IN THE COMMONWEALTH COURT OF PENNSYLVANIA

KENNETH V. KRAWCHUK and ROBERTA L. KRAWCHUK, :

Petitioners,

v. No. 441 MD 2026

JOSHUA D. SHAPIRO, Governor of Pennsylvania, in his official capacity; KIM L. WARD, in her official capacity as President Pro-Tempore of the Pennsylvania Senate; and JOANNA E. McCLINTON, in her official capacity as Speaker of the Pennsylvania House of Representatives,

Respondents.

NOTICE TO PLEAD

To: Kevin R. Bradford, Esquire
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You are hereby notified to file a written response to the enclosed Amended Petition for Review within thirty (30) days from service hereof, or a judgment may be entered against you.

You have been sued in court. If you wish to defend against the claims set forth in the following petition, you must take action within thirty (30) days after service of this petition by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth-herein. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the petition or for any other claim or relief requested by the petitioner. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

DAUPHIN COUNTY LAWYER REFERRAL SERVICE

213 North Front Street

Harrisburg, PA 17101

(717) 232-7536

A V I S O

USTED HA SIDO DEMANDADO/A EN CORTE. Si usted desea defenderse de las demandas que se presentan más adelante en las siguientes páginas, debe tomar acción dentro de los próximos treinta (30) días después de la notificación de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objecciones a, las demandas presentadas aquí en contra suya. Se le advierte de que si usted falla de tomar acción como se describe anteriormente, el caso puede proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier otra reclamación o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin más aviso adicional. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

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JOSHUA D. SHAPIRO, Governor of Pennsylvania, in his official capacity; KIM L. WARD, in her official capacity as President Pro-Tempore of the Pennsylvania Senate; and JOANNA E. McCLINTON, in her official capacity as Speaker of the Pennsylvania House of Representatives,

Respondents.

AMENDED PETITION FOR REVIEW IN THE NATURE OF AN ACTION FOR DECLARATORY AND OTHER RELIEF

Petitioners, Kenneth V. Krawchuk and Roberta L. Krawchuk, hereby file this Amended Petition for Review in the Nature of an Action for Declaratory and Other Relief against the above-named Respondents, and in support thereof aver as follows:

PARTIES

1. Petitioners Kenneth V. Krawchuk and Roberta L. Krawchuk are adult residents and taxpayers of Montgomery County in the Commonwealth of Pennsylvania. They jointly pay state and local taxes that support the public education system challenged in this action. Attached hereto as Exhibit I is their joint 2026 school tax payment receipt (as filed; parcel number and mailing address appear redacted on the face of the filed exhibit). Their three children and two of

their grandchildren currently attend or have attended public schools in Pennsylvania. Their grandson I.C.L. is sixteen years of age and attends school in the Centennial School District in Bucks County, Pennsylvania. Alternatively, and without abandoning the interest alleged above, Petitioners invoke the taxpayer exception to traditional standing recognized in In re Application of Biester, 409 A.2d 848, 852 (Pa. 1979), and Consumer Party of Pennsylvania v. Commonwealth, 507 A.2d 323, 329 (Pa. 1986). They contend that they have standing under that exception as taxpayers who pay the state and local taxes that support the public-education system challenged in this action.

2. Respondent Joshua D. Shapiro, the Governor of the Commonwealth of Pennsylvania, is the chief executive officer of the Commonwealth and is responsible for ensuring that the laws of Pennsylvania, including the Pennsylvania Constitution, are faithfully executed, and for approving or vetoing legislation presented to him.

3. Respondent Kim L. Ward is the President Pro-Tempore of the Pennsylvania Senate, which shares with the Pennsylvania House of Representatives the legislative power of the Commonwealth, including legislation affecting the system of public education.

4. Respondent Joanna E. McClinton is the Speaker of the Pennsylvania House of Representatives, which shares with the Pennsylvania Senate the legislative power of the Commonwealth, including legislation affecting the system of public education.

