen date for the Capacity Interview to Ms. Pattison.

15. On October 10, 2019, Ms. Pattison emailed drafted 30-day extension request to ECA asking for Mr. Higginbotham to sign the request and return to her.

Our team has followed the guidelines in the Charter Policy we were given on June 12, 2019 by Ms. Pattison. We have also complied with all the requests from Ms. Pattison and AADUSD and have provided all additional requested information and documents that were not stipulated in the Policy to ensure that AADUSD has all the necessary information needed to review our petition.

Our team has taken considerable time to consider AADUSD's request for a 30-day extension. However, for the reasons stated above we respectfully do not agree to the 30-day extension request.

We are available to answer any questions you may have.
Your continued support and efforts are appreciated.

Best Regards,
Ken Higginbotham

Ken Higginbotham
President, Board of Directors
Eagle Collegiate Academy

cc: Acton-Agua Dulce Unified School District's Board of Trustees



October 18, 2019

Mr. Higginbotham
President, Board of Directors
Eagle Collegiate Academy

Re: 30-day extension.

I am writing this letter, to clarify the purpose of the 30 extension, and address statements made in the letter received from Mr. Higginbotham.

The 30-day extension may be requested from either the district office, or the petitioner. At no time was it suggested that Eagle Collegiate requested the 30-day extension. The 30-day extension letter has been requested of all petitioners who submit petitions that may exceed, or come close to the 60-day timeframe of Board decision. When there are concerns, and/or additional materials that may be required, the extension gives the charter petitioner time to address these concerns and provide supporting materials. The extension also gives the District time to review the petition.

The following are responses to your specific numbered statements.

#1- During the meeting that Mr. Higginbotham, and Dr. Johnson attended, pages 5-9 of the charter policy was given to them because it included additional language, with respect to submission procedures. At no time did I state that this outline was the only process for submissions. The issue with providing enough binders for Board members was an issue last year, when Dr. Johnson failed to provide the Board with enough copies, due to Board member, Christine Figueroa, having "broken her back" and not being able to bring the binders to the board meeting. The remaining pages of the charter policy did not apply to new submissions, and therefore was irrelevant to the process Eagle Collegiate Academy was preparing for.

#5 & 6 – Due to our previous meeting, no further communication was required on behalf of the Office of Charter Schools (OCS). A timeline had been established for submission, and during our meeting Eagle Collegiate Academy was informed of future Board Meeting dates. Tentative

timelines for public hearings, and Board votes are given after the charters petition has officially been received by the Board, during regularly scheduled Board meeting.

The email sent with instructions for submission had been previously communicated, and has been standard practice that Eagle Collegiate has participated in on at least 3 occasions. A request for information, clarifications, and additional materials, are normal operating procedures. When there is a problem with an electronic file, we will request a copy that is manageable for uploading for public, and Board viewing.

#9, 11, 13 – I received a phone call from Dr. Johnson on 9/30/19, at 9:26am, with a contact number to reach her at. During our conversation I was asked by Dr. Johnson if we could move the date of the public hearing to a later date. She stated that the Board President would not be in town. At that time the schedule had already been set, and I was unsure if I would be able to accommodate that time. I mentioned to her that if that day were to change we would want to have a 30-day extension, so that there was time to review the petition, to extend the vote. I let her know that the lead petitioner, Mr. Higginbotham, would need to sign it and scan it back to me. She made mention that she was not sure that he had access to the internet, or way to receive/send the information. Through several back and forth phone conversations with Dr. Johnson, it was agreed that the date of the public hearing would be changed to October 24, 2019, which did not change the date of the board vote. In these later conversations she stated that the plans had changed and Mr. Higginbotham would be able to attend the October 10, public hearing. Due to the date of this information, the public hearing had to remain at October 24, 2019, due to the public having to be notified the required number of days prior to the public hearing.

During the Capacity meeting it was conveyed that the 30-day extension is a mutual agreement, and at no time was it implied or suggested that Mr. Higginbotham had to sign in affirmative. Give the 60-day timeline for District action on a charter petition, it was imperative that a deadline for and extension be set.

There have been numerous in person, email, and phone communications with Dr. Johnson, with the hopes of answering questions, providing support, and accommodating time schedules in the petition process.

To ensure that there are no further miscommunications of information, and that all parties are presented and provided with accurate information, please provide all future correspondence through email, to include Lynn David, and Eric Stevens, who are cc'd on this email.

Should you have any additional questions, or concerns, please feel free to contact me via email.

Nesha Pattison
Director of Charter Services
Acton-Agua Dulce Unified School District
www.aadusd.k12.ca.us
P: 661-269-0750 | Extension #101
npattison@aadusd.k12.ca.us



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October 23, 2019

Ogo Okoye-Johnson, Ph.D.
Chief Executive Officer

Ms. Nisha Pattison, Director of Charter Schools
Acton-Agua Dulce Unified School District
32248 Crown Valley Road
Acton, CA 93510

Eagle Collegiate Academy
Board of Directors

Dear Ms. Pattison,

Re: 30-Day Extension Response

Ken Higginbotham
President

I am disappointed that your response to my chronological, accurate and evidence-supported documentation of our team's decision not to agree to your request for a 30-day extension gives an appearance of a personal attack on Dr. Johnson based on inaccurate statements, implies a non-existent miscommunication between us, and assumes our team's lack of clarity "about the purpose of the 30 extension."

