

Plaintiff Peter P. is seventeen years old and is enrolled at Dominguez High School in CUSD. In the early years of Peter P.'s life, his biological mother abused drugs, and he was repeatedly physically and sexually abused by his mother's boyfriends. He also witnessed physical abuse of his siblings and mother. He continues to have flashbacks to this period and often experiences an instinct to be aggressive when he sees a male approaching him.

When Peter P. was about five years old, he and his siblings were removed from the home of their biological mother and entered the foster system. Peter P. was initially separated from most of his siblings and moved in and out of a series of foster homes. Peter P. was occasionally sent back to live with his biological mother for a few weeks before being removed from her home again. When Peter P. was about ten or eleven years old, the rights of his biological mother were terminated, and he and some of his siblings were adopted. Peter P.'s adoptive mother's health worsened when Peter P. was sixteen, and he became a caretaker for her and his younger siblings.

Peter P. has witnessed and been the victim of violence on multiple occasions. Peter P. reports that in middle school he watched as his best friend was shot and killed. In 2014, Peter P. received stab wounds and required stitches after he threw himself in front of a friend whose relative was attacking her with a knife. Peter P. reports that he has witnessed more than twenty people get shot.

Peter P.'s two older brothers are currently incarcerated. The man who was living with his mother and serving as a caretaker for Peter P. and his siblings at the time they entered the foster system is also currently in prison for murder.

Peter P. was homeless for two months in March and April 2015. During this period, he slept on the roof of the Dominguez High School cafeteria. At no time did administrators provide

any support or services. Instead, he was suspended. Although some personnel were aware of these circumstances, Peter P.'s attempts to return to school were denied, and he was threatened with law enforcement involvement if he persisted in attempting to return.

As a result of the repeated and sustained trauma that Peter P. has endured, he often experiences uncontrollable anger. "My anger is not normal," he says. "Sometimes I believe my aura is wicked. Sometimes I believe I have a demon in me." Peter P. also feels deep sadness and depression. He says: "Sometimes I pray to God, why do you still keep me here even after all the things I've been through? I have had so many chances to go to heaven but I'm still here. I thank God every day for waking up, but I regret waking up every day."

Because CUSD does not have a system of accommodations and modifications to address the impact of complex trauma, Peter P. has been unable to access his education. Although Peter P. previously had shown an ability to achieve high grades in certain honors classes, complex trauma in his life has at times caused his grades to decline sharply. He is currently failing all but two classes, which causes him to feel deep shame. Although he has repeatedly missed classes due to the complex trauma he has experienced, no mental health or attendance counselor or other school official has intervened or inquired as to the cause of these absences. CUSD has also repeatedly subjected Peter P. to harsh punitive discipline. Over the course of his academic career, he has been repeatedly suspended for disobedient, angry, or aggressive behavior, and has been involuntarily transferred (or "expelled") from all of the following CUSD schools: Roosevelt Elementary School, Clinton Elementary School, Kelly Elementary School, Bunche Elementary School and Bunche Middle School, Roosevelt Middle School, and Davis Middle School. Most of these "expulsions" stemmed from physical altercations and misbehavior caused by unaddressed anger and aggression related to trauma.