

LAW OFFICES OF JAMES T. JONES

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October 24, 2025

RECEIVED

OCT 27 2025

Office of Lisa Allen, Superintendent of Schools
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824

Sacramento City Unified School District
Legal Services Department

Re: Jeanine Rupert/Sacramento City Unified School District; Amendment to Government Tort Claim Initially Filed October 9, 2025 (attached hereto for reference)

Dear Sacramento City Unified School District and Superintendent Lisa Allen,

The facts and legal claims included below are presented to amend Jeanine Rupert's government tort claim, which was submitted on her behalf by Attorney Erik Lindstrom on October 9, 2025.

Jeanine Rupert was a teacher at Phoebe Hearst Elementary School for 24 years. When she began teaching at Phoebe Hearst in 2001, she was assigned to Room 1. During that period of time, Principal Flora Thomas informed teachers that a parent of one of the students owned a carpet store and was offering to install small pieces of carpet in classrooms where teachers wanted carpet. The Principal, acting on behalf of the Sacramento City Unified School District (SCUSD), let teachers decide if they did, or did not want carpet in their rooms. Ms. Rupert indicated she would like the carpet installed.

In a dozen or so classrooms, carpet was installed in the corner over tile that was already in place in the classroom. Within a few short years, the carpet became worn, frayed, and a safety hazard. In approximately Spring of 2006, Ms. Rupert requested that the District repair the carpet. That summer, the District removed the patch of carpet and replaced all the tiles in the classroom.

At no time during the removal of the carpet and replacement of the tile in Room 1 did the District inform Ms. Rupert that removing the carpet and replacing the tile could result in the release of asbestos into the classroom environment. To Ms. Rupert's knowledge, no testing was done to determine if asbestos had been released as a result of the work. Ms. Rupert continued to work in Room 1 for several years following the removal of the carpet and the replacement of the tile. During those years, the District never informed Ms.

Rupert about any concerns related to the existence of asbestos in the classroom or school, or possible asbestos exposure to her, her classes, and others who were present at the school.

In 2015, Ms. Rupert was informed by the Principal that Room 1 would become a kindergarten classroom. Ms. Rupert was given an option to move into either a portable classroom or Room 7. Room 7 had a notorious reputation on the Phoebe Hearst campus of being the classroom “where teachers went to die,” because it was repeatedly occupied by teachers who remained there for only a very short period of time and then moved out (this was a period of time when teachers were frequently receiving pink slips unrelated to performance) - leaving the room in disarray and disrepair. In fact, when Ms. Rupert was given the choice of which room she wanted to move into, the Principal actually asked her if she wanted to go to “the room where teachers go to die.” Ms. Rupert wanted a permanent classroom, and a space large enough for 33 sixth graders, not a portable, so she chose Room 7. Prior to the beginning of the school year, Ms. Rupert cleaned and repaired the dilapidated condition of Room 7 with the help of her father. It was known to the school’s administration, and therefore the District, that Ms. Rupert was engaging in this work, and the District had no objection to that cost-free beautification of the classroom environment.

Together, Ms. Rupert and her father painted the interior classroom walls with primer, and her father hired painters to finish the paint work. All of the walls were exposed plywood when Ms. Rupert at first moved in, and the fresh painting she and her father contributed was open and obvious to school administrators. In fact, it was commonplace for teachers to engage in that kind of cost-free work at the school. That same summer, Ms. Rupert noticed that the carpet in Room 7 was loose, frayed, filthy, and needed to be removed. Ms. Rupert asked the maintenance team via work orders submitted through the custodian, Tony Renda, to remove the carpet, and she continued to make that request for the following ten years to no avail.

As the years passed, the carpet deteriorated even further. It developed more severe staining and edges of the carpet, which covered only a part of Ms. Rupert’s classroom became loose. She and her students would frequently trip over the damaged, unacceptably dangerous carpet. But, as many times as Ms. Rupert tried to get the carpet repaired or removed, the District ignored her requests. On one occasion, Principal Doyal Martin visited Room 7 and asked Ms. Rupert why the carpet was in such poor condition. Ms. Rupert stated that the District was ignoring her repeated complaints about the dangerous condition of the carpet. Mr. Martin thereafter placed a request for repair, and a portion of the loose edge of the carpet was glued down, but the repair did not last, the carpet once again became loose, and it remained frayed, filthy, stained, and bubbled in many places. The custodial staff was unable to clean or fix the carpet, and in fact, the only vacuum available to the evening custodians who cleaned Room 7 had no brush on it

so it could not gather the dirt and debris from the carpet. The filth accumulated over the years.

