

March 29, 2019

VIA E-MAIL AND OVERNIGHT DELIVERY

Bullis Mountain View
Board of Directors
Bertha Alarcon, Board Member
Greg Brauner, Board Member
David Jacques, Board Member
Jordan Hwang, Board Member
Clara Roa, Board Member
Patrick Walsh, Board Member
Jennifer Anderson-Rosse, Founding Head of School

Bullis Mountain View
102 W. Portola Avenue
Los Altos, CA 94022

Re: Notice of Violation Pursuant to Education Code Section
47607(d)

Dear Board Members and Ms. Anderson-Rosse:

Charter schools “are part of the Public School System,” but “operate independently from the existing school district structure.” (Ed. Code, §§ 47615(a)(1), 47601.) Once a governing board has granted a petition, a charter school is created, but it is nevertheless subject to district oversight. It is the responsibility of the charter school to meet the obligations of its charter, to meet the requirements of law, to meet and/or pursue the pupil outcomes identified in its charter, and to engage in sound fiscal practices. (Ed. Code, § 47607(c).)

On or about December 20, 2018, the Mountain View Whisman School District (“District”) Board of Trustees (“Board”) voted to approve the charter petition to establish Bullis Mountain View (“BMV” or “Charter School”) for a three (3) year charter term beginning July 1, 2019, through June 30, 2022, and also the recommendations set forth in the District’s December 20, 2018 Staff Report (“Charter”). Accordingly, the District is the authorizer and oversight agency for BMV, and responsible for overseeing BMV pursuant to the Education Code. This oversight is to ensure the Charter School is operating in compliance with its Charter, following all applicable laws, meeting and/or pursuing pupil outcomes, and acting in a fiscally responsible manner.

Specifically, Education Code section 47607(c)(1) provides the following:

A charter may be revoked by the authority that granted the charter under this chapter if the authority finds, through a showing of substantial evidence, that the charter school did any of the following:

- (A) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
- (B) Failed to meet or pursue any of the pupil outcomes identified in the charter.
- (C) Failed to meet generally accepted accounting principles, or engaged in fiscal mismanagement.
- (D) Violated any provision of law.

Please be advised that BMV has violated provisions of its Charter and provisions of law as set forth below. Accordingly, the District hereby places BMV on notice of its intent to revoke the Charter if BMV fails to remedy such violations on or before **May 5, 2019**. The District reserves its right to immediately revoke the Charter upon its written determination that any violations constitute a severe and imminent threat to the health and safety of the pupils. (Ed. Code, § 47607(d).)

This Notice of Violation ("Notice") sets forth:

- 1) The Charter School's alleged specific material violation of a condition, standard, or procedure set out in the school's Charter pursuant to Education Code section 47607(c)(1)(A); and the specific provision(s) of law that the Charter School allegedly failed to follow pursuant to Education Code section 47607(c)(1)(D), in conformity with Title 5, section 11965(f) of the California Code of Regulations;
- 2) All evidence relied upon by the chartering authority in determining the Charter School engaged in any of the acts or omissions identified in subdivision (f)(1) including the date and duration of the alleged violation(s), showing the violation(s) is/are both material and uncured, and that the alleged violation(s) occurred within a reasonable period of time before a notice of violation is issued; and
- 3) The period of time that the chartering authority has concluded is a reasonable period of time for the Charter School to remedy or refute the identified violation(s). In identifying the time period that will serve as the Charter School's reasonable opportunity to remedy the identified violation(s), the chartering authority shall



consider the amount of time reasonably necessary to remedy each identified violation, which may include the Charter School's estimation as to the anticipated remediation time. (5 C.C.R. § 11965(f)(1)-(3).)

In accordance with Title 5, section 11968.5.2(a) and (b), of the California Code of Regulations, the District provides this Notice to the Charter School's governing body at least seventy-two (72) hours prior to the District's **April 4, 2019** Board meeting wherein the Board will consider issuing the Notice. In conformity with Title 5, section 11968.5.2(a), the Charter School is provided notice of the proposed action by the Board:

PLEASE TAKE NOTICE that at or about **5:30 p.m.** on **April 4, 2019**, the Mountain View Whisman School District Board of Trustees will meet at Graham Middle School MUR, 1175 Castro Street in Mountain View, California, and will consider whether to issue this Notice of Violation based upon Bullis Mountain View's violations of provisions of its Charter and violations of provisions of law.

