

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

DECLARATION OF CLAUDIA T. SALOMON

CLAUDIA T. SALOMON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Partner at the law firm of Latham & Watkins LLP, 885 Third Avenue, New York, NY 10022, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.

2. I respectfully submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I am familiar with all of the facts and circumstances set forth herein.

3. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' Complaint in the above-captioned matter (Dkt. 1).

4. Attached as Exhibit 2 is a true and correct copy of Section 2120 of the East Ramapo Central School District's policies, titled "Board Member Elections", available at http://www.ercsd.org/files/_vNK7T_/a937a7be0281f4043745a49013852ec4/2120_-_Board_Member_Elections.pdf.

5. Attached as Exhibit 3 is a true and correct copy of Section 2120.1 of the East Ramapo Central School District's policies, titled "Candidates and Campaigning", available at http://www.ercsd.org/files/_vNK7T_/781d00554adb44c43745a49013852ec4/2120.1_-_Candidates_and_Campaigning.pdf.

6. Attached as Exhibit 4 is a true and correct copy of Section 2121 of the East Ramapo Central School District's policies, titled "Board Member Qualifications", available at http://www.ercsd.org/files/_vNK7T_/40838ce8aeab4a7f3745a49013852ec4/2121_-_Board_Member_Qualifications.pdf.

7. Attached as Exhibit 5 is a true and correct copy of an article by Mareesa Nicosia titled "East Ramapo Sells Hillcrest For Use As Yeshiva Again", published by The Journal News on Nov. 25, 2014, available at <http://www.lohud.com/story/news/education/2014/11/25/east-ramapo-sells-hillcrest-school/70114646/>.

8. Attached as Exhibit 6 is a true and correct copy of an article by Kimberly Redmond titled "Bill Passed to Restore 2-Year Term of East Ramapo Trustee", published by The Journal News on Jan. 18, 2017, <http://www.lohud.com/story/news/local/rockland/2017/01/18/sabrina-charles-pierre-term-east-ramapo-bill/96726176/>

9. Attached as Exhibit 7 is a true and correct copy of an article by Kimberly Redmond titled "Cuomo Restores Term of E. Ramapo School Board Member", published by The

Journal News on Feb. 1, 2017, available at <http://www.lohud.com/story/news/local/rockland/2017/02/01/cuomo-restores-term-e-ramapo-school-board-member/97361664/>.

10. Attached as Exhibit 8 is a true and correct copy of a letter by Rev. Weldon McWilliams IV, Rabbi Paula Mack Drill and Trustee Azeem Farooki published by The Journal News on Mar. 21, 2017 under the title “East Ramapo Metal Detectors Perpetuate Stereotypes: Letter”, available at <http://www.lohud.com/story/opinion/readers/2017/03/21/east-ramapo-metal-detectors-stereotypes-letter/99403408/>.

11. Attached as Exhibit 9 is a true and correct copy of an article by Michael Powell titled “A School Board That Overlooks Its Obligations to Students”, published by The New York Times on Apr. 7, 2014, available at <https://www.nytimes.com/2014/04/08/nyregion/a-school-board-that-overlooks-its-obligation-to-students.html>.

12. Attached as Exhibit 10 is a true and correct copy of an article by James O’Rourke titled “Wieder Faces Election Charge”, published by The Journal News on May 20, 2011.

13. Attached as Exhibit 11 is a true and correct copy of an East Ramapo Central School District website titled “Where to Vote”, last accessed Dec. 7, 2017, available at http://www.ercsd.org/pages/East_Ramapo_CSD/Departments/District_Clerk/Budget_Vote_and_Election_Infor/739724498086021556.

Dated: New York, New York
December 7, 2017

/s/ Claudia T. Salomon
Claudia T. Salomon