In late April 2025, an animal died under one of the portable classrooms (Room 26, the STEM room) on the Phoebe Hearst campus. Staff complained about the stench from the rotting carcass, and the custodian alerted the District. However, no one came to look, and the custodian reported that the District does not remove decaying carcasses, that are simply left in place to rot. Along with the stench, and the disgust, on May 15, 2025 came a flea infestation in the STEM and Art rooms, and in the garden. The District was again informed of the situation but did not begin spraying until May 19. By that time, the fleas spread throughout the school. The kindergarten classrooms, which were next to the STEM room, were significantly affected.

Volunteers at a book fair in the library (Room 6, fully carpeted) also suffered flea bites. Open house, scheduled for May 20, was cancelled due to fleas. Students missed class due to the flea infestation. The carpet in Room 7 became infested. Ms. Rupert's desk was situated on the carpet, and she was repeatedly bitten by fleas on her legs and ankles. Her students also complained about being bitten. The District attempted to remedy the infestation by serially spraying classrooms (apparently with pesticide), but the fleas remained an ongoing problem. Once again, the District ignored its duty to remove the hazardous carpet from Ms. Rupert's room. The STEM and Art teachers in the portables were not cleared to return to their classrooms until June 4.

A male teacher at Phoebe Hearst saw the severely damaged carpet in Ms. Rupert's room and he told her that he had the same problem, so he pulled up the carpet and simply threw it out. The male teacher said that it was very easy to remove, and he informed Ms. Rupert that another male colleague had also done the same thing. Ms. Rupert concluded she could do the same by herself. Removing the carpet did not appear to Ms. Rupert to be any different than the free work she had repeatedly contributed to improve the school over the years, including climbing on ladders to paint Room 7, moving furniture, heavy cleaning, etc. Hearing that the male teacher had already done so, Ms. Rupert did not believe there was any reason why she would be prohibited from removing the carpet.

June 10, 2025 was the last day that Ms. Rupert's students would be in the classroom for the school year. Students had already received their final grades, academic instruction was complete, and the students were in class listening to music, signing yearbooks, emoting about graduating from Phoebe Hearst, dancing, and cleaning the classroom. The school administration preferred that all classroom furniture be stacked and pushed to one side or corner of the classroom so custodial staff can more easily clean the rooms. It goes without saying that school administration is aware that students assist with these work activities. As the room was being cleaned, Ms. Rupert decided to remove the dangerous carpet. As she began to pull it up, she realized just how dirty it really was, and she could

see the dirt trapped within the carpet's fibers. Initially, the carpet came up with relative ease, but eventually Ms. Rupert found it was more difficult than the male teacher described. Students offered to help, and some students even borrowed some hand tools from another classroom to pry up the carpet (hammers and a crowbar).

Ms. Rupert did not consider the use of the hammers or crowbar to be unsafe in any way, and, in fact, it was not unsafe. The students were well-supervised, and the use of similar tools was commonplace at the school. In fact, one of the aforementioned male teachers submitted multiple District-approved work orders over the years that resulted in projects involving students and the building of structures with tools. Students at Phoebe Hearst use dissection kits, scissors, mow the school lawn, trim bushes with shears, dig with shovels and spades, build models with box cutters, and build picnic tables and Adirondack chairs (dozens) using power tools. The use of the hammers and crowbar was significantly less dangerous than many activities that the school encourages, and Ms. Rupert was present to ensure that the students were handling the tools with care. However, the carpet proved to be too stubborn. Ms. Rupert directed the students to stop trying, and she subsequently informed the head custodian that the carpet had been partially removed. Ms. Rupert's effort to remove the carpet did not dislodge any of the tiles beneath the carpet.

Nevertheless, the District severely punished Ms. Rupert for attempting to create a clean, safe, educationally appropriate classroom environment, claiming she was unprofessional, and that she endangered her students by creating an asbestos hazard and exposing her students to the risks created by using hammers and a crowbar. She was also accused of felonious vandalism and depriving other employees of the opportunity to do work (i.e. remove the carpet that the District refused to remove for over a decade). Please review the extreme and outrageous exaggeration contained in the indefensible Notice of Unprofessional Conduct issued to Ms. Rupert.

