



Los Angeles Unified School District

OFFICE OF THE GENERAL COUNSEL

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RAMON C. CORTINES
Superintendent of Schools

DAVID HOLMQUIST
General Counsel

June 23, 2015

Michael Janofsky
LA School Report
SENT VIA ELECTRONIC MAIL
michael218@gmail.com

Re: Public Records Act Request

Dear Mr. Janofsky:

This letter is in response to your California Public Records Act request seeking a copy of the tort claim filed by Rafe Esquith.

Your request has been reviewed and pursuant to California Government Code Section 6253(b), the District is producing copies of responsive records. See attached.

Should you have any questions, please contact the Office of General Counsel at (213) 241-7600 and reference the following OGC Control number: # **0028555**.

Sincerely,

Onelia Vazquez

Onelia Vazquez,
Senior Paralegal

/ov

GERAGOS & GERAGOS

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ORIGINAL BOARD
SECRETARIAT

June 22, 2015

**CLAIM AGAINST LOS ANGELES UNIFIED SCHOOL DISTRICT
AND RAMON C. CORTINES
(Government Code Section 910)**

TO:

Liability Claim Department
Los Angeles Unified School District
333 S. Beaudry Ave, 24th Floor.
Los Angeles, California 90017

Name and Address of Claimant:

Rafe Esquith
c/o Mark Geragos, Esq. and Ben Meiselas, Esq.
GERAGOS & GERAGOS, APC
644 South Figueroa Street
Los Angeles, California 90017

Address to Which Notices Should be Sent:

Mark Geragos
geragos@geragos.com
Ben Meiselas
ben@geragos.com
GERAGOS & GERAGOS, APC
644 South Figueroa Street
Los Angeles, California 90017
Phone: 213.625.3900
Fax: 213.232.3255

Entity / District Employees Involved:

Los Angeles Unified School District
Superintendent Ramon C. Cortines
DOES 1-50

How the Damages or Injuries Occurred

A. Introduction to Action

It is with a deep sadness and a heavy heart that Rafe Esquith—dedicated and lifelong public servant to Room 56 of Hobart Elementary School—has been compelled to bring this claim against the Los Angeles Unified School District and directly against Superintendent Ramon C. Cortines.

Pursuant to California Government Code Section 910, Mr. Esquith hereby initiates his formal claims for (1) reinstatement, (2) violations of Federal and State Due Process, and (3) irreparable damages caused to his career and reputation.

By this notice, Mr. Esquith further initiates a claim for a formal class action complaint on behalf of thousands of well-respected teachers deprived of their rights by the Los Angeles Unified School District.

These teachers, who have been living in the shadows – serving undefined sentences in LAUSD’s despised teacher-jail – have had their careers, lives, families, and reputations destroyed by McCarthyism-like “investigations” by LAUSD “investigators” and subsequent kangaroo-court-administrative-procedures designed to force out older teachers.

These actions are being brought against the Los Angeles Unified School District and directly against Superintendent Ramon C. Cortines who has sadly proven himself to place personal interests, the interests of disconnected bureaucrats, and the protection of a clearly flawed administrative system, over teachers who are actually in the classroom and the students of this District.

Teachers are afraid to teach. Parents have lost confidence in a District so quick to unlawfully purge itself of its best and brightest teachers. This legal action is therefore compelled by LAUSD’s conduct and recklessness toward its true constituents.

B. The Rafe Esquith Action

i. About Mr. Esquith

Mr. Esquith taught at Hobart Elementary School since 1984. Mr. Esquith received national recognition for his teaching abilities. Room 56, the classroom where Mr. Esquith taught, became legendary as an incubator for the best and brightest students in California, who went on to the best colleges and graduate programs, and made powerful changes in society.

The students who attend Hobart Elementary are typically first generation Americans and/or come from underprivileged backgrounds. Through an unconventional teaching style, including the support of classics, from Shakespeare to Twain, and through introducing music and arts into Room 56, Mr. Esquith's students have excelled. Room 56 students have the highest graduation rates. Room 56 students routinely go on to top universities and graduate programs.

While Mr. Esquith's teaching style is not influenced by the pressures of standardized testing, the result of his teaching style is that his students score the highest on all testing-metrics. Most recently, Mr. Esquith has been critical of the LAUSD iPad program, arguing instead for an investment in the arts and music in the classroom.

Mr. Esquith was awarded the Disney National Outstanding Teacher of the Year Award, a Sigma Beta Delta Fellowship from John Hopkins University, Oprah Winfrey's \$100,000.00 "Use Your Life Award," Parents Magazine's "As You Grow Award," and the National Medal of Arts. Mr. Esquith was also made an honorary member of the Order of the British Empire for his teaching achievements. Mr. Esquith is also a perennial New York Times Best Selling Author of books relating to his teaching philosophy and on education.

Mr. Esquith's classes are regularly attended by school administrators, superintendents, and educators from around the world seeking insight into his successful teaching strategies. His classes are also regularly attended by former students whose lives have been changed by his teachings. Attached hereto as *Exhibit "A"* is a sample of testimonials about Mr. Esquith and his teaching abilities from notable leaders and organizations.

Notably, while superintendents and educators from across the United States and the world have visited Mr. Esquith's classroom, Superintendent Cortines has never once made a visit to room 56. Superintendent Cortines has never once attended a performance by Mr. Esquith's Hobart Shakespeareans. Superintendent Cortines has never once even said hello or introduced himself to Mr. Esquith since he has been with the District.

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ii. *The Mark Twain "Incident"*

Since 1989 Mr. Esquith has run a private nonprofit organization known as the Hobart Shakespeareans. Mr. Esquith has never made money from this organization and has personally contributed thousands of dollars of his own financial contributions to this organization. Mr. Esquith donates the money he gets from speaking engagements directly to the Shakespeareans. The reason Mr. Esquith started the Shakespeareans was because LAUSD was not contributing money to music and the arts and Mr. Esquith believed that such an investment was critical. Mr. Esquith's instinct was obviously correct, given the unquestionable success of his students.

On or around March 19, 2015 Mr. Esquith was called to a meeting by Hobart Elementary School Principal Jonathon Paek. When Mr. Esquith entered the meeting, Hobart's "technology coordinator" Barbara Hayden was present. Ms. Hayden was crying and stated "I don't want this to ruin our friendship." Mr. Esquith did not understand what she was talking about or why she was crying. Principal Paek then stated, "You have nothing to worry about. This is a bump in the road. I need to counsel you that you need to be careful what you say in front of students." Mr. Esquith did not understand what Principal Paek was talking about. The meeting ended without any other substantive communications about what Principal Paek or Ms. Hayden were talking about. Mr. Esquith left the meeting confused but did not think much of it.

