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2004 MAR -4 AM 8:36

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CENTRAL DIST. OF CALIF.
LOS ANGELES

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LAUREN M. CRUZ, by her next friend
Jean Cruz; VALERIE HERRERA, by
her next friend Carolina Herrera;
JENNIFER N. CERROS; CATHERINE
GREMPPEL, by her next friend Tina
Grempele, individually and on behalf of
all those similarly situated,

Plaintiffs,

vs.

ALHAMBRA SCHOOL DISTRICT;
THE CITY OF ALHAMBRA;
RUSSELL LEE-SUNG, VICTOR
SANDOVAL, LOU TORRES,
WILLIAM A. VALLEJOS, JOHN H.
NUÑEZ, ROBERT L. GIN, RUTH E.
CASTRO, and BARBARA A.
MESSINA, in their official capacities,

Defendants.

Case No.

CV04-1460

DT

(Mcx)

CLASS ACTION COMPLAINT
FOR INJUNCTIVE AND
DECLARATORY RELIEF

JURISDICTION AND VENUE

1. Plaintiffs bring this suit under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, et seq. and its interpreting regulations, the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution as enforced through 42 U.S.C. § 1983, the California Constitution, Article 1, § 7, California Education Code § 230 et seq., and California Government Code § 11135. This Court has jurisdiction over Plaintiff's federal law claims pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and 1343(a)(4). This Court has supplemental jurisdiction over the related state law claims pursuant to 28 U.S.C. § 1367(a). Plaintiffs' state law claims are related, as all of Plaintiffs' claims share common operative facts. Resolving all state and federal claims in a single action serves the interests of judicial economy, convenience and fairness to the parties.

2. Declaratory and other relief is authorized pursuant to 28 U.S.C. § 2201 and 28 U.S.C. § 2202 for the purpose of determining a question of factual controversy that exists between the parties. A declaration of the correct interpretation of the legal requirements described in this complaint is necessary and appropriate to determine the respective rights and duties of the parties to this action.

3. Venue is proper in the Central District of California pursuant to 28 U.S.C. § 1391(b), because the events giving rise to Plaintiffs' claims occurred in this District. All Plaintiffs reside in this District, as do the Defendants Alhambra School District and the City of Alhambra. Plaintiffs are informed and believe and based thereon allege that the individual Defendants reside in this District. In any event, all the individual Defendants engaged in the illegal acts described herein in the Central District.

INTRODUCTION

4. Plaintiffs bring this action to remedy the unlawful sex discrimination of Alhambra School District ("the District"), City of Alhambra ("the City"), District employees Russell Lee-Sung, Victor Sandoval, and Lou Torres (the "individual District Defendants"), and Alhambra School Board members William A. Vallejos, John H. Nunez, Robert L. Gin, Ruth E. Castro, and Barbara A. Messina, (the "individual School Board Defendants") against female student athletes at Alhambra High School ("AHS"). Defendants' unlawful sex discrimination violates female students' rights under Title IX of the Education Amendments of 1972 ("Title IX"), the United States and the California Constitutions, and state anti-discrimination laws.

5. Defendants have unlawfully failed to provide female student athletes equal treatment and benefits as compared to male athletes in a myriad of ways, including but not limited to:

(a) Assigning female student athletes to inferior, substandard, poorly maintained, and dangerous playing facilities while assigning male student athletes to the best facilities which are superior, well maintained and safe;

(b) Hiring less experienced and walk-on coaches for female student athletes;

(c) Assigning female student athletes to an inferior and dilapidated locker room with broken showers and restrooms while providing male student athletes three locker rooms, thus giving them access to additional locker space, working showers and restrooms, and lockers that are larger and more appropriate for athletes;

(d) Securing the most popular "prime time" slots for male student athletes' practice and competition times while relegating the female student

1 athletes to the earlier, less desirable times;

2 (e) Excluding female student athletes entirely from two of AHS's
3 weight rooms, and effectively excluding female student athletes from the use of
4 a third weight room;

5 (f) Consistently providing less publicity and support for female
6 athletic teams than for male athletic teams, including not providing
7 cheerleaders, pep band, public address system, scoreboards, and videotaping;
8 and

9 (g) Failing to ensure appropriate funding to support female student
10 athletes.

11 6. Defendants have intentionally discriminated against the female
12 student athletes by funding, authorizing, constructing, renovating, and
13 maintaining Moor Field, a state-of-the-art facility designed and intended
14 primarily for male student athletes. The facility includes fields for the male
15 students' baseball teams; however, the Defendants refused to create any field
16 appropriate for softball use, despite the frequent and explicit pleas by parents
17 and coaches.

18 7. The District and the individual District defendants have
19 discriminated against the female students at AHS by failing to provide them
20 with an equal opportunity to participate in athletic programs. Notwithstanding
21 the significant numbers of female students who have the interests and abilities
22 to participate in athletics, the District and the individual District Defendants
23 have failed to offer the female students at AHS athletic opportunities
24 proportionate to their numbers. As a result, female students have been unable
25 to participate in team sports, have been deterred from participating, and have
26 been excluded from AHS's athletic programs.

1 8. The District cannot demonstrate that its programs nevertheless
2 comply with Title IX despite the failure to provide proportionate numbers of
3 athletic opportunities to the female students at AHS. The District does not have
4 a history and continuing practice of expanding its athletic programs in response
5 to the developing interests and abilities of female students. Accordingly, the
6 failure to provide female students with an equal opportunity to participate has
7 occurred without justification or defense by the District and in total disregard
8 for the female students who have the interest and ability to participate in sports.

9 9. The Defendants' repeated, purposeful differential treatment of
10 female students at AHS and female AHS athletes reveals an utter disregard for
11 laws protecting against such invidious sex discrimination. The Defendants have
12 continued to unfairly discriminate against females despite persistent complaints
13 by students, parents, coaches, and others. Plaintiffs and the class they propose
14 to represent have been provided with no other alternative but to hold the
15 Defendants accountable for their persistent discrimination by instituting this
16 lawsuit.

17 10. In bringing this lawsuit, Plaintiffs seek to require that Defendants
18 comply with Title IX, the Equal Protection Clause of the Fourteenth
19 Amendment to the United States Constitution, the Equal Protection Clause of
20 the California Constitution, and California state laws by ending their
21 discriminatory actions towards the female students at AHS and by taking
22 remedial steps to address discrimination in the athletic program.

