

**UNITED STATES DISTRICT COURT
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 CHEVON DOS REIS

CHEVON DOS REIS, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

Background

1. I am a United States citizen. I am 38 years old. I am a Latina woman.
2. My address is 64 S. Main Street, Apartment #2D, 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 26 years, except from October 2010 until October 2012, when I lived in Garnerville, New York.

4. I currently work as a Community Services Worker for the Department of Social Services of Rockland County, where I provide information regarding how to obtain public benefits and other forms of public assistance.

5. I am currently pursuing a Master's degree in School Counseling on a part time basis.

6. I am a registered voter in the District.

Voting and Lack of Participation

7. For the past few years, I have voted in each of the elections for members of the District's Board of Education (the "Board").

8. After moving back to the District in 2012, I resumed voting in school Board elections in 2015. Since that time, none of the Board candidates who I voted for were elected except for Sabrina Charles-Pierre in 2016, who was an incumbent and ran unopposed. For example, in 2015, I voted for Sabrina Charles-Pierre, Natasha Morales, and Steve White, who all lost; in 2016, I voted for Kim Foskew, Jean Fields, and Natasha Morales, who all lost; and in 2017, a year in which I ran for the Board, I voted for myself, Alexandra Manigo, and Eric Goodwin, and we all lost.

9. Except for Ms. Charles-Pierre, I do not recall any the current members of the Board ever coming to my neighborhood to campaign for office or post campaign materials. Other politicians came to my neighborhood when they were campaigning, but not any of the current Board members.

10. I am aware of and have attended candidate forums hosted in my community by the Spring Valley Branch of the NAACP, the Jamaican Civic and Cultural Association of Rockland ("JAMCCAR"), and Strong East Ramapo. With the exception of Mr. Germain on one

occasion in 2016 and Ms. Charles-Pierre, I am not aware of any current member of the Board participating in any of these candidate forums or any other candidate forum in my community.

11. Of the three Black members of the Board, I only voted for Ms. Sabrina Charles-Pierre. When Mr. Charles and Mr. Germain ran for re-election in 2016, I did not vote for them, and I do not know of any black or Latino voters who did vote for them. I do not recall Mr. Charles or Mr. Germain campaigning in minority neighborhoods or making any effort to appeal to black or Latino voters.

Quality of Education

12. I attended public school in the District and graduated from Spring Valley High School in 1997.

13. I have three children who attend public school in the District: I.O., S.D.R., and G.D.R. I.O. is sixteen years old and attends Spring Valley High School. S.D.R. is nine years old and attends Elmwood Elementary School. G.D.R. is eight years old and attends Margetts Elementary School.

14. I can tell from my children's experiences that the District's public schools are much worse than when I was a student. I am particularly worried about my daughter, I.O., who is 16 years old and will be applying to college soon. I.O. is frequently directed to sit in the cafeteria for a free period because no full time or substitute teachers are available to teach her classes. There are over 30 children in each of her classes, and there are not enough teachers to teach all of the required subjects, including math and science. The schools also do not have enough guidance counselors for the number of students.

15. When I have visited my children's schools, I have seen that the infrastructure of the school buildings has significantly deteriorated: there are wires hanging from light fixtures,

some of the classrooms do not have heat during the winter or air-conditioning during the summer, and at times, some of the stairs were roped off with caution tape.

Board's Lack of Responsiveness

16. Over the past year, I have regularly attended Board meetings, and I have spoken at meetings on two occasions to express my concerns about the decline in the quality of public school education. On April 19, 2017, I spoke at the Board meeting, after I had witnessed students sitting in the Spring Valley High School cafeteria when their classes had been canceled because there were not enough teachers. I also expressed my concern about the Board's decision to hire a new bus-transportation operator that had a record of safety violations.

17. The Board has not been responsive to my concerns about the quality of the public schools, which are shared by other members of the public school community. For example, when I spoke at a Board meeting on April 19, 2017, I noticed that none of the Board members, except for Ms. Charles-Pierre, paid attention or looked at me when I spoke. I witnessed this same behavior when other members of the community concerned about the public schools spoke at Board meetings. At several Board meetings, I watched public school students give speeches, sing songs, and put on performances, but I did not see the Board members express any interest in any of the student presentations. Moreover, the Board never addressed any of the concerns that I raised at these meetings.

