

1 Des Manttari  
2 P.O. Box 64563  
3 Los Angeles, CA 90064  
4 Email: savesmc@yahoo.com  
5 738 South Mariposa Ave. #203  
6 Los Angeles, CA 90005

7 Plaintiff,  
8 IN PRO PER

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 LOS ANGELES COUNTY

11 DES MANTTARI,

12 Plaintiff/Petitioner,

13 vs.

14 SANTA MONICA COMMUNITY  
15 COLLEGE DISTRICT, CHUI L. TSANG,  
16 AND DOES 1-20, INCLUSIVE.

17 Defendants/Respondents.  
18

19 ) Case No. BS104928

20 ) **PEREMPTORY WRIT OF**  
21 ) **MANDATE**

22 The Defendants/Respondents Santa Monica Community College District (hereinafter,  
23 “SMCCD”), Chui L. Tsang, and DOES 1-20, inclusive, and each of them and their agents,  
24 servants, and employees, and all persons acting under, in concert with, or for  
25 Defendants/Respondents are hereby ordered to immediately provide Plaintiff/Petitioner with  
26 copies of the following records on payment of a fee covering the costs to SMCCD of  
27 providing such copies:

28 **PEREMPTORY WRIT OF MANDATE**  
29

1 **RECORDS:**

2 1. Any and all administrative regulations, board policies, or other documents pertaining  
3 to student conduct, including disruption and disruptive behavior.  
4

5 2. Any and all administrative regulations, board policies, or other documents pertaining  
6 to Santa Monica College’s harassment policies, anti-harassment policies, and sexual  
7 harassment policies.  
8

9 3. Any and all administrative regulations, board policies, or other documents pertaining  
10 to Santa Monica College’s discrimination policies, anti-discrimination policies, disability  
11 discrimination policies, and policies that may fall into this category.  
12

13 4. Any and all administrative regulations, board policies, or other documents pertaining  
14 to Santa Monica College’s Free Speech Area or free speech zones, including any  
15 determinations made, maps, diagrams, or other identifying documents.  
16

17 5. Any and all documents pertaining to the SMC Game Club, the SMC Gaming Club,  
18 and the Academy Gaming Club for the period between 2003 to the present, including by-  
19 laws, constitutions, recommendations, approvals, reprimands, restrictions, lists of officers,  
20 lists of faculty advisors or co-advisors, request for funding, funding approval, minutes of  
21 meetings, and agendas.  
22

23 6. Any and all documents pertaining to any and all studies initiated by the Vice  
24 President of Student Affairs to determine the increase in discipline cases and recommended  
25 mitigation strategies as set forth in Plan-IIA.7(b) of Standard II: Student Learning Programs  
26 and Services, SMC’s Policies, Accreditation Self-Study Standard II from 2004 to the present.  
27

28 **PEREMPTORY WRIT OF MANDATE**  
29

1 7. Any and all documents pertaining to any and all reviews of data from the college  
2 disciplinarian, ombudspersons and the College Police, revealing that the number of student  
3 referrals and staff investigations has significantly increased and the reported causes of such  
4 as set forth in Evaluation-IIA.7(b) of Standard II: Student Learning Programs and Services,  
5 SMC's Policies, Accreditation Self-Study Standard II from 2004 to the present.

7 8. Any and all documents pertaining to any and all studies to determine the causes for  
8 the rise in number of discipline cases and the strategies developed to address these concerns  
9 as set forth in the SMC Evaluation Report, SMC's Policies, Santa Monica Team Report  
10 March 2004 for the period of March 2004 to the present, inclusive.

12 9. Any and all documents pertaining to student grievance procedures, policies,  
13 regulations, and investigations.

15 10. Any and all administrative regulations, board policies, or other documents pertaining  
16 to Santa Monica College's due process rights of students, including disciplinary proceedings.

17 11. Any and all administrative regulations, board policies, or other documents pertaining  
18 to Santa Monica College's students rights to free speech and free expression on campus,  
19 including any restrictions and guarantees of such.