This Notice includes all relevant documents related to the proposed action to issue the Notice. BMV is in violation of its Charter and violation of law as further described below:

I. VIOLATIONS OF CONDITIONS, STANDARDS, OR PROCEDURES OF CHARTER

On or about December 20, 2018, the Board voted to approve the charter petition to establish BMV for a three (3) year charter term beginning July 1, 2019, through June 30, 2022, and also to approve the recommendations set forth in the District's December 20, 2018 Staff Report. The recommendations addressed several deficiencies in the petition that were identified during the petition review process and ensured that BMV would be held accountable to its promise to serve Mountain View's underserved and diverse student population. (Petition, p. 6 [BMV "will serve an intentionally diverse student demographic that mirrors the demographics of the Mountain View community both ethnically and socioeconomically"].) Upon approval, the District became the authorizing and oversight agency for BMV, and the recommendations became requirements, or "conditions, standards, or procedures," of the Charter. (Attached hereto as Exhibit A is a true and correct copy of the District Staff Report, dated December 20, 2018; Exhibit B is a true and correct copy of the Board's Meeting Minutes, dated December 20, 2018.)

Accordingly, the following requirements/standards were made part of the Charter:

1. Governance: To address potential conflicts of interest, governance concerns, and ensure local participation in BMV's governance, the Charter requires at least the majority of BMV's Board members reside within the boundaries of Mountain View and/or the Mountain View Whisman School District.
2. Assessments: To address the lack of defined measures to enable the District to compare performance with the Charter School, the Charter requires BMV to utilize the same benchmark and reading assessments used by the District each school year, conduct such assessments on a trimester basis, and meet assessment reporting deadlines as designated by the District. The Charter requires that the Charter School exceed Districtwide assessment results for all pupil subgroups by not less than five (5) percent.
3. Budget Estimates: To address the potential fiscal impacts of the inaccurate estimates, the Charter must revise its budget assumptions by utilizing the revised assumptions reflecting a Free and Reduced-Price Lunch ("FRPL") rate of 42%; English Language Learner ("ELL") rate of 24%; and Socioeconomically Disadvantaged ("SED") rate of 35%. Furthermore, the Charter must indicate that BMV's enrollment rates of FRPL, ELL, and SED students shall be at least equal to those of the District. Title I estimates must be revised and the Charter School must submit a revised budget containing the corrected assumptions to the District no later than July 1, 2019.
4. Admissions Preferences: To effectuate BMV's enrollment goals and purpose of serving the families residing within the attendance boundaries of Castro, Theuerkauf, and Monta Loma Elementary Schools: (1) students who are eligible for Free and Reduced-Price Meals ("FRPM") and who reside within the attendance boundaries of Castro, Theuerkauf, and Monta Loma Elementary Schools shall be afforded first enrollment preference; and (2) students who are eligible for FRPM and who reside within the Mountain View Whisman School District shall be afforded second enrollment preference.
5. MOU: To outline their specific obligations, operational responsibilities, and legal relationship, BMV must enter into the memorandum of understanding ("MOU") attached to the Staff Report.

However, since the Board's December 20th approval of the Charter, BMV has violated and/or taken actions demonstrating its intent to disavow the above requirements/standards and the entirety of its charter. Such actions include but are not limited to the following:

1. On or about January 23, 2019, upon learning BMV started its student registration process and planned to hold informational meetings for interested parents, the District asked BMV to provide information regarding its application, enrollment and lottery procedures, registration and informational meeting materials, and documents demonstrating compliance with the Board-approved admissions preference requirements of the Charter. (Attached hereto as Exhibit C is a true and correct copy of the District's letter to BMV re Admissions Process and Lottery, dated January 23, 2019.)
2. On or about January 23, 2019, to ensure BMV satisfies the requirement that at least the majority of BMV's board members reside within the boundaries of Mountain View and/or the District, the District asked BMV to provide information "regarding the composition of the BPCS Board of Directors, including but not limited to member names and cities of residence." Although BMV responded to the letter, BMV did not provide the requested information and has not provided said information to date. (Attached hereto as Exhibit D is a true and correct copy of the District's letter to BMV re Compliance with Public Integrity Statutes, dated January 23, 2019; Exhibit E is a true and correct copy of BMV's letter to the District re Response to Your Letter re Compliance with Public Integrity Statutes, dated January 30, 2019.)
3. On or about January 30, 2019, BMV responded that it is still in the process of developing enrollment materials. While BMV provided a copy of a "Lottery Interest Form," contrary to its Charter, the form states that first enrollment preference shall be given to "*siblings of admitted students* who are eligible for [FRPM] and reside in the attendance areas of Castro, Theuerkauf, or Monta Loma schools." (Attached hereto as Exhibit F is a true and correct copy of BMV's letter to the District re Response to Your Letter re Admissions Process and Lottery, dated January 30, 2019; Exhibit G is the Bullis Mountain View Lottery Interest Form 2019-2020.)
4. In February 2019, the District learned that BMV held a parent enrollment meeting on January 24, 2019, during which time information was presented regarding BMV's lottery that was inconsistent with the admissions preference requirements. Specifically, BMV represented that admissions preference,

