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March 18, 2019

VIA USPS CERTIFIED MAIL RETURN RECEIPT REQUESTED

Paul Seitz



Re: Demand to Cease and Desist from Engaging in Threatening Behavior Toward District Employees

Dear Mr. Seitz:

We are general counsel for Rancho Santa Fe School District (hereafter, the "District"). Please let this correspondence serve as a formal demand that you immediately cease and desist from engaging in any further threatening behavior toward any District employee.

On Monday, March 11, 2019, at approximately 9 a.m., you entered the District's main front entrance and began yelling profanities at the front desk receptionist, Dori Hawkes. You yelled, "It's bullshit that I have to explain to [REDACTED] that there's a fucking cop in front of our school...this is fucking bullshit!" (You had apparently observed a law enforcement officer in the District parking lot and were upset by the officer's presence.) You then demanded to meet with the Superintendent. When Ms. Hawkes informed you that you needed an appointment, you responded that you were *not* going to wait and you proceeded to barge upstairs without authorization or permission.

When you reached the upstairs area, you threw open the door to the main conference room where Superintendent Tripi was meeting with two District employees. You immediately began yelling profanities in a loud and threatening tone. In an attempt to deescalate your behavior, Superintendent Tripi calmly told you to come to her office so she could understand why you were upset. When you entered her office, you continued to yell and use profanities. You said "fuck," "fucking," and "bullshit" multiple times in a raised voice and using an aggressive tone. When Superintendent Tripi advised you that law enforcement officers would from time to time be on campus for traffic enforcement and to ensure student safety, you yelled at her, "I know Board members...I'll have your job!" Throughout this interaction, your demeanor was angry and aggressive.

During the time you were inside of Superintendent Tripi's office, your tone was so loud and aggressive that District personnel called Principal Corduan and Jeff Pitt, Director of Facilities, to respond because they were fearful you were going to become physically violent. The

Superintendent and the two District employees that she was meeting with prior to your interruption were all extremely frightened of you and felt threatened by your behavior and actions.

On Wednesday, March 13, 2019, at approximately 8:00 a.m., you called the Superintendent's Executive Assistant, Hannah Clements, and demanded to speak with Superintendent Tripi. When Ms. Clements told you that Superintendent Tripi was not available, you responded, "If she won't talk to me, I'm coming up there. I will be there in ten minutes." In anticipation of you arriving and because of her concerns about your prior threatening behavior, Superintendent Tripi went outside to the front of the school where a Rancho Santa Fe Patrolperson and CHP law enforcement officer were present. When you arrived, you approached Superintendent Tripi and began yelling and again used profanities. This was just after school started and there were still some children and parents within hearing distance.

Your above-described behavior resulted in District employees feeling unsafe and threatened by you. The purpose of this letter is to advise you that your threatening conduct is unacceptable and will not be tolerated. I have attached a copy of Board Policy 1009, "Visitors," to this letter. Section "F" of this policy outlines the procedures that will be followed in the event you again engage in any of the above-described behavior. Please be advised that if you refuse to comply with this cease and desist and/or you engage in future misconduct, we will pursue any and all available legal remedies.

Finally, please be advised that law enforcement will continue to be present at the District. I am sharing this information with you so that you can be prepared to control your temper and emotions the next time you observe law enforcement on District property.

Sincerely,



Kendall C. Swanson
CURRIER & HUDSON, APC

Enclosure: Board Policy 1009, "Visitors"

