

BEFORE THE
GOVERNING BOARD OF THE
INGLEWOOD UNIFIED HIGH SCHOOL DISTRICT
STATE OF CALIFORNIA

In the Matter of:

The Reduction in Force of Full-Time Equivalent
Positions of the Certificated Employees of the
District,

Respondents.

OAH No. 2010030605

PROPOSED DECISION

David B. Rosenman, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter on April 23, 2010, at the Inglewood Unified School District, Inglewood, California.

Atkinson, Andelson, Loya, Ruud & Romo, by Sharon Ormond and Jabari Willis, Attorneys at Law, represented the Inglewood Unified School District (District).

Trygstad, Schwab & Trygstad, by Lawrence B. Trygstad, Attorney at Law, represented Respondent teachers. A list of Respondents is attached as Attachment A. An explanation of the notes on that list, including the Respondents who were present at the hearing, is found in Factual Finding 7, below.

Evidence was received by way of stipulation, testimony and documents. The record was closed and the matter was submitted on April 23, 2010.

SUMMARY OF PROPOSED DECISION

The Governing Board of the District determined to reduce or discontinue particular kinds of services provided by certificated teachers for budgetary reasons. The decision was not related to the capabilities and dedication of the individuals whose services are proposed to be reduced or eliminated.

District staff carried out the Board's decision by using a selection process involving review of credentials and seniority. The selection process was in accordance with the requirements of the Education Code, except to the extent that the District failed to send a notice to one certificated employee. Therefore, one Accusation will be dismissed. Otherwise, the Board may proceed as indicated herein.

FACTUAL FINDINGS

Jurisdiction and Parties

1. The District provides educational services for approximately 14,000 students in grades kindergarten through 12 at 21 schools. The District employs approximately 723 certificated staff in permanent or probationary positions.

2. Gary McHenry is the Superintendent of the District and Monalisa Hasson is the Assistant Superintendent of Human Resources of the District. Their actions were taken in those official capacities. Ms. Hasson was responsible for implementation of the technical aspects of the layoff.

3. Before March 15, 2010, the District served on teachers, including Respondents, by personal service and/or certified mail, a written notice (notice) that it had been recommended that notice be given to them pursuant to Education Code sections 44949 and 44955 that their services would not be required for the next school year. Each notice set forth the reasons for the recommendation and noted that the Board had passed a Resolution reducing the certificated staff by full-time equivalent (FTE) positions. The first notice (Exhibit 1) related to the reduction of 95 FTE positions. Some changes were made and a second notice was served relating to the reduction of 83 FTE positions (Exhibit 2).

4. Approximately 70 certificated employees in the regular education program and management, and six certificated employees in the adult education program, referred to as Respondents, submitted timely written requests for a hearing to determine if there is cause for not reemploying them for the ensuing school year.

5. The Superintendent made and filed Accusations against each of the Respondents. On March 31, 2010, the District served the Respondents by certified mail with an Accusation along with required accompanying documents and blank Notices of Defense. Several of the Respondents were also personally served.

6. Notices of Defense were served on the District in two ways. Several Respondents filled out and returned the blank Notice of Defense that had been served with the Accusation packets. Mr. Trygstad filed a Notice of Defense with respect to all of the Respondents. (Both of these formats are found in Exhibit 8.)

7. Attachment A is incorporated by reference. The 76 names originally listed and numbered are teachers whom the District claimed had been served with Accusations. Those who did not return a Notice of Defense have the designation "NNOD." The District stipulated that its notices and Accusations were withdrawn as to all names with the designation "W/D." Finally, all Respondents whose names have the designation "*" appeared at the hearing, although not necessarily for the entire hearing.

8. Respondents in this proceeding are probationary and permanent certificated employees of the District.

The Governing Board and the Lay Off Resolution

9. There are three resolutions relating to this matter. Copies of all three are attached to the Accusation in Exhibit 6. The first was passed on February 10, 2010, when the Governing Board of the District (Board) was given notice of the Superintendent's recommendation that 95 FTE employees be given notice that their services would not be required for the next school year and stating the reasons therefore. Board Resolution number 17/2009-2010 was adopted that day (First Resolution) and proposed a layoff of 95 FTE certificated employees and provided for the reduction or elimination of the following particular kinds of services:

(1.1)	51	K-6 Classroom teaching positions	(51 F.T.E.)
(1.2)	1	7-8 Physical Education teaching position	(1 F.T.E.)
(1.3)	1	7-8 Classroom Language Arts teaching position	(1 F.T.E.)
(1.4)	2	7-8 Classroom Social Studies teaching position	(2 F.T.E.)
(1.5)	1	7-8 Classroom Life Science teaching position	(1 F.T.E.)
(1.6)	1	7-8 Classroom Physical Science teaching position	(1 F.T.E.)
(1.7)	1	7-8 Classroom Mathematics teaching position	(1 F.T.E.)
(1.8)	1	7-8 Classroom Computer teaching position	(1 F.T.E.)
(1.9)	1	9-12 Classroom Physical Education teaching position	(1 F.T.E.)
(1.10)	1	9-12 Classroom Language Arts teaching positions	(1 F.T.E.)
(1.11)	2	9-12 Classroom Social Studies teaching positions	(2 F.T.E.)
(1.12)	1	9-12 Classroom Life Science teaching position	(1 F.T.E.)
(1.13)	1	9-12 Classroom Physical Science teaching position	(1 F.T.E.)
(1.14)	1	9-12 Classroom Mathematics teaching position	(1 F.T.E.)
(1.15)	1	9-12 Classroom Computer teaching position	(1 F.T.E.)
(1.16)	6	Intervention Specialist positions	(6 F.T.E.)
(1.17)	10	Instructional Coaching positions	(10 F.T.E.)
(1.18)	2	Counseling positions	(2 F.T.E.)
(1.19)	1	School Psychologist position	(1 F.T.E.)
(1.20)	2	Program Coordinator positions	(2 F.T.E.)
(1.21)	7	Administrative Assistant positions	(7 F.T.E.)

Total: 95.0 FTEs

10. The First Resolution also established tie-breaker criteria for determining the relative seniority of certificated employees who first rendered paid service on the same date. It provided that the order of termination shall be based on the needs of the District and the students in accordance with the criteria stated therein. More specifically, the tie-breaker criteria provide for a priority list of degrees, qualifications, authorizations, credentials, certifications, experience, undergraduate units and training. In the event of a tie after reference to all listed criteria, a lottery would be held.

11. The First Resolution also included a definition of competency to be used if a more senior employee was to displace, or bump, a less senior employee from their position. The qualifications for such displacement included the status of “highly qualified” for the subject or field within the meaning of the federal No Child Left Behind Act, and appropriate certification qualifications (including English Language authorizations).

12. The second resolution was passed on March 10, 2010, when the Board was given notice of the Superintendent’s recommendation that 83 FTE employees be given notice that their services would not be required for the next school year and stating the reasons therefore. Board Resolution number 31/2009-2010 was adopted that day (Second Resolution) and proposed that, as to the First Resolution, certain services should not be reduced and other additional services should be reduced, and proposed a layoff of 83 FTE certificated employees and provided for the reduction or elimination of the following particular kinds of services:

(1.1)	51	K-6	Elementary Classroom teaching positions	(51 F.T.E.)
(1.2)	1	7-8	Physical Education teaching position	(1 F.T.E.)
(1.3)	1	7-8	Classroom Language Arts teaching positions	(1 F.T.E.)
(1.4)	2	7-8	Classroom Social Studies teaching positions	(2 F.T.E.)
(1.5)	1	7-8	Classroom Life Science teaching position	(1 F.T.E.)
(1.6)	1	7-8	Classroom Physical Science teaching position	(1 F.T.E.)
(1.7)	1	7-8	Classroom Mathematics teaching position	(1 F.T.E.)
(1.8)	1	7-8	Classroom Computer teaching position	(1 F.T.E.)
(1.9)	1	9-12	Classroom Physical Education teaching position	(1 F.T.E.)
(1.10)	1	9-12	Classroom Language Arts teaching positions	(1 F.T.E.)
(1.11)	2	9-12	Classroom Social Studies teaching positions	(2 F.T.E.)
(1.12)	1	9-12	Classroom Life Science teaching position	(1 F.T.E.)
(1.13)	1	9-12	Classroom Physical Science teaching position	(1 F.T.E.)
(1.14)	1	9-12	Classroom Mathematics teaching position	(1 F.T.E.)
(1.15)	1	9-12	Classroom Computer teaching position	(1 F.T.E.)
(1.16)	6		Intervention Specialist positions	(6 F.T.E.)
(1.17)	1		Elementary School Psychologist Position	(1 F.T.E.)
(1.17)	1		School Psychologist Position	(1 F.T.E.)
(1.18)	2		Elementary Program Coordinator Positions	(2 F.T.E.)
(1.19)	6		Administrative Assistant positions	(6 F.T.E.)
(1.19)	6		Elementary Administrative Assistant Positions	(6 F.T.E.)
(1.20)	1		Assistant Principal, Adult Education	(1 F.T.E.)
Total:				83.0 FTEs