21 12. Contract with Animatics (as described in the Board of Trustees minutes, Consent  
22 Agenda, Recommendation No. 12, dated April 3, 2000) and all related documents re:  
23 economic development virtual multimedia /entertainment center grant.

25 13. Any and all documents regarding the \$125,000 GTE grant given to Santa Monica  
26 College on or about December 1996 for the purpose of creating a videoconferencing center,  
27 including grant awards, invoices, purchase orders, expenditures, or other relevant documents

28 **PEREMPTORY WRIT OF MANDATE**

29

1 pertaining to the videoconferencing center including, but not limited to, classes taught,  
2 services provided, and specialized training to area businesses at their sites.

3  
4 14. Any and all documents regarding the \$125,000 GTE grant given to Santa Monica  
5 College for the purpose of creating a videoconferencing center, including grant awards,  
6 invoices, purchase orders, expenditures, or other relevant documents pertaining to the  
7 videoconferencing center.

8  
9 15. Any and all documents regarding the contract with Broadband Multimedia for the  
10 period of November 12, 2001 through January 15, 2002, in an amount not to exceed \$30,000  
11 to research, plan, and design a set of software tools that will facilitate and enable ADA  
12 Section 508 compliance for multimedia produced by SMC under the Title III and Virtual  
13 Multimedia grants as set forth in SMC's Board of Trustee Minutes and Agendas for  
14 November 5, 2001, including but not limited to all grants, contracts, consultant contracts,  
15 receipts, invoices, purchase orders, required tax disclosures, final reports, progress reports, or  
16 other reports and documentation, including a list of individuals who participated or oversaw  
17 this project.  
18

19  
20 16. Any and all documents pertaining to the number of vocational certificates,  
21 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
22 Technology from 1997 to the present.

23  
24 17. Any and all documents pertaining to the number of vocational certificates,  
25 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
26 Technology from 1997 to the present in the area of Themed Entertainment, Theme Park  
27 Entertainment and/or Theme Park Management.

28 **PEREMPTORY WRIT OF MANDATE**  
29

1 18. Any and all documents pertaining to the number of vocational certificates,  
2 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
3 Technology from 1997 to the present in the area of Entertainment Business, Entertainment  
4 Industry Business, and/or Entertainment Industry Accounting.

6 19. Any and all documents pertaining to the number of vocational certificates,  
7 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
8 Technology from 1997 to the present in the area of New Media, and/or Interactive Media.

10 20. Any and all documents pertaining to the number of vocational certificates,  
11 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
12 Technology from 1997 to the present in the area of Computer Animation, 3D Animation,  
13 and/or traditional 2D animation.

15 21. Any and all documents pertaining to the number of vocational certificates,  
16 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
17 Technology from 1997 to the present in the area of Gameworks, Game Works, Game Design  
18 and/or Game Development.

20 22. Any and all documents pertaining to the number of vocational certificates,  
21 occupational certificates, or career certificates awarded at the Academy of Entertainment and  
22 Technology from 1997 to the present in the area of Web Design and/or Web Development.

24 23. Any and all documents pertaining to Judith Penchansky's salary, job duties, job  
25 description, contracts, terms and dates of employment as it pertains to her role as Assistant  
26 Dean, Student Affairs for External Programs as set forth in the Academy of Entertainment  
27

28 **PEREMPTORY WRIT OF MANDATE**  
29

1 and Technology official website from her time of employment in such capacity until its  
2 termination, resignation, or transfer, including dates of employment.

3  
4 24. Any and all documents pertaining to Judith Penschansky's salary, job duties, job  
5 description, contracts, terms and dates of employment as it pertains to her role as Assistant  
6 Dean, Judicial Affairs from her time of employment in such capacity until the present,  
7 including dates of employment.

