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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 ALISON COLLINS

19 Plaintiff,

20 vs.

21 SAN FRANCISCO UNIFIED SCHOOL  
22 DISTRICT, et al.

23 Defendants.  
24

Case No.: 3:21-cv-02272-HSG

**DECLARATION OF ALISON COLLINS  
IN SUPPORT OF APPLICATION AND  
MOTION FOR ORDER TO DIRECTING  
DEFENDANTS TO SHOW CAUSE WHY  
A PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE RESTORING  
PLAINTIFF TO HER POSITION AS VICE  
PRESIDENT OF THE SAN FRANCISCO  
UNIFIED SCHOOL DISTRICT BOARD  
AND TO HER COMMITTEE  
APPOINTMENTS**

Date: Thursday, August 19, 2021  
Time: 2:00 PM  
Courtroom: Courtroom 2 – 4th Floor  
Judge: Honorable Haywood S. Gilliam, Jr

27  
28 I, Alison Collins, declare:

- 1 1. I am the Plaintiff in the above-entitled action.
- 2 2. I have personal knowledge of the facts contained in this declaration and, if called to
- 3 testify, I would competently testify thereto.

### 4 INTRODUCTION

- 5 3. I request this Court restore me to my position as vice president of the Board of San
- 6 Francisco Unified School District and to my committees from which I was wrongfully
- 7 removed based on my exercise of my First Amendment rights of free speech as a private
- 8 citizen two (2) years before I was elected to the Board. A Temporary Restraining Order is
- 9 the only way to remedy this immediate and continuing irreparable injury to me performing
- 10 my duties as vice president and as member of various committees, irreparable injury to my
- 11 reputation, my standing in the community, and to my constituents.
- 12 4. On March 24, 2021, I was summarily, and without adequate and legal prior notice, removed
- 13 from my position as VP and committee assignments solely due to my exercise of my First
- 14 Amendment rights of free speech in twelve (12) tweets on December 4, 2016 as a private
- 15 citizen two (2) years before I was elected to the Board in November 2018.
- 16 5. I was stripped of my positions even though Board members voting to remove me presented
- 17 no evidence I had repeated the remarks I made as a private citizen after I was elected to the
- 18 Board.
- 19 6. I was removed from my positions despite the fact I had not discriminated against any racial
- 20 or ethnic group ever in my life, nor had I advocated for such discrimination as a member
- 21 of the Board, as its VP, in my committee assignments or at any time.
- 22 7. I will prevail on the merits of my Claim for violation of my rights under the First
- 23 Amendment of the United States Constitution because the Board Resolution was solely
- 24 based on the exercise of my First Amendment Right of Free Speech while I was a private
- 25 person, two (2) years before I was elected to the Board.
- 26 8. During the November 6, 2018 election, I was elected to the San Francisco Unified School
- 27 District Board of Education, where I continue to serve as a board commissioner. I was
- 28 elected with a plurality of votes, totaling 122,865, which represents 15% of the 817,920
- 29 votes cast in this election out of the 19 candidates who ran during this election.<sup>1</sup>
- 30 9. On March 23, 2021, at 2:30pm DEFENDANT FAAUUGA MOLIGA announced on
- 31 Twitter: "Commissioner Lam & I will be submitting resolution at 3/25 special meeting to
- 32 remove Commissioner Collins as V.P. and from all Committees to which she is assigned."

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33 <sup>1</sup> November 6, 2018 Election Results - Summary." Department of Elections, City and County of San Francisco, (2018, November 27). <https://sfelections.sfgov.org/november-6-2018-election-results-summary>

1 In violation of SFUSD Board Rules and Procedures providing that items be agendized by  
2 the president, DEFENDANT MOLIGA forced Resolution No. 213-25A1 Assertion of No-  
3 Confidence (“Resolution”)<sup>2</sup>, onto a previously agendized special closed session meeting,  
4 removing me from my position as Vice President and from committees.

5 10. DEFENDANTS MOLIGA and LAM based the Resolution on tweets I made as a private  
6 citizen two (2) years before being elected to the Board. A Lowell alumna, Diane Yap, who  
7 was critical of a resolution I had authored to open enrollment at Lowell High School to  
8 Black, Latinx and immigrant students, and students with disabilities, searched my tweets  
9 and shared them with the media.

10 11. DEFENDANTS MOLIGA and LAM adopted and endorsed Lowell alumna, Diane Yap’s  
11 views that if I championed increased enrollment for Black and Latinx students at Lowell  
12 High School, I was racist against Asian Americans. Diane Yap had expressed documented  
13 racially disparaging statements against the Black and Latinx community, suggesting these  
14 students were academically inferior and undeserving of enrollment at Lowell. Based on  
15 this false assertion, DEFENDANTS MOLIGA AND LAM launched a media campaign  
16 against me, labeling me as an anti-Asian racist.

17 12. DEFENDANTS MOLIGA and LAM’s Resolution made false statements, slandered my  
18 character, and demanded my resignation from the Board. On March 19, 2021,  
19 DEFENDANT LAM had called me, demanding my resignation from the Board, and  
20 threatening that “If you do not resign, it will get messy!” I did not resign. The Resolution  
21 called for the removal of my title as vice president and my removal from membership in  
22 all committees on which I served.

23 13. On March 25, 2021, the Resolution was approved by a vote of 5-2. In so doing,  
24 DEFENDANTS caused irreparable injury to me by putting me and my family at physical,  
25 political, professional and economic risk. As one of the most active and accomplished  
26 members on the Board, DEFENDANTS also put at risk the work I was elected to do,  
27 causing continued irreparable injury to my constituents. In the past two (2) years, I have  
28 drafted more resolutions that pertain to cultural equity, visibility and access than any other  
commissioner currently on the Board. (See Accomplishments section which follows.)

14. As elected officials, commissioners take an oath to follow, uphold, and defend the  
Constitution of the United States of America. In approving the Resolution, DEFENDANTS  
stripped me of my VP and committee positions, violating my First Amendment Rights to  
free speech under the United States Constitution.

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<sup>2</sup> “Boarddocs”. San Francisco Unified School District Board of Education, (2021, March 25).

[https://go.boarddocs.com/ca/sfusd/Board.nsf/files/BZFRPW6F035A/\\$file/Lam%20Moliga%20Assertion%20No-Confidence.pdf](https://go.boarddocs.com/ca/sfusd/Board.nsf/files/BZFRPW6F035A/$file/Lam%20Moliga%20Assertion%20No-Confidence.pdf)

1 15. Before the vote on the illegal Resolution I, along with President Gabriela Lopez, protested  
2 and complained that the Board’s proposed action on the Resolution was a violation of the  
3 Board rules, a deviation from normal Board practices, and a violation of the law.  
4 DEFENDANTS ignored my and President Lopez’ complaints of irregularity and  
5 maintained they had complied with Board Rules. I challenged whether they had complied  
6 with the rules regarding agendaing “non-routine matters”.

7 16. I asserted in words to the effect that DEFENDANTS MOLIGA and LAM violated the  
8 Brown Act by circumventing the Board rules requiring: **“Consideration of Proposals and**  
9 **Non-Routine Items: All non-routine matters shall generally appear on the Board’s**  
10 **agenda for at least two (2) regular meetings prior to adoption by the Board. The proposal**  
11 **shall be introduced for a first reading and assigned to committee or referred to the next**  
12 **regular board meeting for second reading and action.”** Defendants’ Resolution was a  
13 **“non-routine matter”**.