Some of the changes from the First Resolution to the Second Resolution are: ten Instructional Coaching positions were removed; several descriptions of services were changed to add or drop that they were Elementary positions; Elementary Administrative Assistant Positions were reduced from 7 to 6 FTE; and 2 Counseling positions were removed. As a result of the changes, the District identified additional employees for possible lay off.

13. The third resolution was passed on March 10, 2010, when the Board was given notice of the Superintendent's recommendation that employees providing 88 hours per week of services in the Adult Education program be given notice that their services would not be required for the next school year and stating the reasons therefore. Board Resolution number 29/2009-2010 was adopted that day (Third Resolution) and proposed a layoff of certificated employees providing 88 hours per week of services in the Adult Education, Older Adults program, a particular kind of service. At the Hearing, the District withdrew Accusations against all employees in the Adult Education program.

14. Hasson testified that the Resolutions were required by the District's fiscal crisis and need to reduce services to balance its budget for the welfare of students. Despite budget cuts of \$7 million for the present school year, the Board must reduce its present budget by another \$4 million. The Board received information about the next state budget leading the Board to believe that, for school year 2010-2011, it would experience a further budget shortfall of \$4 million. Further, the District does not anticipate that it will be able to maintain required reserve funds and therefore has filed a qualified budget this year.

15. The decision to reduce services was not related to the capabilities and dedication of the individuals whose services are proposed to be reduced or eliminated.

The Seniority List and the Lay Offs

16. The District maintains a seniority list which contains employees' seniority dates (first date of paid service), current assignments and credentials.

17. The District used the seniority list to develop a proposed layoff list of the least senior employees currently assigned in the various services being reduced. The District used information from the seniority list and personnel files to apply the tie-breaker criteria of the First Resolution.

18. The District then determined whether the least senior employees held credentials in another area and were entitled to displace, or "bump," other employees. In determining who would be laid off for each kind of service reduced, the District counted the number of reductions not covered by the known vacancies, and determined the impact on incumbent staff in inverse order of seniority. The District then checked the credentials of affected individuals and whether they could "bump" other employees.

19. The First Resolution also included a determination that the District would seek exemption from the layoff for certain employees "because of the special training and experience . . . which others with more seniority do not possess." (Exhibit B to the Accusation in Exhibit 6.) Although this language would entitle the Board to seek to skip an employee with less seniority rendering a specific service, there was no evidence of skipping in this layoff.

20. The services identified in the First and Second Resolutions are particular kinds of services that could be reduced or discontinued under Education Code section 44955. The Board's decisions to reduce or discontinue the identified services were neither arbitrary nor capricious, and were a proper exercise of its discretion. The decisions were based on the welfare of the District and its students.

21. The District identified the certificated employees providing the particular kinds of services that the Board directed be reduced or discontinued. No junior certificated employee is scheduled to be retained to perform services which a more senior employee is certificated and competent to render, with the exception of Sandra Oliveira, as set forth more specifically below.

Failure to Serve a Notice

22. Sandra Oliveira has a first date of paid service to the District of April 16, 2007. She is a permanent employee with a clear multi subject credential and CLAD, who presently serves as the Program Coordinator at Hudnall Elementary School. She was one of the two Elementary Program Coordinators identified for layoff. The District failed to provide notice of layoff to her.

23. The most senior certificated employee identified for layoff is Gina Lutchter with a first date of paid service to the District of September 28, 2004.¹

Individual Respondents, Respondents' Contentions and Related Evidence

24. Respondents contend that all Respondents with greater seniority than Oliviera (approximately 23 Respondents) must be retained. Further, several Respondents contend that they are qualified to fulfill the duties of the position of Elementary Program Coordinator and were not contacted by the District to determine if they would apply for or take the position. Many Respondents from this group testified and established their capabilities and experience, and that they would be eligible to apply for the position of Elementary Program Coordinator.