On information and belief, the District has failed to comply with the federal Asbestos Hazard Emergency Response Act (AHERA), and it never notified Ms. Rupert or the District employees generally that there were asbestos hazards in the classrooms. The District has claimed that Ms. Rupert could have dislodged tiles containing asbestos, thereby releasing asbestos into the ambient air, but the District is fully aware that there are exposed broken tiles in many places in the District schools, and the District has never treated those as asbestos hazards. The District is also fully aware that Ms. Rupert's actions did not cause the release of asbestos into the classroom. The District's unwarranted discipline of Ms. Rupert is in reality an effort to cover-up the fact that Ms. Rupert's advocacy for safety revealed the District's disregard for safety, including the District's failure to comply with AHERA.

By severely disciplining Ms. Rupert and threatening to fire her if she spoke publicly about why she removed the carpet, the District was hoping to silence Ms. Rupert's advocacy for school safety and hide the fact that it does not comply with AHERA. It is illegal to retaliate against individuals who raise issues about AHERA non-compliance. Although Ms. Rupert did not file a formal complaint about AHERA noncompliance, her conduct had the same result and was therefore the equivalent. She suffered retaliation because her actions exposed the District's violation of AHERA.

Furthermore, Aprille Shafto and Stacey Shorey, two of the District employees who unlawfully retaliated against Ms. Rupert, retaliated because Ms. Rupert had, in the past, exercised her First Amendment right to speak as a private citizen on matters of public concern related to District matters. In February 2025, Ms. Rupert attended a School Board of Directors meeting and publicly opposed fundamental changes to the Phoebe Hearst kindergarten program that had been proposed by Principal Doyal Martin an Assistant Superintendent Aprille Shafto. The School Board rejected the proposed changes, and Aprille Shafto carried a grudge against Ms. Rupert for this.

Additionally, Aprille Shafto had a close relationship with Principal Martin. Ms. Rupert, however, caused the Teachers' Association to alert Ms. Shafto that Principal Martin was frequently missing from campus without explanation. Ms. Rupert knew this to be true because she was the "Teacher in Charge" and she would have to serve as the "acting Principal" when he was not present. On one occasion, it was learned that, during the school day, Principal Martin was attending a Sacramento River Cats game during instructional time. Numerous complaints were made that Doyal Martin was not doing his job, and Ms. Shafto was angered and annoyed by Ms. Rupert's reports. This also led to Ms. Shafto's dislike of Ms. Rupert and contributed to the motivation to retaliate.

Together, Ms. Shafto and Ms. Shorey discriminated against and retaliated against Ms. Rupert. On information and belief, this could not have been accomplished without the acquiescence of and ratification by Superintendent Lisa Allen, Deputy Superintendent Mary Hardin Young (Aprille Shafto's direct supervisor) and the School Board. Pursuant to Board Policy No. 4118 ("Discipline/Suspension/Disciplinary Action") the Board must appoint a designee to ensure discipline is applied in a non-discriminatory manner. The designee can be the Superintendent or some other appropriate individual. The Board, the Superintendent, and/or its designee failed to ensure that the discipline issued to Ms. Rupert was proportional to her conduct and non-discriminatory. At least two male teachers were permitted to remove carpet from their classrooms without discipline. On information and belief, no investigation was conducted to determine whether the discipline issued to Ms. Rupert was proportional to her conduct, and it is believed that further investigation will show the discipline she received was discriminatorily disproportionate. Instead, the District, through its agents, simply imposed a level of discipline that was outrageously severe because it wished to retaliate and it wished to

immediately silence Ms. Rupert so the District's malfeasance would not become publicized.

Furthermore, the District intentionally misled Ms. Rupert by telling her that she had no need for legal representation at the "validation meeting" where she was interrogated about the carpet incident as if she was a hardened criminal, rather than the caring, compassionate, devoted GATE Teacher that she is. In fact, during that meeting, she was threatened with termination if she refused to answer any questions, and she was literally characterized as a felon for allegedly vandalizing school property with malicious intent. Under the duress of the District's blatant intimidation and duplicity, Ms. Rupert provided responses to questions that did not include a full evaluation of the entire context of the situation, because Ms. Rupert was not provided the time to reflect without fearing the potential termination of her stellar 24-year career. A complete consideration of the District's lengthy history of failing to comply with safety laws, coupled with its history of routinely permitting teachers and students to work with tools on facility improvement projects, a context Ms. Rupert did not have a chance to consider due to the unwarranted pressure tactics used by the District in the meeting, clearly lead to only one reasonable conclusion when that context is factored in - Ms. Rupert did nothing that justified any discipline, let alone the cruel punishment imposed.