14 17. The Board Rule is mandatory providing such “non-routine matters ***shall*** generally appear  
15 on the...agenda for at least two (2) days prior to adoption...”. The Resolution was  
16 introduced for a vote in only one meeting, and it was not introduced at a regular board  
17 meeting or special committee of the whole meeting but a special meeting which was  
18 intended to be a closed session meeting to discuss the interim superintendent. This rule was  
19 violated in every other aspect. DEFENDANTS violated the Brown Act, ensuring public  
20 transparency in decision making of district policies. (See Board Rules and Procedures 9322  
21 on Board Docs<sup>3</sup> under the Policies tab.)

22 18. My assertion to the DEFENDANTS in protest of the DEFENDANT’S proposed illegal  
23 conduct, was that it was illegal to follow a legal procedure to create an illegal act. That is,  
24 even if DEFENDANTS procedure was consistent with the Board rules regarding “non-  
25 routine matters”, the procedure was made illegal because the purpose was to violate my  
26 First Amendment Constitutional Rights.

27 19. Further, I, along with President Lopez protested that the DEFENDANTS were violating  
28 the Board’s Rule providing the following: “The Board President, Vice President,  
Superintendent, and/or designee(s) shall review the agenda before it is printed and shall  
have final authority over whether each item on the agenda is placed in accordance with  
Board policy. At his/her discretion the president may delay placing a resolution for first  
reading on the agenda for not more than one (1) meeting if there are more agenda items  
than are manageable.” Id.

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<sup>3</sup> “Boarddocs”. San Francisco Unified School District Board of Education, (2021, March 25).  
<https://go.boarddocs.com/ca/sfusd/Board.nsf/Public#tab-policies>

1 20. Specifically, before the vote during the March 25th Board meeting<sup>4</sup> (1:23:03 time on  
2 video recorded meeting), to strip me of my title and roles, I stated the following.:

3 “The intent and the purpose of this resolution and the urgent and irregular manner  
4 in which it has been conceived and presented, raises several questions and concerns  
5 for me. So, I am compelled to provide the following comments for the record, while  
6 also noting there will be more likely to follow.

7 As a matter of process, and to ensure proper discharge of the Board's duties, it is  
8 the Board President who sets the agenda and runs the meeting. Despite a unanimous  
9 vote by this body to nominate President Lopez to perform these roles and others it  
10 appears the proper process of the role of the president are now being disregarded  
11 by the introduction of a resolution, without going through the president, or without  
12 even notifying the president.

13 This board has agreed, and stated publicly, the number one priority is the reopening  
14 of SFUSD schools as quickly and safely as possible. That is my number one  
15 priority. The public has made it abundantly clear they want to see more evidence  
16 of that commitment in terms of time spent in these meetings and tangible results.

17 This Resolution distracts from priority matters, and at the same time, could have  
18 potentially negative impacts on the proper functioning of this board at a critical  
19 moment for the District and the City. Recently the Board has undertaken the  
20 critically important task of finding a new superintendent, which this body has  
21 agreed would be the focus of today's meeting. It is now 5:40 [pm] the meeting began  
22 at 4:10 [pm] and this is time that could have been used for that purpose.

23 The Resolution put forth at this time, and in this manner, distracts from our  
24 purposes and causes additional risks of delaying this extremely important process,  
25 and potentially destabilizes the district. Now more than ever we need to work  
26 together effectively as a board, and with other stakeholders, to address the critical  
27 challenges of this moment. This Resolution does nothing to enhance our team, nor  
28 our chances for success and I worry harm has already been done, regardless of the  
outcome of this discussion.

Lastly, I reject the attempts to mischaracterize me as a person, and as a member of  
this Board. Thank you.”

21. During the March 25th Board meeting<sup>5</sup> (1:27:44 time on video recorded meeting), before  
the vote to approve the Resolution, President Lopez also noted the irregularity of the

<sup>4</sup> “Special Meeting 3/25/21”. YouTube, (2021, March 26). [https://www.youtube.com/watch?v=p\\_WUGQQOV\\_0](https://www.youtube.com/watch?v=p_WUGQQOV_0)

<sup>5</sup> “Special Meeting 3/25/21”. YouTube, (2021, March 26). [https://www.youtube.com/watch?v=p\\_WUGQQOV\\_0](https://www.youtube.com/watch?v=p_WUGQQOV_0)

1 process, commenting that the way DEFENDANT MOLIGA had pushed it onto the  
2 agenda circumvented her leadership. She stated:

3 “I, before we proceed with the vote, of course would like to share a few of my own  
4 comments and perspectives leading up to this entire process, beginning with truly  
5 naming how this happened. I do want to be clear that it's evident when we are in  
6 these positions my leadership is consistently undermined and that's what happened  
7 with this agenda. It was publicly noted without me knowing in a way that is not the  
8 formal process. But given I've always shown up as a leader to support what the  
9 Board wants, that is why we're having this discussion today. But, it in no way  
10 followed the appropriate process, and I'm seeing patterns from my colleagues.

11 I keep hearing how this is taking away from our priorities. I hear it from the public.  
12 I hear it from commissioners. I hear from our students. And it absolutely does. And  
13 it's really inconsistent with what we say we do. And that's usually happening when  
14 we're met with a challenge. So we're here now, and we've taken this time to move  
15 away from what we said we were going to focus on which is reopening schools, to  
16 discuss the removal of a leader who has shown up for this district since she started,  
17 since before she got on the board.

18 I am not taking away from the pain that people are feeling, and I'm also  
19 acknowledging and I have my own, and I'm carrying that with me and I'm showing  
20 up here because I believe in the school district, and I believe in this board. But this  
21 entire process has been beyond hurtful. Has not acknowledged what we really need  
22 to be discussing. It does not model for our students the process that we say we  
23 preach. And it is really disappointing to hear that we don't want to devalue the work  
24 that Commissioner Collins has done, when it's exactly what's happening.

25 I've learned a lot from your leadership, Commissioner Collins.

26 And I've seen many of the anti-racist practices that SFUSD claims, be called out by  
27 Commissioner Collins. And I look at the track record, the work that she's  
28 contributed, and what she's uplifted and highlighted for us. And I know that this is  
complicated and this is hard, because we don't want to be met with the fact that we  
may have racism inside of us. But, there's no denying that this is what she's brought  
for the board, and that is why she was chosen as a leader by our colleagues.

So, to see this happening now, and to not say that this is political, to me, this is a  
ridiculous display of that. And I know we'll disagree. That's fine. I can have that  
conversation. I don't believe this is the process to do it and I've named that.

I have countless resolutions that show Commissioner Collins' commitment to this  
work. And what I've been hearing is she doesn't display that because of what came

1 up five years ago, which was a political tactic. And that's why, to me this is  
2 inconsistent. Because the work that she's brought up, the work ethic and everything  
3 that I've seen doesn't match what I'm hearing. And it is related to so many other  
4 things.

5 So, I really want us to sit down and acknowledge that we're human. That we need  
6 a process. That we need to confront it. And we cannot rush what's happening right  
7 now, because of the pressure that we face. We've always felt pressured. Since the  
8 beginning of this board's term we've confronted these issues. And have been met  
9 with that pressure, because we've been challenging a lot of the things that people  
10 don't want to talk about. That's why we're harassed. That's why we're threatened.

11 A member of this board told me after the renaming vote, that this is civil rights  
12 work. And the reason why we're met with everything that we're met with is because  
13 of us challenging that. And I just don't want us to fall under the pressure knowing  
14 that we're here representing a number of individuals who don't show up to these  
15 board meetings, who don't email us, who don't have a voice, who can't communicate  
16 with us. Commissioner Collins has consistently shown up for those people, and has  
17 called out the need for language access, for clear communication, for transparency.

18 So, I really am trying to see how we can tap into our hearts and our minds and live  
19 up to what we say we do. Not support any process that limits us in our work, after  
20 being chosen to lead this district by this board.”

