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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

SEP 24 2026

BY: 
Veronica Grdz, Deputy

**Exempt from Filing Fees –
Gov. Code § 6103**

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN BERNARDINO
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15 **THE PEOPLE OF THE STATE OF**
16 **CALIFORNIA EX REL. ROB BONTA,**
17 **ATTORNEY GENERAL OF THE STATE**
18 **OF CALIFORNIA,**

Plaintiff,

19 v.

20 **CHAFFEY JOINT UNION HIGH SCHOOL**
21 **DISTRICT,**

Defendant.

Case No. [XX] CIVSB2625375

**STIPULATION FOR ENTRY OF FINAL
JUDGMENT AND PERMANENT
INJUNCTION**

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8. The individuals signing below represent that they have been authorized by the Parties they represent to sign this Stipulation.

9. This Stipulation may be executed in counterparts, and the Parties agree that a facsimile signature shall be deemed to be, and shall have the full force and effect as, an original signature.

[SIGNATURES ON FOLLOWING PAGE]

1 **PLAINTIFF THE STATE OF**
2 **CALIFORNIA**

ROB BONTA
Attorney General of California



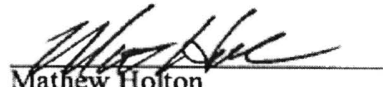
Alexis Piazza
Deputy Attorney General
Attorneys for Plaintiff

4 DATED: 8/26/2026

7 **DEFENDANT CHAFFEY JOINT UNION**
8 **HIGH SCHOOL DISTRICT**

CHAFFEY JOINT UNION HIGH
SCHOOL DISTRICT

11 DATED: 8-4-26



Mathew Holton
Superintendent

14 Approved as to Form:

16 DATED: 8/4/2026



Philip Schuler
General Counsel
Attorneys for Defendant

EXHIBIT 1

1 ROB BONTA
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2 MICHAEL L. NEWMAN
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Gov. Code § 6103**

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN BERNARDINO

15 **THE PEOPLE OF THE STATE OF
CALIFORNIA EX REL. ROB BONTA,
16 ATTORNEY GENERAL OF THE STATE
OF CALIFORNIA,**

17 Plaintiff,

18 v.

19
20 **CHAFFEY JOINT UNION HIGH
SCHOOL DISTRICT,**

21 Defendant.
22

Case No. [XX] CIVSB2625375

**[PROPOSED] STIPULATED
JUDGMENT**

Time:
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Trial Date:
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INTRODUCTION

Plaintiff, the People of the State of California (People or Plaintiff), by and through Rob Bonta, Attorney General of the State of California, and Defendant, Chaffey Joint Union High School District (District) (collectively, the Parties, and any one of them a Party), having stipulated to the entry of this judgment (Judgment) by the Court without the taking of proof and without trial or adjudication of any fact or law, without this Judgment constituting evidence of or admission by the District regarding any issue of law or fact alleged in the People’s Complaint for Injunctive Relief on file in this action or any of the allegations or conclusions set forth herein, and without the District admitting any liability, and with all Parties having waived their right to appeal, and the Court having considered the matter and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

This Court has jurisdiction over the allegations and subject matter of the People’s Complaint filed in this action, and the Parties to this action; venue is proper in the County of San Bernardino; and this Court has jurisdiction to enter this Judgment against the District.

INJUNCTION

The District is permanently enjoined from administering, operating, implementing, or assisting with the youth-ticketing program known as “Operation CleanSWEEP” and from engaging in any violations of law, including the causes of action set forth in the People’s Complaint, and for the term of this Judgment established in Section VI, shall engage in the following affirmative corrective actions established herein.

I. DEFINITIONS

1. “Attorney General” means the Attorney General of the State of California, including his agents, and includes the Office of the Attorney General and the California Department of Justice (DOJ).

2. “CleanSWEEP” means the youth-ticketing program—known as “Operation CleanSWEEP” or “Operation Clean Sweep”—implemented by the District in collaboration with law enforcement agencies in San Bernardino County.

1 3. “Citation” means a notice to appear in any court or court diversion program, and
2 includes a notice to appear issued pursuant to Welfare and Institutions Code sections 601-602 and
3 625-626; Penal Code sections 853.5, 854.6, and 853.6a; and any other statute listed in Welfare
4 and Institutions Code section 257.

5 4. “County” means the County of San Bernardino.

6 5. “Day,” unless otherwise specified, means calendar day. If the date by which an action
7 is to be performed or completed under this Judgment falls on a weekend or state holiday, the date
8 by which the action shall be performed shall be the next day that is not a weekend day or holiday.

9 6. “District Policy” means all policies, regulations, procedures, guidance documents,
10 matrices, agreements, and protocols developed, adopted, and/or implemented by the District, and
11 includes the District’s board policies and administrative regulations, campus officer manuals, and
12 student-parent handbooks.

13 7. “Effective Date” means the date the Court enters this signed Judgment as an order of
14 the Court.

15 8. “Issue” means engaging in any one or more of the following actions: prepare or draft
16 a Citation, sign the Citation as an arresting or citing officer, deliver the Citation to the person
17 cited, secure the cited person’s written promise to appear, or determine whether a Citation shall
18 be prepared.

19 9. “Monitor” means the person or entity designated as the third-party monitor to perform
20 the functions as set forth in this Judgment.

21 10. “Monitoring Period” means the term of the Judgment set out by Section VI, which is
22 the three-year period commencing the first day after the Effective Date that is not a weekend or
23 holiday, and which may be extended or shortened as set out by Section VI.

24 11. “Personnel” means all employees (full-time, part-time, temporary, and/or contracted)
25 of the District.

26 12. “Referral” means a request for assistance by Personnel to School Resource Officers
27 or any other law enforcement officers to investigate or address student behavior, including, but
28 not limited to, by issuing a Citation or conducting a search or an arrest. Any limitations to

1 Referrals set forth in this Judgment do not limit notifications by Personnel to law enforcement
2 agencies required by law, including notifications required by Education Code sections 48902
3 or 44014.

4 13. "School Resource Officer" means any sworn peace officer whose duties include
5 providing law enforcement services to the District or any District school.

6 14. "Warning Citation" means a verbal or written warning that a person may receive a
7 Citation for their conduct.

