

## DECLARATION

I, Devon Atkinson, declare as follows:

1. I am employed as a paralegal in the Legal Services Division of the Orange County Department of Education (“OCDE”). I have personal knowledge of the matters stated herein and, if called as a witness, could and would competently testify thereto.
2. I make this declaration to document the due diligence efforts I undertook to investigate and verify a statement made by Senator Tom Umberg during a March 24, 2026, hearing before the California State Assembly’s Joint Committee on Legislative Audit Committee (“JLAC”) that referenced a purported “settlement involving a former communications officer, Seth Stevens” in connection with the Orange County Board of Education (“OCBE”).
3. In response to that statement, I conducted a diligent search to determine whether any such individual, claim, or settlement exists.
4. I contacted OCDE’s Human Resources Department and requested a search of employment records for any individual named Seth Stevens, including reasonable variations in spelling. Human Resources advised that its database extends back to approximately 1999 and that no individual by that name has ever been employed by OCDE.<sup>1</sup>
5. I contacted OCDE’s Communications and Media Services Department to determine whether any records or institutional knowledge reflected an individual named Seth Stevens as an employee or former communications officer. That department reported no recollection or record of any such individual.
6. I requested that OCDE’s Risk Management Department obtain and review loss run reports from OCDE’s insurance carrier for employment practices claims within the past five (5) years.<sup>2</sup> The loss runs revealed no claims, lawsuits, or settlements involving an individual named Seth Stevens.
7. I conducted a search of transcripts of approximately eighty-three (83) OCBE meetings and hearings spanning five (5) years, utilizing available electronic search tools to identify references to the name “Seth Stevens,” including reasonable variations in spelling. I found no references to any individual by that name in the transcripts.
8. I conducted a search using LexisNexis’ CourtLink website for any lawsuits filed in the Orange County Superior Court by or involving an individual named Seth Stevens. This search revealed no lawsuits filed by such an individual against OCBE.

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<sup>1</sup> OCBE does not employ personnel. All staff, including communications personnel, are employed by OCDE. Accordingly, any search for a purported former OCBE “communications officer” would necessarily involve OCDE employment records, insurance loss runs, and departmental records, as those systems encompass all relevant personnel and claims information associated with OCBE operations.

<sup>2</sup> To the best of my knowledge and based on my duties and responsibilities, OCBE is covered under OCDE’s insurance policies, including policies governing employment practices liability and related claims. Accordingly, any insurance loss run reports reflecting claims involving OCBE would be maintained, tracked, and reported through OCDE’s insurance coverage records.

9. I also conducted a CourtLink search for lawsuits involving OCBE filed in Orange County Superior Court. That search likewise revealed no lawsuits involving any individual named Seth Stevens
10. In addition to the foregoing, I conducted a further review to identify any settlement agreements entered into by OCDE within the past ten (10) years. To the best of my knowledge, and based on my duties and responsibilities, I reviewed reasonably available records across multiple OCDE departments relating to such settlement agreements and found no agreements involving any individual named Seth Stevens.
11. Based on the foregoing efforts, I have found no evidence of any current or former OCDE employee named Seth Stevens, no record of any claim or lawsuit filed by such an individual, and no record of any settlement involving such an individual in connection with OCDE or the OCBE.
12. Accordingly, despite conducting a reasonably diligent search, I have been unable to locate any information substantiating the existence of the purported settlement referenced during the JLAC hearing.

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

Executed this 2<sup>nd</sup> day of April 2026, at Costa Mesa, California.



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Devon Atkinson