23 **PARTIES – PLAINTIFFS**

24 11. Plaintiff Lauren M. Cruz ("CRUZ") is a 15-year-old minor female
25 who attends AHS. CRUZ has played and continues to play softball at AHS.
26 CRUZ intends to play softball in college and hopes to receive an athletic
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1 college scholarship. Defendants have discriminated against CRUZ on the basis
2 of her sex by denying her equal athletic treatment and benefits. CRUZ, a
3 minor, is proceeding in this action by her next friend, her mother, Jean Cruz.
4 CRUZ and Jean Cruz are residents of Alhambra, California, which is within the
5 jurisdiction of the Central District of California.

6 12. Plaintiff Valerie Herrera ("HERRERA") is a 17-year-old minor
7 female who attends AHS. HERRERA has played and continues to play softball
8 at AHS. Defendants have discriminated against HERRERA on the basis of her
9 sex by denying her equal athletic treatment and benefits. HERRERA, a minor,
10 is proceeding in this action by her next friend, her mother, Carolina Herrera.
11 HERRERA and Carolina Herrera are residents of Alhambra, California, which
12 is within the Central District of California.

13 13. Plaintiff Jennifer N. Cerros ("CERROS") is an 18-year-old female
14 student who attends AHS. CERROS plays basketball at AHS. Defendants
15 have discriminated against CERROS on the basis of her sex by denying her
16 equal athletic treatment and benefits. CERROS resides in Alhambra,
17 California, which is within the Central District of California.

18 14. Plaintiff Catherine Grempel ("GREMPEL") is a 14-year-old minor
19 female who attends Emory Park School in Alhambra, California. GREMPEL
20 will be attending AHS starting in Fall 2004. GREMPEL intends to play softball
21 and track and field at AHS. GREMPEL has played softball since she was seven
22 years old. Unless the Defendants cease their discriminatory actions and take
23 remedial action, GREMPEL will be subjected to discrimination and unequal
24 athletic treatment and benefits. GREMPEL intends to pursue an athletic
25 scholarship when she applies to college and is relying on her athletic abilities as
26 a means to help finance her college education. GREMPEL, a minor, is
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1 proceeding in this action by her next friend, her mother, Tina Grempel.

2 GREMPEL and Tina Grempel are residents of Alhambra, California, which is
3 within the Central District of California.

4 **PARTIES – DEFENDANTS**

5 15. Defendant Alhambra School District is a public school district.
6 The District is a state actor subject to the Fourteenth Amendment's Equal
7 Protection Clause as enforced through 42 U.S.C. § 1983. Additionally, the
8 District receives federal funding and, therefore, all of its programs and activities
9 are governed by the requirements of Title IX pursuant to 20 U.S.C. § 1687. The
10 District is authorized to operate, and does operate, AHS, and is responsible for
11 AHS's conduct. The District is located in Alhambra, California, which is
12 within the Central District of California.

13 16. Defendant City of Alhambra is a state actor subject to the Equal
14 Protection Clauses of the United States and the California Constitutions.
15 Additionally, Plaintiffs are informed and believe and based thereon allege that
16 the City of Alhambra receives financial assistance from the State of California
17 and is thus regulated by California Government Code section 11135(a).
18 Together with the District, the City has funded, authorized, constructed,
19 renovated, and maintained Moor Field, a state-of-the-art facility designed
20 primarily for male athletes.

21 17. Defendant Russell Lee-Sung (LEE-SUNG) is the principal of
22 AHS. Defendant LEE-SUNG has authority and control over the day-to-day
23 operations of AHS, including its policies, practices, procedures, facilities,
24 maintenance, programs, activities, services, and employees in AHS's athletic
25 department. Defendant LEE-SUNG is responsible for ensuring that AHS
26 complies with anti-discrimination laws. Defendant LEE-SUNG is a resident of
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1 the State of California. Plaintiffs are informed and believe and based thereon
2 allege that Defendant LEE-SUNG resides within the Central District of
3 California. Defendant LEE-SUNG is sued in his official capacity.

4 18. Defendant Lou Torres ("TORRES") is the athletic director at AHS.
5 Defendant Torres has authority and control over the day-to-day operations of
6 AHS's athletic department, including its policies, practices, procedures,
7 programs, activities, services, coaches, and teams. Defendant TORRES is a
8 resident of the State of California. Plaintiffs are informed and believe and
9 based thereon allege that Defendant TORRES resides within the Central
10 District of California. Defendant TORRES is sued in his official capacity.

11 19. Defendant Victor Sandoval ("SANDOVAL") is the vice principal
12 of business and activities at AHS. Defendant SANDOVAL supervises
13 Defendant TORRES and has authority and control over AHS's athletic
14 department, including its policies, practices, procedures, programs, activities,
15 services, coaches, and teams. Defendant SANDOVAL is a resident of the State
16 of California. Plaintiffs are informed and believe and based thereon allege that
17 Defendant SANDOVAL resides within the Central District of California.
18 Defendant SANDOVAL is sued in his official capacity.

19 20. William A. Vallejos ("VALLEJOS") is the Board President of the
20 Alhambra School District Board of Education. As Board President, Defendant
21 VALLEJOS is responsible for the actions of the Alhambra School District and
22 is responsible for ensuring that the District complies with all state and federal
23 laws prohibiting sex discrimination. Defendant VALLEJOS is a resident of the
24 State of California. Plaintiffs are informed and believe and based thereon allege
25 that Defendant VALLEJOS resides within the Central District of California.
26 Defendant VALLEJOS is sued in his official capacity.

1 21. John H. Nuñez ("NUNEZ") is the Board Vice-President of the
2 Alhambra School District Board of Education. As Board Vice-President,
3 Defendant NUNEZ is responsible for the actions of the Alhambra School
4 District and is responsible for ensuring that the District complies with all state
5 and federal laws prohibiting sex discrimination. Defendant NUNEZ is a
6 resident of the State of California. Plaintiffs are informed and believe and
7 based thereon allege that Defendant NUNEZ resides within the Central District
8 of California. Defendant NUNEZ is sued in his official capacity.

