

# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION

LUREATHA JACKSON as Next )  
Friend of D.M., for herself and others )  
similarly situated, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
BOARD OF EDUCATION OF THE )  
CITY OF CHICAGO, )  
 )  
Defendant. )

Case No. 19-cv-05809

Magistrate Judge Young B. Kim

VERIFICATION OF TAMARA WEST

1. My name is Tamara West. I am over the age of 18 and a resident of Illinois.
2. I am a Data Analytics Manager in the Office of Diverse Learner Supports and Services for the Board of Education of the City of Chicago.
3. The attached data includes all CPS students with disabilities who were placed by the Board pursuant to the students' IEPs at ISBE-approved non-public schools for the 2017–2018, 2018–2019, and 2019–2020 (up to March 17, 2020) school years at Acacia, Arlyn, Bridgeview, Centerview, Challenger, Chicago Autism Academy, Classroom Connections Day School, Cove, Elim Christian, Esperanza, Giant Steps, Helping Hand, Hopewell Academy of Orland Park, Hyde Park Day School-Chicago, Hyde Park Day School-North, Keshet, Learning House, Laureate, Metro Prep, New Hope Academy, New Hope Academy East, New Horizon, Orchard Academy, Rush, PACTT Learning Center, School of Expressive Arts and Learning (SEAL), and Soaring Eagle Academy.

4. The attendance days (including Extended School Year (ESY) attendance days) for the above referenced CPS students for 17-18, 18-19, and 19-20 (up to March 17, 2020) are included in the data.
5. Unless a student did in fact receive free breakfast and/or lunch impacting the rate, a CPS students' reimbursement rate is \$5.53, representing \$2.19 for breakfast and \$3.34 for lunch per attendance day (including ESY days), for those who attended Acacia, Arlyn, Bridgeview, Centerview, Challenger, Chicago Autism Academy, Classroom Connections Day School, Elim Christian, Esperanza, Giant Steps, Helping Hand, Hyde Park Day School-Chicago, Hyde Park Day School-North, Keshet, Learning House, New Hope Academy, New Hope Academy East, Orchard Academy, Rush, Soaring Eagle Academy; \$2.19 per attendance day (including ESY attendance days) for those who attended Laureate, Metro Prep, New Horizon, School of Expressive Arts and Learning (SEAL); and \$3.34 per attendance day (including ESY attendance days) for those who attended Hopewell Academy of Orland Park, Cove, and PACTT Learning Center.
6. All other identifying information including student name and contact information (last known address and telephone number) for a student's parent or guardian; active or inactive status as of March 17, 2020, and the name of the individual to whom the Reimbursement Check should be payable (factoring in whether the Subclass 1 Member is eighteen (18) years or older and has delegated educational rights or not) is true and accurate based on CPS records.

**VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 5-27-2021

By: Camara West