

EXHIBIT JJ

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Attorney for Plaintiffs

IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and on behalf of their minor child N.H.; VERONICA BERRY individually and on behalf of her minor child J.B.; RED AND SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE PUBLIC CHARTER SCHOOL AUTHORITY, a political subdivision of the State of Nevada, and PATRICK GAVIN, in his official capacity as Director of the State Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

DECLARATION OF PETER ROBERTSON IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

I, PETER ROBERTSON, do certify under penalty of perjury as follows:

1. The matters set forth in this declaration are based on my own personal knowledge.

If called upon to testify, I am competent to testify to the matters set forth herein. I make this declaration in support of the Plaintiffs' Motion for Temporary Restraining Order and Preliminary

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Injunction.

2. I joined Connections Education in 2009 and am Senior Vice President of School Operations. I was previously Vice President of Education Services at SchoolOne where I led the redevelopment of a web-based student information system. Prior to that, I was Executive Director of Elementary and Secondary Education Product Management & Development for the Educational Testing Service, where I was responsible for the integration and on-going development of System 5, a standards-based, assessment-focused suite of School Improvement products and services. Prior to that, I served as Chief Information Officer for the Cleveland Municipal School District where I was responsible for student assessment, educational research, and program evaluation; and for the management of information technology resources and infrastructure system-wide. I spent four years as a management consultant at McKinsey & Company; worked as an educational researcher at the National Center for Restructuring Education, Schools, and Teaching; and served as a Social Studies and Communication Arts Program teacher at Montgomery Blair High School in Montgomery County, Maryland. I served on the Shaker Heights (Ohio) School Board from 2007 to 2011 and on the Montgomery County (Maryland) School Board from 1983 to 1984. I earned an M.B.A. from Columbia Business School, an M.A. in Educational Administration from Teachers College, Columbia, and a B.A. from Harvard College.

3. On August 11, 2016, I was in attendance at the Ohio State Auditors Conference on Charter Schools, serving as a panelist at the conference.

4. At that conference, I met Patrick Gavin, the Executive Director of the State Public Charter School Association, and had a brief discussion with Mr. Gavin during a session break.

5. Mr. Gavin expressed to me that he was under a lot of pressure to close schools. Mr. Gavin stated that a portion of his budget was being withheld from him until he closed

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schools and that if he did not close schools he would need to lay off employees at his agency, the State Public Charter School Authority.

6. During our discussion, Mr. Gavin advised me that he did not have any problems with Connections Education, which is working under contract with Nevada Connections Academy to provide education services and curriculum, but complained that he felt that the Nevada Connections Academy board was being "intransigent."

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and corrected and was executed this 1st day of November, 2016, in _____, _____.



PETER ROBERTSON