9 22. Robert L. Gin ("GIN") is the Clerk of the Alhambra School
10 District Board of Education. As Clerk, Defendant GIN is responsible for the
11 actions of the Alhambra School District and is responsible for ensuring that the
12 District complies with all state and federal laws prohibiting sex discrimination.
13 Defendant GIN is a resident of the State of California. Plaintiffs are informed
14 and believe and based thereon allege that Defendant GIN resides within the
15 Central District of California. Defendant GIN is sued in his official capacity.

16 23. Ruth E. Castro ("CASTRO") is a Member of the Alhambra School
17 District Board of Education. As a Board Member, Defendant CASTRO is
18 responsible for the actions of the Alhambra School District and is responsible
19 for ensuring that the District complies with all state and federal laws prohibiting
20 sex discrimination. Defendant CASTRO is a resident of the State of California.
21 Plaintiffs are informed and believe and based thereon allege that Defendant
22 CASTRO resides within the Central District of California. Defendant
23 CASTRO is sued in her official capacity.

24 24. Barbara A. Messina ("MESSINA") is a Member of the Alhambra
25 School District Board of Education. As a Board Member, Defendant
26 MESSINA is responsible for the actions of the Alhambra School District and is

1 responsible for ensuring that the District complies with all state and federal
2 laws prohibiting sex discrimination. Defendant MESSINA is a resident of the
3 State of California. Plaintiffs are informed and believe and based thereon allege
4 that Defendant MESSINA resides within the Central District of California.
5 Defendant MESSINA is sued in her official capacity.

6 **CLASS ACTION ALLEGATIONS**

7 25. The named individual Plaintiffs bring this action on behalf of
8 themselves and on behalf of a class of all those similarly situated pursuant to
9 Rule 23(a) and (b)(2) of the Federal Rules of Civil Procedure.

10 **Definition.**

11 26. Plaintiffs seek to represent a class of all present and future AHS
12 female students and potential students who participate, seek to participate,
13 and/or are deterred from participating in athletics at AHS.

14 **Numerosity.**

15 27. The class is so numerous that joinder of all members is impractical.
16 There are more than 1,400 female students in grades 9 - 12 at AHS, including
17 more than about 300 who participate in interscholastic athletics. It is unknown
18 how many of these current female students or how many future female students
19 would seek to participate in interscholastic athletics if additional opportunities
20 were available. Moreover, members of the class who may suffer future injury
21 are not capable of being identified at this time, as the class includes future AHS
22 female athletes and the class is constantly in flux, with students graduating and
23 new students attending AHS each year.

24 **Common Questions of Law and Fact.**

25 28. Common questions of law and fact predominate, and include: (a)
26 whether female student athletes at AHS are receiving unequal treatment and
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1 benefits in comparison to the male student athletes; and (b) whether female
2 students at AHS are being deprived of equal opportunities to participate in
3 sports.

4 **Typicality.**

5 29. The types of sex discrimination the named Plaintiffs have suffered
6 are typical of the sex discrimination which members of the class have suffered,
7 are suffering, and, unless this Court grants relief, will continue to suffer.

8 30. CRUZ is a member of the proposed class in that she is a current
9 female student athlete at AHS who is subjected to the discriminatory unequal
10 treatment and benefits that the District provides to female student athletes.
11 CRUZ has been subjected to sex-based discrimination by all Defendants.

12 31. HERRERA is a member of the proposed class in that she is a
13 current female student athlete at AHS who is subjected to the discriminatory
14 unequal treatment and benefits that the District provides to female student
15 athletes. HERRERA has been subjected to sex-based discrimination by all
16 Defendants.

17 32. CERROS is a member of the proposed class in that she is a current
18 female student athlete at AHS who is subjected to the discriminatory unequal
19 treatment and benefits that the District provides to female student athletes.
20 CERROS has been subjected to sex-based discrimination by all Defendants.

21 33. GREMPEL is a member of the proposed class in that she will be a
22 female student athlete at AHS for the 2004-2005 school year and will be
23 subjected to the District's failure to accommodate the athletic interest and
24 abilities of AHS's female students, and to the unequal treatment and benefits
25 that Defendants provide to female student athletes at AHS, if Defendants are
26 not ordered to cease immediately their discriminatory actions and to remedy
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1 their past discriminatory conduct.

2 **Adequacy of Representation.**

3 34. The named Plaintiffs are members of the proposed class and will
4 fairly and adequately represent and protect the interests of the class. Plaintiffs
5 intend to prosecute this action rigorously in order to secure remedies for the
6 entire class. Counsel of record for Plaintiffs are experienced in state and federal
7 civil rights litigation and class actions, including Title IX litigation.

8 **Injunctive and Declaratory Relief**

9 35. Defendants have acted or refused to act on grounds generally
10 applicable to the class, thereby making appropriate final declaratory and
11 injunctive relief with respect to the class as a whole under Federal Rule of Civil
12 Procedure 23(b)(2).

13 **STATEMENT OF FACTS**

14 36. Plaintiffs claim that Defendants have been and are discriminating
15 against female students at AHS in violation of Title IX, the United States
16 Constitution, the California Constitution, and California state law.

17 **SEX-BASED DISCRIMINATION IN ATHLETIC TREATMENT AND BENEFITS.**

18 37. The District and the individual District Defendants have
19 unlawfully discriminated against female student athletes with respect to athletic
20 treatment and benefits in areas including, but not limited to: practice and
21 competitive facilities; training facilities; locker rooms; coaches and coaching
22 facilities; scheduling of games and practice times; publicity; and funding. All
23 of the Defendants have discriminated against the female student athletes with
24 respect to the facilities at Moor Field.

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1 sheds. There are also foul poles around one field. One of the fields is
2 designated as a multi-use field, but it is not adequate for softball use, and is the
3 least refurbished of the three fields, lacking proper fencing and an electronic
4 scoreboard.

5 42. Although the City and District closely consulted AHS's head
6 baseball coach about the Moor Field renovation, they did not even inform AHS
7 head softball coach of the proposed upgrade, much less approach him for his
8 input and recommendations.

9 43. The Defendants have refused to build a ball diamond dedicated to
10 softball use despite repeated requests. The Defendants, including Defendant
11 TORRES, have refused to allow the one multi-use field to be used for softball.
12 The Moor Field renovation project was completed in February 2003.