5. Petitioners name the Governor and the presiding officers of each house in their official capacities because Article III, Section 14 of the Pennsylvania Constitution assigns to the General Assembly the duty to provide for the maintenance and support of a thorough and efficient system of public education, and because the Governor participates in the enactment of laws. Petitioners seek a judicial declaration of constitutional rights and duties. Alternatively, to

the extent such relief is legally available, Petitioners seek a general order directing the responsible Respondents to remedy the constitutional violations established in this action, leaving the selection of constitutionally adequate means to the political branches and without prescribing any particular legislative program. Any such compliance-directed relief is requested only to the extent of each Respondent's official authority. Petitioners recognize that the President Pro-Tempore of the Senate and the Speaker of the House possess only the official authority of those offices and do not, acting alone, enact legislation. Petitioners do not by this Amended Petition seek an order compelling any Respondent to draft, introduce, debate, vote upon, enact, sign, or report on any particular statute or program.

JURISDICTION AND VENUE

6. This Court has original jurisdiction over this matter pursuant to 42 Pa.C.S. § 761(a)(1), which grants the Commonwealth Court exclusive original jurisdiction over civil actions against the Commonwealth government, including officers acting in their official capacities.

7. Venue is proper in Dauphin County, the seat of state government.

STATEMENT OF FACTS

8. Article III, Section 14 of the Constitution of the Commonwealth of Pennsylvania provides: “The General Assembly shall provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth.”

9. The current statutory structure relies heavily on local school-district organization with guaranteed public funding. Petitioners aver that, despite high expenditures and decades of effort, statewide outcomes reflected in Exhibits A, F, and G demonstrate persistent inadequacy and inefficiency relative to Article III, Section 14.

10. Recent statewide assessment results show that a large share of Pennsylvania public-school students are not proficient at grade level. Attached as Exhibit A are summaries of recent Pennsylvania System of School Assessment (PSSA) and Keystone Exam results and historical trends. Among other figures reflected in Exhibit A, for the 2024–25 school year statewide PSSA English Language Arts proficiency was reported at 49.9% and Mathematics proficiency at 41.7%.

11. Proficiency rates vary widely among districts and schools. Even higher-performing districts leave substantial shares of students below proficiency, while many lower-performing schools report single-digit or near-zero proficiency in one or more core subjects. Attached as Exhibits A and F are summaries of statewide and school-level patterns drawn from publicly reported assessment data.

12. Public per-pupil spending in Pennsylvania is high relative to many non-elite private-school tuition levels. Attached as Exhibit G are educational cost estimates drawn from publicly reported sources.

13. A 2002 Standard & Poor's analysis, as reported contemporaneously in Education Week, observed that many higher-scoring Pennsylvania districts had below-average spending and that many higher-spending districts had below-average scores, suggesting that additional spending alone does not ensure that all students meet standards. In addition to pointing out that school performance often is inversely related to funding, the analysis went on to say that more fundamental and perhaps structural changes may be needed. Attached as Exhibit H is that reporting.

14. Over a multi-decade period, administrative and other non-teacher professional staffing in public schools has increased while student enrollment has declined. Attached as Exhibit B are summaries of those trends from publicly reported sources.

15. In William Penn School District v. Pennsylvania Department of Education, 294 A.3d 537 (Pa. Commw. Ct. 2023) (single-judge opinion) ("William Penn (2023)"), the Commonwealth Court, after trial, entered declaratory relief concerning Article III, Section 14 and related equal-protection holdings, and afforded the Executive and Legislative Branches the first opportunity to devise a remedial plan. William Penn (2023) did not order creation of an Education Savings Account program, a statewide standards board of the kind described in Exhibit E, dissolution of local school boards, or enactment of any particular statute. Petitioners cite William Penn (2023) as persuasive authority regarding the meaning of Article III, Section 14; it is not binding precedent of the Supreme Court of Pennsylvania in this separate action.

16. In William Penn School District v. Pennsylvania Department of Education, 170 A.3d 414 (Pa. 2017) ("William Penn II"), the Supreme Court of Pennsylvania held that claims under Article III, Section 14 are justiciable. Petitioners rely on William Penn II for the proposition that this Court may adjudicate whether the Commonwealth's system of public education complies with Article III, Section 14.

17. Petitioners aver that the Commonwealth's present system of public education, as reflected in the facts and exhibits above, does not provide the thorough and efficient system required by Article III, Section 14.

18. Attached as Exhibits C, D, and E are illustrative descriptions of possible legislative approaches (an orderly phase-out of local operating monopolies; education savings accounts; and a scholastic standards board). Those exhibits are offered solely as nonbinding

policy examples of how the political branches might choose to remediate a constitutional deficiency if one is declared. They are not requested as court-ordered programs, and Petitioners do not ask this Court to compel Respondents to enact them.