Experience as a Candidate

18. In 2017, I ran for a seat on the Board. I ran because I believed that as a Board member, I could ensure access to a proper education for my children and all of the children attending public schools in the District. I ran on a slate with Eric Goodwin and Alexandra ("Allie") Manigo.

19. I announced my candidacy at a Power of Ten forum in February 2017. Power of Ten published a call for candidates on its web site, poweroften.us, on January 31, 2017. The posting stated that “There are certainly many people in East Ramapo who are qualified to serve on the board.” The posting also stated: “The Center for Public Education says an effective school board member should [1] inspire parents and other stakeholders to have confidence in the local public schools; [2] enhance the mix of skills and backgrounds on the board and help represent the diversity of the community; [3] have the commitment to do what is right for all children, even in the face of opposition. ***Does this sound like someone you know? Or maybe you might be interested yourself?***” The post then encouraged those interested in being a candidate to fill out a questionnaire, which asked potential candidates about their reasons for running, their vision and goals for high academic achievement for all students, their skills and background, and about their community activities.

20. To campaign, the other members of my slate and I created a campaign web page, flyers, posters, yard signs, and t-shirts. We also knocked on doors in many culturally diverse communities throughout East Ramapo, including Spring Valley, Nanuet, Pomona, Chestnut Ridge and Hillcrest. I attended a candidate forum hosted by the Spring Valley Branch of the NAACP and JAMCCAR. People in our community volunteered for our campaign, including by handing out campaign literature and providing transportation to the polls. We held a “Get Out the Vote Election Eve Party” at Memorial Park in Spring Valley and advertised the event in signs in both English and Spanish. We made a television commercial that aired on a local news channel.

21. I was not invited to any candidate forums in the predominantly white communities of the District, including New Square, Kaser, or Monsey. I recall that we were

invited by two members of the white, private school community to speak at an event at the Green Meadow Waldorf School in Chestnut Ridge, which I accepted; however, almost no one from the white, private school community attended the event. Those two people also offered to hand out our campaign literature in predominantly white neighborhoods, but I did not campaign personally in these predominantly white areas because as a Latina, I did not feel welcome there. I do not recall any other members of the white, private school community who engaged with our campaign. I do not otherwise recall any members of the white, private school community who supported or volunteered for our campaign or invited me to campaign in any of the predominantly white neighborhoods, villages, or hamlets in the District.

22. I was not aware of who I was running against until 30 days before the election, when the opposition candidates filed their petitions for candidacy with the Board.

23. I do not know which organizations or community leaders endorsed the slate on which my opponent, Joel Frielich, ran. I was never offered an opportunity to compete for a position on that slate or for the endorsement of the community leaders who endorsed my opponent. I do not know what criteria those organizations or leaders used to slate or endorse their preferred candidates.

24. I never saw my opponent or other members of his slate campaigning, and he did not attend any candidate forums that I attended. For example, my opponent did not attend the forum held by the NAACP and JAMCCAR or the Power of Ten forum that I attended even though the organizers informed me that he was invited.

25. I did not see any campaign posters or flyers for my opponent or other members of his slate in Spring Valley, Nanuet, or Hillcrest until the day of the election. I did not see my opponent or other members of his slate canvassing in any of the communities in which I

campaigned. I did not hear about my opponent campaigning in any minority neighborhoods. I have never seen campaign materials printed in Spanish for any candidates backed by organizations or leaders within the private school community.

26. In the May 16, 2017 election, I was defeated by Joel Freilich. Joel Freilich received approximately 5,000 more votes than I did.

27. Leaders in the black and Latino communities strongly supported my campaign. Many black and Latino voters told me that they were going to vote for me.

28. In a future election, I would prefer to run in a ward system, rather than in the current at-large system because I do not expect that I would have a meaningful chance to win under the current system, given that public school candidates have lost all recent contested elections for seats on the Board.

29. If the May 2018 election takes place under the current at-large system, I may nonetheless run because I recognize the importance of fielding candidates for the Board who support public schools to maintain public and voter engagement on public school issues.

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

Dated: Spring Valley, New York

Nov. 6, 2017.

Chevon Dos Reis
Chevon Dos Reis