13 44. The District and the City were put on notice that renovating Moor
14 Field for the exclusive use and benefit of boys constitutes illegal discrimination
15 against girls. In or around January 2003, AHS's head softball coach informed
16 District officials, including Defendant TORRES, that they were violating Title
17 IX by not providing AHS's softball team with equitable practice and
18 competitive facilities. During planning meetings for the Moor Field renovation,
19 which included District and City officials, attendees discussed but disregarded
20 nondiscrimination mandates.

21 *The Third Street Field.*

22 45. While the AHS boys baseball teams play at a state-of-the-art
23 facility, the girls play softball on a substantially inferior and dangerous field
24 located at AHS (hereinafter "the Third Street Field"). The Third Street Field is
25 a small, dirt field with torn-up grass, weeds, and holes that some athletes refer
26 to as "gopher holes" because they are so deep. The female athletes at AHS
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1 have stated that falling on the field is like "sliding on concrete," because it is
2 rocky, dry ground. The District's maintenance department has refused to lay
3 dirt on the softball field on a regular basis. The field is also not level, causing
4 many students to trip as they try to run on it, and, because it is uneven, it does
5 not drain properly so that the junior varsity home plate is flooded during rainy
6 season so the girls cannot play on this field.

7 46. The condition of the Third Street Field is exacerbated by the fact
8 that AHS allows freshman football, PE, and soccer teams to use and further
9 destroy the field during the year. These students tear up the field with their
10 cleats and leave the field littered with their equipment, such as football sleds,
11 and garbage like candy wrappers and soda bottles. Moreover, because the
12 District fails to maintain the field properly, female softball players must pick up
13 trash, drag the field, and water and trim the grass as needed. But teenage girls
14 cannot perform all the upkeep responsibility of a sports field. The softball
15 teams have had to cancel games because the District has failed to prepare the
16 field. These maintenance problems have been brought to the attention of
17 District personnel, who have intentionally failed to remedy them. The baseball
18 teams' fields have been and continue to be properly and consistently
19 maintained.

20 47. Female softball players have experienced physical injuries as a
21 result of the conditions at the Third Street Field. Softball players have sprained
22 ankles and one player broke a blood vessel in her eye from a ball popping up
23 off one of the holes in the field. Also, other female players who use the field,
24 such as soccer players, have had sprained ankles from falling on the torn-up dirt
25 field. Injuries to female student athletes have not caused Defendants to repair
26 the Third Street Field or to take any other corrective measures.

1 48. The Third Street Field has none of the amenities of the three Moor
2 Field ball diamonds. It has no batting cages, electronic scoreboards, pitching
3 bullpens, or cement dugouts. In fact, the area in which softball pitchers warm
4 up has no pitching rubber, home plate, or protective fence, as the Moor Field
5 baseball diamonds have. Rather, softball pitchers warm up by throwing the ball
6 while standing behind a bench that substitutes for a dugout. Defendants the
7 District and SANDOVAL have denied money to the softball program needed to
8 build appropriate safety fencing. The Third Street Field has no electrical outlets
9 on the field, making it difficult to use a pitching machine to train players. The
10 Third Street Field has no concession stand facilities, thus denying softball
11 players the ability to raise much needed funds from attendees. It also has no
12 cemented areas for bleachers.

13 49. The Third Street Field is far too small to accommodate the girls'
14 play. The two girls' softball teams often play on the field at the same time;
15 during games, the girls are forced to interrupt the regulation play when a fielder
16 from the other team misses a ball because their outfields overlap.

17 *The "Small" Gym.*

18 50. As with softball, AHS discriminates against female student
19 basketball players in its provision of practice and competitive facilities. The
20 girls' basketball team is assigned the "small gym" for practice, even though this
21 gym is not regulation size and the girls' basketball team actually plays games in
22 the "big gym," where the boys are allowed to practice. To compensate for
23 using a non-regulation basketball court, the girls' basketball players "play
24 outside the lines" in the small gym. The female basketball players can use the
25 big gym only if they practice before the boys, practice late in the evening when
26 the boys are done, or when the boys do not have practice.

1 **Training Facilities.**

2 51. Male student athletes have far greater access to weight training
3 facilities and weight training coaches than do the female student athletes. AHS
4 has three weight rooms, including one at Moor Field and two at the school
5 facility. The weight room at Moor Field is available to the football and boys
6 baseball teams; girls are not permitted to use it and therefore have no access.
7 One of the two weight rooms at the school is allocated exclusively to the
8 football team; girls are not permitted to use it and therefore have no access.
9 The last weight room is ostensibly open to girls; however, in fact, girls are
10 denied access while boys' wrestling, basketball, and track teams use the room.
11 Moreover, on the few occasions when female athletes have been able to access
12 the third weight room, they have been directed to leave when male athletes
13 chose to use it, as male athletes are given priority.

14 **Locker Rooms.**

15 52. The girls' locker facilities are dramatically inferior to the boys'
16 locker facilities. While male student athletes are provided three separate locker
17 rooms, female student athletes are provided only one, the physical education
18 (PE) locker room. Further, the boys' PE locker room is larger than the girls'
19 only locker room, providing boys with more and larger lockers to store their
20 athletic equipment and uniforms. Inside this locker room is also a separate,
21 segregated locker area exclusively for the football players.

22 53. The conditions of the girls' locker facilities are abysmal. The
23 showers in the girls' locker room have not worked for several years and the
24 toilets are frequently non-functioning and/or overflowing. Because the toilets
25 frequently leak, the locker room often resembles a sewer and girls cannot place
26 their equipment and clothes on the floor. While male student athletes have
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1 access to functioning showers and amenities in the additional male locker
2 rooms, female student athletes have frequently attended class without having
3 showered after practice.

4 54. The majority of lockers provided to female student athletes in the
5 girls' PE locker room are not large enough to store uniforms or equipment.
6 Additionally, the girls are not allowed to use and lock the lockers overnight.
7 Female softball players are forced to carry their equipment with them all day,
8 and to change into their uniforms in a tin shed on the field. Female basketball
9 players have had to carry their athletic bags and equipment onto the game floor
10 during home games and have been mistaken for the visiting team. Moreover,
11 having their gym bags on the floor presents a hazard to the girls, as they quickly
12 maneuver on and off the court.