21 **22.** During the two (2) years I have served on the board, at no time has a matter, particularly a  
22 “non-routine matter” been placed on the agenda via a Tweet. As noted above, President  
23 Lopez and I opposed and protested the illegal agendizing of the illegal Resolution because  
24 DEFENDANTS willfully chose to violate the following Board Rule: “Agenda Preparation.  
25 The Superintendent shall develop the agenda for each regular and special meeting in  
26 accordance with Board policy. Each agenda shall reflect the district's vision and goals and  
27 the Board's focus on student learning.” Id. DEFENDANTS, in their rush to political  
28 opportunity, ignored President Gabriela's admonition and my protest that DEFENDANTS  
actions were also violating our core purpose as a Board, “Each agenda shall reflect the  
district's vision and goals and the Board's focus on student learning”.

**SPECIAL ORDER OF BUSINESS**

23. The following is the agenda for the March 25, 2021 meeting, reflecting the Resolution to  
violate my First Amendment Rights, Item B.2. which was placed on the agenda by  
DEFENDANT MOLIGA'S tweet.

“A. GENERAL INFORMATION

1. Notice of Virtual Meeting

1 2. ADA Accommodations and Translation Services  
1. Motion to Suspend the Board Rules and Procedures to Permit Immediate Action on Resolution of No Confidence and Vote to Remove Commissioner Collins From Her Position as Vice-President and Her Membership on Board Committees for The Duration of Her Term

2  
3 2. Resolution of No Confidence and Vote to Remove Commissioner Collins From Her Position as Vice-President and Her Membership on Board Committees for The Duration of Her Term

4  
5 C. CLOSED SESSION

6 1. General Information

7 2. Public Employee Discipline/Dismissal Release

8 3. Conference with Labor Negotiators

9 4. Conference with Legal Counsel - Anticipated Litigation

10 5. Conference with Legal Counsel - Existing Litigation

11 6. Public Employee Evaluation

12 7. Public Employee Appointment

13 D. RECONVENE TO PUBLIC SESSION

14 1. Closed Session Action Report

15 E. ADJOURNMENT”

16 24. A true and correct of the illegal Board Resolution is attached hereto as Exhibit A and is as follows:

17 **“SFUSD BOARD RESOLUTION NO. 213-25A1 ASSERTION OF NO-CONFIDENCE”**

18 “For Adoption on Suspension of the Rules at First Reading

19 Subject: Resolution No. 213-25A1 Assertion of No-Confidence - Commissioners Jenny Lam and Faauuga Moliga

20 WHEREAS: Elected officials are community leaders, and students and their families look to them for guidance; and

21 WHEREAS: The inflammatory statements made by Commissioner Collins towards the Asian American community in 2016 perpetuate gross and harmful stereotypes and leave no room for nuance or potential misunderstanding; and,

22 WHEREAS: Our relationship with elected officials must be predicated on mutual respect, and when our elected officials falter, we are faced with the difficult decision of how to hold them accountable; and

23 WHEREAS: When the social media comments resurfaced, what mattered most was that she, as a leader and elected official, accept responsibility and atone for the trauma inflicted on the community by her words; and

24 WHEREAS: Although Commissioner Collins has acknowledged that her words may have caused pain, her public statements to-date have fallen short of sincere recognition of

1 the harm she has caused and Vice President Collins does not seem to take meaningful  
2 responsibility for her actions.

3 THEREFORE, BE IT RESOLVED: That on behalf of the 54,000 students in the San  
4 Francisco Unified School District, the Senior Administrative Staff, the elected officials  
5 representing all levels of San Francisco government who have requested that  
6 Commissioner Collins resign, the Commissioners of the San Francisco Board of  
7 Education have lost confidence in Commissioner Collins and her ability to focus on the  
8 pressing needs of the district at this time; and

9 FURTHER BE IT RESOLVED: That should Commissioner Collins not resign, the San  
10 Francisco Board of Education moves to remove her from her leadership position as Vice  
11 President and from all committees of the San Francisco Board of Education for the  
12 duration of her term; and

13 BE IT FURTHER RESOLVED: That the focus of the San Francisco Board of Education  
14 is the equitable re-opening of schools for our students, the health and safety of our  
15 faculty, staff, administrators, students, and families, and ensuring the financial stability of  
16 the district.

17 Special Meeting 3/25/21”

#### 18 ANALYSIS OF MY 2016 TWEETS

19 25. The following are my tweets, dated December 4, 2016, two (2) years before my election  
20 to the Board on November 6, 2018:

21 1. ***“Hey Twitter! Does anyone know about any news stories highlighting hate speech or  
22 bullying of Asian students? Please send them my way.”***

23 This tweet asks if anyone is aware of examples of hate speech or bullying directed at Asian  
24 American communities. It is not racist, nor does it perpetuate, as claimed in the Resolution,  
25 “gross and harmful stereotypes” about Asian Americans. Indeed, in this tweet I am seeking  
26 any news stories about Anti- Asian hate so both Black and Asian Americans can combat  
27 racism against our respective communities.

28 2. ***“I’m looking to combat anti-black racism in the Asian community at my daughters’  
mostly Asian Am school.”***

This tweet is not racist, nor does it perpetuate “gross and harmful stereotypes” about Asian  
Americans. This tweet was an attempt to call in allies from Asian American communities  
in support of antiracist work and to reduce hate speech and bullying at my daughters’  
school. It is, as stated, an attempt to combat anti-Black racism. Fighting anti-Black racism  
is not Anti-Asian.

- 1 3. ***“Many Asian Ss and Ts I know won't engage in critical race convos unless they see  
2 how they are impacted by white supremacy.”***

3 In this tweet, I shared an observation that, in my experience in 2016, as well as my  
4 experience attending predominantly Asian American schools, many students and teachers  
5 who identify as Asian American did not wish to engage in critical race conversations unless  
6 they can see connections to anti-Asian racism and relationships with white supremacy  
7 culture. It is not racist, nor does it perpetuate “gross and harmful stereotypes” about Asian  
8 Americans. At no time in 2016, did I receive any negative commentary on my 2016 tweets.

- 9 4. ***“I grew up in mostly Asian Am schools and know this experience all to well. Many  
10 Asian Am. believe they benefit from the "model minority" BS.***

11 In this tweet, I am describing my experience as a mixed-race Black student attending  
12 majority Asian American schools. It is not racist, nor does it perpetuate “gross and harmful  
13 stereotypes” about Asian Americans. The fact that I put it in quotes and called it BS clearly  
14 shows I do not believe in this stereotype. I am aware that this is a harmful stereotype was  
15 created by a European American and perpetuated by sociologist William Peterson,  
16 European American, about Asian Americans.

- 17 5. ***“In fact, many Asian American Ts, Ss, and Ps actively promote these myths. They use  
18 white supremacist thinking to assimilate and "get ahead".\***

19 In this tweet, I intentionally used the word “many”, not “most” or “all”, to share an  
20 observation that is shared by members of Asian American communities. As someone with  
21 extensive experience working to disrupt racism and stereotyping in schools, I described an  
22 observation I and others have made about the negative impacts of the “model minority”  
23 stereotype on Asian American community members. This tweet is not racist, nor does it  
24 perpetuate “gross and harmful stereotypes”. In fact, in this instance, my tweet seeks to  
25 dispel this harmful myth.

- 26 6. ***“Talk to many [@thelowell](#) parents and you will hear praise of Tiger Moms and  
27 disparagement of Black/Brown "culture".***

28 In this tweet, I share my experience as a parent of listening to Lowell parents describing  
the cultural superiority of Asian American families using “Tiger Mom” stereotypes,  
publicized in Amy Chua’s book *Battle Hymn of the Tiger Mother* (2011). This tweet is an  
accurate reflection of the commentary that I experienced as a parent in SFUSD Board of  
Education meetings, on parent email groups, in District parent meetings and in comments  
on my blog. It is not racist, nor does it perpetuate “gross and harmful stereotypes” about  
Asian Americans. In this tweet, I am also referencing a disparagement of Black and Brown  
culture as a justification for excluding Black and Brown children from Gifted and Talented

1 Programs such as elementary and middle school honors classes, and from enrollment at  
2 the prestigious Lowell High School.