19. Throughout history, the great importance of an educated citizenry has been emphasized, including by our republic's Founding Fathers and Pennsylvania's own Thaddeus Stevens. The harm wrought by the lack of a thorough and efficient system of public education is difficult to overstate. It is extremely serious and irreparable. It is broad, deep, continuing, and cumulative. Every taxpayer of the Commonwealth is harmed, as billions of dollars are spent annually on a system that fails to deliver the thorough and efficient education the Constitution requires. But the gravest harm is the routine and ongoing denial to our grandson I.C.L. and all of Pennsylvania's children of the constitutional right to a thorough education.

COUNT I

Violation of Article III, Section 14 of the Pennsylvania Constitution

20. Petitioners incorporate paragraphs 1 through 19 as if fully set forth herein.

21. Article III, Section 14 requires the General Assembly to provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth.

22. The facts set forth above, including the assessment outcomes, cost, and staffing patterns reflected in Exhibits A, B, F, G, and H, show that the present system is neither thorough nor efficient within the meaning of Article III, Section 14.

23. Respondents, in their official capacities, stand in violation of Article III, Section 14 because of their continuing failure to provide for a thorough and efficient system of public education as required by that provision.

24. Petitioners are entitled to a declaratory judgment so stating. Alternatively, to the extent such relief is legally available, Petitioners request that the Court direct the responsible Respondents to remedy the constitutional violations established in this action, leaving the selection of constitutionally adequate means to the political branches and without prescribing any particular legislative program. Petitioners do not seek a mandatory injunction compelling Respondents to draft, enact, or implement any particular remedial statute or program, including the illustrative concepts in Exhibits C, D, and E, and do not seek an order requiring any Respondent to take a legislative act beyond that Respondent's official authority.

PRAYER FOR RELIEF

WHEREFORE, Petitioners respectfully request that this Court:

A. Assume original jurisdiction over this matter;

B. Declare that the current system of public education fails to satisfy the thorough and efficient requirements of Article III, Section 14 of the Pennsylvania Constitution;

C. Declare that Respondents stand in violation of Article III, Section 14 of the Pennsylvania Constitution because of their continuing failure to provide for a thorough and efficient system of public education;

D. Alternatively, to the extent such relief is legally available: Direct the responsible Respondents to remedy the constitutional violations established in this action, leaving the selection of constitutionally adequate means to the political branches and without prescribing any particular legislative program;

E. Award costs of suit and filing costs to the extent permitted by law; and

F. Grant such other relief as the Court deems just and proper.

Petitioners expressly do not request an order compelling Respondents to enact, implement, or supervise any Education Savings Account program, scholastic standards board, dissolution or sale of school districts or school property, or any other particular legislative program, whether or not described in Exhibits C, D, or E. Nothing in this Prayer requests a fixed judicial deadline, a mandatory vote, signature, or appropriation, or the joinder of additional respondents. If a declaratory judgment is entered, Petitioners reserve the right to apply later, on reasonable notice, for supplemental relief under 42 Pa.C.S. § 7538.

Dated: November 11, 2026

Respectfully submitted,

Kenneth V. Krawchuk, Petitioner

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VERIFICATION

We, Kenneth V. Krawchuk and Roberta L. Krawchuk, verify that the statements made in the foregoing Amended Petition for Review are true and correct to the best of our knowledge, information, and belief. We understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Date: November 11, 2026

Kenneth V. Krawchuk

Date: 11/11/26

Roberta L. Krawchuk

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents. See Pa.R.A.P. 127. This public filing refers to a minor only by initials (I.C.L.) and does not include the minor's address or date of birth. Exhibit I as attached is the exhibit as filed with the original Petition; parcel and mailing fields appear redacted on that exhibit.