8 15. "Youth" means a person age 25 or under and includes all students enrolled in the
9 District.

10 **II. AFFIRMATIVE REMEDIAL ACTIONS**

11 **A. Permanently Terminate CleanSWEEP**

12 16. Effectively immediately, and pursuant to the injunction described above, the District
13 shall permanently terminate its involvement in CleanSWEEP and shall never administer, operate,
14 implement, or assist with CleanSWEEP.

15 17. The District shall, within 30 days of the Effective Date, communicate the District's
16 permanent termination of its involvement in CleanSWEEP to all Personnel, parents/guardians,
17 and students, including through a written memorandum circulated to all Personnel,
18 parents/guardians, and students by email. The notice shall be visibly posted at the front office of
19 each school site. The notice shall be made available in multiple languages including English and
20 Spanish. The District shall, at the time that such written memorandum is circulated, provide to the
21 Monitor and Attorney General a copy of the notice and a list of all recipients of the notice.

22 18. The District shall, within 30 days of the Effective Date, communicate in writing the
23 District's permanent termination of its involvement in CleanSWEEP to all law enforcement
24 agencies that have ever had any role in implementing CleanSWEEP in the District, including the
25 San Bernardino County Sheriff's Department and Ontario Police Department. The District shall,
26 at the time that such notice is circulated, provide to the Monitor and Attorney General a copy of
27 the notice and a list of all recipients of the notice.

1 **B. Revise District Policy Relating to CleanSWEEP**

2 19. The District shall, within 60 days of the Effective Date, provide, for review and
3 approval by the Monitor and Attorney General, revised District Policy to require and ensure that
4 Personnel:

- 5 a. Do not administer, operate, implement, or assist with CleanSWEEP or any similar
6 program by which Youth are Issued Citations or provided Warning Citations for
7 conduct on school grounds;
- 8 b. Do not Issue Citations to any person for any reason, unless the Personnel is a
9 sworn peace officer (see Welf. & Inst. Code, § 626; Pen. Code, § 853.6);
- 10 c. Do not Issue Citations to Youth, Refer Youth to School Resource Officers or any
11 other law enforcement officers, or provide Warning Citations to Youth for conduct
12 on school grounds that cannot otherwise be cited as a felony or misdemeanor.

13 20. The revised District Policy shall include and address the collection of documents
14 and/or data necessary to monitor the District's implementation of the revised District Policy, and
15 shall include the collection of data required by Section II.L.

16 21. The District shall, within 90 days of receiving the approvals of the Monitor and
17 Attorney General, adopt and publish the revised District Policy.

18 **C. Revise District Policy Relating to Specified Citations**

19 22. The District shall, within 60 days of the Effective Date, provide, for review and
20 approval by the Monitor and Attorney General, revised District Policy to require and ensure that
21 Personnel:

- 22 a. Do not Issue Citations to Youth, Refer Youth to School Resource Officers or any
23 other law enforcement officers, or provide Warning Citations to Youth for daytime
24 loitering on school grounds under San Bernardino County Ordinance
25 section 25.0202, or any municipal analogue, including, but not limited to, Rancho
26 Cucamonga Municipal Code section 9.30.030 and Ontario Municipal Code
27 section 5-7.04;

- 1 b. Do not Issue Citations to Youth, Refer Youth to School Resource Officers or any
2 other law enforcement officers, or provide Warning Citations to Youth for
3 tobacco-related offenses under former-Penal Code section 308, subdivision (b);
4 and
5 c. Do not Issue Citations to Youth, Refer Youth to School Resource Officers or any
6 other law enforcement officers, or provide Warning Citations to Youth for
7 disturbing the peace on school grounds under Penal Code section 415.

8 23. The revised District Policy shall include and address the collection of documents
9 and/or data necessary to monitor the District's implementation of the revised District Policy, and
10 shall include the collection of data required by Section II.L.

11 24. The District shall, within 90 days of receiving the approvals of the Monitor and
12 Attorney General, adopt and publish the revised District Policy.

13 **D. Revise District Policy Relating to Review of Referrals to School Resource**
14 **Officers or any other Law Enforcement Officers**

15 25. The District shall, within 60 days of the Effective Date, provide, for review and
16 approval by the Monitor and Attorney General, revised District Policy to require and ensure that
17 supervisory Personnel, such as a school principal, review all Referrals of Youth to School
18 Resource Officers or any other law enforcement officers. The revised District Policy shall require
19 each school to designate one or more school-site administrators, such as a school principal, who
20 will be responsible for reviewing all Referrals of Youth to School Resource Officers or any other
21 law enforcement officers. The revised District Policy shall require that, before the District may
22 Refer a Youth to School Resource Officers or any other law enforcement officers, designated
23 school-site administrators confirm that such actions are consistent with the revised District Policy
24 set out in Sections II.B and II.C. Any Referrals not consistent with the revised District Policy set
25 out in Sections II.B and II.C shall not be shared with School Resource Officers or any other law
26 enforcement officers.

27 26. The revised District Policy shall include and address the collection of documents
28 and/or data necessary to monitor the District's implementation of the revised District Policy. The

1 revised District Policy shall require and ensure that Personnel document all Referrals of Youth to
2 School Resource Officers or any other law enforcement officers, and that such written
3 documentation be maintained by the District for a period of at least four years. The revised
4 District Policy shall include the collection of data relating to all Referrals of Youth to School
5 Resource Officers or any other law enforcement officers and the collection of data required by
6 Section II.L.

7 27. The District shall, within 90 days of receiving the approvals of the Monitor and
8 Attorney General, adopt and publish the revised District Policy.