- 3 **7. *"I even see it in my FB timeline with former HS peers. Their TLs [timelines] are full of  
4 White and Asian ppl [people]. No recognition #BlackLivesMatter exists."***

5 This tweet is a statement of fact based on my observations and is not racist, nor does it  
6 perpetuate "gross and harmful stereotypes" about Asian Americans. This tweet is an  
7 accurate description of the Facebook timelines of my high school peers, many of whom  
8 are Asian American, who did not post at all about the killing of Mike Brown during the  
9 Ferguson protests. The contrast was very evident as compared to timelines of my Black  
10 relatives who live in and around St. Louis, MO. As I mentioned previously, during high  
11 school I was tracked into mostly Asian and white "college-going" classes, with few if any  
12 Black or Latinx peers. This tweet is not racist, nor does it perpetuate "gross and harmful  
13 stereotypes" about Asian Americans.

- 14 **8. *"2 [weeks] ago, my mixed-race/Black daughter heard boys teasing a Latino about  
15 "Trump, Mexicans and the KKK." The boys were Asian American."***

16 This tweet is an accurate description of my experience as a parent of twin sixth graders  
17 who attended Francisco Middle School in the fall of 2016 after Trump was elected. This  
18 tweet is not racist, nor does it perpetuate "gross and harmful stereotypes" about Asian  
19 Americans.

- 20 **9. *"She spoke up when none of the other staff did. The after school counselor was Asian.  
21 :/"***

22 This tweet is a statement of fact shared with me by my daughter when I came to pick her  
23 up after school. I immediately confirmed this with the after-school teacher/counselor. The  
24 after-school teacher/counselor was Asian American, as were all of the other children in the  
25 after school class, aside from my daughter and the Latino boy who were being teased. This  
26 tweet is a continuation of the previous tweet. This tweet is not racist, nor does it perpetuate  
27 "gross and harmful stereotypes" about Asian Americans. I watched a news report,  
28 confirming through interviews the truth of the content in this tweet. Lyanne Melendez, of  
ABC7 Bay Area News reported:

"Several sources have confirmed that shortly after Donald Trump won the  
presidential election in 2016, a group of Asian American students in the after-  
school program at Francisco Middle School began taunting a Latino student. Alison  
Collins was a parent and not a member of the school board. Those sources tell us  
she was outraged, posting the now well-known controversial 2016 tweets."

1 **10. “My best friend from school says she feels alone in the Chinese community. She feels**  
 2 **ostracized when she speaks up against anti-black hate.”**

3 In this tweet, I reference conversations I had with my childhood friend, Tula Jeng, who is  
 4 Chinese American. Over the years, she has described instances where she felt alone in her  
 5 community when advocating in support for Black lives. This tweet is not racist, nor does  
 6 it perpetuate “gross and harmful stereotypes” about Asian Americans. I posted two posts:  
 7 “Asian-Americans for Black Lives”<sup>6</sup>, on June 8, 2020, by Tula Jeng who wrote: “During a  
 8 time when our own community is facing rampant anti-Asian violence, some of us may  
 9 choose to go insular. In the hopes that if we don’t make noise, it will pass over us...I’m  
 10 calling on, and in, my Asian American folks on here and want to know how can I support  
 11 those of you who decried anti-Asian violence one day and are silent to anti-Black violence  
 12 today.”

13 **11. “Where are the vocal Asians speaking up against Trump? Don’t Asian Americans**  
 14 **know they are on his list as well?”**

15 In this tweet I called on Asian American community members to fight back against Trump's  
 16 expressed Anti-Black, Anti-Asian, Anti-Mexican, Anti-Muslim and anti-immigrant  
 17 racism. As my friend, Tula Jeng said in her post, “This complicity and colluding to white  
 18 supremacy and the settler-colonial state will never protect us. It only makes us more  
 19 vulnerable.” I also published another post “I Am Asian. See Me”<sup>7</sup> by fellow  
 20 educator/blogger, Joanna Bradshaw, who wrote: “We cannot allow ourselves to be lulled  
 21 into complacency and used to perpetuate the status quo. Let’s speak up. It’s past time to  
 22 rock the boat.” My tweet echoes both Tula and Joanna’s call to Asian American community  
 23 members to take action. It is not racist, nor does it perpetuate “gross and harmful  
 24 stereotypes” about Asian Americans.

25 **12. “Do they think they won't be deported? profiled? beaten? Being a house n\*\*\*\*r is still**  
 26 **being a n\*\*\*\*r. You're still considered "the help."**

27 This tweet is a reference to a speech by Malcolm X titled, “The Race Problem”<sup>8</sup> where he  
 28 describes this dynamic of the “house slave” and the “field slave” within the Black  
 community. Malcolm X was telling well-off Black people who were not engaged in the  
 fight for civil rights to get involved. He was explaining that although they benefited by  
 white supremacy, they were not immune to the effects of racism. Asian American scholars

<sup>6</sup> Collins, Alison. (2020, June 8). Asian Americans for Black Lives. <http://sfpsmom.com/asian-americans-for-black-lives/>

<sup>7</sup> Collins, Alison. (2016, June 23). I Am Asian See Me. <https://sfpsmom.com/i-am-asian-see-me/>

<sup>8</sup> SOURCE: X, Malcolm. "The Race Problem." African Students Association and NAACP Campus Chapter. Michigan State University, East Lansing, Michigan. 23 January 1963.

1 have also used plantation politics to describe this dynamic in their own community. Mari  
2 Matsuda, a UCLA law professor, wrote a piece titled, “We Will Not Be Used”<sup>9</sup>.

3 This tweet is not racist, nor does it perpetuate “gross and harmful stereotypes” about Asian  
4 Americans. It is a call to action for those Asian Americans who lean into the “model  
5 minority” stereotype and believe they are better than Black or immigrant Latinx people.

6 In this tweet I urge Asian Americans who utilize the model minority myth or who are silent  
7 in the face of white supremacy to be more vocal in fighting anti-Asian, anti-Mexican, anti-  
8 Black and anti-immigrant oppression and racism.

9 This tweet does not call Asian Americans “house slaves” or the n-word. Rather, it served  
10 as a prophetic warning for those in Asian American communities who believe themselves  
11 safe from being targeted by white supremacist hate. It says, “You won’t be safe, just like  
12 house slaves aren’t safe.” Like Audre Lorde, I am saying, “Your silence will not protect  
13 you.”

14 26. Placing the resolution on the agenda, and voting to affirm it, caused the following  
15 irreparable injuries:

16 **IRREPARABLE INJURY**

17 **Irreparable Injury Caused by Stripping Me of Position as Vice President and Committee**  
18 **Membership:**

19 27. Stripping me of my unanimously elected position as Vice President and committee  
20 memberships, in violation of my First Amendment Rights of Free Speech, is an irreparable  
21 injury.

22 28. Denying me due process without adequate notice and opportunity to prepare a meaningful  
23 response to the Resolution is an irreparable injury.

24 29. Invading my Constitutional right of Privacy under both the California Constitution of  
25 Article 1, Section 1, and the Fourth Amendment of the United States Constitution by  
26 publicizing a matter of employment relations is an irreparable injury.