8  
9 25. Any and all documents pertaining to Robert Sammis's salary, job duties, job  
10 description, contracts, terms and dates of employment as it pertains to his role as Vice-  
11 President of Human Resources from the period between 1998 through 2004, inclusive.

12  
13 26. Any and all documents pertaining to Robert Sammis's salary, job duties, job  
14 description, contracts, terms and dates of employment as it pertains to his role as Vice-  
15 President of Planning and Development from his time of employment in such capacity until  
16 the present.

17  
18 27. Any and all documents pertaining to Robert Adam's salary, job duties, job  
19 description, contracts, terms and dates of employment as it pertains to his role as Vice-  
20 President of Student Affairs from his time of employment in such capacity until the present.

21  
22 28. Any and all documents pertaining to Denya Hearn's salary, job duties, job  
23 description, contracts, terms and dates of employment as it pertains to her role as Assistant  
24 Dean of Student Life from his time of employment in such capacity until the present.

25  
26 29. Any and all documents pertaining to James F. Keeshen's salary, job duties, job  
27 description, contracts, terms and dates of employment as it pertains to his role as faculty from  
28 his time of employment in such capacity until the present.

29 **PEREMPTORY WRIT OF MANDATE**

1 30. Any and all documents pertaining to David Javelosa's salary, job duties, job  
2 description, contracts, terms and dates of employment as it pertains to his role as faculty from  
3 his time of employment in such capacity until the present.

4  
5 31. Any and all documents pertaining to Howard A. Stahl's salary, job duties, job  
6 description, contracts, terms and dates of employment as it pertains to his role as faculty from  
7 his time of employment in such capacity until the present.

8  
9 32. Any and all documents pertaining to Chui L. Tsang's salary, job duties, job  
10 description, contracts, terms and dates of employment as it pertains to his role as  
11 President/Superintendent from his time of employment in such capacity until the present.

12 33. Any and all documents pertaining to successful job placement of graduates from the  
13 Academy of Entertainment & Technology, including freelance jobs, from 2005 to the  
14 present.

15  
16 34. Any and all documents pertaining to internship placements of students from the  
17 Academy of Entertainment & Technology, including paid internships and non-paid  
18 internships, from 2005 to the present.

19  
20 35. Any and all documents pertaining to information and enrollment figures of full-time  
21 students (FTE) and part-time students at SMC's Academy of Entertainment & Technology  
22 for the following semesters: Winter 2006, Spring 2006, Summer 2006, and Fall 2006,  
23 respectively.

24  
25 36. Any and all documents pertaining to information and data as to the number of  
26 disruptive student complaints received to Judith Penchansky and the Office of Judicial  
27 Affairs in the year 2006.

28 **PEREMPTORY WRIT OF MANDATE**

29

1 37. Any and all documents pertaining to information and data as to the number of  
2 disruptive student complaints received to Judith Penchansky and the Office of Judicial  
3 Affairs in the year 2005.

4  
5 38. Any and all documents pertaining to information and data as to the number of  
6 disruptive student complaints received to Judith Penchansky and the Office of Judicial  
7 Affairs in the year 2004.

8  
9 39. Any and all documents pertaining to information and data as to the number of  
10 disruptive student complaints received to Judith Penchansky and the Office of Judicial  
11 Affairs in the year 2003.

12 40. Any and all documents pertaining to information and data as to the number of  
13 disruptive student complaints received to Judith Penchansky and the Office of Judicial  
14 Affairs in the year 2002.

15  
16 41. Any and all documents pertaining to information and data as to the number of  
17 disabled students, including students with perceived disabilities, who were suspended from  
18 Santa Monica in the year 2006.

19  
20 42. Any and all documents pertaining to information and data as to the number of  
21 disabled students, including students with perceived disabilities, who were suspended from  
22 Santa Monica in the year 2005.

23  
24 43. Any and all documents pertaining to information and data as to the number of  
25 disabled students, including students with perceived disabilities, who were suspended from  
26 Santa Monica in the year 2004.