25. Hiring for the position of Elementary Program Coordinator is a competitive process and a recent announcement of vacancy (Exhibit C) includes numerous qualifications and desired characteristics for a successful applicant. The process is flexible and program coordinators have been appointed in the past who do not satisfy every qualification and characteristic listed in the announcement, but who nevertheless established that they were capable. Many of the skills of a successful program coordinator are learned on-the-job.

¹ The evidence explained that, in the Seniority Report (Exhibit 10), employees proposed for lay off have their seniority number highlighted in purple. Lutchter is the most senior certificated employee with a seniority number highlighted in purple.

26. Heather Devereaux has a seniority date of January 3, 2005, number 523 on the seniority list. She changed her address in January 2009 and submitted a change of address card (Exhibit B) to her school site at the beginning of the next school year in September 2009. The notice and Accusation were sent to Devereaux at her prior address of record with the District.

27. According to District policy (Exhibit 14), employees must notify the District's human resources department of all address changes within 15 days. The clerk in charge of entering this information into the records does not receive change of address cards from the school sites.

28. Although Devereaux had an excused absence from her school on March 12, 2009, she signed in and attended a meeting with Hasson relating to the layoffs and learned she was on the layoff list. Despite her claim that she did not receive a notice, she submitted a Request for Hearing. Despite her claim that she did not receive an Accusation, she submitted a Notice of Defense. Under all of the circumstances, it was established that the District served Devereaux at her address of record on file with the District human resources department and that such service was sufficient.

29. John Schubert, seniority number 677, received his CLAD certification effective April 10, 2010 (Exhibit D). The District agreed to add this to his seniority information for future use.

30. The District stipulated to amend the seniority date of Marisela Ruiz, seniority number 682, to change it from September 10, 2008, to September 22, 2006. Ruiz would still be subject to lay off under this new seniority date.

31. The District stipulated to amend the seniority date of Tracy Brown, seniority number 643, to change it from April 16, 2007, to a date no earlier than January 2006. Additional research is necessary to determine the exact date. Brown's status as a probationary employee would not change, and she would still be subject to lay off under this new seniority date.

32. Respondents raised several additional contentions in their brief (Exhibit A), including, but not limited to: improper classification as temporary or substitute employees; violation of the rights of probationary employees to notice and an opportunity to be heard; improper reduction in teaching in general; improper skipping by the District; failure to permit employees to bump into another position; and failure to assign correct seniority dates. Except as specifically set forth herein, these contentions were not supported by sufficient evidence or the law and, therefore, are rejected.

LEGAL CONCLUSIONS AND DISCUSSION

1. Education Code² section 44949, subdivision (a), states in pertinent part:

“No later than March 15 and before an employee is given notice by the governing board that his or her services will not be required for the ensuing year for the reasons specified in Section 44955, the governing board and the employee shall be given written notice by the superintendent of the district or his or her designee . . . that it has been recommended that the notice be given to the employee, and stating the reasons therefor.”

2. Section 44955 provides, in pertinent part:

“(a) No permanent employee shall be deprived of his or her position for causes other than those specified in Sections 44907 and 44923, and Sections 44932 to 44947, inclusive, and no probationary employee shall be deprived of his or her position for cause other than as specified in Sections 44948 to 44949, inclusive.

“(b) Whenever . . . a particular kind of service is to be reduced or discontinued not later than the beginning of the following school year, . . . and when in the opinion of the governing board of the district it shall have become necessary by reason of any of these conditions to decrease the number of permanent employees in the district, the governing board may terminate the services of not more than a corresponding percentage of the certificated employees of the district, permanent as well as probationary, at the close of the school year. Except as otherwise provided by statute, the services of no permanent employee may be terminated under the provisions of this section while any probationary employee, or any other employee with less seniority, is retained to render a service which said permanent employee is certificated and competent to render.

“As between employees who first rendered paid service to the district on the same date, the governing board shall determine the order of termination solely on the basis of needs of the district and the students thereof. Upon the request of any employee whose order of termination is so determined, the governing board shall furnish in writing no later than five days prior to the commencement of the hearing held in accordance with Section 44949, a statement of the specific criteria used in determining the order of termination and the application of the criteria in ranking each employee relative to the other employees in the group. This requirement that the governing board provide, on request, a written statement of reasons for determining the order of termination shall not be interpreted to give affected employees any legal right or interest that would not exist without such a requirement. . . .