As further indication that Mr. Esquith had every reason not think much of this meeting with Principal Paek and Ms. Hayden was the fact that Mr. Esquith went right back to his classroom.

In fact, Mr. Esquith's classroom was selected by Principal Paek and Ms. Hayden to take the three-day computerized "Common Core Test" before other classes beginning March 23, 2015. Hobart was nervous about the rollout of the Common Core Test and wanted to use Mr. Esquith's class, as their testing-ground for the program's rollout, given the success and discipline of Mr. Esquith's students. Mr. Esquith, along with Ms. Hayden, supervised students during the Common Core Test.

Spring Recess took place the week of March 30, 2015 – April 3, 2015. On or around April 7, 2015, following Spring Break, Principal Paek came into Mr. Esquith's classroom and discussed that the District forwarded a "complaint" to the California Teacher Credentialing Committee. Mr. Esquith remained in his classroom with the students. Principal Paek did not give more details, but again stated, "you have nothing to worry about. I will help you. This is about nothing."

On or around April 8, 2015, Principal Paek called Mr. Esquith into his office. Principal Paek explained that it was Barbara Hayden, the technology coordinator, who made a complaint that Mr. Esquith made a joke about “nudity” in front of students and that this could be deemed offensive to students and their parents.

Mr. Esquith told Principal Paek that he had no idea what he was talking about, that no parent or student or teacher has ever complained to him or about him for his jokes, and that while he does make jokes in front of his classroom, all jokes need to be understood within their literary context in which they are made.

Mr. Esquith explained that the joke that Ms. Hayden was evidently complaining about related to a Mark Twain passage. The use of this particular joke that Ms. Hayden found offensive was in the context that LAUSD was not funding the arts and sciences, and if not enough funds were raised for the annual Shakespearean play, which Mr. Esquith was funding entirely from his own pocket and from private donations that, “we will all have to play the role of the king in Huckleberry Finn.”

Mr. Esquith went on to quote directly from Mark Twain:

At last, when he'd built up everyone's expectations high enough, he rolled up the curtain. The next minute the king came prancing out on all fours, naked. He was painted in rings and stripes all over in all sorts of colors and looked as splendid as a rainbow. And... well, never mind the rest of his outfit—it was just as wild, but it was really funny. The people nearly died laughing. And when the king finished prancing around and capered off stage, they roared and clapped and raged and guffawed until he came back and did it all over again.

Principal Paek explained that he was receiving “pressure” from the District who demanded Mr. Esquith issue a formal apology. Principal Paek reiterated that he was assured by the District that “nothing bad was going to happen,” but that the “District” wanted Mr. Esquith to sign a written apology acknowledging that his statements might be viewed as “serious” and may have made “others uncomfortable.” Mr. Esquith, who was not represented by a lawyer at the time, nor instructed that he should have a lawyer, did what any teacher in his position would do and followed the request of his Principal and wrote:

I am deeply and sincerely sorry that any comment someone heard, *or thought they heard*, has anyone uncomfortable. I am a teacher who prides himself on professionalism I dress immaculately for the job. Over a thousand teachers a year come to my class to seek my guidance about the profession of teaching. As a proud teacher, I am deeply saddened by this situation.

Mr. Esquith returned to the classroom. He spent Thursday April 9, 2015 in the classroom. On Friday April 10, 2015, at the end of the day, Mr. Esquith received a notice from the District informing him he was to report to teacher-jail, until further notice. Everything that was represented to Mr. Esquith by Principal Paek (or, which was likely represented to Principal Paek by the District) was false. In a moment, Mr. Esquith's extraordinary career had come to an abrupt halt.

LAUSD issued a formal gag order against Mr. Esquith prohibiting him from communicating with students and parents. Mr. Esquith received hundreds of emails and calls each day from parents and students to which he was not permitted to respond.

Mr. Esquith, who directs and produces all aspects of the annual Hobart Shakespearean play was forced to cancel the performance. LAUSD claimed they were taking these actions to protect the "safety of its students." Obviously, LAUSD's invocation of "student safety" was complete pretext given that if safety was the *real concern*, Mr. Esquith's students would not have been selected for the common core testing, after Mr. Esquith met with Principal Paek, and Mr. Esquith would not have been permitted to be in the classroom for weeks after the statement was made. It became apparent that LAUSD had a different agenda.

iii. The Accusing Teacher Concedes There Was No Merit to Her Complaint

Although LAUSD prevented Mr. Esquith from contacting teachers, students, or parents, they did not prevent teachers from contacting Mr. Esquith.

On April 22, 2015, at 2:00 PM, Ms. Hayden wrote to Mr. Esquith:

I just want you to know that I am here for you and if there's anything you need, please let me know! My thoughts are with you constantly, and I wish you the best resolution possible! Barbara.

Attached as *Exhibit "B"* is a true and correct copy of this email

On April 29, 2015 Ms. Hayden wrote to Mr. Esquith:

Everybody misses you a lot, especially the kids of course, and you'd be proud! (See also, *Exhibit "B"*)

On June 16, 2015 after the television network KCAL first reported about Mr. Esquith's removal from the classroom, Ms. Hayden wrote:

Hi Rafe, I hope you are doing well! I was so pleased to read the article and statement that your lawyer, Mark Geragos, put out! You are known for always getting quality, and it shows with your choice of lawyer! (I'm sure you would've gotten F Lee Bailey if he was still available). I Wish you the best! Warm regards, Barbara.

Attached hereto as *Exhibit "C"* is a true and correct copy of Ms. Hayden's June 16, 2015 email commending Mr. Esquith's selection of attorneys and wishing him "the best."

As evidenced by the cover letter of *Exhibit "B"* and as admitted by the LAUSD investigators assigned to this "matter," the LAUSD investigators never once asked Ms. Hayden as part of their "investigation," if she had been writing to Mr. Esquith. Ms. Hayden was never asked about her views toward Mr. Esquith's removal from the classroom.

Additionally, the LAUSD investigators have also ignored the letter they received from the California Teacher Credentialing Committee rejecting the claim against Mr. Esquith and closing their file at the State-level.

On May 27, 2015, the California Commission on Teacher Credentialing rejected LAUSD's claim against Mr. Esquith. Attached hereto as *Exhibit "D"* is a true and correct copy of the letter sent by the State of California to LAUSD rejecting the claim and closing their file.

Nonetheless, despite emails from Ms. Hayden and the letter from the State of California, on Friday, June 19, 2015 Superintendent Cortines sent a defamatory press release to all media stating that the "investigation" would take until August and he would not be "rushed" in the investigation.

