



SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

MATHEW & STEPHANIE MCCLEARY, on their own behalf and on behalf of KELSEY & CARTER MCCLEARY, their two children in Washington's public schools; ROBERT & PATTY VENEMA, on their own behalf and on behalf of HALIE & ROBBIE VENEMA, their two children in Washington's public schools; and NETWORK FOR EXCELLENCE IN WASHINGTON SCHOOLS ("NEWS"), a state-wide coalition of community groups, public school districts, and education organizations,

Petitioners,

v.

STATE OF WASHINGTON,

Respondent.

No. 07-2-02323-2 SEA

PETITION FOR DECLARATORY JUDGMENT ENFORCING OUR CONSTITUTION

The above petitioners allege as follows against the respondent State of Washington:

SUMMARY OF THIS SUIT

1. We applaud the Governor's budget appropriation request for the next 2 years and her committed leadership on behalf of education in that request. But such a proposal does not diminish the fact that our State government as a whole has not established the stable and dependable long term funding system that our State Constitution mandates for the education of every child in our State. We look forward to the Governor's continuing investment in and commitment to the education needs of all Washington children.

1 public school districts. The State of Washington provides such public school districts with
2 funds for education – but the State does not fully fund all of the education-related programs and
3 needs necessary to provide every child in those school districts with the basic education
4 guaranteed by our State Constitution. The following parents file this action on their own behalf
5 and on behalf of their minor children. The following petitioners have satisfied all conditions
6 precedent to bring this suit.

7 (a) Petitioners Matt, Stephanie, Carter, and Kelsey McCleary: Matt and
8 Stephanie are parents, voters, and taxpayers living in Jefferson County, Washington. They
9 bring this action on their own behalf and as legal guardians on behalf of their two children,
10 Carter and Kelsey. At the time of this suit’s filing, their son Carter is 7 years old and is second
11 grader at Chimacum Creek Primary School. At the time of this suit’s filing, their daughter
12 Kelsey is 13 years old and is seventh grader at Chimacum Middle School.

13 Stephanie McCleary was 13 years old when the Washington Supreme Court issued its
14 1978 decision requiring the State to obey its Constitutional mandate to amply fund public
15 education for all Washington’s children. Stephanie’s daughter is now 13 years old. An entire
16 generation has passed, and the State still has not complied with that ruling or its Constitutional
17 mandate.

18 (b) Petitioners Robert, Patty, Halie, and Robbie Venema: Robert and Patty are
19 parents, voters, and taxpayers living in Snohomish County, Washington. They bring this action
20 on their own behalf and as legal guardians on behalf of their two children, Halie and Robbie. At
21 the time of this suit’s filing, their son Robbie is 12 years old and is sixth grader at Cathcart
22 Elementary School. At the time of this suit’s filing, their daughter Halie is 15 years old and is
23 ninth grader at the Snohomish High School (Freshman Campus).

24 Patty Venema was in high school when the Washington Supreme Court issued its 1978
25 decision requiring the State to obey its Constitutional mandate to amply fund public education
26

1 for all Washington's children. Patty's daughter is now in high school. An entire generation has
2 passed, and the State still has not complied with that ruling or its Constitutional mandate.

3 3. Petitioner Network for Excellence in Washington Schools ("NEWS"): Petitioner
4 Network for Excellence in Washington Schools ("NEWS") is a state-wide coalition of
5 community groups, education organizations, public school districts, and others in Washington
6 who support better education in the public schools of our State. NEWS was formed to promote
7 the education of children in the public schools, and to ensure that public schools are provided
8 with the Constitutionally required State resources necessary to effectively manage and operate
9 public schools pursuant to Article IX of our State Constitution. NEWS encourages the State's
10 compliance with its paramount duty under our State Constitution to fully fund education for the
11 children of – and thus the future of – our State. NEWS is a non-profit corporation organized
12 under the laws of the State of Washington, and has satisfied all conditions precedent to bring
13 this suit. At the time of this suit's filing, NEWS includes the following member organizations
14 from all across our State:

15 (a) Washington State PTA. Washington State PTA, formally the Washington
16 Congress of Parents and Teachers, was founded in 1905. It is a state-wide, non-profit
17 membership association which brings together the home, school, and community on behalf of
18 all children and youth. It is comprised of over 150,000 members in over 900 local PTA units
19 throughout our State. It is governed by a board of directors consisting of four statewide
20 officers, 13 region directors, a leadership director, a program director, and a legislative director.
21 It is chartered by and affiliated with the National Congress of Parents and Teachers (the
22 National PTA).

23 (b) League of Women Voters of Washington. The League of Women Voters of
24 Washington is a non-partisan, non-profit organization that encourages the informed and active
25 participation of citizens in government. It was organized in 1920, and includes 23 local
26 chapters throughout our State (Bellingham-Whatcom Counties chapter, Benton-Franklin