“once finalized,” would be provided to prospective pupils in the following order: Students qualifying for FRPM who reside in MVWSD; Siblings; Founding board members; Staff up to 10%; Residents within boundaries of MVWSD; Siblings outside of MVWSD boundaries; Students qualifying for FRPM who reside outside of MVWSD; and all others who reside outside of MVWSD boundaries.” Not only does this information violate the preference requirements but they also reflect that the preferences have not been “finalized,” despite the fact that such requirements were approved by the Board one (1) month earlier. Accordingly, by letter dated February 15, 2019, the District informed BMV that it expects all information presented to the public moving forward to be consistent with the approved admissions preference requirements. (Attached hereto as Exhibit H is a true and correct copy of the District’s letter to BMV re Admissions Process and Lottery, dated February 15, 2019.)

5. BMV did not respond to the District or otherwise confirm its understanding of the District’s expectation for it to comply with the approved admissions preference requirement. Accordingly, on or about March 1, 2019, the District asked BMV to confirm its intent to comply with the preference requirements. (Attached hereto as Exhibit I is a true and correct copy of the District’s letter to BMV re Admissions Process and Lottery Information Follow Up, dated March 1, 2019.)
6. BMV was asked to present to the Board, on or about March 7, 2018, at a regular Board meeting, information regarding, among other things, its admissions and enrollment procedures. BMV did not make a meaningful presentation and failed to confirm its intent to effectuate the admissions preference requirements.
7. The following day, BMV stated its intent to not comply with the Board-approved admissions preference requirements. On or about March 8, 2019, BMV asked the District to “confirm that the district agrees that BMV’s enrollment preferences at this time are those as explicitly listed in our charter petition, and not those that the district attempted to impose in its December 20, 2018 action on the charter petition.” (Attached hereto as Exhibit J is a true and correct copy of an email from Ms. Anderson-Rosse to Dr. Rudolph re Enrollment Preferences, dated March 8, 2019.)
8. On or about March 11, 2019, the District responded by again reiterating BMV’s obligation to comply with its Charter to provide enrollment preferences for pupils eligible for FRPM who

reside within the attendance boundaries of Castro, Theuerkauf, and Monta Loma Elementary Schools, and who reside within the boundaries of the District. The District informed BMV that its Charter “requires the above stated preferences and the expectation is that BMV will comply.” (Attached hereto as Exhibit K is a true and correct copy of the District’s letter to BMV re Request for Clarification Regarding Requirements for Admissions Practices, dated March 11, 2019.)

9. On or about March 19, 2019, the District learned from the Santa Clara County Office of Education (“SCCOE”) that BMV representatives met directly with County Superintendent Mary Ann Dewan and SCCOE staff – without District knowledge or advance notification – to request that SCCOE “approve” BMV’s already-existing Charter and to operate under SCCOE’s oversight.

The District informed BMV that its actions reflect BMV’s intention to disavow its obligations under its Charter and raised questions whether BMV intends to serve District students, to serve a diverse population, or to engage the Mountain View Whisman community, as promised in its Charter. The District informed BMV that its attempt to “swap” authorizers, or otherwise seek the “approval” of an already-existing district-approved charter from the county office of education, or any other agency for that matter, absent the exhaustion of statutory procedures for petition denial or nonrenewal, violates the law.