13 55. Not only has the District and the individual District Defendants
14 provided girls with less locker space, they have also refused to allow girls to
15 have access to the superior male facilities. For example, during home games,
16 visiting male basketball teams are allowed to use the boys' locker room located
17 off of the big gym, but the District's own girls' basketball players have been
18 denied access to this locker room.

19 **Coaches and Coaching Facilities.**

20 56. The District and the individual District Defendants discriminate
21 against female student athletes by hiring walk-on coaches to head female teams,
22 while providing male teams with coaches who are also full-time teachers at
23 AHS. As a result, male athletes have greater access to their coaches who are
24 located on campus, whereas the coaches of female teams are frequently
25 inaccessible to the female student athletes during non-scheduled practice and
26 game times.

1 57. Student athletes at AHS can sign up for 6th period classes to play
2 their particular sport during the Fall. However, the District does not secure
3 softball coaches during this time. While some softball coaches have chosen to
4 work for free to help ameliorate the effects of the District's discriminatory
5 actions, frequently the girls have no coach to supervise them during 6th period.
6 They are instead left unsupervised and have often been sent to the cafeteria to
7 study. In contrast, the head baseball coach is a full-time teacher and is assigned
8 to supervise the male baseball players during 6th period.

9 58. Similarly, the girls' basketball team receives less coaching time
10 because neither the head coach nor the three assistant coaches are full-time
11 teachers. The District has not paid basketball coaches to supervise 6th period
12 girls' basketball play. If the girls' basketball coach is unable or unwilling to
13 work for free during 6th period, the girls play unsupervised or are sent to the
14 cafeteria to study. In addition, at times, the girls' basketball team has had to
15 practice late at night because their walk-on coach was not available during the
16 day to coach them. The current girls' basketball head coach is a security guard
17 at AHS who is scheduled to work during 6th period. Consequently, he has not
18 been available to supervise the girls during 6th period. In contrast, the boys'
19 basketball players receive coaching during 6th period because their head coach
20 is full-time faculty, as are three of the four assistant coaches.

21 59. The coaches of the female student athletic teams at AHS have less
22 experience than the coaches of the male athletic teams. For example, the head
23 softball coach for the past five years had less experience than the head baseball
24 coach. The head baseball coach has significant coaching and professional
25 baseball experience, including playing for a Minor League baseball team.
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1 60. The head coach of the boys' basketball team is likewise more
2 experienced than the girls' basketball team head coach, including college level
3 coaching experience. The District recently replaced the girls' head basketball
4 coach. The District's delay in interviewing and selecting a candidate caused
5 several highly-qualified candidates to accept other positions. The District
6 ultimately hired the school's security guard, who has insufficient experience for
7 the position. As a result of the District's neglect, the girls' basketball program
8 suffered. Girls missed significant playing opportunities and incoming eighth
9 grade girls were not adequately recruited for this current season.

10 61. The District does not provide its walk-on coaches of female sports
11 teams with proper office facilities. After repeated requests for an office, the
12 former girls' basketball coach was eventually given a space – what was
13 formerly a closet. This closet-office had no window and no electrical outlet.
14 To warm the closet, girls dragged a cord from an adjoining room to bring in a
15 heater. Although the girls' basketball team had requested a place to go during
16 game half-times and an office to meet with their coach, this tiny room was too
17 small to accommodate the team, as there was not enough room to sit. In
18 contrast, the boys' basketball coach has an office large enough to accommodate
19 students who want to meet with him, and the office is equipped with electrical
20 outlets, couches, storage closets, and a television and a video recorder. This
21 office is provided to the boys' basketball team, in addition to the separate boys'
22 basketball locker room in the gym, where they team frequently meets.

23 Scheduling of Games and Practice Times.

24 62. The District and the individual District Defendants discriminate
25 against female student athletes in the scheduling of games. While males are
26 assigned to the most popular, "prime time" slots – i.e., after 7:00 p.m. and on
27

1 non-school nights – girls are assigned to the earlier, less desirable afternoon
2 spots. Many parents of female basketball players have been unable to watch
3 their daughters play because they cannot leave work in time to attend their
4 games. As a result of the unequal scheduling, the gym is only about one-third
5 full for girls' basketball games, depriving the girls of an audience as well as the
6 opportunity to raise much needed funds through the sales of programs and
7 concessions.

8 **Publicity.**

9 63. The District and the individual District Defendants consistently
10 provide less publicity and support for their female student athletic teams than
11 for their male student athletic teams, including cheerleaders, pep band, public
12 address system, scoreboards, and videotaping. Such unequal distribution of
13 publicity and support includes, but is not limited to, the fact that cheerleaders
14 and pep band perform at varsity boys' basketball games, but not at girls' varsity
15 basketball games.

16 **Funding.**

17 64. Plaintiffs are informed and believe and based thereon allege that
18 the District and the individual District Defendants fail to provide necessary
19 funds for female teams, and provide less money to support female athletes than
20 to support male athletes.

21 65. The District and the individual District Defendants interfere with
22 and fail to properly support fund raising for female athletes and their teams.

23 **FAILURE TO EFFECTIVELY ACCOMMODATE FEMALE STUDENTS' INTEREST**
24 **AND ABILITIES IN ATHLETICS.**

25 66. The District and the individual District Defendants have
26 discriminated, and continue to discriminate, against female students by failing
27

1 to provide them with equal athletic participation opportunities, despite their
2 demonstrated athletic interest and abilities to participate in sports.

3 67. For the 2002-03 school year, girls were about 49 percent of the
4 population at AHS; however, they received only 38 percent of the sports
5 opportunities, despite having the interest and abilities to participate in greater
6 numbers.

7 68. The failure to provide girls with participation opportunities
8 substantially proportionate to their representation in AHS's student body,
9 despite their interest and abilities to participate, has occurred without
10 justification or defense by the District or the individual Defendants. The
11 District has no history and continuing practice of expanding its athletic
12 programs in response to the developing interests and abilities of female
13 students.

14 69. Defendants' failure to provide adequate participation opportunities
15 and the full range of teams for girls' sports severely limits girls' participation in
16 sports and discourages interested girls from going out for sports.