27  
28 **PEREMPTORY WRIT OF MANDATE**  
29

1 44. Any and all documents pertaining to information and data as to the number of  
2 disabled students, including students with perceived disabilities, who were suspended from  
3 Santa Monica in the year 2003.  
4

5 45. Any and all documents pertaining to information and data as to the number of  
6 disabled students, including students with perceived disabilities, who were suspended from  
7 Santa Monica in the year 2002.  
8

9 46. Any and all documents pertaining to information and data as to the number of  
10 disabled students, including students with perceived disabilities, who were expelled from  
11 Santa Monica in the year 2006.  
12

13 47. Any and all documents pertaining to information and data as to the number of  
14 disabled students, including students with perceived disabilities, who were expelled from  
15 Santa Monica in the year 2005.  
16

17 48. Any and all documents pertaining to information and data as to the number of  
18 disabled students, including students with perceived disabilities, who were expelled from  
19 Santa Monica in the year 2004.  
20

21 49. Any and all documents pertaining to information and data as to the number of  
22 disabled students, including students with perceived disabilities, who were expelled from  
23 Santa Monica in the year 2003.  
24

25 50. Any and all documents pertaining to information and data as to the number of  
26 disabled students, including students with perceived disabilities, who were expelled from  
27 Santa Monica in the year 2002.  
28

29 **PEREMPTORY WRIT OF MANDATE**

1 51. Any and all documents pertaining to information and data as to the number of  
2 students who received an immediate interim suspension from Santa Monica in the year 2006.

3 52. Any and all documents pertaining to information and data as to the number of  
4 students who received an immediate interim suspension from Santa Monica in the year 2005.

5 53. Any and all documents pertaining to information and data as to the number of  
6 students who received an immediate interim suspension from Santa Monica in the year 2004.

7 54. Any and all documents pertaining to information and data as to the number of  
8 students who received an immediate interim suspension from Santa Monica in the year 2003.

9 55. Any and all documents pertaining to information and data as to the number of  
10 students who received an immediate interim suspension from Santa Monica in the year 2002.

11 56. Any and all documents pertaining to information and data as to the number of  
12 students suspended from Santa Monica College for the duration of less than one semester in  
13 the year 2006.

14 57. Any and all documents pertaining to information and data as to the number of  
15 students suspended from Santa Monica College for the duration of less than one semester in  
16 the year 2005.

17 58. Any and all documents pertaining to information and data as to the number of  
18 students suspended from Santa Monica College for the duration of less than one semester in  
19 the year 2004.

20 59. Any and all documents pertaining to information and data as to the number of  
21 students suspended from Santa Monica College for the duration of less than one semester in  
22 the year 2003.

23  
24  
25  
26  
27  
28 **PEREMPTORY WRIT OF MANDATE**

1 60. Any and all documents pertaining to information and data as to the number of  
2 students suspended from Santa Monica College for the duration of less than one semester in  
3 the year 2002.  
4

5 61. Any and all documents pertaining to information and data as to the number of  
6 students suspended from Santa Monica College for the duration of one semester in the year  
7 2006.  
8

9 62. Any and all documents pertaining to information and data as to the number of  
10 students suspended from Santa Monica College for the duration of one semester in the year  
11 2005.  
12

13 63. Any and all documents pertaining to information and data as to the number of  
14 students suspended from Santa Monica College for the duration of one semester in the year  
15 2004.  
16

17 64. Any and all documents pertaining to information and data as to the number of  
18 students suspended from Santa Monica College for the duration of one semester in the year  
19 2003.  
20

21 65. Any and all documents pertaining to information and data as to the number of  
22 students suspended from Santa Monica College for the duration of one semester in the year  
23 2002.  
24

25 66. Any and all documents pertaining to information and data as to the number of  
26 students suspended from Santa Monica College for the duration of two semesters in the year  
27 2006.  
28

29 **PEREMPTORY WRIT OF MANDATE**

1 67. Any and all documents pertaining to information and data as to the number of  
2 students suspended from Santa Monica College for the duration of two semesters in the year  
3 2005.