Concerned about BMV’s attempt to bypass its obligations under the Charter, the District asked BMV to provide a written response to the District to explain its actions. Furthermore, the District asked that, if BMV does not have any intention of operating in compliance with its Charter, BMV must immediately communicate such intention. (Attached hereto as Exhibit L is a true and correct copy of the District’s letter to BMV re Santa Clara County Office of Education Meeting, dated March 19, 2019.)

10. In response, on or about March 21, 2019, BMV asserted to the District for the first time that the Board never approved its petition in the first place. BMV asserts that, by not approving the charter petition “as presented,” the District “denied” the petition and that, “we consider our petition denied, and will proceed accordingly.” (Attached hereto as Exhibit M is a true and correct copy of BMV’s letter to the District re Bullis Mountain View Charter School, dated March 21, 2019.)

11. That same day, on or about March 21, 2019, BMV informed interested families that “we will not be opening this Fall as we’d hoped. For the 218 families that were eager to participate in the lottery, we are sorry to inform you that we will not be holding a lottery and we thank you for your trust and support through the entire process.” (Attached hereto as Exhibit N is a true and correct copy of an email from BMV to interested families re Important Updates, BMV, dated March 21, 2019.)
12. The full day meeting that was scheduled between the District and BMV for March 22, 2019, for the purpose of communicating regarding the status of the school’s planned opening was canceled by BMV at the last minute.

BMV’s actions as described above reflect the Charter School’s violation of its Charter.

The presentation of information to parents of admissions preferences inconsistent with the Board-approved requirements of its Charter, BMV’s repeated failure and/or unwillingness to confirm its understanding of and otherwise assure the District that it will comply with the requirements, BMV’s attempt to illegally seek “authorization” of its already-existing Charter from the SCCOE, and also its representation that its Charter was never approved by the District in the first place constitutes a violation of, and an intent to disavow, not only the admissions preference requirements of its Charter but also all of its Charter requirements.

Furthermore, BMV’s failure to provide information regarding its board member composition, including their cities of reference, combined with the fact that BMV represents that its Charter was never approved, further violates, and constitutes an intent to continue violating, the governance requirement of its Charter.

Additionally, BMV’s stated intent not to open in fall 2019 also violates its Charter, which was not only approved for a term beginning July 1, 2019, but which also anticipated commencing the first day of instruction on August 14, 2019. (Petition, p. 23; Petition Appendix 1, “School Calendar 2019-20.”) Indeed, BMV’s failure to open in fall 2019 constitutes a wholesale failure to implement the entirety of its educational program and operations set forth in its Charter.

Accordingly, BMV is in violation of the requirements and must demonstrate remedy of its violation of the conditions, standards, or procedures of the Charter.

II. VIOLATIONS OF LAW

A. Charter Schools Act – Petition Approval

The Charter Schools Act (“CSA”) does not permit a charter school with an already-existing charter approved by a local school district to seek “authorization” of its charter from the county office of education, or any other agency for that matter. Approval of a petition by a local school district precludes the charter school from seeking oversight elsewhere from another agency as a matter of law. The only way in which a charter school petitioner may seek authorization of its charter from the county office of education is if its charter petition is denied by the local school district and the charter school seeks approval on appeal.

Specifically, Education Code section 47605(j)(1) states:

If the governing board of a school district denies a petition, the petitioner may elect to submit the petition for the establishment of a charter school to the county board of education. The county board of education shall review the petition pursuant to subdivision (b). If the petitioner elects to submit a petition for establishment of a charter school to the county board of education and the county board of education denies the petition, the petitioner may file a petition for establishment of a charter school with the state board, and the state board may approve the petition, in accordance with subdivision (b). A charter school that receives approval of its petition from a county board of education or from the state board on appeal shall be subject to the same requirements concerning geographic location to which it would otherwise be subject if it received approval from the entity to which it originally submitted its petition. A charter petition that is submitted to either a county board of education or to the state board shall meet all otherwise applicable petition requirements, including the identification of the proposed site or sites where the charter school will operate.