RANCHO SANTA FE SCHOOL DISTRICT

Board Policy No. 1009: VISITORS

- A. Parents/guardians and interested members of the community are encouraged to visit the District's schools and view the educational program.
- B. If a conference with a teacher is the purpose of the visit, an appointment must first be made with the teacher for the conference which must be held on non-instructional time.
- C. All visitors must register immediately with the principal or site administrator upon entering any school building or school grounds. The principal or site administrator shall provide a visible means of identification to visitors with a legitimate reason for being on school property to wear at all times while on school premises.
- D. Except in unusual circumstances, only a parents/guardians will be permitted to observe instruction or student activities which involve their child.
 - 1. A parent or guardian who desires to observe instruction and/or other school activities that involve the parent or guardian's child shall submit a prior written request to the principal including the classroom or activity desired to be observed, name of child participating in the class or activity, and general reason for the request. This written request shall be submitted at least 24 hours in advance of the desired time of the classroom observation. The principal will make arrangements with the teacher. The time, date, and length of the observation will be at the discretion of the teacher. If the requested time is not appropriate under the circumstance, alternative arrangements will be made.
 - 2. The principal may place reasonable limitations on the frequency or number of classroom visits per parent/guardian or other observers at a time where a parent/guardian is not a classroom volunteer.
 - 3. No classroom observation will be permitted if it conflicts with a valid restraining order, protective order, or order for custody or visitation issued by a court of competent jurisdiction.
 - 4. Approved parents/guardians shall sign in immediately upon arriving on campus in the office, sign out at the office on leaving the office, and obtain and wear a visitor's permit/sticker at all times.
 - 5. Parents/guardians approved for a particular observation are not to go to other classrooms or areas other than the area of the approved observation.
 - 6. Children/siblings may not accompany parents/guardians to observe classrooms or other activities.

7. Parents/guardians observing in classrooms are not to converse with the teacher during class time. Arrange a time before or after school to do so.
8. Parents/guardians are not to communicate with their children or the other children during class time.
9. The teacher will provide a place for visitors to observe which will not disrupt classroom work. Observers should remain in the designated area.
10. Observers must enter and leave the classroom as quietly as possible.
11. Observers are not to read or review completed tests, scores, or other confidential information regarding students in the class.
12. Observers are not to use cellular phones, cameras, photographic equipment, tape recorders or other electronic listening or recording devices in the classroom or while observing other activities without the prior permission of the principal or designee and teacher. Education Code section 51512.
13. Observations will not be permitted during the first month of school, local/state testing, and during the last month of school.
14. Lunch with child.
15. Observers are not to bring to school any item which students are not permitted to possess at school such as drugs, weapons, gum, alcohol, etc.

E. Lunch with Child

1. A parent or guardian who desires to have lunch with his/her child shall submit a prior written request to the principal at least 24 hours in advance. If the requested day is not appropriate under the circumstance, alternative arrangements will be made.
2. Upon approval by the principal, a parent/guardian may join his/her child for the twenty (20) minute lunch period, only. A parent/guardian may not visit with his/her child for the recess period that immediately precedes or follows the lunch period and may not participate in any playground and/or recess activities

F. Disruption of school, office, or educational program

1. Any visitor who disrupts or threatens to disrupt school, office or the educational program or threatens the health and safety of students or staff, or willfully causes property damages or uses loud and/or offensive language which could provoke a violent reaction, or who has otherwise established a continued pattern of unauthorized entry on school district property, will be directed to leave school or District property promptly by the superintendent, principal or designee.

2. If a visitor uses obscenities or speaks in a demanding, loud, insulting and/or demeaning manner, the administrator or employee to whom the remarks are directed will calmly and politely admonish the speaker to communicate in a civil manner. If the conduct does not stop, the District employee will verbally notify the person that his participation in the meeting, conference, telephone conversation, or observation is terminated and, if on District premises, the person will be directed to leave District property promptly.
3. When a visitor is directed to leave District property under the above circumstances, the Superintendent, principal or designee shall inform the visitor that he/she will be guilty of a misdemeanor in accordance with Education Code section 44811 and Penal Code sections 415.5 and 626.7 if he/she reenters and District facility within thirty (30) days after being directed to leave or within seven (7) days if the visitor is a parent/guardian of a student attending that school.
4. If a visitor refuses to leave upon request or returns before the applicable period of time, or if it reasonably appears that students, employees or District property may be in immediate danger of physical violence, the visitor the Superintendent, principal or designee shall immediately notify law enforcement.
5. When violence is directed against an employee or student, or there is threatened damage or theft of District property, the employee shall promptly report the incident to the principal or supervisor and complete and file an Incident Report.

Legal Reference: Education Code sections 32210, 32211, 32212, 35292, 44014, 44810, 44811, 49091.10(b), 51512
Penal Code sections 243.5, 413.5, 626.8, 626.10-626.10-627-627.10, 627.2, 627.7

Date Policy Adopted By The Board: December 11, 2008

Date Policy Revised By The Board: March 1, 2012, October 16, 2018