9 **E. Revise District Policy Relating to Searches and Seizures**

10 28. The District shall, within 60 days of the Effective Date, provide, for review and
11 approval by the Monitor and Attorney General, revised District Policy to require and ensure that:

- 12 a. All individualized student searches conducted by Personnel who are not sworn
13 peace officers are supported by reasonable suspicion. In particular, any search
14 must be supported by “articulable facts, together with rational inferences from
15 those facts, warranting an objectively reasonable suspicion” of a student’s
16 violation, may not be supported “by mere curiosity, rumor, or hunch.” (*In re*
17 *William G.* (1985) 40 Cal.3d 550, 564-565.) Searches may not be based solely on a
18 student’s tardiness or truancy. (See *ibid.*)
- 19 b. All individualized student searches conducted by Personnel who are not sworn
20 peace officers are reasonably limited in scope. In particular, the scope of any
21 search must be “reasonably related to the objectives of the search and not
22 excessively intrusive in light of the age and sex of the student and the nature of the
23 infraction.” (*In re William G.* (1985) 40 Cal.3d 550, 564-565.) Searches of
24 students’ vehicles shall not be conducted as a matter of course; instead, vehicle
25 searches may be conducted only where the search of the vehicle is reasonably
26 related to the circumstances that first justified the search.
- 27 c. School employees never conduct a body cavity search of a student and never
28 conduct a search that involves “[r]emoving or arranging any or all of the clothing

- 1 of a [student] to permit a visual inspection of the underclothing, breast, buttocks,
2 or genitalia of the [student].” (Ed. Code, § 49050.)
- 3 d. Personnel who are not sworn peace officers never conduct a search—and never
4 threaten, say, indicate, or suggest that they will conduct a search—inconsistent
5 with subdivisions (a), (b), and (c) above.
- 6 e. Subdivisions (a), (b), (c), and (d) above do not apply to searches conducted by
7 Personnel who are sworn peace officers, which shall comply with all state and
8 federal laws and shall be addressed by the revised District Policy set out in
9 Section II.I.

10 29. The revised District Policy shall include and address the collection of documents
11 and/or data necessary to monitor the District’s implementation of the revised District Policy, and
12 shall include the collection of data required by Section II.L.

13 30. The District shall, within 90 days of receiving the approvals of the Monitor and
14 Attorney General, adopt and publish the revised District Policy.

15 **F. Revise District Policy Relating to Attendance**

16 31. The District shall, within 120 days of the Effective Date, provide, for review and
17 approval by the Monitor and Attorney General, revised District Policy setting out a
18 comprehensive approach to address student attendance, including tardiness, excused and
19 unexcused absences, chronic absenteeism, truancy, ditching, skipping, and daytime loitering.

20 32. The District shall consult with the Monitor in developing the revised District Policy.

21 33. The revised District Policy shall include multiple tiers of supports, including a tier of
22 universal strategies applicable to all students and families and additional tiers of increasing levels
23 of targeted or intensive supports for students with greater needs. The revised District Policy shall
24 prohibit Personnel from Referring Youth to School Resource Officers or any other law
25 enforcement officers, and from referring Youth to any court or court diversion program, to
26 address student attendance, except to the extent permitted under the Education Code and relating
27 to the School Attendance Review Board (SARB) process. (See Ed. Code, § 48320 *et seq.*) The
28

1 revised District Policy shall include additional best practices regarding student attendance, as
2 determined by the Monitor in consultation with the Attorney General.

3 34. The revised District Policy shall include and address the collection of documents
4 and/or data necessary to monitor the District's implementation of the revised District Policy, such
5 as data regarding implementation of other means of correction, interventions and supports, and
6 meetings held to review and revise interventions and supports for students, and shall include the
7 collection of data required by Section II.L.

8 **G. Revise District Policy Relating to Drug Use**

9 35. The District shall, within 120 days of the Effective Date, provide, for review and
10 approval by the Monitor and Attorney General, revised District Policy setting out a
11 comprehensive approach to address student drug or alcohol use.

12 36. The District shall consult with the Monitor in developing the revised District Policy.

13 37. The revised District Policy shall include multiple tiers of supports, including a tier of
14 universal strategies applicable to all students and families and additional tiers of increasing levels
15 of targeted or intensive supports for students with greater needs. The revised District Policy shall
16 include evidence-based strategies demonstrated to reduce student drug or alcohol use, such as
17 Positive Behavioral Interventions and Supports (PBIS); the delivery of school-based mental
18 health services and robust referrals and follow-through for non-school mental health services; a
19 culture of caring and climate for students that is decriminalizing of students; and culturally-
20 competent, trauma-informed responses and restorative justice practices. The revised District
21 Policy shall prohibit Personnel from Referring Youth to School Resource Officers or any other
22 law enforcement officers, and from referring Youth to any court or court diversion program, to
23 address student drug or alcohol use, unless the student's conduct poses a serious threat to school
24 safety or constitutes serious criminal behavior that cannot be safely and appropriately handled by
25 school-site administrators in accordance with the District's disciplinary procedures, or unless
26 required by state law. The revised District Policy shall include additional best practices regarding
27 student drug or alcohol use, as determined by the Monitor in consultation with the Attorney
28 General.

1 38. The revised District Policy shall include and address the collection of documents
2 and/or data necessary to monitor the District's implementation of the revised District Policy, such
3 as data regarding implementation of other means of correction, interventions and supports, and
4 meetings held to review and revise interventions and supports for students, and shall include the
5 collection of data required by Section II.L.

6 **H. Revise District Policy Relating to Referrals of Youth to School Resource**
7 **Officers or any other Law Enforcement Officers**

8 39. The District shall, within 120 days of the Effective Date, provide, for review and
9 approval by the Monitor and Attorney General, revised District Policy setting out a
10 comprehensive approach to Referrals of Youth to School Resource Officers or any other law
11 enforcement officers. The revised District Policy shall apply to Personnel's handling of all
12 student conduct subject to the District's jurisdiction, including acts related to a school activity or
13 school attendance and including acts while on school grounds, while going to or coming from
14 school, during the lunch period whether on or off the campus, and during, or while going to or
15 coming from, a school-sponsored activity. (See Ed. Code, § 48900, subd. (s).)

16 40. The District shall consult with the Monitor in developing the revised District Policy.