Accordingly, an investigation which should have lasted less than *6 minutes* will apparently take *6 months* to complete, while LAUSD investigators engage in a fishing expedition trying to find negative facts – unrelated to the initial investigation -- about Mr. Esquith to further harm his reputation. LAUSD has hired and assigned two full-time investigators, at tax-payers' expense for this purpose.

iv. The Conditions of Teacher Jail

LAUSD maintains a nondescript, fenced-in, warehouse facility located at 2151 North Soto Street, Los Angeles, California 90032. This facility is referred to by LAUSD as “Educational Service Center-East,” but to those unfortunate teachers who have spent time behind its walls, it is known more commonly as “teacher jail.”

At its core, teacher jail is a form of psychological torture where, teachers spend 6 hours in a cubicle staring at a wall.

Mr. Esquith was forced to teacher jail beginning the week of April 13, 2015. There, Mr. Esquith was assigned a cubicle. He checked in each day to a receptionist seated behind a glass wall at 8:00 am. He sat at the cubicle from 8:00 AM through 2:30 AM.

Mr. Esquith was not allowed to communicate with other teachers. Mr. Esquith was not allowed to use the computer. Mr. Esquith was given one 30 minute lunch break and another 20 minute “stretch break” during the day.

On May 4, 2015, while in teacher jail, Mr. Esquith received a letter from LAUSD informing him that “there is an ongoing investigation about allegations concerning events or conduct in which you may have been involved. While this investigation is taking place, and unless otherwise directed or reassigned, you are to remain at home in paid status during your reassignment to the ESC.”

Attached hereto as *Exhibit “E”* is a true and correct copy of this May 4, 2014 letter.

v. The Investigation and Interview of Rafe Esquith

a. The Investigation

LAUSD assigned at least two investigators whose full-time job became *not* to investigate the allegations made by Ms. Hayden, but to apparently investigate Mr. Esquith and his affiliations. A despicable and shocking investigation took place. Parents of students in Room 56 confirm that their students were pulled from class, without parental consent, and grilled by adult-male investigators who made derogatory comments about Mr. Esquith.

Unlike Mr. Esquith's quoting of Mark Twain, which no student or parent found offensive or complained about, students actually felt threatened by the LAUSD investigators. Parents of students in Room 56 collectively complained to LAUSD about the harassing conduct their students experienced at the hands of LAUSD investigators. Parents complained of their children being removed from class without parental consent. Parents feared for the health and safety of their children based on the LAUSD investigator tactics. At least one student's mental health was seriously, and medically compromised, by the conduct of the LAUSD investigators.

The LAUSD investigators asked students, who had never complained of Mr. Esquith, loaded questions such as whether Mr. Esquith ever did anything "bad" or that they "did not like." Parents were never informed of the reason why Mr. Esquith was removed from class for quoting Mark Twain. As parents contacted Mr. Esquith, following the interviews with their children, Mr. Esquith remained under a LAUSD imposed gag order and could not respond to their calls or emails.

The LAUSD investigation then turned its focus to Mr. Esquith's nonprofit group called the Hobart Shakespeareans. The Hobart Shakespeareans is a completely nonprofit organization with an independent board of directors. Mr. Esquith does not draw any salary from the Hobart Shakespeareans. Mr. Esquith himself donates thousands of dollars to the organization.

The Hobart Shakespeareans sponsor an annual performance of a Shakespeare play each year. This year's play was going to be "The Winter's Tale." There were going to be 12 separate days of performances this year. All shows were completely booked, as they are every year. Donors from across the world show up and watch the incredible student performances.

The Shakespeareans also sponsor free SAT and college prep for students and lead a trip every year in July to Oregon for the annual Shakespearean festival. The Shakespeareans have been sponsoring trips since the 1980s. The group was the focus of both a PBS documentary as well as a widely viewed TED talk given by Mr. Esquith.

On or about the week of May 11, 2015, the LAUSD investigators contacted the Board of Directors (other than Rafe) and informed them that Mr. Esquith was fully apprised of the allegations against him. This was false. At that time, Mr. Esquith had not even sat down with investigators.

The investigators questioned the Board about "permission slips," about the organizations affiliations with LAUSD and how the organization holds itself out, whether parents were aware that the Shakespeareans were separate and not "officially affiliated" with LAUSD, and the amount of chaperones used by the Shakespeareans during their trips.

On May 18, 2015, Geragos & Geragos, on behalf of Mr. Esquith, sent a letter to LAUSD informing them of the misrepresentations being made by the investigators to the board of directors and requesting the reasons why Mr. Esquith was still not permitted to go back into his classroom and why the focus was now on the Shakespeareans. Attached hereto as *Exhibit "F"* is a true and correct copy of the letter sent by Geragos & Geragos on May 18, 2015.

The May 18, 2015 Geragos letter also questioned why Mr. Esquith was being directly contacted by LAUSD on substantive matters when Mr. Esquith was known to be represented by attorneys.

Indeed, directly contacting a represented party on any legal matter, especially significant matters such as this, is highly improper, unethical, and anathema to the law. LAUSD was intentionally avoiding proper legal processes.

Attached hereto as *Exhibit "G"* is a true and correct copy of the response from LAUSD dated May 20, 2015. The LAUSD letter states:

We are actively investigating this matter. *This includes fact finding and research in connection with the Hobart Shakespeareans program.* I am not aware of the statements made by the investigator. *We also understand and acknowledge you are representing Mr. Esquith. However, as part of LAUSD's fact finding, we believe we are well within our rights to contact Mr. Esquith directly* because he is our employee.

On June 1, 2015 LAUSD sent another letter directly to Mr. Esquith demanding that the July trip sponsored by the Shakespeareans be cancelled because the "trip is not authorized or sponsored by the District." Attached hereto as *Exhibit "H"* is a true and correct copy of the July 1, 2015 letter.

Based on the conduct of the LAUSD investigators, the Hobart Shakespearean board of directors felt compelled to retain independent legal counsel. The Shakespeareans retained the independent legal services of the well-respected Los Angeles firm of Scheper Kim & Harris LLP.

Attached hereto as *Exhibit "I"* is a true and correct copy of a June 11, 2015 letter sent by the ScheperKim firm to LAUSD confirming that LAUSD investigators "refused to identify any facts or other information that would warrant the Hobart Shakespeareans cancelling the July 2015 trip."

The ScheperKim firm demanded that the LAUSD investigators put any request in writing and provide the policy, procedure, or other authority that justifies LAUSD's requests. LAUSD did not, and has not responded.

To the extent LAUSD was actually conducting a credible investigation, what it would have realized was the following:

First, not a single parent has ever complained about the Hobart Shakespeareans.

Second, the Hobart Shakespeareans have been responsible for enriching thousands of lives by providing funding into the music and arts in education where LAUSD refuses to do so.

Third, when instructed in the past that the Shakespeareans needed to use permission slips with specified disclaimers (no parent has ever made this an issue) Mr. Esquith has always complied. Attached hereto as *Exhibit "J"* is a copy of the permission slip used.