17 **Girls' Softball.**

18 70. The District sponsors only two softball teams for female students
19 at AHS (junior varsity and varsity), while it sponsors three baseball teams for
20 boys (freshmen, junior varsity, and varsity). As a result, the District offers
21 significantly more participation opportunities to boys than to girls.

22 71. Without a first-year softball team, 13 and 14-year-old freshmen
23 and sophomore girls must compete for spots on the junior varsity and varsity
24 teams against upper-class girls. Girls who need more seasoning before they are
25 capable of performing at the junior varsity or varsity level are denied the
26 opportunity to play. Upper-class girls are also affected by lack of adequate
27

1 participation opportunities. Younger girls with the skills and potential to be
2 accepted into the upper level teams displace upper class girls.

3 72. These disparities have persisted at AHS despite the fact that in the
4 past five years, the interest and abilities of girls trying out for softball has
5 increased dramatically. For the 2002-2003 season, approximately 50 girls tried
6 out for softball, but the coach had only 12 vacant available slots.

7 **Girls' Basketball.**

8 73. The District sponsors only three basketball teams for female
9 students at AHS (frosh, junior varsity and varsity), but sponsors four boys'
10 basketball teams (freshman, sophomore, junior varsity and varsity). Despite the
11 demonstrated interest and abilities of AHS female students to play basketball,
12 girls are denied the opportunity to play basketball for lack of participation
13 opportunities. As with girls who play softball, young female basketball players
14 are denied the chance to develop their skills and, often, are discouraged from
15 trying out in later years. Upper-class girls also have to be displaced to make
16 opportunities available for talented freshman and sophomore female athletes.

17 **Additional Girls' Sports.**

18 74. The Plaintiffs are informed and believe and based thereon allege
19 that the District denies female student athletes equal athletic participation
20 opportunities by failing to provide opportunities in additional girls' sports.

21 **FIRST CLAIM FOR RELIEF**

22 Unequal Treatment and Benefits in Athletic Programs
23 in Violation of Title IX of the Education Amendments of 1972
24 Against Defendant Alhambra School District

25 75. Plaintiffs restate and incorporate by reference, as though fully set
26 forth herein, the allegations contained in the preceding paragraphs.
27

1 76. Title IX, enacted in 1972, provides in relevant part: "No person in
2 the United States shall, on the basis of sex, be excluded from participation in, be
3 denied the benefits of, or be subjected to discrimination under any education
4 program or activity receiving Federal financial assistance ..." 20 U.S.C. §
5 1681(a).

6 77. Since the passage of Title IX, the District has received and
7 continues to receive federal financial assistance and the benefits therefrom.
8 Therefore, all programs in the Alhambra School District, including the athletic
9 programs, are subject to the requirements of Title IX. 20 U.S.C. § 1687.

10 78. Title IX's implementing regulations provide that "No person shall,
11 on the basis of sex, be excluded from participation in, be denied the benefits of,
12 be treated differently from another person or otherwise be discriminated against
13 in any interscholastic, intercollegiate, club or intramural athletics offered by a
14 recipient, and the recipient shall provide any such athletics separately on such
15 basis." 34 C.F.R. § 106.41(a).

16 79. Under Title IX, schools must provide "equal treatment and
17 benefits" to members of both sexes in their athletic programs. 44 Federal
18 Register 71,413 (1979), the Department of Education, Office of Civil Rights'
19 1979 Policy Interpretation (the "Policy Interpretation").

20 80. Equal treatment and benefits is assessed based on an overall
21 comparison of the male and female student athletic programs, including an
22 analysis of the following factors, among other considerations: "The provision
23 of equipment and supplies; Scheduling of games and practice time; Opportunity
24 to receive coaching . . . ; Assignment and compensation of coaches . . . ;
25 Provision of locker rooms, practice and competitive facilities; Provision of ...
26 training facilities; Publicity" and a school's "failure to provide necessary funds
27

1 for teams for one sex.” 34 C.F.R. § 106.41(c) (2) – (10).

2 81. The regulations required that sponsors of interscholastic athletics
3 comply with the regulations within three years of their effective date, or by July
4 21, 1978. The regulations further require that sponsors of interscholastic
5 athletics take such remedial actions as are necessary to overcome the effects of
6 sex discrimination in violation of Title IX. 34 C.F.R. §106.3(a).

7 82. Plaintiffs are informed and believe and based thereon allege that
8 the District has not taken any recent remedial actions and that any remedial
9 actions which the District has taken in the past thirty (30) years have been
10 insufficient to satisfy the District’s obligations under Title IX.

11 83. The District has intentionally violated Title IX by knowingly and
12 deliberately discriminating against female students, including Plaintiffs, by,
13 among other things, failing to provide female student athletes at AHS with
14 treatment and benefits that are comparable to the treatment and benefits
15 provided to male student athletes in areas including, but not limited to: practice
16 and competitive facilities, training facilities, locker rooms, coaches and
17 coaching facilities, scheduling of games and practice times, publicity, and
18 funding.

19 84. The inequitable treatment of female and male student athletes at
20 AHS, as detailed above, demonstrates the District’s intentional and conscious
21 failure to comply with Title IX. The District’s conduct has persisted despite the
22 information provided by and the requests made by Plaintiffs and other
23 individuals, and despite the mandates of the relevant Title IX regulations,
24 particularly 34 C.F.R. §§ 106.3 and 106.41, and the Policy Interpretation.

25 85. Plaintiffs and other individuals have informed the District that its
26 actions constitute violations of Plaintiffs’ Title IX rights. The District has failed
27

1 to remedy or address its violations.

2 86. As a proximate result of these unlawful acts, the Plaintiffs and
3 others similarly situated have suffered and continue to suffer irreparable injury.

4 87. The Plaintiffs and others similarly situated are entitled to relief,
5 including declaratory relief and injunctive relief.

6 88. Counsel for the Plaintiffs and the proposed class of similarly
7 situated individuals are entitled to attorneys' fees and costs.

8 **SECOND CLAIM FOR RELIEF**

9 Unequal Participation Opportunities in Athletic Programs
10 in Violation of Title IX of the Education Amendments of 1972
Against Defendant Alhambra School District

11 89. Plaintiffs restate and incorporate by reference, as though fully set
12 forth herein, the allegations contained in the preceding paragraphs.