17 41. The revised District Policy shall be consistent with U.S. Department of Justice, Office
18 of Community Oriented Policing Services (COPS Office), Guiding Principles for School
19 Resource Officer Programs (2022). Consistent with COPS Office Guiding Principles, the revised
20 District Policy shall expressly distinguish between disciplinary infractions appropriately handled
21 by school officials and serious threats to school safety or serious criminal behavior that cannot be
22 safely and appropriately handled by school-site administrators in accordance with the District's
23 disciplinary procedures. The list of low-level disciplinary conduct that should be subject to school
24 discipline rather than Referrals to School Resource Officers or any other law enforcement officers
25 shall include all conduct previously covered by CleanSWEEP and shall include: dress code
26 violations, defiance, disruption, disorderly conduct, using profanity, disturbing the peace,
27 ditching, skipping, being tardy to school or class, being absent from school or class, truancy,
28 daytime loitering, loitering, trespassing, littering, gaming, possession of alcohol, possession of

1 tobacco, possession of marijuana, public intoxication, theft of property less than \$950, keeping
2 lost property less than \$950, graffiti less than \$250 unless pertains to gang affiliation or hate
3 groups, possession of etching cream or aerosol paint, vandalism less than \$400 unless pertains to
4 gang affiliation or hate groups, verbal altercations unless threat of serious bodily injury or
5 involves hate speech, and fights. The revised District Policy shall include additional best practices
6 regarding student Referrals to School Resource Officers and any other law enforcement officers ,
7 as determined by the Monitor in consultation with the Attorney General. The revised District
8 Policy shall expressly state that Personnel are not prohibited from requesting assistance from
9 School Resource Officers or any other law enforcement officers whenever a student's conduct
10 poses a serious threat to school safety or constitutes serious criminal behavior that cannot be
11 safely and appropriately handled by school-site administrators in accordance with the District's
12 disciplinary procedures. The revised District Policy shall expressly state that Personnel are not
13 prohibited from providing notifications to law enforcement authorities required by law, including
14 notifications required by Education Code sections 48902 or 44014. The revised District Policy
15 shall include and address the collection of documents and/ or data necessary to monitor the
16 District's implementation of the revised District Policy, and shall include the collection of data
17 required by Section II.L.

18 **I. Revise District Memorandums of Understanding Relating to School**
19 **Resource Officers Consistent with Best Practices**

20 42. The District shall, within 60 days of the Effective Date, provide, for review and
21 approval by the Monitor and Attorney General, a list of expectations (SRO Program
22 Expectations) regarding any a School Resource Officer program operating in the District. The
23 SRO Program Expectations shall set forth roles and responsibilities for the District and for any
24 law enforcement agency with which the District operates a School Resource Officer program.
25 The SRO Program Expectations shall be consistent with best practices regarding law enforcement
26 interactions with Youth, including the U.S. Department of Justice, Office of Community Oriented
27 Policing Services (COPS Office), Guiding Principles for School Resource Officer Programs
28 (2022).

1 43. The SRO Program Expectations shall, consistent with the COPS Office Guiding
2 Principles, set forth requirements for any Memorandum of Understanding (MOU) establishing a
3 School Resource Officer program with the District, including that the MOU shall document the
4 School Resource Officer's duties and program mission; identify partner roles and responsibilities;
5 prohibit School Resource Officers from engaging in school disciplinary incidents or enforcing
6 school codes of conduct or addressing typical student behavior that can be safely and
7 appropriately handled by school officials; define reporting and data collection requirements,
8 including the sharing of additional data and information collected by law enforcement; require
9 annual assessment of School Resource Officers; provide for effective training by the District or
10 other appropriate entity on various school-related topics, including nondiscrimination and serving
11 diverse students and communities (e.g., diversity based on race, color, national origin, disability,
12 and sex); outline supervision of the School Resource Officers named in the MOU; and include a
13 mechanism for the school district to receive feedback regarding School Resource Officers'
14 activities and actions.

15 44. The District shall, within 30 days of receiving the approvals of the Monitor and
16 Attorney General, publish on the District's website the SRO Program Expectations and notify all
17 law enforcement agencies that serve the District of the SRO Program Expectations. The District
18 may at that time invite any law enforcement agency serving the District to revise any MOU
19 establishing a School Resource Officer program with the District, consistent with the SRO
20 Program Expectations.

21 45. The District shall, for any law enforcement agency that the District intends to operate
22 a School Resource Officer program, make best efforts to revise, consistent with the SRO Program
23 Expectations and in collaboration with partner agencies, any MOU establishing a School
24 Resource Officer program with the District. Consistent with the COPS Office Guiding Principles,
25 all revised MOU(s) shall include input from a variety of sources including School Resource
26 Officers, school officials, law enforcement leadership, community members, school counselors,
27 students, their families, and other stakeholders. All revised MOU(s) shall set forth the District's
28 role and responsibility in making training on school-related topics available for SROs and

1 ensuring that records are maintained relating to Referrals of Youth to School Resource Officers or
2 any other law enforcement officers. All revised MOU(s) shall be consistent with the terms of the
3 Judgment and District policies as revised pursuant to the Judgment.

4 46. The District shall, within 180 days of the Effective Date, provide, for review and
5 approval by the Monitor and Attorney General, any revised MOU(s) establishing a School
6 Resource Officer program with the District. The District shall at that time provide to the Monitor
7 and Attorney General an explanation of each instance, if any, where the revised MOU(s) does not
8 meet the requirements set forth by the approved SRO Program Expectations. Notwithstanding the
9 above, any revised MOU(s) shall set forth the District's roles and responsibilities consistent with
10 the SRO Program Expectations.

11 **J. Finalize District Policy and any Memorandums of Understanding Relating**
12 **to Attendance, Drug Use, and School Resource Officers or any other Law**
13 **Enforcement Officers**

14 47. The District shall, within 30 days of receiving a response from the Monitor and
15 Attorney General regarding each of the revised District Policies and any MOU(s) set out in
16 Sections II.F through II.I, make any modifications or changes to each of the revised District
17 Policies and any MOU(s).

18 48. In addition to the requirements set out in Sections II.F through II.I, the revised
19 District Policies and any MOU(s) shall incorporate and be consistent with the rights of students
20 with disabilities under the Individuals with Disabilities Education Improvement Act (20 U.S.C.
21 § 1400 *et seq.*), Americans with Disabilities Act (42 U.S.C. § 12101 *et seq.*), and Section 504 of
22 the Rehabilitation Act of 1973 (29 U.S.C. § 795), and all implementing regulations, including
23 those requiring the timely identification and referral of students as appropriate for a full initial
24 individual evaluation to determine if the student is a student with a disability, manifestation
25 determinations, Individualized Education Program and Section 504 plan team meetings, and
26 evaluation for and development of individualized Behavior Support Plans and Behavior
27 Intervention Plans.

