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IN THE UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Debtor and Debtor in Possession.	Case No. 26-25868 Chapter 11 Adv No. 26-02134
HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Plaintiff, **v.** **TWIN RIVERS UNIFIED SCHOOL DISTRICT BOARD OF TRUSTEES; CALIFORNIA STATE BOARD OF EDUCATION,** Defendants.	**DECLARATION OF COLIN D. SCHOELL IN SUPPORT OF DEFENDANT CALIFORNIA STATE BOARD OF EDUCATION'S OPPOSITION TO MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL** Date: November 10, 2026 Time: 11:00 a.m. Dept: 32 Judge: The Hon. Christopher D. Jaime Action Filed: October 13, 2026

I, Colin D. Schoell, declare as follows:

1. I am an attorney at law licensed to practice before the United States Bankruptcy Court, Eastern District of California, and am counsel of record for defendant California State Board of Education (SBE) in the above-captioned matter as of October 15, 2026. I have personal

knowledge of the facts stated herein, and if called to do so, could and would testify competently as follows:

2. Attached as Exhibit A to SBE's Request for Judicial Notice in Support of Opposition to Motion for Order Extending Stay to the Revocation Appeal (SBE's RJN) is a true and correct copy of the Highlands Community Charter Schools (HCCS) Notice of Violation, dated June 12, 2025, which I obtained at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes.

3. Attached as Exhibit B to SBE's RJN is a true and correct copy of the California Innovative Career Academy (CICA) Notice of Violation, dated June 12, 2025, which I obtained at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes.

4. Attached as Exhibit C to SBE's RJN is a true and correct copy of the California Department of Education's ACCS Meeting Agenda Notice, dated September 25, 2026, and SBE Policy 01-04 re: ACCS, dated April 2002, which I obtained at https://www.cde.ca.gov/be/cc/cs/documents/charterschools.pdf.

5. Attached as Exhibit D to SBE's RJN is a true and correct copy of the Outreach and Technical Assistance Network, California AE Provider Directory, which I obtained at https://otan.us/Resources/Home/ProviderDirectory.

6. Attached as Exhibit E to SBE's RJN is a true and correct copy of the Capital Adult Education, Adult Education Career & Workforce Preparation handout, Fall 2025, which I obtained at https://www.capitaladulted.org/Content/Downloads/pdf/2025/Career%20&%20Workforce%20Infographic%20Fall%202025%20-%20Final.pdf.

7. Attached as Exhibit F to SBE's RJN is a true and correct copy of the School Sites – John Muir Charter Schools webpage, which I obtained athttps://johnmuircs.com/school-sites/?filter-location=101#.

8. Attached as Exhibit G to SBE's RJN is a true and correct copy of the HCCS' Response to Notice of Violation, dated September 26, 2025, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387823&MID=54735.

9. Attached as Exhibit H to SBE's RJN is a true and correct copy of the CICA's Response to Notice of Violation, dated September 26, 2025, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387846&MID=54735.

10. Attached as Exhibit I to SBE's RJN is a true and correct copy of the HCCS Notice of Intent to Revoke, dated November 5, 2025, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387822&MID=54735.

11. Attached as Exhibit J to SBE's RJN is a true and correct copy of the CICA Notice of Intent to Revoke, dated November 5, 2025, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387845&MID=54735.

12. Attached as Exhibit K to SBE's RJN is a true and correct copy of the Twin Rivers Unified School District Special and Virtual School Board Meeting Minutes dated January 30, 2026, which I obtained at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes.

13. Attached as Exhibit L to SBE's RJN is a true and correct copy of the Sacramento County Board of Education (SCBOE) Board Agenda, dated May 19, 2026, which I obtained at https://scoe.community.highbond.com/Portal/MeetingInformation.aspx?Id=407.

14. Attached as Exhibit M to SBE's RJN is a true and correct copy of the SCBOE May 19, 2026 Board Minutes, which I obtained at https://scoe.community.highbond.com/Portal/MeetingInformation.aspx?Id=407.

15. Attached as Exhibit N to SBE's RJN is a true and correct copy of the Advisory Commission on Charter Schools Meeting Agenda, dated October 6, 2026, which I obtained at https://www.cde.ca.gov/be/cc/cs/accsnotice100626.asp.

16. Attached as Exhibit O to SBE's RJN is a true and correct copy of the Twin Rivers Unified School District Regular and Virtual School Board Meeting Minutes, dated June 16, 2026, which I obtained at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=68365&Tab=Agenda&enIID=kgEYplusYbfFpjQ3w3vLMNX8w%3D%3D.

17. Attached as Exhibit P to SBE's RJN is a true and correct copy of the HCCS Notice of Violation, dated August 6, 2026, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1643509&MID=76004.

18. Attached as Exhibit Q to SBE's RJN is a true and correct copy of the CICA Notice of Violation, dated August 6, 2026, which I obtained at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1643572&MID=76004

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

Executed on this 27th day of October, 2026, at San Diego, California



Colin D. Schoell
Deputy Attorney General

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