27 30. The Board Rule and Procedure 9121.1 states: “Vice President. This Rule and Procedure  
28 applies to the San Francisco Unified School District and the County Office of Education.  
29 In addition to performing the duties of the Board of Education's President in the President's  
30 absence, and assuming the office of the President in the event the president leaves office  
before his/her term is expired, pursuant to Board Rules and Procedures 9121, the Vice  
President shall also preside at all meetings of the Committee of the Whole, Closed Session

<sup>9</sup> Mari Matsuda, We Will Not Be Used, 1 UCLA Asian Am. Pac. Is. L.J. 79 (1993).  
<https://scholarspace.manoa.hawaii.edu/bitstream/10125/65951/We%20Will%20Not%20Be%20used.pdf>

1 and at other meetings as designated by the President in accordance with Board rules.” I can  
2 no longer serve in any capacity as outlined in Board Rule and Procedure 9121.1.Id.

3 31. I am no longer able to participate in joint SF City and SF Board of Education meetings as  
4 the Board’s representative. This includes serving on the SF Board of Supervisors RISE  
5 Task Force to which I was told by the President I would be assigned to serve. This  
6 important city task force plans to define a city district partnership to support philanthropic  
7 investment in public education and the community schools’ model being led by our district.  
8 This is work I have been shepherding since before I was on the Board. I am now effectively  
9 being removed from a body whose work I am pivotal in advancing.

10 32. I can no longer participate in reviewing the Board agenda (Board Rule 9322) with the  
11 Superintendent, Deputy Superintendents and Board President each. Determining items for  
12 the agenda helps drive policy discussions. What we discuss in board meetings determines  
13 district priorities.

14 33. The position of Vice President is a valuable platform for anyone on the Board and is a step  
15 towards becoming President. Being Vice President had put me in line to become President  
16 of the Board next year during the last year of my term in office. It is a common practice to  
17 elevate the Board Vice President to President the following year. Boards members also  
18 traditionally share leadership among members. Despite a record of achievement in my role  
19 as vice president, the Board’s action now means it is extremely unlikely I will be President  
20 of the Board during my term of office. Not so coincidentally, DEFENDANT LAM  
21 nominated DEFENDANT MOLIGA to be vice president in my stead. DEFENDANTS  
22 LAM and MOLIGA drafted the resolution to remove me and have positioned themselves  
23 to be next in line. This blatant power grab indicates they understand the real and perceived  
24 value of the office. They conspired to use my tweets prior to being in office to spread  
25 malicious lies about my character in order to advance politically.

26 34. Being Vice President has allowed me to speak as the president’s representative. The  
27 President and Vice President are the Board’s representatives. I am no longer allowed to  
28 carry the Board President’s voice. (Board Rule 9121.1)

31 35. The role of President and Vice President are highly visible and impactful. The visibility  
32 that comes from these positions has been taken from me and diminishes my contributions  
33 and instead shifts my accomplishments to others on the board. This causes real harm while  
34 I remain in office and negatively impacts my future opportunities.

35 36. SFUSD and County Office of Education Rule and Procedure 9121.1, the Vice President  
36 “shall also preside at all meetings of the Committee of the Whole, Closed Session and at  
37 other meetings as designated by the President in accordance with Board rules.” I am no  
38 longer able to chair these meetings or participate in setting the agenda of these meetings.

1 This impacts my ability to set priorities for which topics will be considered for Board action  
2 or discussion.

3 37. The fact is that the individual who took my Vice President role has a history of undermining  
4 female Commissioners leadership (including the Board President). By assuming more  
5 authority as Vice President, this same commissioner, DEFENDANT MOLIGA, will cause  
6 more harm to me personally due to what appears to be some inherent bias against women  
7 in positions of authority.

8 **Irreparable Injury Caused to My Constituents by Stripping me of My Role as Vice  
9 President and Committee Membership:**

10 38. Being the Vice President put me in a position to better support the President. President  
11 Lopez and I ran for office together and supported one another on the Board. We were  
12 aligned in supporting racial justice in our district. We are both seasoned credentialled  
13 educators who understand educational pedagogy. We are also strong voices for Black and  
14 Brown families in our district and for site-based educators. Many of our voters voted for  
15 us as a team. Now that DEFENDANT MOLIGA has usurped the Vice Presidency,  
16 President Lopez is less supported. DEFENDANT MOLIGA has repeatedly undermined  
17 her leadership. President Lopez was the second highest vote getter during our election. Our  
18 shared constituents will be harmed by a Vice President who works against her while she is  
19 in office.

20 39. As a Black mother and educator, my leadership means representation for constituents who  
21 seldom have a seat at the table. Removing me from Board Leadership means removing my  
22 important voice from spaces that do not often welcome communities of color and Black  
23 women's perspectives.

24 40. Removing me from committees means I do not have a voice in approving or informing  
25 votes on the committees to which I was assigned: Policy, Ad Hoc Student Assignment, and  
26 Building and Grounds. As the only Black SFUSD parent who has children currently  
27 enrolled in the district, the voice I bring to enrollment discussions is extremely important  
28 when considering the district's charge to decrease racial segregation in our schools. I have  
also been championing ventilation and air filtration in school classrooms and my voice will  
now be muted in discussion of this topic at committee meetings. Additionally, all  
constituents are harmed because the committees on which I served now only have two,  
rather than three members to inform district decision making.

41. The President and I worked together to determine committee assignments to ensure Board  
Leadership (both President and Vice President) could be informed about all actions taken  
in the Board's various committees. Her leadership has been circumvented because now  
that structure is no longer in place. She will be less informed as a result, and our  
constituents will likewise be harmed.

1 42. Harm to my constituents is reflected in a parent’s statement to the Board protesting the  
2 Resolution. District parent leader Rionda Batiste, a Black parent leader on the African  
3 American Parent Advisory council gave testimony at the March 25, 2021 meeting stating:

4 “Today I’m deeply saddened by the actions of this board. I was filled with  
5 hope when the board spoke up in support of Black lives. I honestly felt that  
6 for once, Black lives really mattered to SFUSD. However, I am reminded  
7 once again to Black lives do not matter. I heard specifically a calling out that  
8 the Black population is only 13%. So does that mean that our 13% no longer  
9 matters? I’m also reminded, that despite the statement to the opposite, that  
10 restorative practices mean nothing to SFUSD. Removing Alison from her  
11 position as VP and from her committees will only negate all the hard work  
12 that Alison has done and continues to do for all of our babies. Despite the fact  
13 that Black students and our families within this district make up a small  
14 number, we *do* matter.”

15 43. Constituents were further harmed because of the rushed nature of the introduction of the  
16 Resolution. They had only two days to learn about it and provide input to the Board. As it  
17 states in Board Rules and Procedures 9322: “A Board member or member of the public  
18 may request that a matter within the jurisdiction of the Board be placed on the agenda of a  
19 regular meeting. The request shall be in writing and be submitted to the Superintendent or  
20 designee with supporting documents and information, if any, at least seven days before the  
21 scheduled meeting date. Items submitted less than seven days before the scheduled meeting  
22 date may be postponed to a later meeting in order to allow sufficient time for consideration  
23 and research of the issue.”

24 44. In accordance with Board Rules and Procedures 9121, “In addition to performing the duties  
25 of the Board of Education's President in the President's absence, and assuming the office  
26 of the President in the event the president leaves office before his/her term is expired,  
27 pursuant to Board Rules and Procedures 9121, the Vice President shall also preside at all  
28 meetings of the Committee of the Whole, Closed Session and at other meetings as  
designated by the President in accordance with Board rules.”