Finally, LAUSD's newly feigned concern that the Shakespeareans might be viewed as affiliated or "officially sponsored" by LAUSD was not a problem Mr. Esquith created. To the extent any confusion exists, it is because LAUSD administrators, and not Mr. Esquith, promoted Mr. Esquith on the Hobart Elementary School website. The website is overseen by Principal Paek and "technology coordinator" Barbara Hayden. Mr. Esquith has no control over its content. The LAUSD sponsored website refers to the elementary school as, "the Proud Home of Rafe Esquith and the Hobart Shakespearns[sic]." (misspelling on website).

Attached hereto as *Exhibit "K"* is a true and correct copy of a screenshot of the Hobart Elementary School website taken June 18, 2015.

On June 11, 2015, the same day the attorneys for the Hobart Shakespearean Board of Directors informed LAUSD that the July 2015 Oregon trip was cancelled, Principal Paek announced to parents he was stepping down and transferring to another school after spending "twenty-four years in this wonderful place called Hobart."

Attached hereto as *Exhibit "L"* is a true and correct copy of the Principal Paek's transfer letter to parents.

b. The Interview

Three months after meeting with Principal Paek in March 2015, Mr. Esquith was finally summoned by LAUSD investigators for a meeting to take place on May 27, 2014.

Indeed, from March 2015 through May 2015, Mr. Esquith's counsel continuously demanded explanations regarding what the allegations were as well as the scope of the investigation. To this date, LAUSD has not articulated any explanation but, as Superintendent Cortines has done recently, cites an open ended "fact-finding investigation" underway.

The May 27, 2015 interview took place at the teacher jail location at North Soto street. Attached hereto as *Exhibit "M"* is the notice Mr. Esquith received requiring his appearance on May 27, 2015. Mr. Esquith attended with counsel.

The questions asked during the interview followed no conventional interviewing protocol or any appropriate or logical line of questioning. Counsel for Mr. Esquith took diligent notes of the questions being asked which included:

- "Do you know any teachers that might not like you? If so, who are they?"
- "List the women you dated when you were in college."
- "Were you ever counseled for pushing someone when you were a camp counselor at the JCC Jewish Center Summer Camp you worked at when you were a teenager 40 years ago?"
- "Why might teacher X or teacher Y not like your teaching style or your personality?"

- “Did you ever buy a student a hamburger off school grounds without first getting the permission of that student’s parent? Do you know buying students food is against policy?”
- “Why don’t you have backup plan for someone else to put on the annual Shakespearean performance, in case, for example, you have a heart attack, so it does not have be cancelled again like it was this year.”

These questions, all of which would be objectionable and completely out-of-line in any legitimate legal process, made obvious that there was no clear or defined scope or legitimate purpose behind the LAUSD investigation. Nor did the investigators reveal the scope or proffer any foundation for their questioning.

It was patently obvious that LAUSD had used the initial allegations – which were proven meritless – as a pretext to conduct an open-ended investigation and engage in a scurrilous character assassination of Mr. Esquith and appointed two full-time investigators for this purpose. This experience is shared by hundreds and thousands of other teachers who LAUSD wanted to (and have) force out under Superintendent Cortines’ regime.

During the May 27, 2015 hearing, LAUSD investigators conceded that the “initial investigation” was based on Ms. Haden’s report. However, the investigators did not say what their current purpose was. When Mr. Esquith responded to questioning about teachers who “might not like him,” by stating he is “generally supported by tens of millions of teachers throughout the world,” the investigators responded, “the purpose of what we do is to find people who do not like you, not talk to your supporters.”

vi. Superintendent Ramon C. Cortines’ June 19, 2015 Press Release

On July 19, 2015, LAUSD Superintendent Ramon C. Cortines issued the following press release:

“This is a very complex issue. While I respect that this teacher is extremely popular – and has been for some time – in the briefings that have been given to me, there are serious issues that go beyond the initial investigation.

The Los Angeles Unified School District will not be rushed to make a decision and will complete our investigation with the highest level of integrity. The safety and security of every District student will remain our number one priority.”

Additionally, in conjunction with the press release, LAUSD announced the “investigation” would take until August 2015 to complete and that “it will not be rushed.”

To date, LAUSD has provided no reason why an investigation based on a disproven report—found meritless by the State of California—and made by a teacher who supports Mr. Esquith, would take until August 2015 to complete. The “complex issues” referred to in Superintendent Cortines’ press release are manufactured allegations that LAUSD is attempting to create since the “initial allegations” were disproven and since LAUSD realized it would likely face catastrophic liability based on the manner and methods its used to remove the world’s most well-known teacher from his classroom based on a Mark Twain quote.

Superintendent Cortines’ statement to the press is not covered by any investigative privilege or claim to immunity. The comments constitute defamation and defamation *per se*, made in reckless disregard for Mr. Esquith’s reputation and Mr. Esquith’s unprecedented career.

Further Superintendent Cortines’ press release confirms the investigation is a fishing expedition of the worst kind, disconnected from any “initial investigation.” Despite being on notice that the “initial investigation” conducted by LAUSD was reckless, completely bogus, and wrongfully deprived students of having Mr. Esquith in their class during a pivotal time in their lives – in addition to destroying Mr. Esquith’s career – Superintendent Cortines refers vaguely to other “complex issues” further defaming Mr. Esquith.

Superintendent Cortines’ statements to the press reflect a complete disconnect between himself and the teachers within LAUSD. This complete and utter disconnect, in turn, has led to a climate in LAUSD where teacher jails thrive and due process is denied.

vii. Damages

Mr. Esquith has suffered severe damage to his unprecedented and illustrious teaching career and reputation caused directly by LAUSD and Superintendent Cortines.

Mr. Esquith had previously turned down lucrative six to seven figure salaries by private schools and firms wanting to brand “Rafe Esquith private schools” throughout the world, to remain a public school teacher, for which, his reward has been to be defamed by the District and its Superintendent.

Additionally, Mr. Esquith has suffered substantial general and consequential damages of an amount to be proven at the time of trial.

C. Class Action Claims

In addition to bringing a complaint on his own behalf, Mr. Esquith hereby gives notice of his intent to bring a Class Action Complaint on behalf of all teachers, during the applicable statute of limitations period, who have been denied procedural and substantive due process by LAUSD.

It is anticipated the composition of the relevant class will be comprised of at least several thousand current and former LAUSD teachers who have similarly been deprived of due process, and have endured arbitrary process, undefined investigations, indefinite stays in teacher jail, and capricious classroom removals.

Damages Incurred to Date:

Reinstatement;
Violation of constitutional rights and liberties, violation of due process, defamation of character, intentional infliction of emotional distress, unfair business practices, intentional interference with economic relations;
Injunction re denial of due process and arbitrary and capricious investigation.

