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FAIR EDUCATION SANTA  
BARBARA, INC.  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SANTA BARBARA**

11 FAIR EDUCATION SANTA BARBARA,  
12 INC., a 501(c)(3) organization

13 Plaintiff,

14 vs.

15 SANTA BARBARA UNIFIED SCHOOL  
16 DISTRICT, a public-school district; CARY  
MATSUOKA, in his official capacity; and  
17 JUST COMMUNITIES CENTRAL  
COAST, INC., a 501(c)(3) organization,

18 Defendants.  
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Case No.: 19CV01875

**DECLARATION OF GREG GANDRUD**

Date Filed: April 8, 2019  
Trial Date: None Yet

[Assigned for all purposes to Hon. Thomas  
P. Anderle, SB Dept. 3]

**DECLARATION OF GREG GANDRUD**

I, Greg Gandrud, declare and state as follows:

1. I am the Chief Financial Officer of Fair Education Santa Barbara, Inc. (“FESB”), a California not for profit corporation. I am also a member of the Board of Directors. In that capacity I am generally made aware of the activities of FESB.

2. I am Caucasian. However, I am married to a man of color from Brazil.

3. FESB currently has approximately 300 members, many of whom have minor children in schools within the Santa Barbara Unified School District (SBUSD) and are taxpayers within the district. FESB’s objective, among others, is to ensure an excellent education for all children in the District regardless of their background.

4. I have substantial experience in organizing and maintaining 501(c)(3) non-profit corporations, including obtaining, maintaining and regaining tax exempt status from the IRS and the California Franchise Tax Board.

5. In June 2019, in addition to my other activities for FESB, I produced and hosted on behalf of FESB a four part TV series on community television, including subjects on dyslexia education, the new sex education program, a high school student’s perspective on the current school environment curriculum, and the latest activities into the sexual misconduct at the MAD Academy and its ramifications. As a representative of FESB I participated and spoke at a symposium at the Santa Barbara Elks Club.

6. At one of the early meetings of FESB, long before any litigation was filed on behalf of FESB, there was discussion about the proposed changes for admission to the academies within the SBUSD, including a proposed change to a quota system. This was of concern to the members of FESB separate and apart from the SBUSD’s funding of outside non-profits.

7. In February 2019, based on first hand student complaints, I became aware of serious deficiencies with the facilities at Santa Barbara High School. I and the other Board members authorized Sheridan Rosenberg, on behalf of FESB, to obtain photographs to document these conditions for the purpose of making official complaints. Thereafter, in April 2019, FESB filed nine separate complaints under the Williams Act to document these conditions, which the

1 SBUSD School Board purported to be thankful to have received and the matters brought to their  
2 attention. As yet, however, I am informed that the facilities have not been completely repaired or  
3 the Williams Act Complaints completely resolved.

4 8. In addition to challenging the funding for JCCC, FESB has advocated for other  
5 measures to improve the educational experience for students and teachers within the SBUSD. In  
6 particular, FESB obtained documentation concerning the scandal at the MAD Academy regarding  
7 the sexual advances to students made by Pablo Sweeney, a representative of a non-profit on  
8 campus at the MAD Academy, and the failure of the SBUSD to follow appropriate procedures in  
9 response. In particular, FESB members encouraged the parents of one of these students to report  
10 the situation directly to the School Board and to go to the police with a formal complaint. I  
11 personally addressed the School Board about this situation after this parent came forward. FESB  
12 efforts in this regard resulted in the termination of Mr. Sweeney and the departure of the MAD  
13 Academy director, Dan Williams.

14 9. FESB remains committed to addressing issues of concern to all students, parents,  
15 faculty and staff within the SBUSD. FESB's function goes well beyond the lawsuit filed  
16 regarding the funding of JCCC and involves lobbying, watchdog activities and grassroots work in  
17 the community.

18 10. Following my public involvement with FESB I have been subjected to attacks on  
19 my business and me personally. In particular:

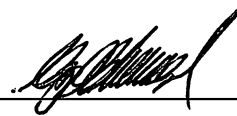
- 20 a. On December 12, 2018 (two days after the Federal lawsuit was filed, and one day  
21 after publication of a news article about the lawsuit) I received a false Yelp review  
22 from someone who to the best of my knowledge apparently never used our  
23 services.
- 24 b. On January 7, 2019 I discovered the false Yelp review and responded to the sender,  
25 whose identity I have never ascertained. The next day, January 8, 2019, I received  
26 two bogus scheduling requests on my firm's website, directing notes to my staff  
27 accusing me of being a racist greedy hatemonger and calling me a "Republican  
28 swine".

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- c. On January 9, 2019, I made a radio program in downtown Santa Barbara. After leaving the studio, I was yelled at by someone driving an Orange Honda Fit, who called me a “swine”, the same accusation leveled at me two days earlier.
- d. On February 25, 2019, I appeared on Fox News TV with Shannon Bream. Three days later, on February 28, 2019, another false posting was made on my firm’s scheduling page, by someone who booked an appointment, accusing me of being a “white nationalist swine”. On that same date, I made a Police Report on all of these matters.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 4th day of September, 2019 at Carpinteria, CA.



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GREG GANDRUD