These appeal procedures underpin the Constitutional principle embedded within the CSA that provides preference for local control of charter schools. (Cal. Const., art. IX, §§ 5, 14; Ed. Code, § 47605(b) [“the governing board of the school district shall hold a public hearing on the provisions of the charter” and “[f]ollowing review of the petition and the public hearing, the governing board of the school district shall either grant or deny the charter”]; *Wilson v. State Bd. of Educ.* (1999) 75 Cal.App.4th 1125, 1136, 1139 [“it bears

underscoring that charter schools are strictly creatures of statute” and “under the control of officers of the public schools”]; *Mendoza v. State* (2007) 149 Cal.App.4th 1034, 1041 [“under the Constitution, the public schools themselves exist at the district level and are governed by school districts”]; *Cal. Sch. Bds. Assn v. State Bd. of Educ.* (2010) 186 Cal.App.4th 1298, 1320 [“the statutory scheme reflects an intent to promote district chartered schools and local oversight while allowing for limited exceptions”].)

The Board officially voted to approve the BMV petition, as reflected in the December 20, 2018 Board meeting minutes, and therefore it is without question that the District is the oversight agency over the Charter School. (Ed Code, § 35163 [“Every official action taken by the governing board of every school district shall be affirmed by a formal vote of the members of the board, and the governing board of every school district shall keep minutes of its meetings”], § 47604 [“An authority that grants a charter to a charter school to be operated by, or as, a nonprofit public benefit corporation is not liable for the debts or obligations of the charter school, or for claims arising from the performance of acts, errors, or omissions by the charter school, if the authority has complied with all oversight responsibilities required by law”], § 47604.3, and § 47604.32.) The law regulates the specific circumstances for which a petition may be denied and failure to approve a petition “as presented” is not a valid basis. (Ed. Code, § 47605(b).)

Accordingly, BMV’s representation that the District “denied” its petition on December 20, 2018, and any actions taken by BMV that are consistent with that representation, constitutes an attempt to operate outside the District’s constitutionally and statutorily-mandated oversight authority in violation of Education Code sections 35163, 47604, 47605, 47604.3, and 47604.32.

Furthermore, BMV’s *ad-hoc* characterization of the Board’s December 20th approval of the BMV petition as a “denial” – combined with the fact that BMV representatives met with SCCOE officials in an effort to seek SCCOE’s “approval” of its already-existing Charter – reflects BMV’s violation and/or intent to violate Education Code section 47605(j)(1). Specifically, in violation of law, BMV seeks to bypass the appeal procedures set forth under Section 47605(j)(1) by seeking approval of its Charter from the SCCOE without satisfying the requisite condition precedent – denial of its petition by the District.

BMV’s assertion that the District “denied” its petition is contradicted by countless actions undertaken by BMV following the Board’s approval, which reflect BMV’s clear understanding that its petition was in fact approved on December 20, 2018. For example, according to the California Department of Education (“CDE”), BMV applied for a

charter school number which is necessary to operate a school, to qualify for funding, and which may only be done upon charter approval. BMV also accepted the District's facilities offer under Proposition 39 to be housed where the District's offices are currently housed. The District and BMV began negotiating specific provisions of the operational MOU. On or about January 4, 2019, BMV sent a letter to the District thanking staff "for the significant amount of time it dedicated to the charter petition review process [and]...extend[ing] our appreciation to the District trustees," and to "address next steps in *our mutual service of Mountain View students and families.*" (Emphasis added.) BMV applied for admission to the El Dorado Charter Special Education Local Plan Area ("SELPA") and, on or about January 23, 2019, BMV's application was approved. In January 2019, BMV began holding public student registration and information meetings for parents interested in enrolling their children in the Charter School. BMV further sought to hire teachers by posting advertisements in EdJoin and on the BMV website. These advertisements were posted February 12, 2019, and offered salaries between \$60,000 and \$110,000. (See Exhibits – and ---.) Hiring is only consistent with a charter school operating under an approved charter and the funds necessary for hiring are only available to a charter school with an approved charter. There is no question that BMV understood the Board's action on December 20th to be an approval of its charter. (Attached hereto as Exhibit O is a true and correct copy of BMV's letter to the District re Request for Proposition 39 Facilities for the 2019-20 School Year, dated October 31, 2018; Exhibit P is a true and correct copy of BMV's letter to the District re Response to Preliminary Officer, dated March 1, 2019; Exhibit Q is a true and correct copy of BMV's letter to the District, dated January 4, 2019; Exhibit R is a true and correct copy of the District's letter to BMV re Bullis Mountain View Charter Approval, dated January 14, 2019; Exhibit S is a true and correct copy of the EL Dorado Charter SELPA's letter to BMV, dated January 23, 2019.)