29 **Irreparable injury caused to me and my family by maligning my character and making me  
30 a target of harassment, and physical and economic attacks:**

31 45. Placing the resolution on the agenda and voting to affirm it, put my character on the Board  
32 agenda and positioned me as not only a racist but someone who is responsible for the Anti-  
33 Asian hate speech and violence we see across the nation. The following impacts have  
34 occurred as a result:

- 35 a. **Toxic workplace environment** — In every meeting since March 23rd,  
36 DEFENDANTS have sanctioned and invited direct harassment and slander of my

1 character. This verbal abuse has never been tolerated on the Board of Education  
 2 since the ten years I have been attending meetings as a private citizen. Before public  
 3 comment at every meeting, staff regularly remind the public to “refrain from  
 4 naming employees or community members by name.” This practice was flagrantly  
 5 violated when we spent two separate meetings during public comment listening to  
 6 the public shame me. DEFENDANTS MOLIGA and LAM even criticized  
 7 President Lopez for not increasing the allotted time for this verbal abuse, which  
 8 included threats like this one which was included in the ABC7 News<sup>10</sup>:

9 "Regardless of whether you choose to do the right thing and resign or not, you will  
 10 pay the ultimate price and that's the loss of your dignity and your reputation. For  
 11 the rest of your life you will be haunted by your actions, wherever you go people  
 12 will see you for what you really are - a racist," said a resident."

- 13 b. **Damage to professional relationships** — DEFENDANTS’ actions have made it  
 14 uncomfortable for staff to interact and communicate with me. Projects I was  
 15 working on, like the Lowell Resolution, or Equity Studies Resolution, which I had  
 16 worked on with other Commissioners, are moving forward with difficulty. I am  
 17 now barred from participating in projects involving official participation in joint  
 18 committees or task forces that I had initiated in my role as Vice President and  
 19 representative of the Board, such as Community Schools work.
- 20 c. **Social ostracization and exclusion** — By stating that I am perpetuating “gross and  
 21 harmful stereotypes” DEFENDANTS officially labeled me a racist. This is an  
 22 irreparable injury to my reputation as a Board member, as a community leader, and  
 23 as a member of a political and social network that opposes racism. My social  
 24 network is full of people who engage in education and local politics.  
 25 DEFENDANTS labeling me a racist in the Resolution is an irreparable injury.
- 26 d. **Slandering my professional reputation** — DEFENDANTS’ Resolution caused  
 27 me irreparable injury by generating worldwide news and media reports, from the  
 28 US to UK and Australia, slandering me as a racist. DEFENDANTS’ slanderous  
 Resolution is also reflected in Wikipedia which repeats these false narratives.
- e. **Destruction of my political future** — In affirming the Resolution,  
 DEFENDANTS have ratified lies about me and have diminished my ability to run  
 for subsequent office on the Board or any other office or commission. This is an  
 irreparable injury.

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<sup>10</sup> Melendez, Lyanne, and Larsen, Kate. (2021, March 24). SFUSD Board Vice President Alison Collins apologizes for offensive tweets aimed at Asian Americans. Retrieved from <https://abc7news.com/sfusd-board-vp-alison-collins-asian-tweets-anti/10444050/>

1 f. **Damage to professional opportunities** — Even if I do not choose to run for future  
2 office, Google searches will now pull up a multitude of negative articles referencing  
3 the vote which falsely affirms that I am a racist. I have worked over 20 years in  
4 public education as an advocate for social justice and educational access. This false  
5 label strikes at the heart of what is most important to me in all my work—  
6 eradicating racism in public education. This is an irreparable injury. I have worked  
7 as an education consultant leading anti-racism work, coached hundreds of  
8 education leaders and successfully organized community members to eradicate  
9 racist policies and procedures. Now my resume is tarnished and undermined. There  
10 is no way to ever repair the harm this has caused and it will continually be  
11 something I will have to be prepared to respond to in future endeavors. This is an  
12 irreparable injury.

13 g. **Physical risk to me and my children** - Several weeks ago, I was in the  
14 neighborhood market shopping for food for my family. As I was leaving the store,  
15 a stranger asked me if I was Alison Collins. I said, “Yes”, to which he responded  
16 aggressively, “Fuck you!” to me in front of my teenage daughter. This experience,  
17 as well as the appearance of several individuals including a man outside my door  
18 carrying a sign that says “Resign” (last fall after our board unanimously voted to  
19 temporarily suspend selective enrollment due to lack of standardized test scores)  
20 have made me worry about my own safety and the safety of my children and  
21 husband whether we are home or out in public. This is an irreparable injury.

22 Following the Resolution, my fear for my children’s and family’s safety has  
23 increased. Even my children’s teachers have reached out to me and expressed  
24 interest in supporting my girls’ physical and emotional well-being. This is an  
25 irreparable injury.

26 h. The Resolution caused irreparable injury to me by perpetuating an existing attack  
27 on President Lopez and me because of our advocacy for equity in education,  
28 specifically at Lowell High School. Last fall President Lopez and I were targeted  
by hate speech. Ida Mojadad of the Examiner wrote an article titled: “Angered by  
Lowell decision, SFUSD grad targets school board members with violent  
imagery<sup>11</sup>—Facebook page depicts two women of color on board with swastikas  
and x-marks on their faces”:

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<sup>11</sup> Mojadad, Ida. (2020, October 23). Angered by Lowell decision, SFUSD grad targets school board members with violent imagery. Retrieved from <https://www.sfoxaminer.com/news/angered-by-lowell-decision-sfusd-grad-targets-school-board-members-with-violent-imagery/>

1 “Two school board members, both women of color, have been targeted in  
2 a Facebook page launched Friday with loaded imagery of swastikas,  
3 bloodied gloves, and photos ablaze.

4 The page, dubbed “No2racebaiting,” features photos of school board  
5 members Gabriela Lopez and Alison Collins with swastikas photoshopped  
6 on their foreheads and red x-marks across their faces with the text “NO  
7 TO NAZISM IN SFUSD.”

8 The page was launched after the Board of Education unanimously voted  
9 Tuesday to temporarily end the merit-based admissions process for Lowell  
10 High School due to coronavirus. At that meeting, Collins and Lopez were  
11 vocal in their support for consideration of permanently ending the  
12 selective process. The discussion opened up a larger, often ugly  
13 conversation about race in schools.”

14 This was one of the images that was burned in a video on the Facebook site:



21 46. **Cyber bullying** — The following tweets are but a few of the myriad of hostile bullying  
22 that has caused irreparable injury to me based on the false narrative that I am a racist as  
23 reflected in DEFENDANTS’ Resolution:

24 **Meesh** @1bigfuzzydunlop·Mar 31 Tweeted: “Racist Alison Collins has decided  
25 to sue SFUSD over “the reaction” to her nasty racist tweets. Truly unbelievable  
26 @AliMCollins”

27 **Gabe Donohoe** @gabe\_donohoe

28 **Susan Dyer Reynolds** @SusanDReynolds·Mar 27 As Brandon Harami defends  
Alison Collins after her racist tweets aimed at the API community (“I just think  
she needs to do a bigger apology”) the hypocrisy is palpable...“Wow! Alison

1 Collins the racist against AAPI folks who won't resign. She apparently is also  
2 dragging the SF NAACP down with her. This woman needs to go away." [8:19](#)  
[PM · Mar 31, 2021 · Twitter for iPhone](#)

3 **Tony Bravo** [@TonyBravoSF](#) · Mar 25 Breaking news from the indefatigable  
4 [@jilltucker](#) San Francisco school board members, in a vote of no confidence,  
5 stripped their colleague **Alison Collins** of her role as vice president over racist  
6 tweets against Asian Americans.