13 90. Under Title IX, schools must provide both sexes "equivalent
14 participation opportunities (including both the number of opportunities and
15 whether the selection of sports and the level of competition effectively
16 accommodate the interests and abilities of members of both sexes)." 44 Federal
17 Register 71,413, the Policy Interpretation.

18 91. Compliance in the area of equivalent participation opportunities
19 must be determined by a three-part test:

20 (1) whether intercollegiate level participation opportunities for male and
21 female students are provided in numbers substantially proportionate to
22 their respective enrollments;

23 (2) where the members of one sex have been and are under-represented
24 among intercollegiate athletes, whether the institution can show a history
25 and continuing practice of program expansion which is demonstrably
26 responsive to the developing interest and abilities of the members of that
27

1 sex; or

2 (3) where the members of one sex are under-represented among
3 intercollegiate athletes and the institution cannot show a continuing
4 practice of program expansion such as that cited above, whether it can be
5 demonstrated that the interests and abilities of the members of that sex
6 have been fully and effectively accommodated by the present program.

7 44 Fed. Reg. 71,418, the Policy Interpretation. (Although the Policy
8 Interpretation refers to "intercollegiate" sports, it is applicable to all recipients
9 of federal education funds, including high schools and is thus, applicable to
10 interscholastic high school sports as well as intercollegiate sports. 34 C.F.R. §
11 106.11.)

12 92. The District has failed to comply with each of the three (3) parts of
13 the test for determining the equal opportunity to participate in athletics under
14 Title IX. Specifically, Plaintiffs are informed and believe and based thereon
15 allege that the ratio of female to male athletes at AHS is not substantially
16 proportionate to the overall ratio of enrolled female and male students at AHS
17 and that the interests and abilities of the female students at AHS have not been
18 fully and effectively accommodated by the present program. Further, the
19 District cannot show "a history and continuing practice of program expansion
20 which is demonstrably responsive to the developing interest and abilities" of
21 AHS's female students.

22 93. Rather, female students have historically been and continue to be
23 under-represented in AHS's athletics program. Despite this under-
24 representation and despite the interest and abilities of the female students to
25 participate on additional teams, the District has not adequately expanded its
26 girls' athletics program as female students' interests and abilities have

1 demanded.

2 94. Plaintiffs, coaches, and parents have on numerous occasions
3 informed the District that its actions discriminate against female students and
4 that these actions constitute violations of Plaintiffs' Title IX rights to have their
5 interest and abilities effectively accommodated. Despite the fact that these
6 inequities have been drawn to the attention of the District, it has knowingly and
7 consciously continued to fail and refuse to take any of the necessary actions to
8 remediate existing violations, even though Title IX mandates that it do so. The
9 fact that the District persists in refusing to provide these athletic participation
10 opportunities demonstrates the District's intentional and conscious failure to
11 comply with Title IX.

12 95. The District's conduct has persisted despite the information
13 provided by and the requests made by Plaintiffs and other individuals and
14 despite the mandates of federal anti-discrimination law.

15 96. As a proximate result of these unlawful acts, the Plaintiffs and
16 others similarly situated have suffered and continue to suffer irreparable injury.

17 97. The Plaintiffs and others similarly situated are entitled to relief,
18 including declaratory relief and injunctive relief.

19 98. Such injunctive relief may include, but is not limited to, the
20 provision of the full range of teams and participation slots in existing sports,
21 with teams for freshmen, sophomore, junior varsity, and varsity-level female
22 student athletes.

23 99. Counsel for the Plaintiffs and the proposed class of similarly
24 situated individuals are entitled to attorneys' fees and costs.

1 **THIRD CLAIM FOR RELIEF**

2 Sex-Based Discrimination in Violation of
3 the Fourteenth Amendment to the United States Constitution
4 42 U.S.C. § 1983; Against the City of Alhambra and All
5 Individual Defendants in Their Official Capacities

6 100. Plaintiffs restate and incorporate by reference, as though
7 fully set forth herein, the allegations contained in the preceding paragraphs.

8 101. The Equal Protection Clause of the Fourteenth Amendment
9 to the United States Constitution prohibits state actors from discriminating on
10 the basis of sex.

11 102. Under 42 U.S.C. § 1983, certain Defendants may be held
12 liable for their actions in violating Plaintiffs' rights under the Fourteenth
13 Amendment.

14 103. By deciding to renovate Moor Field virtually exclusively for
15 male athletes, the City and all individual Defendants have intentionally
16 discriminated against the Plaintiffs, and against a class of female students at
17 AHS, on the basis of sex and have intentionally deprived them of their rights to
18 equal protection secured by the Fourteenth Amendment to the Constitution.

19 104. By failing to provide female student athletes with the same
20 treatment and benefits as the male student athletes (as detailed above) and by
21 failing to provide equal athletic participation opportunities for female students,
22 the individual District Defendants have intentionally discriminated against
23 female students, including the named Plaintiffs, on the basis of sex and have
24 intentionally deprived them of their rights to equal protection secured by the
25 Fourteenth Amendment to the Constitution.

26 105. Defendant LEE-SUNG, as the principal at AHS, has
27 consistently failed and refused to add athletic participation opportunities for
28 female students or to remedy the unequal treatment and benefits received by

1 AHS's female student athletes – despite the numerous complaints made to him
2 about these inequities. Therefore, Defendant LEE-SUNG's actions constitute a
3 knowing disregard for Plaintiffs' constitutional rights.

4 106. Defendants SANDOVAL, as Vice Principal, Business and
5 Activities, has consistently failed and refused to add athletic participation
6 opportunities for female students or to remedy the unequal treatment and
7 benefits received by AHS's female student athletes – despite the numerous
8 complaints made to him about these inequities. Defendant SANDOVAL's
9 actions constitute a knowing disregard for Plaintiffs' constitutional rights.

10 107. Defendant TORRES, as Athletic Director at AHS, has failed
11 and refused to add athletic participation opportunities for female students or to
12 remedy the unequal treatment and benefits received by AHS's female student
13 athletes – despite the numerous complaints made to him about these inequities.
14 Defendant TORRES' actions constitute a knowing disregard for Plaintiffs'
15 constitutional rights.