Accordingly, in addition to those claims identified in the October 9, 2025 letter from attorney Erik Lindstrom, which is attached hereto and incorporated herein by reference, Ms. Rupert also intends to bring claims for retaliation pursuant to Labor Code § 6310 (OSHA Retaliation), Retaliation in Violation of AHERA, Infliction of Emotional Distress, and Deprivation of her Constitutional Right to Free Speech (U.S. and California Constitutions).

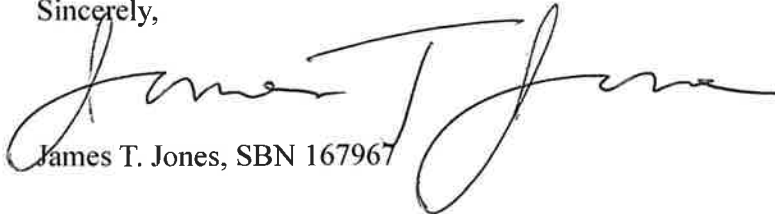
Ms. Rupert further amends her claim to include a monetary demand in the amount of \$2.3 million, which is not intended to limit her recovery at trial, should a court action be necessary to obtain a remedy. Ms. Rupert's claims will be brought against the District, all individuals named herein, and any other individual who is presently unknown but proves to be involved in the illegal decisions and conduct identified herein. This amount is not inflated for tactical advantage, but instead reflects a reasonable fraction of what can potentially be achieved at trial. Damages recoverable under these causes of action include lost wages (back pay, front pay, and lost benefits), emotional distress damages, attorneys' fees and costs, and punitive damages against any individual defendants found liable for the unlawful actions that violated Ms. Rupert's rights. Such damages can be considerable.

For example, in *Briley v. City of West Covina*, 66 Cal.App.5th 119 (2021), the court reduced a jury's award of emotional distress damages from \$3,500,000 to \$1,100,000 because it found that the plaintiff's testimony regarding emotional distress was too weak to support the full amount of the jury's award. The court noted that the plaintiff had

merely testified that he had some “sleep issues” and was “pretty devastated” and he cried a bit on the witness stand. The points to take away from that case are: (1) juries routinely make significant seven-figure emotional distress awards; and (2) even where the court acknowledges the evidence is weak, a \$1,100,000 award for emotional distress will not be overturned on appeal. Ms. Rupert’s evidence of emotional distress will be far more serious and compelling than that presented in the *Briley v. City of West Covina* case.

Also consider the following cases: (1) *Khan v. Alki David Productions* awarding \$8.5 million in emotional distress damages; (2) *Rael v. Sybon Dental Specialties* awarding \$3 million in emotional distress; (3) *Pearl v. City of Los Angeles* awarding \$15 million in emotional distress damages; (4) *Simers v. Los Angeles Times* awarding \$15.4 million in emotional distress damages; and (5) *Oriz v. Chipotle Mexican Grill, Inc.* awarding \$6 million in emotional distress damages. If litigation is necessary to obtain redress for Ms. Rupert’s injuries, economic damages (lost wages, etc.) would be quantified by an expert economist, but those damages can also easily reach the seven-figure range. If Ms. Rupert remains emotionally distressed to the extent that she cannot work, she will seek damages for all lost wages from the defendants. Attorneys’ fees and costs, conservatively estimated, will likely be in excess of \$800,000 if the case goes to trial.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Jones". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James T. Jones, SBN 167967

LANGENKAMP CURTIS PRICE
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ATTORNEYS

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Suite 100
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95814-2933

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Please send all correspondence to
our Sacramento Office

PHONE
916.648.2570
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L2C2P.com

*Labor and
Employment*

October 9, 2025

VIA E-MAIL AND U.S. MAIL

Superintendent Lisa Allen
Board President Jasjit Singh
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824
superintendent@scusd.edu
jasjit-singh@scusd.edu

Re: Jeanine Rupert — Notice of Claims and Request for Records

Dear Superintendent Allen and Board President Singh:

I am writing for Jeanine Rupert—veteran and beloved teacher at Phoebe A. Hearst Elementary School—to notify the Sacramento City Unified School District (“District”) of claims that will be brought if the District does not rescind adverse employment actions against Ms. Rupert related to her removal of flea-infested carpet in her classroom.

