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TWIN RIVERS UNIFIED SCHOOL DISTRICT
BOARD OF TRUSTEES

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

In re HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Debtor and Debtor in Possession.	Case No. 26-25868 Chapter 11
HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Plaintiff, v. TWIN RIVERS UNIFIED SCHOOL DISTRICT BOARD OF TRUSTEES and CALIFORNIA STATE BOARD OF EDUCATION, Defendants.	Adv No. 26-02134 DCN: SRM-1 **DECLARATION OF RYAN DIGIULIO IN SUPPORT OF DEFENDANT TWIN RIVERS UNIFIED SCHOOL DISTRICT BOARD OF TRUSTEE'S RESPONSE TO MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362** Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: 11:00 a.m. Dept.: Dept. B, Ctrm 32, 6th Floor 501 I Street Sacramento, CA 95814

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I, Ryan DiGiulio, declare:

1. I am the Chief Business Official for the TWIN RIVERS UNIFIED SCHOOL DISTRICT ("District"). Unless stated otherwise, this declaration is based upon my own personal knowledge and if called as a witness, I could and would competently testify to the facts set forth herein. I make this declaration in support of the District's response to the motion for an order extending stay to the revocation appeal under Bankruptcy Code sections 105(a) and 362.

2. Due to my experience and position with the District, I have personal knowledge of the business practices of the District in preparing and maintaining business records, including those related to the revocation proceedings involving HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS ("Debtor"). With respect to revocation proceedings involving the Debtor, I have been personally working on the books, records, files, and/or records and, as to the following facts in which I make this declaration, I know them to be true of my own knowledge or I have gained knowledge of them from my review of the business records of the District.

3. The revocation proceedings were commenced by the District because the District believes the Debtor: (a) committed a material violation of the conditions, standards, or procedures set forth in its charter by offering unauthorized grade levels and operating unauthorized locations; (b) violated the law by failing to submit an annual independent audit report, failing to track instruction minutes, and violating the federal WIOA exclusive partnership; and (c) committed fiscal mismanagement with unauthorized facilities expenditure.

4. The revocation proceedings are now before the California State Board of Education ("SBE"). The revocation proceedings and its history are summarized in the documents submitted before the SBE which are public documents. True and correct copies of these documents, including the Agenda for the SBE is filed herewith as **Exhibit A**, the California Department of Education Charter School Appeal Review is filed herewith as **Exhibit B**, the Notice of Appeal filed by the District is filed herewith as **Exhibit C**, the Debtor's Opposition to the Appeal is filed herewith as **Exhibit D**, and the Reply filed by the District is filed herewith as **Exhibit E**.

5. The documents submitted to the SBE reflect that the District is seeking to enforce its regulatory and police powers.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 27th day of October, 2026, at October, California.

Ryan DiGiulio