

**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 JOSE VITELIO GREGORIO

JOSE VITELIO GREGORIO, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

Background

1. I am a United States citizen. I am 59 years old. I am a Latino man.
2. My address is 26 Gerardine Place, New City, New York 10956. I reside within the East Ramapo Central School District (“East Ramapo” or the “District”).
3. I have resided in the District for the past ten years.
4. I currently work as a residential contractor.
5. I am a registered voter in the District.

Voting and Lack of Representation on the Board

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

7. Since 2008, no candidate who I voted for has won a contested election for a Board seat. The only candidates who I voted for who won their elections were Sabrina Charles-Pierre in 2016, JoAnn Thompson in 2011, and Steve Price and Suzanne Young-Mercer in 2010, but they all ran as unopposed incumbents.

Quality of the Schools

8. I have two biological children and one step-child who attend or attended East Ramapo public schools. N.G., age ten, attends Kakiat Elementary School. K.G., age seven, attends Summit Park Elementary School. Michele, age 21, attended Ramapo High School.

9. The Board has made numerous decisions that have negatively affected the quality of my children's education. For example, in 2012, the Board made a decision to cut funding for full-day kindergarten programming. My daughter, N.G., attended kindergarten in the District when it was reduced from full-day to half-day. She was only in school for about two hours per day at that time, which required my wife and me to pay for additional childcare services. Between 2009 and 2012, the Board cut funding for art and music programs. My children lost art education and music education in their schools. After the District laid off many teachers, my children's class sizes increased.

Lack of Responsiveness of the Board to Latino Concerns

10. I have long been concerned that there is no representation of Latinos on the Board or in the District leadership.

11. I first became engaged as a parent with the public schools around 2010, when my step-daughter was in high school, because I was concerned that the school was not providing her and other Latino students with a good learning environment. At the time, the school had one Spanish-speaking social worker, Ms. Esquivel, who encouraged my wife and me to organize other parents to try to make positive changes for our children. My wife and I were both employed, but we spent much of our remaining time working on organizing Latino parents to have a voice in our children's public schools and education.

12. Around 2010 and 2011, I was one of the organizers of a group of primarily Spanish-speaking Latino parents called "Padres Unidos" who worked to engage with public school stakeholders to support our children and hold the District accountable for a quality public school education. With the help of Mr. Pedro Santana, who was Assistant Superintendent at that time, we coordinated events like "Noche Latino," which was a celebration of Latino culture. At Noche Latino, I addressed an auditorium of 500 parents and students regarding the importance of supporting Latino students in public schools and for Latinos to be involved with their children's education. My daughter translated for me.

13. To the best of my knowledge, during the ten years in which I have lived in the District, Mr. Santana was the only districtwide official of Latino heritage. Mr. Santana was very popular with the public school community and particularly with the Latino community. He served as a role model for black and Latino students, and often told them to not allow their circumstances to define them. After Mr. Santana was terminated as Assistant Superintendent in 2011, I was among the many minority parents, including other members of Padres Unidos, who voiced opposition to his termination, and advocated for him to continue working as a principal within the District.

14. In general, the District has done very little to support Latino students and families. Although Latinos now make up more than half of the District's student population, I am unaware of the Board or the District making any serious effort to hire a Latino districtwide official since Mr. Santana was terminated in 2011. In addition, when the Board's budget cuts led the District to lay off all of the social workers in the public schools, Ms. Esquivel was laid off, and the Latino community lost one of its key resources in the District.

15. At times, the District has been hostile to the needs of the Latino community. For example, in 2014, the Superintendent at the time, Joel Klein, made some derogatory remarks about Latino students stating, "[t]hey want to learn the language. They want free lunch, breakfast, and whatever else they can get. They know they cannot get a diploma." I protested with other Latino parents and called for Mr. Klein to resign. Mr. Klein was not removed from his position for another year.

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

Dated: New City, New York
 _____, 2017

Jose Vitelio Gregorio



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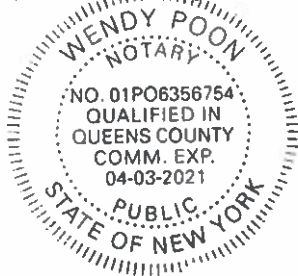
City of New York, State of New York, County of New York

I, Angela Lo, hereby certify that the document, “**Jose Vitelio Gregorio Declaration__94636448_7_0**” is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish (US).

Angela Lo

Sworn to before me this
December 6, 2017

Signature, Notary Public



Stamp, Notary Public

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