

**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 JULIO CLERVEAUX**

JULIO CLERVEAUX, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury  
as follows:

**Background**

1. I am a United States citizen. I am 36 years old. I am a black man.
2. My address is 8 Wolfe Drive, Spring Valley, New York, 10977. I reside within  
the East Ramapo Central School District (“East Ramapo” or the “District”).
3. I have resided in the District for the past 15 years.
4. I currently work as a Finance Analyst for CreditRiskMonitor, which provides  
financial risk analyses and news services for credit, supply chain and financial professionals.
5. I am a registered voter in the District.

**Voting and Lack of Representation on the Board**

6. For the last five years, I have voted in each of the elections for members of the District's Board of Education (the "Board").

7. I began voting in Board elections in 2013, when my brother, Eustache Clerveaux, ran for a seat on the Board. Since 2013, none of the Board candidates who I voted for were elected except for Sabrina Charles-Pierre, who ran in an uncontested election. In 2017, I voted for Chevon Dos Reis, Alexandra Manigo, and Eric Goodwin, who all lost. Except for Ms. Charles-Pierre, I do not recall any of the current members of the Board coming to my neighborhood to campaign for office or post campaign materials.

8. I am aware of and have attended candidate forums hosted in my community by the Spring Valley Branch of the NAACP and the Jamaican Civic and Cultural Association of Rockland ("JAMCCAR"). With the exception of Ms. Charles-Pierre and Mr. Pierre Germain, who attended the Spring Valley NAACP and JAMCCAR forum in 2016, I am not aware of any current member of the Board participating in this forum or any other candidate forum in my community.

9. My candidates of choice in the May 2017 election, Eric Goodwin, Chevon Dos Reis, and Alexandra Manigo, published a campaign website. I have also viewed web pages discussing the candidacies of other public school candidates on the local website Power of Ten ([www.poweroften.us](http://www.poweroften.us)). Other than Ms. Charles-Pierre, I am not aware of any campaign website or page published by or on behalf of any of the current Board members.

10. Of the three black members of the Board, I only voted for Ms. Charles-Pierre. I did not vote for Mr. Charles or Mr. Germain. I do not know of any black or Latino voters who voted for Mr. Charles or Mr. Germain. Other than Mr. Germain's appearance at the 2016

NAACP/JAMCCAR candidate forum, I am not otherwise aware of Mr. Charles or Mr. Germain campaigning in minority neighborhoods or making any effort to appeal to black and Latino voters.


**Quality of the District's Public Schools**

11. I have three children, E.C., age nine, J.C., age five, and M.C., age one. None of my children attend public school in East Ramapo. My two older children, E.C. and J.C., live with their mother in Nyack and attend public school there. However, even before my ex-wife moved with our children to Nyack, we avoided sending our children to public schools in East Ramapo because we were deeply concerned about the quality of the education our children would receive there.

12. As a parent and concerned citizen, I have paid attention to the decline in the quality of public school education in the District. My brother, Eustache Clerveaux, is very involved in the public school community and ran for a seat on the Board in 2013. His children, my nieces and nephews, attend public schools in East Ramapo, and I have observed the quality of the education they receive decline. For example, my nieces and nephews have very limited, if any, options for extracurricular activities and sports, have very large class sizes, and are given very old and out-of-date textbooks and materials. When my children discuss what they are learning in school with my nieces and nephews, the contrast is stark, and it is readily apparent that the quality of the public school education in the District is significantly worse than the public school education my children receive outside of the District.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: Spring Valley, New York  
11 24, 2017.

  
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JULIO CLERVEAUX