Where Damages or Injuries Occurred:

Los Angeles Unified School District

When Damages or Injuries Occurred:

March 2015 through the present; Applicable statute of limitations for anticipated class action claims.

Names of Persons Causing Injuries:

Los Angeles Unified School District; Superintendent Cortines; DOES 1-50.

Acts or Omission Causing Injuries:

Violation of civil rights, violation of constitutional rights, wrongful removal from classroom, defamation of character.

Amount of Money Claimed at this Time:

To be ascertained, but within the "unlimited jurisdiction" of the Superior Court.

Names and Addresses of Witnesses:

Los Angeles Unified School District Employees referenced in this letter, or in any way connected with, or related to, the wrongful conduct taken against Mr. Esquith.

DATED: June 22, 2015

GERAGOS & GERAGOS, APC

By:



MARK J. GERAGOS
BEN J. MEISELAS
Attorneys for Rafe Esquith

EXHIBIT "A"

Testimonials

From the Media

Rafe Esquith is my only hero.

--Sir Ian McKellen

Rafe Esquith's work at Hobart is a wonderful example of all that I argue for. It demonstrates that all students have deep talents and potential and that with the right inspiration and leadership, they can achieve miracles.

--Sir Ken Robinson

The Hobart Shakespeareans are the ultimate example of how and why Shakespeare should be performed.

--The Royal Shakespeare Company

Rafe Esquith is the most interesting and influential classroom teacher in the country.

--The Washington Post

Rafe Esquith is a genius and a saint.

--The New York Times

You can't watch the little actors without wanting to cry. Why do you cry? I suppose it's happiness, really, and a regret that not all the children in the world could have a Rafe Esquith for a teacher.

--Sir Ian McKellen

What this group of students and their remarkable teacher are proving is that kids with no secure homes and no secure futures can *learn to hope*, and do, and become first class citizens. If there's anything more important than that, please tell me.

--Hal Holbrook

Real Students

Every graduation from middle school to college, I've thought back on my days as a Hobart Shakespearean. Room 56 gave me the guidance and audacity to undertake any challenges the world would present.

Redact
ed

, class of 1995

It's my last year of college and I still can't believe it. It's been thirteen years since I first entered your classroom. At the time, I thought I did all of the activities because they were enjoyable. College had been very stressful, but I have been able to keep calm. I realize I might already have had a breakdown if I had not learned the life lessons I learned in your class. From playing the guitar to the trips we took to the Shakespeare we studied, I see the bigger picture. Thank you for being with me always.

Redact
ed

, class of 1997

Your students made me cry tears of admiration, disbelief, and joy this evening. This entire year I haven't seen something so beautiful and so heartfelt and so amazing! They must all understand their collective achievement and talent. Thank you so much to the Hobart Shakespeareans for making the world a better place.

Red
ate

, Class of 1998

Without a doubt, your name pops up nearly daily in my conversations. Thank you so much, and I still hold onto so many of the things you have taught me. It truly helped me get to where I am today. I'm always amazed by what you did for our class, and the things you still do now.

Reda
Reda, Class of 1999

I remember sitting in Room 56 hearing letters from former students thanking you for the immense impact you have had on their lives. I found it hard to fathom how this could possibly be so. It is not until now that I can understand the great influence you have had on the lives of those around you, including mine. Every opportunity that I face I fear might not have been there if it weren't for your presence in my life.

Reda
Reda, Class of 2001

I understand that your help and support as my teacher and mentor greatly shaped my American adventure. I won't be where I am without you.
Thank you, Rafe. Looking back at your work at Hobart with a slightly older and, hopefully more mature perspective, I see the extraordinary in what you do.
I want to share with you that you are a very special person to many and I hope you know the gratitude that I and many others feel towards you.

Red
Reda, Class of 2005

I will truly miss being with you, Barbara, and my friends. It was a great experience that allowed me to grow as a person and learn who I really am. I thank you for everything you have done for my family, for your exceptional teachings, and for all the lessons you have taught me throughout these years of my life.

Reda
Reda, Class of 2007

Mark, Superintendent, Arizona

Your ideas have helped me shape my own classroom vision, and some of the obstacles I will confront on the journey. That is an immense aid to someone so eager to begin teaching but so short on experience. Thank you!

Tyson, teacher, Iowa

I wanted to tell you that your philosophy on education has greatly shaped who I am and what I do as a teacher. Thank you so much. If my students had a teacher like you when they were in elementary school, then my job would be much easier; Nevertheless, I try my best to instill in my own students the same values that you instill in yours.

Colby, High School Teacher, Georgia

No hype can approach what I saw on that April night. The mutual love and respect seen that night represented a whole year plus a teacher's reputation over the years. Although it was warm and kind, and the students were polished and sophisticated, methinks this teacher tolerates no nonsense! This training has a lifetime of value.

Elaine, teacher, California

I thank you for your wit and dedication. These have helped me to endure the rat race that DC is. THANKS SO MUCH!!!

Jason, Federal Government Employee and School Administrator

The courageous footprints that you and your students have left, and continue to leave, will no doubt help us all find our own path to excellence. Thank you for leading the way and making our steps just a little lighter.

Boe, teacher, Oregon

Real People From Around the World

You make me so happy, Mr. Esquith; I feel amazed by your deeds. I always repeat your words and think about what you would do in certain situations when I teach my students.

Indira, teacher in Kosovo

Many Chinese teachers and parents know you and take in your good ideas about children's education. The suggestions mentioned in your books have made many teachers and parents rethink how to educate the children. I should say you have done a very great thing, not only for American children, but also for Chinese students.

Jack, education writer, Chinese Press, People's Republic of China

Children here are pronouncing your name who normally only know TV stars. You are a star among my students! They want to come to school for more hours because of you. These days in Greece we are in the middle of massive strikes in education and days can be very difficult. I have to tell you that reading your books really help me at night, and make the work tomorrow less difficult.

Voula, teacher, Athens

It's really hard to describe my happiness when I saw you! Although we had never met before, you have been my model and mentor in my teaching! I apply the moral teaching in my class, and it works well. Because of you, my students know what a good person

should be.

Rebecca, teacher, Taiwan

Teaching is not easy and in the past I felt a bit unmotivated. Your words gave strength. I have completely changed my idea of working with kids and my lessons started to be more effective, immediately. So I want to thank you. Thank you for sharing your personal experience so that people who want to improve can get true inspiration from you.

I am so excited that I would like the school to start again tomorrow!

Giulia, teacher, Italy

What an achievement! It was great to see the kids sinking their teeth into the text—you all clearly worked very hard but everyone was also having a fantastic time (audience included). Congratulations!