B. Charter Schools Act – Information Request

The District is entitled to information and documentation regarding the Charter School in order to meet its oversight obligations. The failure to timely provide such information interferes with the District's oversight duties. Furthermore, such failure by the Charter School to comply with its statutory duty to promptly respond to requests for information subjects the Charter School to notice to remedy and potential revocation. (Ed. Code, §§ 47604.3 and 47607(c)(1).) Education Code section 47604.3 provides:

A charter school shall promptly respond to all reasonable inquiries, including, but not limited to, inquiries regarding its financial records, from its chartering

authority, the county office of education that has jurisdiction over the school's chartering authority, or from the Superintendent of Public Instruction and shall consult with the chartering authority, the county office of education, or the Superintendent of Public Instruction regarding any inquiries.

Education Code section 47604.32 provides:

Each chartering authority, in addition to any other duties imposed by this part, shall do all of the following with respect to each charter school under its authority:

- (a) Identify at least one staff member as a contact person for the charter school.
- (b) Visit each charter school at least annually.
- (c) Ensure that each charter school under its authority complies with all reports required of charter schools by law.
- (d) Monitor the fiscal condition of each charter school under its authority.
- (e) Provide timely notification to the department if any of the following circumstances occur or will occur with regard to a charter school for which it is the chartering authority: (1) A renewal of the charter is granted or denied. (2) The charter is revoked. (3) The charter school will cease operation for any reason.
- (f) The cost of performing the duties required by this section shall be funded with supervisory oversight fees collected pursuant to Section 47613.

BMV's failure to provide information regarding its board member composition, including but not limited to their cities of residence, and its failure to provide information regarding the application/lottery/admission process impairs the District's oversight obligations, including its ability to determine the Charter School's compliance with the board-approved requirement that at least the majority of BMV's board members reside within the boundaries of Mountain View and/or the District and that BMV properly sought enrollment, had generated necessary enrollment interest, and was prepared to comply with the admissions requirements.

Accordingly, BMV is in violation of law and must demonstrate remedy.

CONCLUSION

Please be advised that the District views BMV's violations of its Charter and violations of law as grounds for revocation pursuant to the Charter and Education Code section 47607(c). These serious matters require your immediate attention and must be resolved



without delay. BMV is required to demonstrate remedy of all issues no later than **May 5, 2019**.

Regards,

Dr. Ayindé Rudolph
Superintendent

cc: Santa Clara County Office of Education

Exhibits:

- A. District Staff Report, dated December 20, 2018
- B. Board Meeting Minutes, dated December 20, 2018
- C. District's letter to BMV re Admissions Process and Lottery, dated January 23, 2019
- D. District's letter to BMV re Compliance with Public Integrity Statutes, dated January 23, 2019
- E. BMV's letter to the District re Response to Your Letter re Compliance with Public Integrity Statutes, dated January 30, 2019
- F. BMV's letter to the District re Response to Your Letter re Admissions Process and Lottery, dated January 30, 2019
- G. Bullis Mountain View Lottery Interest Form 2019-2020
- H. District's letter to BMV re Admissions Process and Lottery, dated February 15, 2019
- I. District's letter to BMV re Admissions Process and Lottery Information Follow Up, dated March 1, 2019
- J. Email from Ms. Anderson-Rosse to Dr. Rudolph re Enrollment Preferences, dated March 8, 2019
- K. District's letter to BMV re Request for Clarification Regarding Requirements for Admissions Practices, dated March 11, 2019
- L. District's letter to BMV re Santa Clara County Office of Education Meeting, dated March 19, 2019
- M. BMV's letter to the District re Bullis Mountain View Charter School, dated March 21, 2019
- N. Email from BMV to interested families re Important Updates, BMV, dated March 21, 2019
- O. BMV's letter to the District re Request for Proposition 39 Facilities for the 2019-20 School Year, dated October 31, 2018
- P. BMV's letter to the District re Response to Preliminary Officer, dated March 1, 2019
- Q. BMV's letter to the District, dated January 4, 2019
- R. District's letter to BMV re Bullis Mountain View Charter Approval, dated January 14, 2019
- S. EL Dorado Charter SELPA's letter to BMV, dated January 23, 2019



**Mountain View
Whisman
School District**

- T. BMV hiring advertisements posted on its website and EdJoin on or about February 12, 2019
- U. Minutes from the Mountain View Whisman Board of Education March 7, 2019 meeting