28 49. The District shall, within 30 days of receiving the approvals of the Monitor and
Attorney General to each of the revised District Policies and any MOU(s) set out in Sections II.F

1 through II.I, provide each of the revised District Policies and any MOU(s) to the Community
2 Advisory Committee for the Committee's review, as set out in Section II.N.

3 50. The District shall, within 30 days of receiving feedback from the Community
4 Advisory Committee regarding each of the revised District Policies and any MOU(s), and after
5 taking into consideration the Committee's feedback, provide a detailed and substantive written
6 response to the Committee, as set out in Section II.N. The District may at that time make further
7 modifications or changes to each of the revised District Policies and any MOU(s), in response to
8 the Committee's feedback, subject to the final approval by the Monitor and Attorney General.

9 51. The District shall, within 90 days of receiving each of the approvals of the Monitor
10 and Attorney General and considering and responding to the Community Advisory Committee's
11 feedback regarding each of the revised District Policies and any MOU(s) set out in Sections II.F
12 through II.I, adopt and publish each of the revised District Policies and any MOU(s).

13 **K. Notify and Train Personnel**

14 52. The District shall, within 30 days of the adoption of each of the revised District
15 Policies and any revised MOU(s) required by this Judgment, notify all Personnel of each of the
16 revised District Policies and any revised MOU(s), including through a written memorandum
17 circulated to all Personnel by email and posted in a visible place frequented by school-site
18 Personnel and through any other usual means of communicating policy changes to Personnel. The
19 District shall also notify all law enforcement agencies that serve the District and all School
20 Resource Officers of each of the revised District Policies and any revised MOU(s) pertaining to
21 that agency. The District shall, at the time that such written memorandum(s) is circulated, provide
22 to the Monitor and Attorney General a copy of the notice(s) and an explanation of how it was
23 disseminated to all Personnel and any law enforcement agencies and/or School Resource Officers.

24 53. The District shall, within 90 days of the adoption of each of the revised District
25 Policies required by this Judgment, provide, for review and approval by the Monitor and Attorney
26 General, a mandatory training schedule for Personnel regarding each of the revised District
27 Policies. The training schedule shall require that all Personnel receive, and that School Resource
28 Officers are strongly encouraged to receive, comprehensive annual training regarding each of the

1 revised District Policies, as appropriate in light of their job duties. The comprehensive annual
2 training shall ensure that Personnel who may administer or oversee school discipline in
3 accordance with District Policy, including school-site administrators, and/or who may support
4 campus safety, including campus safety officers, be trained on the following issues:

- 5 a. Implicit bias;
- 6 b. Cultural competence;
- 7 c. Responses to trauma;
- 8 d. Restorative practices;
- 9 e. Constitutional and civil rights, including the Fourth Amendment of the U.S.
10 Constitution, Title VI of the Civil Rights Act of 1964, and compliance with the
11 Americans with Disabilities Act; and
- 12 f. Conflict resolution and de-escalation techniques.

13 54. The District shall, within 120 days of the adoption of each of the revised District
14 Policies required by this Judgment, provide, for review and approval by the Monitor and Attorney
15 General, a training plan, including course outlines, for Personnel regarding the topics above and
16 the revised District Policies. The training plan shall be developed in consultation with the
17 Monitor.

18 55. The District shall, within 120 days of adopting any revised MOU(s) required by this
19 Judgment, provide, for review and approval by the Monitor and Attorney General, a mandatory
20 training schedule and training plan regarding any revised MOU(s). The training schedule shall
21 require that all Personnel receive, and that School Resource Officers are strongly encouraged to
22 receive, annual training regarding the revised MOU corresponding to the school(s) they serve.
23 The training plan shall include course outlines and be developed in consultation with the Monitor.
24 The training schedule and training plan regarding any revised MOU(s) may be integrated into the
25 comprehensive annual training schedule and plan set out above.

26 56. The District shall annually review the training schedules and training plans set out
27 above. The District's annual review shall take into consideration all data regarding the District's
28 implementation of the revised District Policies and any revised MOU(s) required by this

1 Judgment. The District's annual review shall take into account any relevant changes in law,
2 including any relevant legislation and court decisions. All changes to the training schedules and
3 training plans shall be provided to the Monitor and Attorney General within 30 days of the
4 proposed change and are subject to review and approval by the Monitor and Attorney General.

5 **L. Revise District Policy Relating to Data, and Collect and Analyze Data**

6 57. The District shall, within 60 days of the Effective Date, provide, for review and
7 approval by the Monitor and Attorney General, revised District Policy to require and ensure the
8 regular collection of detailed information regarding all Citations Issued to Youth, all Referrals of
9 Youth to School Resource Officers or any other law enforcement officers, and all Warning
10 Citations provided to Youth. The collected data shall include the Personnel taking such action and
11 any school-site administrators who reviewed such action; the Youth's conduct giving rise to such
12 action; and any other means of correction used with the Youth before taking such action. This is
13 in addition to any other documents and/or data collected pursuant to other sections of the
14 Judgment.

15 58. The District shall, within 60 days of the Effective Date, provide, for review and
16 approval by the Monitor and Attorney General, revised District Policy to require and ensure the
17 regular collection of detailed information regarding student searches. The collected data shall
18 include the basis for any search; the identity of any person that conducted any search; the scope of
19 any search, including whether the search included the student's body, clothes, pockets, backpack,
20 wallet, purse, phone, or locker, or the student's vehicle; and the result of the search.

21 59. The District shall, within 90 days of receiving the approvals of the Monitor and
22 Attorney General, adopt and publish the revised District Policies above.

23 60. The District shall, within 30 days of the Effective Date, provide to the Monitor and
24 Attorney General student-level data relating to the District's handling of student discipline. The
25 data shall include, but not be limited to, all data relating Citations Issued to Youth, Referrals of
26 Youth to School Resource Officers or any other law enforcement officers, Warning Citations
27 provided to Youth, searches, seizures, student attendance, student drug or alcohol use,
28 suspensions, and expulsions. The data shall not include student names or contact information, but

1 shall include all other demographic information, including student race, ethnicity, gender,
2 disability, language, socioeconomic status, foster youth status, and homeless status. The District
3 shall provide the data on a quarterly basis during the Monitoring Period, on a schedule as agreed
4 to by the Parties. The District shall provide the data in a format as requested by the Monitor and
5 as agreed to by the Parties.