Date: November 11, 2021

Kenneth V. Krawchuk, Petitioner

Roberta L. Krawchuk, Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2026 a true and correct copy of the foregoing Amended Petition for Review was served upon the following by electronic service through the Court's PACFile system:

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Pennsylvania Office of Attorney General

Civil Litigation Section

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Kenneth V. Krawchuk, Petitioner

Roberta L. Krawchuk, Petitioner

EXHIBITS

The following exhibits are attached to and made part of this Amended Petition:

Exhibit A – PSSA and Keystone Exam Results – Statewide Proficiency Rates and Historical Trends (factual support)

Exhibit B – Trends in Administrative and Professional Staffing Versus Student Enrollment (factual support)

Exhibit C – Process for Phasing Out the Monopolies (ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT REQUESTED AS A COURT-ORDERED PROGRAM)

Exhibit D – Education Savings Accounts (ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT REQUESTED AS A COURT-ORDERED PROGRAM)

Exhibit E – The Pennsylvania Scholastic Standards Board (ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT REQUESTED AS A COURT-ORDERED PROGRAM)

Exhibit F – Extremely Low-Performing Schools (factual support)

Exhibit G – Educational Cost Estimates (factual support)

Exhibit H – Funding Inversely Related to School Performance (factual support)

Exhibit I – Joint 2026 School Tax Payment Receipt (as filed; factual support for taxpayer status)

EXHIBIT A (from filed Petition)

EXHIBIT A

PENNSYLVANIA SYSTEM OF SCHOOL ASSESSMENT (PSSA) AND KEYSTONE EXAM RESULTS – STATEWIDE PROFICIENCY RATES AND HISTORICAL TRENDS

2024-25 School Year Results (released by Pennsylvania Department of Education,

November 14, 2025):PSSA (Grades 3–8)

- English Language Arts (ELA): 49.9% Proficient or Advanced (down from 53.9% in 2023-24)
- Mathematics: 41.7% Proficient or Advanced (up from 40.2% in 2023-24)

Keystone Exams (primarily Grade 11)

- Algebra I: 44.3% Proficient or Advanced (up from 41.6%)
- Literature: 62.1% Proficient or Advanced (down from 63.2%)
- Biology: 49.4% Proficient or Advanced (down from 50.5%)

Summary of Statewide Performance

- More than half of students in grades 3–8 are not proficient in reading/ELA.
- Approximately 58% of students in grades 3–8 are not proficient in mathematics.
- Roughly half or more of high-school students tested are not proficient in Algebra I and Biology.

Historical Trends (selected years)

- Pre-pandemic (2018-19 / 2019) proficiency rates were substantially higher in most subjects.
- ELA proficiency has declined for multiple consecutive post-pandemic years.
- Math has shown modest recovery but remains well below 50% overall and far below pre-2019 levels in middle grades (Grade 8 math proficiency ≈ 30.5% in 2025).
- Overall proficiency rates have stagnated or declined despite significant increases in per-pupil funding since 2019.

SOURCES:

Pennsylvania Department of Education, Assessment Reporting (2025 PSSA and Keystone State-Level Data); contemporaneous PDE news release and independent summaries (Chalkbeat, Post-Gazette, State Test Score Results analyses).

EXHIBIT B (from filed Petition)

EXHIBIT B

TRENDS IN ADMINISTRATIVE AND PROFESSIONAL STAFFING VERSUS STUDENT ENROLLMENT

Enrollment

- Pennsylvania public school district enrollment has declined approximately 8–9% since 1999–2000 (roughly 300,000+ fewer students in traditional districts over the long term).
- From 2019–20 to recent years, district enrollment fell by approximately 80,000 students (about 5%).
- Current approximate K–12 public enrollment (districts + charters): ≈ 1.5–1.7 million.

Staffing

- From 1999–2000 to 2025–26, public schools added approximately 28,000 employees overall (≈ 10% growth) while enrollment declined.
- Non-teacher professional staff (administrators, coordinators, and other professional positions) increased by roughly 40–47% over the same long-term period.
- Classroom teachers increased more modestly (≈ 6–10%).
- Resulting student-to-professional-staff ratios have declined significantly (more staff per student).

SOURCES:

Pennsylvania Department of Education Enrollment Reports and Professional/Support Personnel Summaries; Commonwealth Foundation "State of Education Spending" analyses (2025 and 2026 editions).

EXHIBIT C — ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT A REQUESTED DECREE

EXHIBIT C

PROCESS FOR PHASING OUT THE MONOPOLIES

As it so desperately needs to be, the new system is a significant change from the old. It is important to implement the transition carefully so as to be as smooth as possible and to minimize disruption. About five years should accommodate most of the change. Enabling legislation should set an effective date of a June 30 that is a minimum of 18 months after the date it is signed into law by the Governor.