7 **Mason** [@webdevMason](#) · Mar 31 Replying to [@webdevMason](#) The complaint is  
8 essentially arguing that **Alison Collins** had a constitutionally-protected right to  
9 tweet racial slurs without (nonmonetary) impact to her employment, but that her  
10 fellow board members should have to compensate her for merely allowing the  
11 public to comment on them

12 **Mason** [@webdevMason](#) · Mar 31 I think **Alison Collins** might genuinely believe  
13 that it's illegal to call her a **racist**

14 **My accomplishments on the SF Board of Education and as a parent organizer:**

15 47. I am an experienced educator and community organizer working for education equity in  
16 San Francisco for more than 20 years. As a former high school English teacher and  
17 instructional coach, my accomplishments include strategic planning of the "A-G for all"  
18 high school graduation initiative for Oakland Unified School District, authoring a  
19 successful grant for SFUSD and United Way Bay Area to engage parents of first-generation  
20 college-going students, and supporting low-income Black and Pacific Islander families in  
21 organize for over \$1 Million to redesign a Bayview school which lacked doors and  
22 windows.

23 48. I have also conducted professional development for hundreds of educators across the Bay  
24 Area on topics such as bullying, anger management, and conflict resolution skills. I  
25 informed development of anti-bullying curriculum for Groundspark's "Let's Get Real"  
26 video and was a contributing author to the San Francisco Peer Resources Peer Leader  
27 Training curriculum. I also co-authored curriculum used by UC Berkeley's TRIO programs  
28 used by thousands of educators to support low-income first-generation college-bound  
students access higher education.

49. I am committed to giving back to the public education system that helped my mother rise  
out of poverty, and helped my father become one of the first Black professors at UCLA. I  
am cofounder of the SF Families Union, a Parent advocacy organization committed to  
fighting for equitable, integrated and inclusive schools. I am also the author of a blog, *SF*

1 *Public School Mom*<sup>12</sup>, focused on race, parenting and education. I also write about district  
2 policy, racism and education on *Medium*<sup>13</sup>.

3 50. I hold a master's degree in education from San Francisco State University. My two  
4 children have attended SFUSD schools since kindergarten.

#### 5 **Resolutions I Have Authored or Supported**

6 51. **Arts Equity Resolution** (Lead author) - unanimous approval. When my daughter was in  
7 fourth grade and showed her that the district arts department was excluding low income  
8 and immigrant students from arts education by requiring families to rent instruments, and  
9 violating state law, I did something about it. When I got on the Board of Education,  
10 President Gabriela López and I wrote the Arts Equity Resolution, which made SFUSD and  
11 "Arts Equity District" and directed district staff to design a plan to provide access to quality  
12 arts instruction for all children.

13 52. **Native American/Native Alaskan Resolution** (Co-author) - unanimous approval. In this  
14 resolution, the San Francisco Board of Education formally apologized to Native American  
15 families for the pain and trauma caused by racist imagery, textbooks and mascots in our  
16 schools; and consistent erasure of American Indian and Indigenous students by omission  
17 in data collection and demographics and remove stereotypes and misinformation about  
18 American Indian, Alaskan Native and all Indigenous people from school walls,  
19 celebrations and textbooks, including the current United States History textbooks.

20 53. **Equity Studies Resolution** (Lead author) - unanimous approval. The Equity Studies  
21 resolution calls for decolonizing instruction Pre-K through 12th grade by teaching about  
22 historically underrepresented communities and cultures, and removing oppressive  
23 curriculum, books, activities, school celebrations and other school practices. For the first  
24 time, this resolution calls for mandatory professional development for staff district-wide  
25 on implicit bias and racism and establishes a permanent district Equity Studies Team to  
26 identify most effective practices to address the issues of race/ethnicity, language, culture,  
27 gender identity, expression, and sexual orientation, ability, and underserved populations as  
28 they impact instruction in the classroom. It also establishes a partnership with the Human  
Rights Commission to facilitate an Equity Studies Community Taskforce to make  
recommendations on how the District is accountable to the community.

54. **SFUSD's Expanded Early College Interns program for high school and transitional  
age youth- Resolution** (Lead contributor). This policy directs \$2.7 Million to SFUSD's  
Expanded Early College Interns program to provide summer opportunities for high school  
and transitional age youth.

<sup>12</sup> Collins, Alison. SF Public School Mom. <https://sfpsmom.com/>

<sup>13</sup> Collins, Alison. Medium. <https://alimcollins.medium.com/>

1 55. **SFUSD Data Access, Inclusion, and Partnership to Enhance Student Success**  
2 **Resolution** (Co-author) - unanimous approval. In an effort to better reflect the diversity  
3 of the San Francisco Unified School District (SFUSD) and capture the true identities of the  
4 student population, this resolution revises its data collection systems to maintain more  
5 specific racial/ethnic, national origin, language and gender specific data, including  
increased visibility for Vietnamese, Arab, Native American students and multi-racial  
students.

6 56. **In Response to Ongoing, Pervasive Systemic Racism at Lowell High School**  
7 **Resolution** (Lead author) – 5-2 approval. The resolution calls on the SF Board of  
8 Education to initiate a Memorandum of Understanding (MOU) process with the Education  
9 and Civil Rights Initiative (CRI) of the University of Kentucky College of Education,  
10 Lexington KY, in collaboration with the SF NAACP, California NAACP and National  
11 NAACP to facilitate an equity audit and resulting action plan to “address the exclusion and  
ongoing toxic racist abuse that students of color, and specifically Black students, have  
experienced at Lowell High School.

12 57. **In Support of Black Lives in SFUSD and the Abolition of Armed Law Enforcement**  
13 **in Schools** (Lead author) – unanimous approval. The resolution declares schools a  
14 sanctuary space from law enforcement so that we can continue to create safe, healthy, and  
15 equitable schools for all SFUSD students. I directs the district to clarify safety policies and  
16 requests increased investment from the City of San Francisco for Community Schools and  
violence prevention and youth development.

17 58. **Our Healing in Our Hands SFUSD Resolution: Creating Schools as Spaces of**  
18 **Student-Driven Healing, Transformation, and Growth** (Co-author) – unanimous  
19 approval. This resolution seeks to increase funding to support preventative wellness  
20 services for students. It also creaes a role for immigrant, Black, Asian, Latinx and Arab  
21 youth as leaders and decision makers. In doing so, it provides opportunities for youth of  
color to take collective action in creating for wellness and healing in their school  
communities.

22 59. **Resolution 204-14A1, To Establish Policies and Procedures for the San Francisco**  
23 **Unified School District to Provide Trauma-Informed, Coordinated Care that**  
24 **Promotes Resilience and Healing During and After the COVID-19 Pandemic** (Co-  
25 author) – unanimous approval. This resolution adopts a coordination of care plan designed  
26 with an equity lens and cultural humility, implementing a school community needs  
27 assessment to assess needs of students, families and educators and provide organizational  
support for all educators and staff and administrators around burnout and secondary  
traumatic stress.

28 **SUPPORT FROM ASIAN AMERICAN COMMUNITIES**

1 60. Despite what I tweeted, the idea that there is “no room for nuance or potential  
2 misunderstanding” for others who read my tweet is easily disproved when you review the  
3 response my tweets garnered from the larger community. Initially, when I posted my  
4 tweets, there was no negative response. I think I may have only received one comment.  
5 When I ran for office, there was no outcry about them. My tweets only became  
6 controversial after they were misinterpreted and shared within the context of recent anti-  
Asian violence and within the context of people suing SFUSD with the rationale that  
removing selective enrollment from Lowell High School is anti-Asian.

7 61. Despite the controversy, I have received widespread support from Black, Latinx, and many  
8 Asian American parents and community members, including social media influencers and  
9 social commentators. Nick Cho and Ranier Maningding have vociferously spoken on my  
10 behalf as well, stating that not only are my tweets not racist but elevate a truth that needs  
to be discussed in the Asian American and larger community.

11 62. Some examples of support were captured in an ABC7 News video “Asian supporters come  
12 to defense of SF school board member; woman who found offensive tweets talks to ABC”  
which interviewed members of the Asian American Lowell alumni:

13 "Those messages were not racist," said Lowell High School alum Vivian Tong, "I think  
14 they could have been worded more tactfully, but she was in such a position of pain. A lot  
of us in the Asian community don't speak up enough.