6 61. The District shall, starting within 30 days of the Effective Date, work together with
7 the Monitor to analyze data regarding the District's handling of student discipline, including
8 issues relating to Citations Issued to Youth, Referrals of Youth to School Resource Officers or
9 any other law enforcement officers, Warning Citations provided to Youth, searches, seizures,
10 student attendance, and student drug or alcohol use, and regarding any other data collected
11 pursuant to other sections of the Judgment. The District and Monitor shall, on a monthly basis,
12 together review the data; summarize trends by location and school site; and review demographic
13 information related to citations and evaluate any disparities, including along lines of race,
14 ethnicity, gender, disability, language, socioeconomic status, foster youth status, and homeless
15 status.

16 62. The District and Monitor shall together produce, on a biannual basis, a report
17 summarizing their data analysis, as set out above. Data that would permit an individual to be
18 identified shall not be included in the biannual report. The biannual report shall not disclose
19 confidential information about Youth, shall be made publicly available, and shall be provided to
20 the Community Advisory Committee for the Committee's consideration and review, as set out in
21 Section II.N. The District shall, within 30 days of receiving the Community Advisory
22 Committee's input regarding the biannual report, provide a detailed and substantive written
23 response to the Community Advisory Committee's input. The District and Monitor's biannual
24 report may be integrated into the Monitor's biannual monitoring report to the Attorney General,
25 as set out in Section III.A.

26 **M. Revise District Policy Relating to Complaints and Analyze Complaints**

27 63. The District shall, within 60 days of the Effective Date, provide, for review and
28 approval by the Monitor and Attorney General, revised District policy to ensure that all

1 Personnel, parents/guardians, and students may easily file a formal or informal complaint
2 regarding harassment or discrimination or the District's handling of student discipline, including
3 but not limited to issues relating to Citations; Referrals to School Resource Officers or any other
4 law enforcement officers; Warning Citations; searches; seizures; student attendance; student drug
5 or alcohol use; and student interactions with School Resource Officers or any other law
6 enforcement officers. The revised District Policy shall be consistent with all requirements relating
7 to the Uniform Complaint Procedures, as set out by California Code of Regulations, Title 5,
8 division 1, chapter 5.1. (See Cal. Code Regs., tit. 5, §§ 4600 *et seq.*) The revised District Policy
9 shall be consistent with complaint procedure requirements under any other applicable laws. The
10 revised District Policy shall require and ensure that Personnel accept all complaints. The revised
11 District Policy shall require and ensure that complaint forms are available, and may be submitted,
12 at the front office of any school, and that the complaint forms are easily understood; available in
13 multiple languages including English and Spanish; available in alternative accessible formats
14 upon request; and publicized to students, parents/guardians, and the community, including
15 students and parents/guardians with limited English proficiency and students and
16 parents/guardians with disabilities. The revised District Policy shall require and ensure that
17 complaint forms are available, and may be submitted, online, and that the forms are available in a
18 format that is accessible to people with disabilities. The revised District Policy shall require and
19 ensure that Personnel provide information about the process to file a complaint and assistance, as
20 needed, to file a complaint, to any person who may want to file a complaint. The revised District
21 Policy shall require and ensure that the District retains all complaints and all materials related to
22 the District's handling of the complaints for a period of at least five years or the minimum time
23 period proscribed by law if longer than five years.

24 64. The District shall, within 90 days of receiving the approvals of the Monitor and
25 Attorney General, adopt and publish the revised District Policy above.

26 65. The District shall, within 30 days of the Effective Date, work together with the
27 Monitor to analyze all complaints received by the District, including any formal and informal
28 complaints and any written complaints or oral reports regarding harassment or discrimination or

1 the District's handling of student discipline, including but not limited to issues relating to
2 Citations; Referrals to School Resource Officers or any other law enforcement officers; Warning
3 Citations; searches; seizures; student attendance; student drug or alcohol use; and student
4 interactions with School Resource Officers or any other law enforcement officers. The District
5 shall provide detailed complaint information and any analysis to the Monitor on a monthly basis
6 during the Monitoring Period.

7 **N. Establish Community Advisory Committee**

8 66. The District shall, within 180 days of the Effective Date, establish a Community
9 Advisory Committee (Committee), whose primary purpose is to provide community feedback to
10 the District's Board of Trustees and Superintendent regarding the District's policies and
11 implementation of policies relating to student discipline, including but not limited issues relating
12 to Citations; Referrals to School Resource Officers or any other law enforcement officers;
13 Warning Citations; searches; seizures; student attendance; student drug or alcohol use; and
14 student interactions with School Resource Officers or any other law enforcement officers. The
15 Committee shall be comprised of parents/guardians, students, educators, and community
16 members and community organizations. The District shall invite representatives from the
17 following groups to join the Committee, although membership is not limited to representatives
18 from the following groups:

- 19 a. Students from each District school, including students reflecting the District's
20 diversity, including along lines of race, color, ethnicity, national origin, gender,
21 sexual orientation, disability, and language;
- 22 b. Parents, legal guardians, and education rights holders of students from each
23 District school;
- 24 c. Teachers and counselors from each District school; and
- 25 d. Community members and community organizations that work with or represent
26 Youth, including any that the Attorney General identifies for invitation.

27 67. The Committee shall meet at least once per semester during the Monitoring Period.
28 All meetings shall be held at a time and location that promotes full attendance and participation

1 by all Committee members. All meetings shall be publicized and open to the broader school
2 community.

3 68. The Committee's duties include, but are not limited to, the following:

- 4 a. Review and comment on the revised District Policies and any revised MOU(s)
5 required by this Judgment;
- 6 b. Review and comment on the implementation of the revised District Policies and
7 any MOU(s) required by this Judgment;
- 8 c. Review and comment on the data analysis required by Section II.L, and provide
9 related recommendations; and
- 10 d. Review of feedback (e.g., through surveys) from the community regarding the
11 District's practices.