Upon the effective date, all local school boards are dissolved and the state will take ownership of all public school assets and liabilities, including of course the responsibility of servicing and retiring any bonds in accordance with the terms of their issuance. The state will put all schools up for sale as soon as possible after the enabling legislation is signed by the Governor. All assets and liabilities of the schools will be assumed by the purchasers except for any bond liabilities which will remain the state's responsibility to retire. The settlement date will be the July 1 immediately after the effective date or as soon thereafter as possible.

Efforts to sell remaining schools will continue. Any schools not sold and settled by the August 1 following the effective date will continue to operate, but will be operated and managed by the state as competitive business entities until they are sold and settled. Schools so operated by the state shall charge tuition equal to the Education Savings Account (ESA) subsidy amount each year. Schools lacking sufficient enrollment for reasonable viability will cease operation.

Any schools not under a sales agreement by the fourth May 31 following the effective date will be auctioned off to the highest bidder. Any schools still remaining unsold, if still in operation, will discontinue operation within one more year and the properties will remain on the market until sold.

All education-related revenues shall be separately tracked at the state level via a separate education account. Thus, revenue inflows and outflows from the sales of schools, the servicing of bonds, the payment of ESA subsidies and the taxpayer funding for education will flow through this account. Funding shall be allocated to maintain an adequate balance in this account.

EXHIBIT D — ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT A REQUESTED DECREE

EXHIBIT D

EDUCATION SAVINGS ACCOUNTS

An Education Savings Account (ESA) will be established for each child who will be its permanent owner. ESA earnings and deposits will be Pennsylvania-tax-free (somewhat like an IRA). Anyone may make deposits into an ESA. ESA withdrawals may be used only to pay for bona fide educational expenses of the ESA owner such as tuition, books, and transportation strictly to/from schools or colleges.

Beginning with kindergarten, an amount equal to the median amount that parents actually spent for education in the prior school year will be deposited by the Commonwealth into each minor citizen's ESA during July for use the following school year. The amount will vary by age/grade level and be determined from the monitoring of ESA expenditures. Subsidization will end upon the eighteenth birthday of the (formerly) minor citizen. Since the median amount spent the prior year will not be available the first year, $11,500 will be the initial subsidy. This amount is slightly more than the average tuition charged by non-elite private schools plus transportation, and can be provided by current federal and state funding alone, and without any local school property taxes.

Unspent ESA balances will roll forward to future years or may be transferred to any other ESA. Parents will have control of the ESAs of their minor citizens. Upon age 18, ESA control will transfer to the new adult citizen. An ESA may be dissolved after age 27, and must be dissolved by age 35. When dissolved, any residual balance becomes the taxable income of the ESA owner.

All schools will be private schools. The schools will compete to provide the best possible education at the lowest price. Their "funding" will be unquestionably "fair" as they will have earned the tuition dollars parents pay them when voluntarily choosing a school for their children. There will be full school choice. Schools will be very attentive to their customers' (parents) needs and desires.

Varying student needs will be better served by specialized schools instead of the current one-size-fits-all unresponsive monopoly. Free market mechanisms will sort all that out and optimize it. "Bad" schools will quietly go out of business or be acquired and rejuvenated under new management; note that this is a critically important function of the free market economic system that is completely missing with the government monopoly where horrible schools never die.

Parents may educate their children in any way they see fit, including home schooling. There is absolutely no way to know how low education costs can be or how well children can be educated until the proven free market economic system shows us.

The balances in the ESAs are specifically not the business of the state. The only proper government interest is to ensure that ESA funds are spent for bona fide educational expenses of its owner, determining the median amount spent by parents each year, and in ensuring that parents actually are educating minor citizens so they will be well prepared to succeed as adults.

EXHIBIT E (page 1) — ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT A REQUESTED DECREE

EXHIBIT E

THE PENNSYLVANIA SCHOLASTIC STANDARDS BOARD

1. Schools are free to teach whatever they believe is appropriate. However, they must teach a minimum set of skills and factual knowledge that will enable Minor Citizens to succeed as adults. A Pennsylvania Scholastic Standards Board (PSSB) will establish and maintain academic standards for a core curriculum for the education of Minor Citizens.

2. The PSSB shall be comprised of twenty-one members divided into three classes of seven each. Each member shall serve a term of six years. The terms shall be staggered so that a class of seven will be empaneled in June of every even-numbered year. PSSB members will be elected one member per Pennsylvania State Senate District at a time, on a numeric rotation basis by District number, as classes come due for replacement or when vacancies occur. The PSSB will elect its own chair, vice chair, and secretary in July of even-numbered years.