Amaka Donn
Vice President

Prest Oshodi
Secretary

I affirm that our team had an excellent understanding about the intent and reason for a 30-day extension as specified in *EC* Section 47605(b) prior to my initial letter dated October 17, 2019.

Ben Geronimo
Treasurer

Angela Hill

Response to your numbered items:

Don Rimac, Ed.D.

#1. We stand by our statement that you asked us to use only the information on pages 5-9 of the charter policy you gave us because you wanted to make sure we do not use the charter policy from 2005 found on the AADUSD website or the charter policy given to Eagle Collegiate Academy (ECA) by the previous Charter School Director. Please refer to initial letter dated October 17, 2019.

Mark T. Young, Esq.

I have thoroughly reviewed the email communications between you and our team from last year, reviewed our phone records and had conversations with the team. Here are the facts: On September 12, 2018 after our team's several emails requesting a meeting with you, Board member Figueroa, stopped by the District Office to submit our petition, as ECA had done in the past, and also in order to meet the California Department of Education's Public Charter School Grant Program's timeline. You refused to accept the petition and directed her to bring the petition to a Board meeting. As you are aware, Dr. Johnson was not present at the meeting with you and Ms. Figueroa.

On Sept 27, 2018, Board member Figueroa and then Board President Dr. Rimac attended the AADUSD Board meeting and submitted ECA's petition binders. Dr. Johnson was not present during this submission also. Hence your accusation that Dr. Johnson failed to provide the Board with enough copies, due to Board member, Christine Figueroa, having "broken her back" and not being able to bring the binders to the board meeting" is not based on facts. The fact remains that while the policy you gave us on June 12, 2019 did not specify how many petition binders needed to be submitted, we gave you the extra binders within 24 hours.

#5 & 6. No timeline for submission was established during our meeting with you on June 12, 2019 because we had not decided when to submit nor have sent your required letter of intent,



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(LOI). No email regarding the instructions for submission was sent to ECA by you after we submitted our LOI, and before we submitted our petition. Please refer to initial letter dated October 17, 2019.

#9, 11, 13. There are some inaccurate statements made by you in this section.

Dr. Johnson did not have a phone conversation with you on September 30, 2019 since you were not in the office all day on September 30, 2019. However, Board member Dr. Rimac and Dr. Johnson stopped by the District Office on September 30, 2019 hoping to meet with you to discuss the timeline for the public hearing and board vote. They were advised by the District receptionist that you were out in the field and to leave a number for you to call back in case you came in to the office. They did so and left. At 2:11 pm, you sent an email acknowledging the receipt of the petition binders and a timeline of submission (September 26, 2019), public hearing (October 10) and vote (November 14). Please refer to initial letter dated October 17, 2019.

On October 1, 2019, Dr. Johnson called at 10:35 am. At 11:35 am, you called ECA and notified Dr. Johnson that the timeline for public hearing (October 10) and vote (November 14) you had emailed to ECA on September 30, 2019 will not be changed. That was when Dr. Johnson asked on my behalf if it was possible to hold the Public Hearing on October 24, 2019. However, you stated that you would not be able to change the date. There was no discussion of 30 day extensions during this call. Dr. Johnson notified me same day, October 1, 2019 that you were unable to adjust the October 10, 2019 public hearing date.

Hence, I was surprised to learn that two days later, on October 3, 2019, you called ECA twice and informed Dr. Johnson that AADUSD has decided to move ECA's public hearing to October 24, 2019 and notified her that you may need a 30-Day extension. On Thursday October 10, 2019, you emailed the 30-Day extension request. On Monday October 14, 2019, I sent you an email that our team will get back to you with our Board's decision.

Dr. Johnson spoke with you over the phone only 3 times: one time on October 1, 2019 at 10:35 am which Dr. Johnson initiated; and two calls initiated by you on October 3, 2019. These calls could hardly be characterized as "back and forth," "several" and "numerous." The chronology of our communications with you, which were mostly via email, has been detailed in my initial letter. Please refer to initial letter dated October 17, 2019.

It is important to note that our team has complied with all requests made of us with no issues. However, not dealing with facts is extremely dangerous and could lead to the mischaracterization of events and people. As a result, our team and families are deeply concerned about your Charter Office's ability to give this new charter petition a fair and equitable review.

Your continued support and efforts are appreciated.

Sincerely,
Ken Higginbotham

Ken Higginbotham
President, Board of Directors

cc: Lawrence King, Superintendent
Acton-Agua Dulce Unified School District's Board of Trustees