12 **O. Annually Review District Policy**

13 69. The District shall annually review the revised District Policies and any revised
14 MOU(s) required by this Judgment. The District's annual review shall take into consideration all
15 data regarding the District's implementation of the revised District Policies and any revised
16 MOU(s). The District's annual review shall take into consideration and provide a detailed and
17 substantive written response to the Community Advisory Committee's input regarding the revised
18 District Policy, as set out in Section II.N. The District's annual review shall take into account any
19 relevant changes in law, including any relevant legislation and court decisions. All changes to the
20 revised District Policy shall be provided to the Monitor and Attorney General within 30 days of
21 the proposed change and are subject to review and approval by the Monitor and Attorney
22 General.

23 **P. Ensure and Demonstrate Compliance**

24 70. The District shall ensure compliance with all provisions of the Judgment, including
25 but not limited to ensuring compliance with the notifications required by Section II.A; the revised
26 District Policies and any revised MOU(s) required by Sections II.B through II.M; the data
27 analysis required by Section II.L; the review of complaint information required by Section II.M;
28 and the establishment of the Community Advisory Committee required by Section II.N.

1 71. The District shall demonstrate to the Monitor and Attorney General compliance with
2 all provisions of the Judgment, as set out in Section III.B, including but not limited to showing
3 compliance with the notifications required by Section II.A; the revised District Policies and any
4 revised MOU(s) required by Sections II.B through II.M; the data analysis required by Section
5 II.L; the review of complaint information required by Section II.M; and the establishment of the
6 Community Advisory Committee required by Section II.N.

7 **III. MONITORING**

8 **A. The Monitor**

9 72. Compliance with the Judgment shall be overseen by the Attorney General and the
10 Monitor, who shall serve as a third-party monitor of the Judgment.

11 73. The Monitor shall be subject to the approval of the Attorney General. The Monitor
12 that the Parties have selected is Peter E. Leone, Ph.D.

13 74. The Monitor works at the sole direction of, and under the sole supervision of, the
14 Attorney General and is responsible for monitoring all aspects of compliance with the Judgment
15 during the Monitoring Period. The Monitor's duties include, but are not limited to, the following
16 functions: consult regarding the development of, and review and approve, the revised District
17 Policies and any revised MOU(s) required by Sections II.B through II.M; consult regarding the
18 development of, and review and approve, the notifications to Personnel and stakeholders required
19 by Section II.A; consult regarding the development of, and review and approve, the notifications,
20 training schedule, and training plan required by Section II.K; work together with the District to
21 review and analyze data, as required by Section II.L; work together with the District to review
22 complaint information, as required by Section II.M; and consult regarding the Community
23 Advisory Committee required by Section II.N, including regarding the Committee's formation,
24 the District's sharing of information shared with the Committee, and the District's consideration
25 and written response to input from the Committee.

26 75. The Monitor and Parties shall, within 15 days of the Effective Date, meet to discuss
27 the Monitor's monitoring of the District's compliance with the Judgment.
28

1 76. At the sole direction of the Attorney General, the Monitor shall provide to the
2 Attorney General a biannual report on the status of the compliance with the Judgment. The first
3 report shall be due within 180 days of the Effective Date, and the Monitor shall work with the
4 Attorney General to develop a schedule for the biannual reports thereafter. The Monitor shall
5 provide to the Parties an advance draft copy of each biannual report, at least 30 days prior to its
6 due date. The biannual report shall not disclose confidential information about Youth and shall be
7 made publicly available and be posted on the District's website. The Monitor shall provide
8 biannual reports during the Monitoring Period.

9 77. If at any time the Monitor is no longer able to serve, the Monitor shall inform the
10 Parties in writing as soon as possible prior to ending services. Within 14 days of receiving notice,
11 the Parties will meet and confer regarding a replacement. The District agrees at that time to give
12 primary consideration to any pre-approved Monitor(s) identified by the Attorney General. The
13 replacement will be selected with the approval of the Attorney General's office no later than 60
14 calendar days after written notice is received, or as extended by written agreement of the Parties.
15 If a replacement or alternative method of selection cannot be agreed upon within 60 days, each
16 Party will submit the names of three candidates, or three groups of candidates, along with
17 resumes and cost proposals, to the Court, and the Court will select and appoint the Monitor from
18 among the qualified candidates/candidate groups.

19 **B. Monitoring Access**

20 78. The Attorney General and/or Monitor may request from the District information and
21 documents related to compliance with any provision of this Judgment, including any information,
22 data, and/or documents produced by the District to the Attorney General pursuant the DOJ's
23 investigative subpoenas in this matter. The District shall furnish all such information, data, and/or
24 documents within its possession, custody, or control no later than 14 days after the request is
25 made, unless the Parties agree in writing to another date.

26 79. The Attorney General and/or Monitor may request to review the District's data
27 systems containing information related to compliance with any provision of this Judgment,
28 including any data systems containing information relating to student discipline, including but not

1 limited to issues relating to Citations; referrals to School Resource Officers or any other law
2 enforcement; Warning Citations; student searches; seizures; student attendance; student drug or
3 alcohol use; student interactions with School Resource Officers or any other law enforcement;
4 training of Personnel; and complaints. The District shall provide access to the Attorney General
5 and the Monitor sufficient to permit such review, including but not limited to establishing screen
6 sharing.

7 80. The Attorney General and/or Monitor may request to speak with District Personnel as
8 part of their efforts to ensure compliance with any provision of this Judgment. The District shall
9 provide access to the Attorney General and the Monitor to speak with such Personnel.

10 81. The Attorney General and/or Monitor shall have direct access to the District's
11 facilities, including any District school, necessary to ensure compliance with any provision of this
12 Judgment.

13 82. The Attorney General and Monitor shall maintain all information provided by the
14 District relating to compliance with any provision of this Judgment in a confidential manner,
15 other than as expressly provided in this Judgment, including to enforce and/or extend the term of
16 the Judgment pursuant to Sections VI and VII.

17 **C. Monitoring Costs**

18 83. The District shall pay all reasonable fees and costs of the Monitor. Within ten days of
19 entry of judgment, the District shall deposit with the Department of Justice a minimum of
20 \$100,000, which shall be held in an interest-bearing account.