16 108. When the herein named Defendants engaged in the improper
17 actions described above, they were acting as state actors and under color of law
18 for purposes of 42 U.S.C. § 1983 and were acting in violation of the Equal
19 Protection Clause.

20 109. As a proximate result of these unlawful acts, the Plaintiffs
21 and others similarly situated have suffered and continue to suffer irreparable
22 injury.

23 110. The Plaintiffs and others similarly situated are entitled to
24 relief, including declaratory relief and injunctive relief.

25 111. Counsel for the Plaintiffs and the proposed class of similarly
26 situated individuals are entitled to attorneys' fees and costs.

1 **FOURTH CLAIM FOR RELIEF**
2 Sex-Based Discrimination in Violation of
3 Article I, Section 7 of the California State Constitution
4 Against the Defendant City of Alhambra

5 112. Plaintiffs restate and incorporate by reference, as though
6 fully set forth herein, the allegations contained in the preceding paragraphs.

7 113. Article I, Section 7 of the California State Constitution
8 prohibits public entities from engaging in sex-based discrimination.

9 114. By deciding to renovate Moor Field virtually exclusively for
10 male athletes, the Defendant City of Alhambra has intentionally discriminated
11 against the Plaintiffs, and against a class of female students at AHS, on the
12 basis of sex and has intentionally deprived them of their rights to equal
13 protection secured by Article I, Section 7 of the California State Constitution.

14 115. The City's actions are arbitrary and cannot be justified.

15 116. As a proximate result of these unlawful acts, the Plaintiffs
16 and others similarly situated have suffered and continue to suffer irreparable
17 injury.

18 117. The Plaintiffs and others similarly situated are entitled to
19 relief, including declaratory relief and injunctive relief.

20 118. Counsel for the Plaintiffs and the proposed class of similarly
21 situated individuals are entitled to attorneys' fees and costs.

22 **FIFTH CLAIM FOR RELIEF**
23 Sex-Based Discrimination in Violation of
24 California Government Code Section 11135
25 Against the Defendant City of Alhambra

26 119. Plaintiffs restate and incorporate by reference, as though
27 fully set forth herein, the allegations contained in the preceding paragraphs.

1 120. California Government Code § 11135(a) prohibits sex-based
2 discrimination in "any program or activity that is conducted, operated, or
3 administered by the state or by any state agency, is funded directly by the state,
4 or receives any financial assistance from the state," and requires "full an equal
5 access to the benefits" of any such program or activity.

6 121. By deciding to renovate Moor Field virtually exclusively for
7 male athletes, the Defendant City of Alhambra has discriminated against the
8 Plaintiffs, and against a class of female students at AHS, on the basis of sex and
9 has thereby deprived them of the rights provided by Government Code § 11135.

10 122. As a proximate result of these unlawful acts, the Plaintiffs
11 have suffered injury.

12 123. The Plaintiffs are entitled to relief, including declaratory
13 relief and injunctive relief.

14 124. Counsel for the Plaintiffs and the proposed class of similarly
15 situated individuals are entitled to attorneys' fees and costs.

16 **DECLARATORY RELIEF ALLEGATIONS**

17 125. Plaintiffs restate and incorporate by reference, as though
18 fully set forth herein, the allegations contained in the preceding paragraphs.

19 126. A present and actual controversy exists between Plaintiffs
20 and Defendants concerning their rights and respective duties. The Plaintiffs
21 contend that the Defendants have violated their rights, and the rights of those
22 similarly situated, under federal and state anti-discrimination laws. The
23 Plaintiffs are informed and believe and based thereon allege that the Defendants
24 deny these allegations. Declaratory relief is therefore necessary and
25 appropriate.
26
27

1 **INJUNCTIVE RELIEF ALLEGATIONS**

2 127. Plaintiffs restate and incorporate by reference, as though
3 fully set forth herein, the allegations contained in the preceding paragraphs.

4 128. No plain, adequate, or complete remedy at law is available
5 to the Plaintiffs to redress the wrongs addressed herein.

6 129. If the Court does not grant the injunctive relief sought
7 herein, the Plaintiffs, and others similarly situated, will be irreparably harmed.

8 **PRAYER FOR RELIEF**

9 WHEREFORE Plaintiffs respectfully pray that this Court:

10 (1) Certify the proposed class of plaintiffs.

11 (2) Enter an order declaring that the District has discriminated against
12 female students on the basis of sex in violation of Title IX and the regulations
13 promulgated thereunder (including both unequal treatment and benefits and
14 unequal participation opportunities);

15 (3) Enter an order declaring that the Defendant City and the individual
16 Defendants have discriminated against female students on the basis of sex in
17 violation of the Equal Protection Clauses of the Fourteenth Amendment to the
18 United States Constitution as enforced by 42 U.S.C. § 1983.

19 (4) Enter an order declaring that Defendant City has discriminated
20 against female students on the basis of sex in violation of Article I, section 7 of
21 the California State Constitution and in violation of California Government
22 Code § 11135;

23 (5) Issue a permanent injunction restraining the Defendants and their
24 officers, agents, employees, successors, and any other persons acting in concert
25 with them, from discriminating against female students on the basis of sex;
26
27

1 (6) Issue a permanent injunction requiring Defendants to remediate
2 their violations of state and federal laws prohibiting sex discrimination by,
3 among other required actions, providing female student athletes with treatment
4 and benefits comparable to those provided to male athletes, and affording
5 female students the equal opportunity to participate in school-sponsored sports;

6 (7) Award counsel for Plaintiffs reasonable attorneys' fees and costs,
7 pursuant to 42 U.S.C. § 1988, Cal. Civil Proc. Code § 1021.5, and any other
8 applicable provisions of federal and state law; and

9 (8) Order such other and further relief as the Court deems appropriate.

10 Dated: March 4, 2004

11
12 Respectfully submitted,

13 Nancy Solomon
14 Vicky L. Barker
15 CALIFORNIA WOMEN'S LAW
16 CENTER

17 Patricia Shiu
18 Claudia Center
19 Elizabeth Kristen
20 LEGAL AID SOCIETY-
21 EMPLOYMENT LAW CENTER

22 By: Nancy Solomon
23 Nancy Solomon
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26
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