3. All PSSB members must be United States citizens, and no member of the PSSB may have any other connection, direct or indirect, past or present, with any government or quasi-governmental body. A minimum of eleven PSSB members must be parents of Minor Citizens. A minimum of seven PSSB members must be professional educators. A minimum of seven PSSB members must be drawn from business management. Individual PSSB members can be part of more than one of these groupings. School managements are encouraged to submit names of qualified nominees. Whenever it is a District's turn to elect a PSSB member, the following procedure is to be followed:

3.1 If the number of PSSB members who are parents of Minor Citizens is currently less than eleven, the District must elect a new member who is a parent of a Minor Citizen.

3.2 If the number of PSSB members who are professional educators is currently less than seven, the District must elect a new member who is a professional educator.

3.3 If the number of PSSB members who are professional educators is seven or more, but the number of PSSB members who are business managers is currently less than seven, the District must elect a new member drawn from business management.

3.4 If the requirements for eleven or more parents and seven or more professional educators and seven or more business managers are all met, the District may elect any Citizen they consider best qualified.

4. Each PSSB member shall receive a competitive salary to be determined by law and shall be reimbursed for bona fide PSSB expenses upon the filing of weekly expense reports. They shall receive no other remuneration or benefits whatsoever, excepting dividends and interest from private investments they may hold. All salaries and expenses, including contracts with consultants and/or testing companies, shall be borne by the Commonwealth.

EXHIBIT E (page 2) — ILLUSTRATIVE POLICY EXAMPLE ONLY — NOT A REQUESTED DECREE

5. The PSSB shall contract with private professional educational testing companies for the creation, calibration, and maintenance of a battery of standardized achievement tests. Tests shall deal only with factual historical and scientific information and shall scrupulously avoid subjectivity and matters of opinion. The tests shall be designed to provide a valid measure of each student's proficiency in each major core curriculum subject and at each grade level. In a theoretically average case, a student would rank at the fiftieth percentile every year in each subject area and overall. An increase in the percentile ranking from one year to the next will indicate faster-than-normal progress during the immediately preceding year, while a decrease will reveal slower-than-normal progress. Thus, the PSSB tests provide an objective measure of the performance of students, teachers, and schools.

6. The core curriculum subjects shall be as follows:

6.1 English language reading and writing

6.2 Mathematics

6.3 Science (physics, chemistry, biology, with emphasis on the scientific method and rational thinking)

6.4 Economics (microeconomics only) and understanding the free market economic system

6.5 Computer science

6.6 World, United States, and Pennsylvania geography

6.7 World, United States, and Pennsylvania history

6.8 Civics, including understanding of the United States and Pennsylvania Constitutions and the principles upon which they are based

7. Each Minor Citizen's annual test results in each subject area shall be sent to the parents of that Citizen. The aggregated test results by subject for each school shall be made public each year.

EXHIBIT F (from filed Petition)

EXHIBIT F
EXTREMELY LOW-PERFORMING SCHOOLS

Multiple Pennsylvania public schools continue to report extremely low proficiency rates on PSSA and Keystone Exams. In recent reporting years, numerous schools (particularly in high-poverty urban and certain rural districts) have recorded proficiency rates in the single digits or near zero in one or more core subjects (ELA, Mathematics, Algebra I, Literature, or Biology). While exact year-to-year counts of schools with 0% proficient vary and require the full PDE school-level data files for precise enumeration, the existence of schools with zero or near-zero proficiency in core subjects is documented in PDE school-level results and contemporaneous analyses. The worst-performing districts routinely show 70–80%+ of students not proficient in both reading and mathematics. Even higher-performing districts typically leave 15–25% of students below proficiency.

EXTREMELY LOW-PERFORMING SCHOOLS – SCHOOLS WITH ZERO OR NEAR-ZERO PROFICIENCY

Pennsylvania Department of Education (PDE) school-level data and contemporaneous reporting for the 2024-25 assessments document multiple public schools with zero or near-zero proficiency rates on core subjects.