4  
5 68. Any and all documents pertaining to information and data as to the number of  
6 students suspended from Santa Monica College for the duration of two semesters in the year  
7 2004.

8  
9 69. Any and all documents pertaining to information and data as to the number of  
10 students suspended from Santa Monica College for the duration of two semesters in the year  
11 2003.

12 70. Any and all documents pertaining to information and data as to the number of  
13 students suspended from Santa Monica College for the duration of two semesters in the year  
14 2002.

15  
16 71. Any and all documents pertaining to information and data as to the number of  
17 students suspended from Santa Monica College for the duration of three semesters in the year  
18 2006.

19  
20 72. Any and all documents pertaining to information and data as to the number of  
21 students suspended from Santa Monica College for the duration of three semesters in the year  
22 2005.

23  
24 73. Any and all documents pertaining to information and data as to the number of  
25 students suspended from Santa Monica College for the duration of three semesters in the year  
26 2004.

27  
28 **PEREMPTORY WRIT OF MANDATE**

1 74. Any and all documents pertaining to information and data as to the number of  
2 students suspended from Santa Monica College for the duration of three semesters in the year  
3 2003.

4  
5 75. Any and all documents pertaining to information and data as to the number of  
6 students suspended from Santa Monica College for the duration of three semesters in the year  
7 2002.

8  
9 76. Any and all documents pertaining to information and data as to the number of  
10 students suspended from Santa Monica College for the duration of four semesters in the year  
11 2006.

12 77. Any and all documents pertaining to information and data as to the number of  
13 students suspended from Santa Monica College for the duration of four semesters in the year  
14 2005.

15  
16 78. Any and all documents pertaining to information and data as to the number of  
17 students suspended from Santa Monica College for the duration of four semesters in the year  
18 2004.

19  
20 79. Any and all documents pertaining to information and data as to the number of  
21 students suspended from Santa Monica College for the duration of four semesters in the year  
22 2003.

23  
24 80. Any and all documents pertaining to information and data as to the number of  
25 students suspended from Santa Monica College for the duration of four semesters in the year  
26 2002.

27  
28 **PEREMPTORY WRIT OF MANDATE**  
29

1 81. Any and all documents pertaining to information and data as to the number of  
2 students suspended from Santa Monica College for the duration of two or more years in the  
3 year 2006.

4  
5 82. Any and all documents pertaining to information and data as to the number of  
6 students suspended from Santa Monica College for the duration of two or more years in the  
7 year 2005.

8  
9 83. Any and all documents pertaining to information and data as to the number of  
10 students suspended from Santa Monica College for the duration of two or more years in the  
11 year 2004.

12 84. Any and all documents pertaining to information and data as to the number of  
13 students suspended from Santa Monica College for the duration of two or more years in the  
14 year 2003.

15  
16 85. Any and all documents pertaining to information and data as to the number of  
17 students suspended from Santa Monica College for the duration of two or more years in the  
18 year 2002.

19  
20 86. Any and all documents pertaining to information and data as to the number of  
21 students expelled from Santa Monica College in the year 2006.

22 87. Any and all documents pertaining to information and data as to the number of  
23 students expelled from Santa Monica College in the year 2005.

24  
25 88. Any and all documents pertaining to information and data as to the number of  
26 students expelled from Santa Monica College in the year 2004.

27  
28 **PEREMPTORY WRIT OF MANDATE**

1 89. Any and all documents pertaining to information and data as to the number of  
2 students expelled from Santa Monica College in the year 2003.

3  
4 90. Any and all documents pertaining to information and data as to the number of  
5 students expelled from Santa Monica College in the year 2002.

6 / / /

7 / / /

8  
9 It is so ordered:

10

11

12 Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge, Superior Court of Los Angeles County

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

**PEREMPTORY WRIT OF MANDATE**

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29