Tracy, Director of Education, Royal Shakespeare Company

EXHIBIT "B"

GERAGOS & GERAGOS

A PROFESSIONAL CORPORATION
LAWYERS
HISTORIC ENGINE CO. No. 28
644 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017-3411
TELEPHONE (213) 625-3900
FACSIMILE (213) 625-1600
GERAGOS@GERAGOS.COM

May 30, 2015

By Facsimile and Email

Virgil A. County
Investigator
Office of General Counsel
Los Angeles Unified School District
333 South Beaudry Avenue, 14th Fl.
Los Angeles, California 90017

Re: *In Re Rafe Esquith*

Dear Mr. County:

It was a pleasure meeting you and Mr. Johnson last Tuesday, May 27, 2015.

From our discussion, I understand the above-referenced LAUSD investigation was started following a report by Barbara Hayden – Hobart Elementary School Technology Coordinator and Arts Supervisor – where Ms. Hayden apparently did not realize the reference being made by Mr. Esquith to a classic book the students were reading in class.

Ms. Hayden's misunderstanding, and support of Mr. Esquith, is further evidenced by the recent unprovoked emails she has sent Mr. Esquith during the pendency of your investigation. Mr. Esquith has not, and will not, respond. I informed you during last week's interview I would send you the emails which I don't believe you knew existed. As promised, I have enclosed the emails.

Again, it was a pleasure meeting with you. We look forward to a prompt resolution of this matter.

Very truly yours,

/s/

Ben Meiselas
GERAGOS & GERAGOS

Enclosure

cc: Ray Johnson; Mark Geragos

-----Original Message-----

From: Gmail <barbarahayden Redacted >
To: Rafe Esquith <Redacted >
Sent: Wed, Apr 22, 2015 2:00 pm
Subject: Re: winter's tale canceled

I just want you to know that I am here for you and if there's anything you need, please let me know!

My thoughts are with you constantly, and I wish you the best resolution possible!

Barbara

Sent from Barbara Hayden's iPhone

-----Original Message-----

From: Barbara Hayden <barbarahayden Redacted >
To: Rafe Esquith <Redacted >
Sent: Wed, Apr 29, 2015 7:05 am

Everybody misses you a lot, especially the kids of course, and you'd be proud!

Barbara Hayden
Technology Coordinator
Arts Supervisor
Hobart Elementary School
980 S. Hobart Blvd.
L.A., CA 90006
http://www.lausd.net/Hobart_EL/

EXHIBIT "C"

-----Original Message-----

From: Gmail <barbarahayden [Redacted]>
To: Rafe Esquith <[Redacted]>
Sent: Tue, Jun 16, 2015 9:27 am
Subject: Getting better all the time –

Hi Rafe,

I hope you're doing well!

I was so pleased to read the article
and statement that your lawyer, Mark Garagos, put out!
You are known for always
getting quality, and it shows with your choice of lawyer!
(I'm sure you
would've gotten F Lee Bailey if he was still available!)

I wish you all the
best!

Warm regards,
Barbara

Sent from Barbara Hayden's iPhone

EXHIBIT "D"



Commission on Teacher Credentialing

1900 Capitol Avenue Sacramento, CA 95811 Phone (916) 322-4974 Fax (916) 323-6735 www.ctc.ca.gov

Division of Professional Practices

May 27, 2015

Los Angeles Unified School District
333 S. Beaudry Avenue, 14th Floor
Los Angeles, CA 90017

Attn: John Brasfield, Jr.

Re: 80304 Notice of Sexual Misconduct
ESQUITH, Rafe Alan

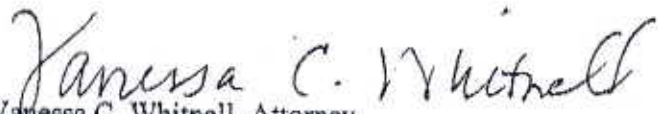
Dear Mr. Brasfield, Jr.:

The Committee of Credentials, after careful review and consideration of the materials submitted by the Los Angeles Unified School District, has determined to close the case at this time.

In the event that your district takes a final action that provides the Committee with jurisdiction to review Rafe Esquith under Education Code §44242.5, your superintendent is required by Title 5, CCR §80303 to report to the Commission. Please submit the record at that time and the Committee will proceed with a review.

Date of Action: May 20-22, 2015

Very truly yours,


Vanessa C. Whitnell, Attorney

VW: mez

cc: Rafe Esquith

EXHIBIT "E"

Los Angeles Unified School District
INTEROFFICE CORRESPONDENCE
Educational Service Center East
Operations Unit

TO: Rafe Esquith, Teacher
Hobart Elementary School
EN: Redacte

DATE: May 4, 2015

FROM: Eugene L. Hernandez
Administrator of Operations

SUBJECT: TEMPORARY REASSIGNMENT TO EDUCATIONAL SERVICE CENTER AT HOME

This memo is to summarize our conference on May, 4, 2015 regarding your temporary reassignment to Educational Service Center (ESC) East. During the conference, I informed you that there is an ongoing investigation about allegations concerning events or conduct in which you may have been involved. While this investigation is taking place, and unless and until otherwise directed or reassigned, you are to remain at home in paid status during your reassignment to the ESC.

The following information and procedural directives are applicable to you at all times during your home assignment:


1. Your administrator while you are so assigned is Davie Devereaux, Operations Coordinator.
2. Your work assignment covers all dates of your regular assignment basis, and the following hours:

A. Work Day	8:00 am to 2:30 pm
B. Break	9:50 am to 10:10 pm
C. Lunch	12:00 to 12:30 pm
3. You are to call-in to Operations Unit at (323) 224-3177 at the start of your workday between 7:50 am to 8:00 am and at the end of your work day between 2:30 pm to 2:36 pm. You are required to remain at home during your assigned working hours, available to assist in the investigation upon request except during the designated break and lunch times. Your time card will be provided. You are to fill it in each work day, and send a fax to (323) 224-3393 or email at mdelahoy@lausd.net each Friday afternoon to **Attention:** Maria De La Hoya, with the appropriate days initialed so that your payroll can be completed. Failure to turn in a timely-completed timecard will prevent you from being paid on time.
4. If you are ill or need to utilize an absence from your home for personal necessity or other paid or unpaid leave/absence, you are immediately to call Maria De La Hoya, at (323) 224-3177 to report the beginning date of your absence(s), the reason for your absence and your anticipated return date, and you shall also reflect such information on your timecard entries. In such event you are to restrict your activities and locations to the designated purpose of the applicable leave/absence.

