

07-CV-00759-DECL

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WESTERN DISTRICT OF WASHINGTON  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GREGORY REQUA, ADULT STUDENT

PLAINTIFF,

vs.

KENT SCHOOL DISTRICT No. 415;

BARBARA GROHE, SUPERINTENDENT;

AND MICHAEL ALBRECHT, PRINCIPAL

DEFENDANTS

Case No.: **C07-0759** *MJP*

DECLARATION OF GREGORY REQUA IN  
SUPPORT OF MOTION FOR TEMPORARY  
RESTRAINING ORDER

I GREGORY REQUA DO HEREBY DECLARE:

1. I am over the age of 18 years old and competent to testify in this matter.
2. I am the PLAINTIFF in this matter.
3. I have personal knowledge of all stated below.
4. I am currently a senior at Kentridge High School.

Declaration of Gregory Requa in Support of Motion for  
Temporary Restraining Order - 1

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- 1 5. I first knew about the video of Mrs. Mong the end of June 2006 and after I viewed it I  
2 thought it was funny and put a link to it on my MySpace.com page. I thought it was just  
3 an amusing critique of a teacher I had the past year at the high school.
- 4 6. I was not involved in video-taping of Mrs. Mong at school. From viewing the video I  
5 believe it was done during fifth period and I did not have Mrs. Mong for fifth period that  
6 school year. In fact I was in another class during fifth period, Current World Issues II  
7 with Ms. Robin, during the time the video was taped.
- 8 7. I was not involved in editing or posting the video of Mrs. Mong onto YouTube.com.
- 9 8. I did not speak to anyone telling them I was involved in the videotaping of Mrs. Mong or  
10 in the editing or posting of the video.
- 11 9. I spoke to no one at the high school about the video when school resumed in September  
12 of 2006.
- 13 10. Around February 12, 2007 I heard that KOMO 4 News was doing a news program on  
14 videos posted on YouTube.com that were critical of teachers and that is when I heard the  
15 video could be viewed as harassment. I immediately took the video link off my  
16 MySpace.com page as I was afraid I would be accused of harassing Mrs. Mong by having  
17 the video on my MySpace.com page.
- 18 11. On February 14, 2007 Mr. Albrecht called me out of class into his office and told me  
19 other students stated I told them I either produced or edited and posted the video of Mrs.  
20 Mong onto YouTube.com. I told Mr. Albrecht I was not involved in any way with that  
21 video.
- 22 12. On February 15, 2007 Mr. Albrecht pulled me out of class and told me I was to be put  
23 onto a long-term suspension for 40 days starting the next day. I told him I was not  
24 involved in the production, editing, or posting of the video and that I believed the other  
25

Declaration of Gregory Requa in Support of Motion for  
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1 students assumed I was involved due to my reputation at school as a first-rate video  
2 editor. Mr. Albrecht told me he did not believe me but believed the statements of the  
3 other students. I was not able to find out who the students were who told Mr. Albrecht I  
4 told them I was involved other than S.W. who confessed to the videotaping of Mrs.  
5 Mong.

6 13. Due to my suspension, I was told I would not be able to participate in the DECA  
7 competition. I placed third in the competition with my partner and we were set to  
8 compete at the state level, but the school pulled me out of the competition and forced my  
9 partner to compete as an individual. This competition had the potential of providing me  
10 with college scholarship money and recognition that would have benefited me in my  
11 college applications and future plans. Also, teachers had told me I had a good chance of  
12 winning the state competition and then going to the national competition. The loss of this  
13 competition to me is irreparable.

14 14. I filed a timely appeal of my suspension and the school district told me I could continue  
15 at school while my suspension was being appealed. I continued attending school while I  
16 was appealing my suspension.

17 15. I have never been in trouble at school and I have never had any discipline before this one.  
18 I go to school regularly and I turn in all my work and I currently have a "B" average.  
19 During the appeal of my suspension I attended school every day I could (except for when  
20 I had to attend hearings) and I did not discuss the video with anyone. I was not a  
21 disturbance at school in any way and I was not disciplined in any way.

22 16. After all my appeals were denied the school district told me I had to start my suspension  
23 on Tuesday May 8, 2007. That was my first day out of school onto my long-term  
24 suspension.

25 Declaration of Gregory Requa in Support of Motion for  
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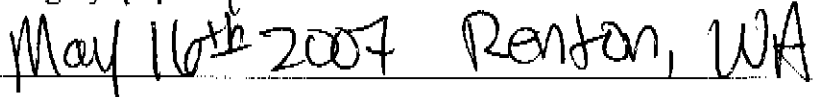
17. The school district told me I could apply for Contract School which I have done.

Contract School allows me to go to the high school two afternoons a week after school is dismissed and all the other students are gone. I meet with a teacher for approximately one to one-half hours to go over my homework and turn in assignments. This Contract School is not providing me with the same education I would receive if I was able to attend all my classes each day and get the full benefit of my education. I believe this suspension is denying me my education and is putting my graduation and future college plans at risk.

18. Money will not repair the injuries that will occur as long as I am out of school. Money will not make up for the education I am losing by being excluded from the classroom. Money will not make up for the injury to my reputation among my fellow students and teachers who have never had any reason to view me as a discipline problem. Money will not substitute for my right as a United States citizen to express myself on the internet without fear of being punished by the government.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

  
\_\_\_\_\_  
Gregory Requa

  
\_\_\_\_\_  
Date and Place

Declaration of Gregory Requa in Support of Motion for  
Temporary Restraining Order - 4

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