NORTHERN DISTRICT OF NEW YO		
ANNE POPE, et al., Plaintiffs,	; ; ;	
-against-	:	No. 11-cv-0736 (LEK) (DRH)
COUNTY OF ALBANY, et al.,	:	
Defendants.	:	
	X	

DECLARATION OF NOELENE SMITH

- I, Noelene Smith, hereby declare the following:
- 1. I am over the age of eighteen.

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- 2. I am a co-founder of the Albany Family Education Alliance, a community-based organization dedicated to ensuring that all children in Albany, no matter their race, ethnicity, or economic or social circumstances, will excel academically, and be able to attend college should they wish to do so.
- 3. According to the New York State District Report Card, Accountability and Overview Report 2009-10, for the Albany City School District, the high school graduation rate for blacks is 46%. For Hispanics, the rate is 44%. For whites, on the other hand, the graduation rate is 74%.
- 4. Upon information and belief, the percentage of black children being placed in special education in the Albany City School District is 21%.
- 5. Upon information and belief, the drop-out rate for black high school students in the Albany City School District is 26%, while the rate is 12% for white students.

- 6. Upon information and belief, 5% of black students in the Albany City School District take an Advanced Placement (AP) class during the course of their education, while 60% of white children do.
- 7. Upon information and belief, over 95% of all students in Alternative Schools in the Albany City School District are black.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 4, 2011

Noelene Smith