5. You have been relieved from duty from your regular assignment and you are directed not to enter the premises of Hobart Elementary School at any time, either during or outside of assigned work hours, without prior written administrative direction or approval from your ESC's Administrator of Operations. While on temporary home assignment, you may be assigned work by Eugene L. Hernandez, Administrator of Operations. However, except as may be directly so assigned, you are not to perform any services for the District or students relating to your former assignment, nor any other work for the District, nor are you to represent to anyone that you are doing so. You shall, however, remain readily available and responsive to District administration or other designated investigators. You are not to perform duties or services for any other individual or entity during work hours.
6. You are not to contact any District employee during regular work hours. You are directed to refrain from harassing, intimidating, or retaliating against students, staff, nor parents at Hobart Elementary School. You are not to contact students of Hobart Elementary School or any other students at any time, excepting those who live in your immediate family or household.

Any failure to adhere any of the above rules or directives, or any failure to follow any other administrative directive, may lead to disciplinary action, including suspension and/or dismissal.

Should you have any questions or concerns, please email me at eugene.hernandez@lausd.net or schedule a phone conference appointment with me or with Davie Devereaux at 323 224-3177 or by email at ddeverea@lausd.net.

Received 

Date 5/4/15

EXHIBIT "F"

GERAGOS & GERAGOS

A PROFESSIONAL CORPORATION
LAWYERS
HISTORIC ENGINE Co. No. 28
644 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017-3411
TELEPHONE (213) 625-3900
FACSIMILE (213) 625-1600
GERAGOS@GERAGOS.COM

May 18, 2015

By U.S. Mail, Facsimile, and Email

Michael Voigt
Coordinator – Employee Relations
Los Angeles Unified School District
333 South Beaudry Avenue, 14th Fl.
Los Angeles, California 90017

Re: In Re Rafe Esquith

Dear Mr. Voigt:

We write about two recent disturbing developments.

First, it has been brought to our attention that an LAUSD investigator contacted the Board of Directors for the Hobart Shakespeareans, purportedly in connection with this investigation.

We have independently confirmed that the investigator informed the Board that Mr. Esquith had been fully informed of the allegations against him. The LAUSD investigator proceeded to ask numerous questions about the operations and structure of the organization.

These statements made by the investigator were false.

There is no dispute that LAUSD has not provided an explanation about this investigation to Mr. Esquith or his counsel. You and I have equally acknowledged this in our correspondence. I have been demanding the allegations for some time as Mr. Esquith's career and reputation have been unjustly placed in peril without explanation.

It was false and very damaging to Mr. Esquith for the LAUSD investigator to misinform the Board that "Mr. Esquith has been informed by LAUSD what this investigation is all about." Further, it is unclear why the investigator demanded answers to numerous questions related to the structure of the organization. Please provide an explanation why the investigator made these false comments to the Board.

Mr. Voigt
Page 2
May 18, 2015

GERAGOS & GERAGOS

A PROFESSIONAL CORPORATION
LAWYERS

Second, we have learned that a representative from LAUSD left a voice message with Mr. Esquith requesting his participation in a meeting with the investigator on May 27, 2015. Our firm was never informed of this by LAUSD despite notice of our representation and our prior request to keep us informed. Please make sure that all communications and correspondence relating to the investigation be sent to our attention as well.

We will be present at the May 27, 2015 meeting.

Very truly yours,

/s/

Ben Meiselas
GERAGOS & GERAGOS

EXHIBIT "G"

In Re Rafe Esquith

Voigt, Michael <michael.voigt@lausd.net>
To: Ben Meiselas <meiselas@geragos.com>
Cc: Mark Geragos <mark@geragos.com>

Wed, May 20, 2015 at 1:33 PM

Dear Mr. Meiselas,

I apologize for sending a second email. My first email was sent prior to completion.

LAUSD is actively investigating this matter. This includes fact finding and research in connection with the Hobart Shakespeareans program. I am not aware of the statements made by the investigator.

We also understand and acknowledge that you are representing Mr. Esquith. However, as a part of LAUSD's fact finding, we believe we are well within our rights to contact Ms. Esquith directly because he is in our employee.

Sincerely,

Mike Voigt

MIKE VOIGT, JD | COORDINATOR

DIVISION OF HUMAN RESOURCES

EMPLOYEE RELATIONS

LOS ANGELES UNIFIED SCHOOL DISTRICT

333 S. BEAUDRY AVE.

LOS ANGELES, CA 90017

(213) 241-8021 (OFFICE)

(213) 241-8404 (FAX)

EXHIBIT "H"

RAMON C. CORTINES
SUPERINTENDENT OF SCHOOLS

MICHELLE KING
CHIEF DEPUTY SUPERINTENDENT OF SCHOOLS

RUTH PEREZ, PH.D.
DEPUTY SUPERINTENDENT
INSTRUCTION



2151 N. SOTO STREET, LOS ANGELES, CALIFORNIA 90032
TELEPHONE: (323) 224-3100 FAX: (323) 222-5702

ROBERTO A. MARTINEZ
INSTRUCTIONAL AREA SUPERINTENDENT

EUGENE L. HERNANDEZ
ADMINISTRATOR OF OPERATIONS

MIGUEL DUEÑAS
ADMINISTRATOR OF PARENT & COMMUNITY ENGAGEMENT

JANET MONTOYA
ADMINISTRATOR OF SPECIAL EDUCATION

"Supporting 21st Century learners through leadership and service"

June 1, 2015

Dear Mr. Esquith,

I am sending this letter to reiterate our previous discussions regarding contact with Students or Staff at Hobart Elementary School. It was brought to my attention that there is an out of state trip scheduled for July, 2015 to Oregon for the Shakespearean Theatrical Festival. At this time, I must remind you that this violates the current district directive given upon your being assigned to Home Status. The District has not authorized and will not sponsor this trip as evidenced by the lack of authorization via the proper channels for field trip authorization.

As such, this trip should be cancelled. In addition, please immediately provide a complete list of the students including their contact information. We plan to contact the students' parents to inform them that the trip is not authorized or sponsored by the District.

Should you have any questions, please feel free to contact my office.

Sincerely,

A handwritten signature in cursive script that reads "Davie Devereaux".

Davie Devereaux
Operations Coordinator
Educational Service Center East

EXHIBIT "I"

SCHEPER KIM & HARRIS LLP

Amos A. Lowder
(213) 613-4689
alowder@scheperkim.com

June 11, 2015

VIA U.S. MAIL

Davie Devereaux
Operations Coordinator
Los Angeles Unified School District
2151 N. Soto Street
Los Angeles, CA 90032

Virgil A. County
Senior Investigator
Los Angeles Unified School District
333 South Beaudry Avenue
14th Floor
Los Angeles, CA 90017

Re: Hobart Shakespeareans: July 2015 Trip to Oregon

Dear Messrs. Devereaux and County:

On May 26, 2015, I contacted Mr. County to advise him of the Hobart Shakespeareans July 2015 trip to Oregon. I asked Mr. County if there was any reason that the trip should not go forward. I also asked Mr. County to identify any policies or procedures the District believes that the Hobart Shakespeareans have not complied with. Furthermore, I asked Mr. County to put any requests for information in writing and to reference the policy, procedure, or other authority that justifies the request(s).