Documented examples from 2024-25 results include:

- Roberto Clemente Charter School (Lehigh Valley area): 0% proficient or advanced on the Keystone Literature exam; 0% proficient or advanced on the Keystone Algebra I exam (among tested students).
- Innovative Arts Academy: 0.6% proficiency in mathematics on the PSSA.
- Additional schools (including certain Allentown-area middle schools and charter schools such as Trexler Middle School and Arts Academy Charter School) recorded proficiency rates under 5% in mathematics or other core subjects.

BROADER PATTERNS:

In high-poverty districts, proficiency gaps versus low-poverty districts reach approximately 33–35 percentage points in ELA and mathematics.
Pittsburgh Public Schools (statewide second-largest district) recorded overall 2024-25 rates of approximately 39.3% proficient/advanced in ELA PSSA, 27.8% in math PSSA, 33.8% in Keystone Algebra I, 35% in Biology, and 54.4% in Literature.
Numerous individual schools and several districts continue to post single-digit or low-teens proficiency rates in one or more core subjects, leaving the large majority of their students below grade-level standards.

While the exact statewide count of schools reporting precisely 0% proficient varies by subject and year (and is best verified from the full PDE school-level Excel files), the existence of schools with zero or near-zero proficiency in reading, mathematics, Algebra I, Literature, or

Biology is a recurring and documented feature of recent results. These outcomes persist despite elevated per-pupil spending.

PRIMARY SOURCES:

PDE 2025 Keystone Exam School-Level Data and PSSA School-Level Data (available at pa.gov education assessment reporting).
Local and statewide reporting on 2025 results (e.g., The Morning Call / Lehigh Valley analysis, Pittsburgh Post-Gazette, other district-level summaries).

EXHIBIT G (from filed Petition)

EXHIBIT G
EDUCATIONAL COST ESTIMATES

SPENDING

Public School Per-Pupil Spending

- U.S. Census Bureau (FY 2024): Pennsylvania current spending per pupil ≈ $21,091.
- Commonwealth Foundation and related analyses of PDE Annual Financial Report data: total revenue per student reached approximately $24,000 in 2023–24 (and has continued to rise with subsequent budget increases).
- This places Pennsylvania among the higher-spending states nationally (roughly 11th–12th).

Non-Elite Private School Tuition

- Average private school tuition in Pennsylvania (2025–26 data): approximately $14,954 overall.
- Elementary average ≈ $13,000; high-school average ≈ $19,000.
- Many non-elite, religious, and independent private schools charge substantially less—frequently in the $8,000–$13,000 range—consistent with the Petition's approximate $11,000 figure for non-elite options (plus transportation).

COMPARISON:

Public per-pupil expenditures are roughly double (or more) the tuition charged by a large segment of non-elite private schools, while delivering proficiency rates in which half or more of students fail to reach grade-level standards.

SOURCES:

U.S. Census Bureau Annual Survey of School System Finances (FY 2024); Commonwealth Foundation reports; Private School Review / Pennsylvania private-school tuition aggregates (2025–26).

EXHIBIT H (from filed Petition)

EXHIBIT H
FUNDING INVERSELY RELATED TO SCHOOL PERFORMANCE

The original Standard and Poor's 2002 study explaining how school funding is inversely related to school performance is no longer available on the web. However, a contemporary 2002 article in Education Week reports on the study, explaining that "from 1997 to 1999, 60 percent of Pennsylvania school districts with above-average scores on the state's accountability exams had below-average spending, the report says. On the other hand, nearly a third of all school districts with above-average spending had below-average scores."

The article goes on to explain that "Pennsylvania's current rate of return 'suggests that additional spending, on its own, is not likely to enable all students to meet state standards.' The report goes on to say that more 'fundamental and perhaps structural changes (emphasis not in original) may be needed to maximize the impact of incremental spending on student achievement.' "

The full Education Week article can be found at https://www.edweek.org/policy-politics/standard-poors-studies-school-spending-in-pennsylvania/2002/05.

EXHIBIT I (from filed Petition; parcel/mailing appear redacted)

EXHIBIT I
JOINT 2026 SCHOOL TAX PAYMENT RECEIPT
FOR KENNETH V. KRAWCHUK AND ROBERTA L. KRAWCHUK

07/01/26 - 06/30/27 SCHOOL REAL ESTATE TAXES

Mail Date: 07/07/2026

[redacted]

MAKE CHECKS PAYABLE TO:
ABINGTON TOWNSHIP TAX COLLECTOR
1176 Old York Rd, Abington, PA 19001

Abington Township
Karen M. Sanchez, Tax Collector (267) 536-1024
HOURS: 8:00 AM to 4:00 PM MON-FRI
24 HOUR DROP BOX AVAILABLE

COUNTY ASSESSMENT	PARCEL NO.
109,500	[redacted]

Parcel Number **MUST** Be On Your Check.