“(c) . . . [S]ervices of such employees shall be shall be terminated in the reverse order in which they were employed, as determined by the board in accordance with Sections 44844 and 44845. In the event that a permanent or probationary employee is not given the notices

² All citations are to the Education Code.

and a right to a hearing as provided for in Section 44949, he or she shall be deemed reemployed for the ensuing school year.

“The governing board shall make assignments and reassignments in such a manner that employees shall be retained to render any service which their seniority and qualifications entitle them to render. . . .

“(d) Notwithstanding subdivision (b), a school district may deviate from terminating a certificated employee in order of seniority for either of the following reasons:

“(1) The district demonstrates a specific need for personnel to teach a specific course or course of study, or to provide services authorized by a services credential with a specialization in either pupil personnel services or health for a school nurse, and that the certificated employee has special training and experience necessary to teach that course or course of study or to provide those services, which others with more seniority do not possess.”

3. Sections 44949 and 44955 establish jurisdiction for this proceeding. The notice and jurisdictional requirements set forth in sections 44949 and 44945 were met. (Factual Findings 1 through 8.)

4. A District may reduce services within the meaning of section 44955, subdivision (b), “either by determining that a certain type of service to students shall not, thereafter, be performed at all by anyone, or it may ‘reduce services’ by determining that proffered services shall be reduced in extent because fewer employees are made available to deal with the pupils involved.” (*Rutherford v. Board of Trustees* (1976) 64 Cal.App.3d 167, 178-179.)

5. Cause exists to reduce the number of certificated employees of the District due to the reduction and discontinuation of particular kinds of services. Cause for the reduction or discontinuation of services relates solely to the welfare of the District’s schools and students within the meaning of section 44949.

6. A senior teacher whose position is discontinued has the right to transfer to a continuing position which he or she is certificated and competent to fill. In doing so, the senior employee may displace or “bump” a junior employee who is filling that position. (*Lacy v. Richmond Unified School District* (1975) 13 Cal.3d 469.) Junior teachers may be given retention priority over senior teachers if the junior teachers possess superior skills or capabilities which their more senior counterparts lack. (*Poppers v. Tamalpais Union High School District* (1986) 184 Cal.App.3d 399; *Santa Clara Federation of Teachers v. Governing Board* (1981) 116 Cal.App.3d 831.)

7. Stipulations were reached in instances where the seniority list was incorrect, and the District agreed to reconfigure the seniority list. See Factual Findings 20, 21 and 22. This will not have an affect on the order of layoff. It may affect possible rehiring rights, which

are not subject to the jurisdiction of this hearing and are covered in other statutory provisions such as sections 44956 and 44957.

8. None of the errors in the seniority list are prejudicial to Respondents in the context of this proceeding. Therefore, they are deemed “nonsubstantive procedural errors” under section 44949, subdivision (c), and are not cause for dismissing the charges.

9. As a result of the District’s failure to send a notice to Oliviera and her lack of inclusion in these proceedings, Respondents contend that the Accusations must be dismissed as to all Respondents with greater seniority in the District, based on the language in section 44955, subdivision (b), that “the services of no permanent employee may be terminated under the provisions of this section while any probationary employee, or any other employee with less seniority, is retained to render a service which said permanent employee is certificated and competent to render.” The District contends that any prejudice resulting from its failure to include Oliviera is limited to the one most senior employee receiving a notice, Lutchter, and that, if the Accusation against Lutchter is dismissed and she is retained as an employee, there is no further prejudice to Respondents. See Factual Findings 22 through 25.

10. Respondents’ argument is frequently made in these kinds of proceedings and is known as “the domino effect”; that is, because of the error as to one employee, several more senior Respondents must be retained. However, it is determined that there is insufficient justification for invalidating the entire layoff or imposing a “domino effect.” Section 44949, subdivision (c)(3), specifically provides: “Nonsubstantive procedural errors committed by the school district or governing board of the school district shall not constitute cause for dismissing the charges unless the errors are prejudicial errors.”

Further, *Alexander v. Board of Trustees* (1983) 139 Cal.App.3d 567, adopted a “corresponding number” approach in not applying the over-inclusive remedy of ordering the school district to retain all employees who were senior to the junior employees who were not served with a layoff notice. The remedy was tailored to correct the mistake to identify only those employees who were directly prejudiced by the error. The Court held:

“Because at least some of the persons skipped should have received the notices, a corresponding number of the most senior of the employees who were not reemployed must have been improperly given notices. The trial court must determine which of the Teachers suffered prejudicial error in this case.” (*Id.* at p. 576.)