During the call, Mr. County refused to identify any facts or other information that would warrant the Hobart Shakespeareans cancelling the July 2015 trip to Oregon. Instead, Mr. County merely referred to the pending investigation and the District's preference that the trip not go forward. I advised Mr. County that I would inform the Board of the District's preference so that the Board could make an informed decision about the July 2015 Oregon trip.

SCHEPER KIM & HARRIS LLP

Davie Devereaux

Virgil A. County

June 11, 2015

Page 2

Though the District failed to respond to our requests, in the abundance of caution, on Tuesday, June 2nd, the Hobart Shakespearians Board of Directors decided to cancel the July 2015 trip to Oregon.

To date, the District has yet to respond to any of our requests for information regarding the investigation or the policies and procedures the District believes are at issue.

Regards,



Amos A. Lowder

SCHEPER KIM & HARRIS LLP

cc: Ben Meiselas

EXHIBIT “J”

Date

Dear Parent:

Your child has been invited to participate in a privately sponsored trip for the dates of F

Please be advised that this tour has not been approved by the Los Angeles Unified School District and is not a school-sponsored activity. Your child's participation in such a tour is a private matter between you and Rafe Esquith. Students who are absent from school during the time regular school is in session will have their attendance cards marked with an "unexcused absence" for the days missed. Any chaperon who provide supervision for minors on this tour do so as private citizens, and are in no way authorized to perform such supervision as school district employees.

Neither Hobart School nor LAUSD is responsible for the education, supervision, or welfare of your son/daughter during this trip and therefore, neither will compensate, insure or indemnify you or your child for any incident, loss of property, illness or injury that may occur during the tour.

Sincerely,

Rafe Esquith

I have read the letter and understand that this tour has not been authorized by the Los Angeles Unified School District.

signature of parent/guardian

EXHIBIT "K"



HOBART BOULEVARD ELEMENTARY SCHOOL

980 S. Hobart Boulevard
Los Angeles, CA 90006
(213) 386-8661



[School Information](#)

[Our Faculty](#)

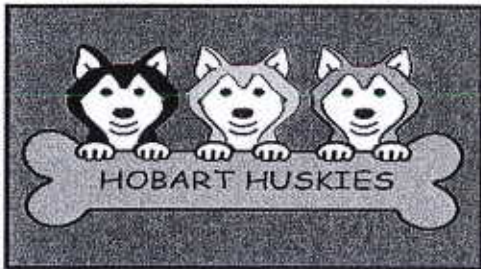
[For Parents](#)

[For Staff](#)

[For Students](#)

[Contact Us](#)

Hobart Happenings



Weekly Newsletter

Find out what is going on this week.

MONTHLY BULLETIN

English *** Spanish

Important Dates for April

Proud Home of Rafe Esquith and The Hobart Shakespearns

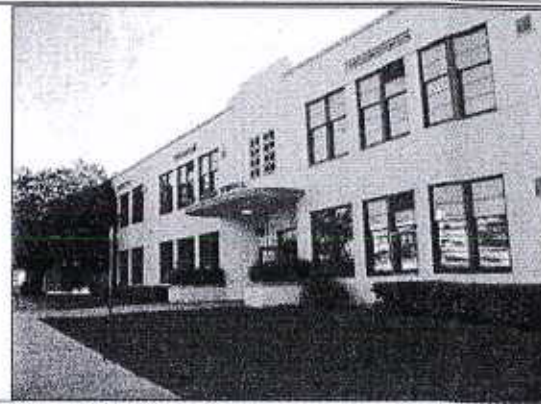


Pics of Visiting D.C. and Laying a Wreath on the Tomb of the Unknown Soldiers

[Click Links to View Photos of Hobart Events](#)

[Mr. Pulner's 3rd Grade Breaks the Code](#)

[5th Grade Visits The Getty](#)



2015-2016 LAUSD SCHOOL CALENDAR

Banked Time - Testing - Conference Dates

HOBART PRIDE Every FRIDAY!!!

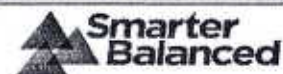


SHOW YOUR SUPPORT for HOBART!!! T-SHIRTS \$10 POLOS \$18

[Click to enlarge photo](#)

CITIZENS OF THE MONTH and RISING STARS:*

April 2015



3rd Grade Test Schedule

EXHIBIT "L"

June 11, 2015

Dear Hobart Family,

I am writing this letter, regretfully, to let you know that I have been offered and have accepted a principal position at Charles Kim Elementary School for the next school year. I am so lucky to have spent the last twenty-four years in this wonderful place called Hobart. Hobart has been a second home and family to me. I find myself struggling with a gamut of emotions as I leave.

I would like to express my gratitude to every member of the Hobart staff and community for the kindness, encouragement, and generous displays of friendship you have afforded me throughout my twenty-four years. I've heard it said many times that "Hobart is a special place." I can now say with heartfelt sincerity that Hobart is a special place. I will always carry a piece of it with me.

I am looking forward to new and different challenges in my next assignment. I will miss you, but please know that I am only a phone call away. I will be at school next week from Wednesday to Friday(6/17-19). Good luck to all of you in your personal lives as well as in your careers. I wish you the best that life has to offer. I look forward to seeing you in the future

God bless you!


Jonathan Paek

EXHIBIT "M"

**INTEROFFICE CORRESPONDENCE
Los Angeles Unified School District
Educational Service Center-East**

DATE: May 13, 2015

TO: Rafe Esquith, EN# Redacted

FROM: Davie Devereaux,  Operations Coordinator

SUBJECT: Investigation of Alleged Misconduct

I am directing you to meet with Virgil A. County, Senior Investigator for the Los Angeles Unified School District (LAUSD) regarding allegations of inappropriate conduct. The appointment has been scheduled for you as follows:

DATE: **Wednesday, May 27, 2014**

TIME: **11:00 a.m.**

LOCATION: **Educational Service Center-East**
2151 North Soto Street
Los Angeles, CA 90032
Office: (323) 224-3100

Failure to follow an administrative directive may lead to disciplinary action, such as but not limited to a Notice of Unsatisfactory Acts(s), Notice of Unsatisfactory Service, and/or Suspension and/or Dismissal.

You may have a representative present at this meeting. If you desire representation, please make your own arrangements prior to your scheduled interview. The LAUSD shall not be responsible for coordinating the attendance or scheduling of your representative.

Sent via US Mail and Certified Mail No. 7014 0510 0002 1519 9784