109,500	X 39.8992	School Mills	$4,368.96
109,500	X 1.3738	Referendum Mills	$150.43
COUNTY ASSESSMENT	109,500	Tax Liability	$4,519.39
S D Homestead Exclusion	13,016	Homestead Tax Reduction	$537.21
Net Assessment	96,484	Net Tax Amount	$3,982.18

TOWNSHIP OF ABINGTON PAID
SEP 04 2026
KAREN M. SANCHEZ TAX COLLECTOR TREASURER

DESCRIPTION OF PARCEL
[redacted]

PAYMENT METHOD
Date:
☑ Check Bank: SOFI
Check #: 242

KRAWCHUK KENNETH & ROBERTA L
[redacted]

IF PAID ON OR BEFORE	IF PAID ON OR BEFORE	IF PAID AFTER
SEPT 9, 2026 taxes are paid at 2% **Discount**	**NOV 9, 2026** taxes are paid at **Face**	**NOV 9, 2026** taxes are paid at a 10% **Penalty**
$3,902.54	$3,982.18	$4,380.39

OR

INSTALLMENT METHOD 1ST PAYMENT DUE ON OR BEFORE **AUG 17, 2026**
$1,327.40

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT - TEAR AT PERFORATION

PLEASE KEEP THIS PORTION FOR YOUR RECORDS

1. **IF A BANK OR MORTGAGE COMPANY ESCROWS YOUR TAX MONEY, PLEASE FORWARD THIS BILL TO THEM IMMEDIATELY.**
2. Please include phone number or email on your check to aid in communication with our office.
3. **Taxes are due and payable as prescribed by law, whether or not a tax bill has been received by the taxpayer. The Tax Collector will not be held responsible if a bill is not received.**
4. In order to earn discounts or avoid penalty, payments must be postmarked by the U.S. Postal Service on or before the payment due dates as shown on this bill.
5. IF YOU ARE USING A "BILL PAYING" SERVICE FOR DISCOUNT/FACE/PENALTY PLEASE ALLOW TIME FOR PROCESSING (7-10 DAYS) BEFORE DUE DATE. **BILL PAY CHECKS WILL NOT BE ACCEPTED DATED AFTER DECEMBER 15, THESE ARE CONSIDERED PERSONAL CHECKS.**
6. Personal checks will not be accepted between December 15 and December 31. **ONLY GUARANTEED FUNDS (MONEY ORDER OR BANK CHECK) WILL BE ACCEPTED.**
7. If a receipt is desired you must return **both copies** of the tax bill with a **self-addressed stamped envelope**
8. If a check is returned for any reason you must pay $25.00 fee to Abington Township Tax Collector.
9. **CASH PAYMENTS WILL NOT BE ACCEPTED.**
10. Online payments through the Township's website, abingtonpa.gov (go to the Tax Office webpage) or by calling 1-866-874-9602. Payments may be made using Visa, MasterCard, Amex or Discover cards. Additional charges will apply. **ONLINE PAYMENTS THRU THIS SITE WILL NOT BE ACCEPTED FROM DECEMBER 15 - DECEMBER 31, THE SITE WILL NOT BE AVAILABLE.**
11. **Installment payers: For those electing the installment method see enclosed instructions.**
12. 24-HOUR DROP OFF SLOT - Located outside the main entrance of the Township Building or in the hallway outside the Tax Office. If a receipt is required, include a stamped self-addressed envelope.
13. **The Township building is handicapped accessible.**
14. Notice: Your Property is assessed by the Montgomery County Board of Assessments. This office only collects the taxes. 1 MILL=$1.00 per $1,000.00 ASSESSED VALUE.

For those homeowners who are eligible:

Property Tax Relief Notice: This tax bill includes a tax reduction for your homestead and/or farmstead property. As an eligible homestead and/or farmstead property owner, you have received tax relief through a homestead and/or farmstead exclusion, which has been provided under the Pennsylvania Tax Relief Act, a law passed by the Pennsylvania General Assembly designed to reduce your property taxes. **(The tax reduction has been funded from slot money tax revenue received from the state.)**