15 Tong graduated from Lowell High School in 2012 and said she saw racial discrimination  
16 at the school directed towards Black and Brown students. There have been rallies in  
17 the past addressing this issue.

18 Tong and ABC7 News anchor Jobina Fortson talked on Zoom with several other supporters  
19 of Collins who said she wasn't offered restorative justice. Ina Dang is a Lowell Alum and  
20 put her four children through SFUSD schools.

21 "There were several times where I was so frustrated because race relations were not  
22 addressed that I could understand and I actually identified- her tweets actually resonated  
with me," Dang said.

23 "Just the screenshots," Dang continued. "It's really...is actually taking advantage of the pain  
24 of Asian Americans right now and using it as a tool to get what they want.""

25 63. Nick Cho is a SFUSD parent and social media influencer with over 2 Million followers on  
26 TikTok and 62,000 followers on Twitter. As soon as news broke, he immediately started  
27 tweeting his support and his analysis of the smear campaign being elevated by Jill Tucker's  
article about my tweets. Over the two weeks he tweeted in support of me.

28 64. On March 19, 2019 Nick Cho tweeted:

1 “I’m FURIOUS about this. A group of white parents trying to recall WOC @lopez4schools  
2 & @AliMCollins dug up tweets by Collins about anti-Black racism by Asian Americans  
3 and are adding it to their smears. HOW MANY TIMES WILL WE TELL WHITE  
4 PEOPLE THAT ASIANS ARE NOT YOUR WEDGE!!!” [This tweet was a Quote  
5 Retweet containing a post by Jill Tucker which read: “The Lowell HS Black Student Union  
6 has removed Alison Collins from a Women in Leadership panel tonight. “The Lowell Black  
7 Student Union stands with the Asian community and condemns all acts of anti-Asian hate.”  
8 San Francisco school board member criticized for racist tweets in 2016 aimed at Asian  
9 Americans] “Do you people actually think that you can weaponize the current anti-Asian  
10 crisis against a Black VP of the SFUSD? This is beyond disgusting. @AliMCollins has a  
11 consistent record of supporting Asian families along with all SF students. Her 2016 tweets  
12 are legit and true.”

13 “How DARE THESE PEOPLE THINK THEY CAN DO THIS! How dare @recallSFBOE  
14 with a consistent white supremacist message and mission try to smear @AliMCollins with  
15 this? @jennyhham do not fall for this white supremacist trap.”

16 “I’m absolutely disgusted. To do this this week, TO HAVE THE GALL TO TRY TO USE  
17 ASIAN AMERICANS AS A WEDGE THIS WEEK AGAINST ALISON COLLINS?  
18 THIS WHITE SUPREMACIST SAN FRANCISCO FOOLISHNESS HAS GONE TOO  
19 FAR.”

20 “The tweets in question are difficult to read but they express absolutely legitimate and true  
21 issues within the Asian American community. Anti-Black racism in the APA community  
22 is a real issue. @RecallSFBOE you will not get away with this.”

23 My story was also picked up by another Asian American social media influencer and social  
24 commentator focused on uplifting topics of “race, politics, and culture”. Rainier  
25 Maningding is the creator of Love Life of an Asian Guy (LLAG for short) with over 250K  
26 followers, who hosts a regular Facebook livestream called Office Hours. On March 29,  
27 2021, he chose to devote an entire two-hour episode in support of me: What I Learned  
28 From The Alison Collins Story<sup>14</sup> | Office Hours #11 In it he reviewed my tweets and  
clarified that not only were they not racist, they were articulating important truths.

“So let me first just talk about these tweets just breaking down some really quick things.  
One, a lot of people misinterpreted her tweets as saying that like, “Oh my gosh, you know  
Asians are the model minority and you guys don't experience racism!” But really what she  
was talking about was that you know, unfortunately, there are a lot of Asian people who  
buy into the myth of the model minority stereotype. And you can usually tell when someone  
is invoking the model minority stereotype in a transparent, not positive but truthful way,  
versus a dishonest more racist way, based on whether or not they include the word “myth”

<sup>14</sup> <https://www.facebook.com/theLLAG/posts/317417359750444>

1 or some sort of word qualifying that the term model minority is sort of this, a misunderstood  
2 term. And she specifically said that it is a myth, and that it is bullshit, so I recognize that  
3 she is calling upon the fact that Asian people will try to look at the model minority  
4 stereotype thinking, “Wow I can sort of elevate my status in society by acting this way, or  
5 aligning myself with these values, or trying to be chummy with white conservatives.” That  
6 is a real thing. ...

7 And lastly, in reference to these series of tweets. People thought that like Alison was calling  
8 Asian people a slur. Like, there’s so many people who seriously think that that last tweet  
9 is indicative of Allison calling Asian people the n-word. Not realizing that she's actually  
10 talking about the way Asian people dismiss racism because they think things like merit,  
11 and hard work, and accolades will elevate themselves to a level in society where they can  
12 actually avoid racism, or racism is no longer a factor because, “Well, I'm smart. I'm  
13 successful. I'm rich. I've done everything right. You guys experienced racism because you  
14 are the ones who are race-baiting. I don't deal with racism 'cause I'm a hard worker!” Like,  
15 that is what she's talking about. And again it's like it is a common theme in so many of the  
16 Asian people talking about what she said, and again, they're not really engaging in sort of  
17 the larger issues that are surrounding this thing.”

### 18 **Investing in the community**

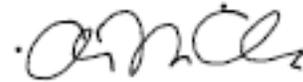
19 65. I and my husband have supported the following San Francisco non-profit and  
20 community-based and professional organizations:

- 21 ● Hamilton Families
- 22 ● Compass Family Center
- 23 ● Horizons
- 24 ● SF Recreation and Parks
- 25 ● Equality CA
- 26 ● Teachers for Social Justice
- 27 ● Coleman Advocates
- 28 ● SF Alliance of Black School Educators
- CCDC - Chinatown Community Development Center
- CYC - Community Youth Center
- CBRP - Committee for Better Rec & Park
- Brightline Defense
- United Playaz
- Local 2
- San Francisco Building & Construction Trades
- TelHi Neighborhood Center
- Jean Parker School
- Helen Wills Park
- Broadway Streetscape
- SF Public Library

1 66. I request that the court restore me to my vice presidency and to my committees. It is the  
2 only way to remedy this immediate and continuing irreparable injury to my reputation,  
3 my standing in the community, and to my constituents.

4 I declare under the penalty of perjury under the laws of the United States of America that  
5 the foregoing is true and correct.

6 This declaration was executed on May 26, 2021 in San Francisco, CA.

7 

8 Alison M. Collins

**PROOF OF SERVICE**

I, the undersigned, hereby certify that I am a citizen of the United States, over the age of eighteen years and not a party to the within action. My business address is 475 GATE FIVE RD, SUITE 211, SAUSALITO, CALIFORNIA 94965.

**DOCUMENT(S): DECLARATION OF ALISON COLLINS IN SUPPORT OF APPLICATION AND MOTION FOR ORDER TO DIRECTING DEFENDANTS TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE RESTORING PLAINTIFF TO HER POSITION AS VICE PRESIDENT OF THE SAN FRANCISCO UNIFIED SCHOOL DISTRICT BOARD AND TO HER COMMITTEE APPOINTMENTS**

I caused to be served a true copy of the above-named document(s) per the addressee(s) listed below or per the attached list.

**(X) E-MAIL**

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MEYERS NAVE  
1999 Harrison Street, 9th Floor  
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Served and executed this 26th Day of March, 2021

  
\_\_\_\_\_  
MATT McCULLEY