As you know, in June 2025, just before summer break, Ms. Rupert attempted to remove a filthy, frayed, and bubbling piece of carpet in the corner of her classroom. Ms. Rupert has taught at Phoebe Hearst for 24 years, and was a teacher when, 15 years ago, carpets were glued over existing classroom tile in the corners of classrooms. Over time, the carpets deteriorated and some have been removed. Ms. Rupert submitted work orders for many years to have the carpet in her classroom removed, but the District ignored Ms. Rupert’s requests. Last year, the situation became intolerable: a flea infestation affected the carpets so severely that parents were afraid to send their children to school. Some parents kept their children home. Ms. Rupert and her students who did attend suffered flea bites.

In the face of District dereliction, other employees (males) at Phoebe Hearst removed carpets without District support, and no one told teachers they could not remove their own carpets. Indeed, previous principals (male) have done substantial renovation projects without District support.

Superintendent Allen and Board President Singh
Re: Jeanine Rupert — Notice of Claims and Request for Records
October 9, 2025
Page 2

In this context—countless requests ignored, increasingly urgent health and safety issues, and knowing that other school staff had previously removed the carpets themselves—Ms. Rupert undertook the work herself. On the afternoon of the last day of school, after reports cards were delivered and desks were being cleared, Ms. Rupert began pulling up the carpet in her classroom. She believed she was helping the District. Ms. Rupert had spoken with other staff who had done this themselves and based on those conversations she believed it would not be too difficult. But after beginning to pull back some carpet, the job turned out to be too difficult for her to complete herself, and she abandoned the effort. She again submitted a work order asking the District to finally remove the carpet from her classroom over the summer recess and she reported that she had already begun some of the work herself.

Ms. Rupert was shocked when, in response, the District's Human Resources office placed her on administrative leave; took her keys and identification badge; suspended her email and District technology; directed her not to communicate with any other district employees or students; and prohibited her from stepping foot on any school site or District offices—even though they know Ms. Rupert has children enrolled in the District. Human Resources even prevented Ms. Rupert from contacting her children's teacher and barred her from attending a Back-to-School night.

Human Resources kept Ms. Rupert on leave under these cruel conditions until August 29, 2025, when it issued Ms. Rupert a disciplinary action and notified her she was being involuntarily transferred to a different school further away from her home and children's school, to an assignment outside of her specialty, and with a \$16,000 pay cut—her assignment at Phoebe Hearst earned above the ordinary salary schedule because of over-enrollment. Human Resources also threatened Ms. Rupert with a criminal felony—"malicious defacement, damage, or destruction of someone else's property"—and warned her that she could be fired if she engages in any conduct outside of her "job description" or fails to "maintain the confidentiality of this investigation."

Ms. Rupert has never before, in her 24 years of teaching, been disciplined. Her teaching evaluations have been impeccable. She is beloved. She did not deserve to be treated like this. Human Resource's shocking actions—retaliation for attempting in good faith to remove unsafe and unhealthy carpet, sequestration from her school community and colleagues, involuntary transfer away from her home for 24 years, and threats designed to silence and isolate her—significantly impacted Ms. Rupert's health. She is now on medical leave for extreme anxiety and depression.

The school community is outraged at the District's treatment of Ms. Rupert. Angry students have lined Folsom Boulevard in protest. Hundreds of angry parents and colleagues have attended board meetings. Yet, Ms. Rupert herself has remained

Superintendent Allen and Board President Singh
Re: Jeanine Rupert — Notice of Claims and Request for Records
October 9, 2025
Page 3

isolated out of fear of violating the Human Resource's threat of felony and warning to "maintain confidentiality" and act only within her job description.

Meanwhile, the District has not maintained confidentiality. The District has made statements disparaging Ms. Rupert and falsely alleging her actions were unethical, malicious, and criminal.

Ms. Rupert was investigated and disciplined by Human Resources Director Stacey Shorey and Assistant Superintendent Aprille Shafto. Ms. Shorey and Ms. Shafto hold grudges against Ms. Rupert for her outspoken opposition to several of their initiatives. As the longest-serving teacher at Phoebe Hearst, Ms. Rupert has often spoken publicly on issues of public concern. In 2024, Ms. Rupert publicly opposed Ms. Shafto's plan to address over-enrollment at Phoebe Hearst by, among other things, eliminating full-day kindergarten. When objections to Ms. Shafto's plan were brought to the school board, the board rejected Ms. Shafto's approach, to her embarrassment. In 2025, Ms. Rupert publicly complained about Ms. Shafto's non-responsiveness to complaints about the principal.