Thus, the adjustment to be made in this case is limited to reinstatement of only the most senior teacher who received a preliminary layoff notice, the only employee who was actually prejudiced by the mistake. This approach is more in keeping with the entire statutory scheme for teacher layoffs

ORDER

1. Notice may be given to employees occupying full-time equivalent certificated positions that their services will not be required for the 2010-2011 school year because of the reduction and discontinuance of particular kinds of services. Such notices may be given to the Respondents listed in Attachment A who are **not** designated with “W/D.” No such notice may be given to Gina Lutchner.

2. Notice shall be given in inverse order of seniority. Each Respondent may receive such a notice.

3. The Accusations are dismissed as to the Respondents listed in Attachment A who are designated with “W/D” and Gina Lutchner, and no final layoff notices may be sent to them.

DATED: April 27, 2010.

DAVID B. ROSENMAN
Administrative Law Judge
Office of Administrative Hearings

ATTACHMENT “A”

Section 1: Respondents in Regular Education Program and Management:

1. ROBERT ALANIZ *
2. CHERYL ALEXANDER *
3. AARON ALLEN *
4. MOI ALLUMS *
5. TARA L ARMSTRONG-BOOTH*
6. RAVINDER ATHWAL *
7. NANCY AVILA *
8. MIGUEL BARAHONA
9. LETICIA BARBA *
10. JONATHAN BARBEE *
11. SHARON BELL * **NNOD**
12. JIMANESE BENTLEY *
13. TRACEY BROWN *
14. TIFFNEY L. CAMBRIDGE **W/D**
15. TRICIA CAPWELL **W/D**
16. FRANCES CARDENAS **W/D**
17. FRANCESCA D CHASE
18. DEBORAH CHERRY *
19. BECKY J CHOI
20. CYNTHIA F CLARK *
21. CRYSTAL A CRAWFORD *
22. JORGE CRUZ **W/D**
23. HEATHER DEVEREAUX *
24. RIJALI DURHAM *
25. LISA FEARS **NNOD**
26. ALLEN FOWLER *
27. SALLY FRIEDMAN **W/D**
28. SHERRI GREER *
29. IRA HARDEN **NNOD; W/D**
30. CHERELLE HARTLEY-BONAR **W/D**
31. BRIAN HARVEY *
32. JO ANN L HERNDON **W/D**
33. ELISE C JERNIGAN *
34. MICHAEL KLINGLER **W/D**
35. ALLISON LEGGETT *
36. LETICIA LEYVA *
37. JAYE LIEBERMAN *
38. EARLENE LORD **W/D**
39. YI PING LU * **NNOD**
40. ALLISON LUND*
41. GINA LUTCHER *
42. JAMES MANNING **W/D**
43. CAROLYN MCDONALD **W/D**
44. AMA MUNDI **W/D**
45. ANGELA NADOZIE *
46. MARIA NAJERA *
47. MELODY POGUE **NNOD**
48. NICHOLAS RASCHILLA
49. TERRENCE RICE
50. REGINA RIEUX-HARVEY * **NNOD; W/D**
51. STEPHEN ROWE **W/D**
52. JENNIFER I RUBEN *
53. MARISELA RUIZ *
54. NELLIE SALDANA DE GUZMAN *
55. JOHN SCHUBERT *
56. KENNETH SRESHTA **W/D**
57. SHAWN STANTON *
58. NATALIE STECKEN
59. EDITH STONE-JACKSON *
60. SAMANTHA TAHAJIAN *
61. CARNITA THOMAS **NNOD; W/D**
62. YOLANDA VALDIVIA-GARCIA *
63. CLAUDIA VALENZUELA *
64. SOFIA VELARDE **NNOD**
65. BASILISA VILLAVICENCIO *
66. MAYRA VILLAVICENCIO *
67. OPAL L WILKERSON *
68. NAKIA WILSON *
69. CHANTELE WINSLOW **NNOD**
70. DARCIE WOLFE *

Section 2: Respondents in Adult Education Program:

1. CELESTINE COLLINS **W/D**
2. RUBEN JAIME GONZALEZ **W/D**
3. TREVOR A GRAHAM **W/D**
4. DEIDRE HARRIS **W/D**
5. MILLARD JOHNSON **W/D**
6. CARMEN RICHARDSON **W/D**