21 84. The Department of Justice shall pay the Monitor from this account. The Attorney
22 General shall notify the District any time the balance in said account reaches less than \$25,000,
23 and the District shall, within ten days of receiving such notice, deliver to the DOJ sufficient funds
24 to return the account's balance to \$100,000. When the Judgment has been terminated, all funds
25 remaining in the account shall be returned to the District.

26 85. The Monitor shall submit monthly monitoring invoices reflecting hourly work to the
27 District for approval and shall at that time provide a copy of the invoice to the DOJ. The District
28 shall notify the DOJ and the Monitor within 30 days, in writing, that the DOJ is authorized to pay

1 the Monitor's invoice. The District shall not unreasonably withhold approval; however, if a
2 dispute arises the District will notify the Monitor and Attorney General, and the Parties and
3 Monitor will work toward resolving the disagreement. If the disagreement cannot be resolved
4 through a meet and confer process with all Parties, then the Parties shall follow the Dispute
5 Resolution process set forth in Section IV.

6 **IV. DISPUTE RESOLUTION**

7 86. It is the Parties' intent to work collaboratively to address any disputes related to, or
8 non-compliance with, this Judgment. Unless a different timeframe is specified in this Judgment,
9 should a dispute arise, or should the Attorney General believe that the District is not in substantial
10 compliance with any part of this Judgment, the Parties shall, within five business days, initiate the
11 meet and confer process in good faith. If the Parties are unable to reach resolution, either Party, or
12 the Parties jointly, may thereafter submit the matter(s) upon which they disagree to the Court for
13 further proceedings.

14 **V. SCOPE OF JUDGMENT**

15 87. Nothing in this Judgment alters the requirements of federal or state law to the extent
16 these laws may currently, or upon future amendment will, offer greater protection.

17 88. Nothing in this Judgment alters the right of any person who believes the District has
18 violated the person's rights under any law to file a civil action or other proceeding seeking redress
19 for the alleged violation(s).

20 89. Nothing in this Judgment limits in any way the powers vested in the Attorney General
21 by the California Constitution and state statutory law, regulation, and common law, including but
22 not limited to, Government Code section 11180 et seq., to oversee and enforce any California
23 laws and regulations, which the Attorney General may use to monitor the District's compliance
24 with the Judgment. Nothing in this Judgment limits the Attorney General's jurisdiction or ability
25 to conduct any investigation or enforcement action with regard to the District's compliance with
26 this Judgment, or with any California law, regulation, or practice, whether related or unrelated to
27 this Judgment.
28

1 **VI. JUDGMENT TERM AND TERMINATION**

2 90. The term of the Judgment is three years from the Effective Date, commencing the
3 first day after the Effective Date that is not a weekend or holiday. The Judgment will terminate
4 automatically three years from the Effective Date if the District is in substantial compliance with
5 all of the substantive provisions of the Judgment.

6 91. Within 90 days prior to the automatic three-year termination date, if the Attorney
7 General determines that the District has not substantially complied with any of the substantive
8 provisions of the Judgment, then the Parties shall initiate a meet and confer process that shall not
9 extend more than 30 days. The Attorney General's determination of the District's substantial
10 compliance will be measured by the District's actions or inactions. If the Parties cannot agree on
11 the length of time that the term of the Judgment shall be extended to allow the District to reach
12 substantial compliance, the Attorney General may move the Court for such an extension within
13 60 days of the close of the meet and confer process, during the pendency of which motion this
14 Judgment shall remain in full force and effect. The Parties agree to be bound by the Court's
15 decision and forego any appeal rights they might otherwise have.

16 92. If, at any time after two years from the Effective Date, the District believes it has
17 achieved substantial compliance with all substantive provisions of the Judgment, it may submit a
18 written request to the Attorney General and Monitor that the Judgment be terminated early and
19 before the completion of the three-year term. If the District submits such a request, the Attorney
20 General may request that the Monitor prepare a written report for the Parties within 30 days that
21 evaluates whether the District has achieved substantial compliance with all of the substantive
22 provisions of the Judgment, and identifies any outstanding areas for compliance. The term of the
23 Judgment may be shortened and the Judgment terminated early if, after consulting with the
24 Monitor, the Attorney General determines that the District has substantially complied with all of
25 the substantive provisions of the Judgment. If the Attorney General determines that the District
26 has not substantially complied with any of the substantive provisions of the Judgment, the
27 Attorney General will provide written notice to the District of that determination and the term of
28 the Judgment shall not be shortened. The decision to shorten the term of the Judgment pursuant to

1 this Paragraph is at the Attorney General's sole discretion and is not subject to the dispute
2 resolution process described in Section IV.

3 93. Jurisdiction is retained by the Court to enforce the Judgment for the term of the
4 Judgment as described above for the purpose of enabling any Party to apply to the Court at any
5 time for such further orders and directions as may be necessary or appropriate for the
6 interpretation or carrying out of this Judgment, for the modification of any of the injunctive
7 provisions hereof, for enforcement of compliance herewith, and for the punishment of violations
8 hereof, if any.

9 **VII. CHANGES TO THE JUDGMENT**

10 94. The Attorney General and the District may jointly stipulate to make changes,
11 modifications, and amendments to the Judgment, which shall be effective after a joint motion is
12 filed by the Parties and is granted by the Court.

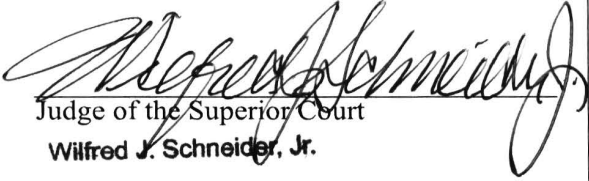
13 95. Notwithstanding the previous Paragraph, any time limits for compliance with this
14 Judgment may be extended by the Parties' written, mutual agreement, or by the Court on a
15 showing of good cause. This provision does not apply to possible extensions of the term of this
16 Judgment, which are provided for in Section VI.

17 **ENTRY OF JUDGMENT**

18 96. The Clerk is ordered to enter this Judgment forthwith.

19
20 **~~PROPOSED~~ JUDGMENT**

21
22
23
24 Dated: 9/24/2026

25 
26 Judge of the Superior Court
27 Wilfred J. Schneider, Jr.
28