Government Claims Act Notice

This is notice, pursuant to the Government Claims Act, of claims by Ms. Rupert against the District related to the above-described circumstances. For purposes of Government Code section 910, Ms. Rupert can be reached at 1231 I Street, Suite 100, Sacramento, CA 95814.

Ms. Rupert would bring claims for retaliation based on her disclosure of unsafe conditions. School districts have a statutory duty to ensure classrooms are safe and conducive to learning. (*See, e.g.*, Ed. Code §§ 32280, 44807, 51101.) Classrooms are also workplaces and employers have a statutory duty to ensure workplaces are "safe and healthful," and to do everything "reasonably necessary to protect the life, safety, and health of employees." (Labor Code §§ 6400, 6403.) Ms. Rupert's classroom was not safe and conducive to learning because of the filthy, infested, frayed, and bubbling carpet in the corner of her classroom. She reported her concerns and asked the District to remedy the conditions. When her concerns were publicized, District administrators were embarrassed and then retaliated against her. The Education Code and Labor Code prohibit retaliation against employees for reporting unsafe conditions. (Ed. Code §§ 44110 *et seq.*, Labor Code § 1102.5.) These statutes authorize actions for compensatory damages, civil penalties, and prevailing-plaintiff attorney's fees.

Ms. Rupert would also bring claims for retaliation based on her free speech activities. Retaliatory actions often have multiple unlawful motives. A plaintiff need only show an unlawful motive was one "substantial motivating factor." Public

Superintendent Allen and Board President Singh
Re: Jeanine Rupert — Notice of Claims and Request for Records
October 9, 2025
Page 4

employees are protected from retaliation when they speak as private citizens on matters of public concern. (*Kennedy v. Bremerton Sch. Dist.* (2022) 597 U.S. 507, 543.) Ms. Shorey and Ms. Shafto held grudges against Ms. Rupert for her outspoken public opposition, and these grudges motivated their cruel and retaliatory actions against Ms. Rupert.

The District's conduct is also patent sex discrimination. Other male employees have engaged in comparable or more intrusive facilities actions (carpet removal, painting, fixture removal) without District approval and were not disciplined. Only Ms. Rupert was disciplined.

Human Resources also committed unfair labor practices in violation of the Education Employment Relations Act by gagging and isolating Ms. Rupert during her period of administrative leave and threatening, going forward indefinitely, that she "maintain confidentiality" and act only within her job description. Employees have a right to communicate with their colleagues and representatives for their defense and mutual protection, even during administrative leave, and engage in concerted activity. (*Santa Clara County Correctional Peace Officers' Assn. v. County of Santa Clara* (2018) PERB Dec. No. 2613-M.)

Human Resources also violated Ms. Rupert's statutory rights as a parent of children in the District to communicate and meet with her children's teacher and to participate in parent-teacher events. (Ed. Code § 51101.)

The District is also liable for defamation for accusing Ms. Rupert of improprieties, including felony "malicious" vandalism. No person could reasonably find Ms. Rupert's conduct was *malicious* under these circumstances.

Upon requesting Ms. Rupert's personnel file, we found that (i) Ms. Rupert's evaluations have not been saved in her file, and (ii) Ms. Rupert's confidential medical information is commingled in her file. This conduct violates the Education Code requirements regarding maintaining personnel files, the California Public Records Act's duty to preserve public records, and the medical privacy protections for employees under the Fair Employment and Housing Act, the California Family Medical Rights Act, and the Americans with Disabilities Act.

Ms. Rupert would file these claims in superior court as an unlimited civil action and in other agencies with jurisdiction over these claims.

