

Plaintiff Armando Castro II has been teaching at Cesar Chavez Continuation School for eight years. In that time, Plaintiff Castro has seen significant violence take place in and around the school. Plaintiff Castro has multiple students who have lost family members to violence or who have family members who are incarcerated. Many current and former students of Plaintiff Castro die every year as a consequence of violence in the community. Plaintiff Castro believes that other high schools in the district send students who are acting out unaddressed complex trauma to the continuation school, but that the continuation school does not have sufficient mental health resources to help those students. Because he must teach children who experience complex trauma, Plaintiff Castro is affected by, and has an interest in, Defendants' failure to provide reasonable accommodations for CUSD students. Students in Plaintiff Castro's classes are hindered in their ability to learn by the effects of complex trauma. Because of Defendants' failure to accommodate students suffering from complex trauma, Plaintiff Castro exerts significant additional effort both in teaching and in managing his classroom. Plaintiff Castro also experiences substantial emotional distress from observing the effects that unaddressed complex trauma has on his students' lives.