Superintendent Allen and Board President Singh
Re: Jeanine Rupert — Notice of Claims and Request for Records
October 9, 2025
Page 5

Public Records Requests

We do not believe the District's claims that Ms. Rupert's carpet was in "good" condition; that she exposed students to unsafe conditions; that she risked exposing students to asbestos; or that Ms. Rupert's partial removal of carpet should have cost the District thousands of dollars. To that end, we request the following pursuant to the California Public Records Act:

1. Any complaints against Ms. Rupert since June 2025.
2. Any records related to requests for the removal of carpet in Ms. Rupert's classroom since July 1, 2015, including but not limited to any inspections, findings, or decisions related to such requests, and related correspondence.
3. Any records related to inspections of carpet in Ms. Rupert's classroom since July 1, 2015, and related correspondence.
4. Any records documenting or related to injuries or illnesses related to the removal of the carpet in Ms. Rupert's classroom since June 2025, and related correspondence.
5. Any records related to the costs of removing of carpet in Ms. Rupert's classroom since June 2025, including but not limited to invoices, payments, and accountings, and related correspondence.
6. Records showing District compliance with the Asbestos Hazard Emergency Response Act since July 1, 2015, specific to Phoebe Hearst Elementary School, including but not limited to any Management Plan, inspections, records required to be kept pursuant to 40 CFR 763.94, and related correspondence.
7. Any photographs, video, or other media showing carpet and tile conditions in Ms. Rupert's classroom since June 2025.
8. Any public statements issued by the District related to Ms. Rupert since June 2025.
9. Any communications to or from Stacey Shorey (including emails, text messages, and any other electronic or physical medium; including on work and personal devices), related to Ms. Rupert since June 1, 2025.

Superintendent Allen and Board President Singh
Re: Jeanine Rupert — Notice of Claims and Request for Records
October 9, 2025
Page 6

10. Any communications to or from Aprille Shafto (including emails, text messages, and any other electronic or physical medium; including on work and personal devices), related to Ms. Rupert since June 1, 2025.

Conclusion

Ms. Rupert is not seeking money. She just wants to return to her students and school community. She is willing to waive all claims against the District, if the District rescinds the adverse actions against her.

The District has struggled to fill her unique position at Phoebe Hearst. Her students have been without a consistent teacher since the beginning of the school year. The school community is outraged at the District's treatment of Ms. Rupert and waiting for Ms. Rupert to return. Ms. Rupert is ready, willing, and able to return to her classroom.

If the District insists on implementing the adverse employment actions against her, however, we are prepared to pursue the above-described claims and would seek all available legal remedies.

Sincerely,

LANGENKAMP, CURTIS, PRICE,
LINDSTROM & CHEVEDDEN, LLP


ERIC LINDSTROM

PROOF OF SERVICE

I am a citizen of the United States and a resident of the County of Sacramento. I am over the age of eighteen years and not a party to the above-entitled action; my business address is 1231 I Street, Suite 100, Sacramento, CA 95814.

On the date below, I served the following document(s):

Notice of Claims and Request for Records

 X **BY MAIL.** I am familiar with this Company's practice whereby the mail, after being placed in a designated area, is given the appropriate postage and is deposited in a U. S. mailbox in the City of Sacramento, California, after the close of the day's business.

 X **BY EMAIL:** I sent such document by use of email to the email address(es) listed on the service list.

addressed as follows:

Superintendent Lisa Allen
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824
superintendent@scusd.edu

Board President Jasjit Singh
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824
Jasjit-singh@scusd.edu

I declare under penalty of perjury that the foregoing is true and correct and was executed on October 9, 2025 at Sacramento, California.



JoAnn Iverson

PROOF OF SERVICE

I am a citizen of the United States and a Resident of the County of Yolo. I am over the age of eighteen years and not a party to the above-entitled action. My business address is P.O. Box 941, Davis CA, 95617.

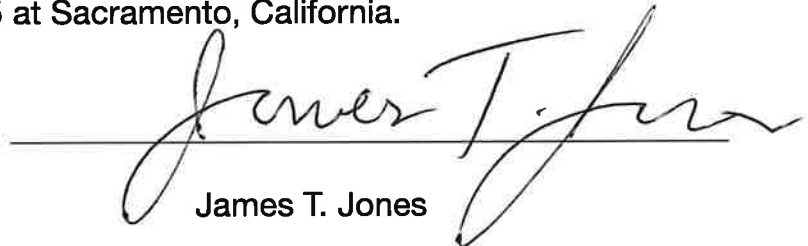
On the date below, I served the following document(s):

Jeanine Rupert/Sacramento City Unified School District; Amendment to Government Tort Claim (originally filed October 9, 2025)

I served said document by personal service, hand-delivery, to:

- (1) Lisa Allen, Superintendent, Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824
- (2) Board President Jasjit Singh, Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824

I declare under penalty of perjury that the foregoing is true and correct and was executed on October 24, 2025 at Sacramento, California.



James T. Jones