

**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 ALEXANDRA MANIGO

ALEXANDRA KRISTINA MANIGO, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

Background

1. I am a United States citizen. I am 30 years old. I am a white woman.
2. I currently work as an administrator for the Human Resources Department at Comfort Measures in New City, New York. I am also a student at Southern New Hampshire University, working towards a Bachelor's degree in Human Services with a concentration in Child and Family Services.
3. My husband, Paul Manigo, is black. We have a son, who is bi-racial.
4. I have lived within the East Ramapo Central School District ("East Ramapo" or the "District") for most of my life. Most recently, I lived at an address in Pomona, New York

that was within the District. In November 2017, I moved to an address in Pomona, New York in the North Rockland Central School District. When I lived in East Ramapo, I lived in predominantly minority neighborhoods.

5. My grandparents lived and owned property within East Ramapo until about a year ago. My father and all of his siblings were raised in East Ramapo, and my father was a student at East Ramapo public schools from 1970 to 1982.

6. I was a student at Spring Valley High School from 2002 to 2004.

Quality of the District's Public Schools

7. Before I moved out of East Ramapo in November 2017, my six-year-old son, P.M., was a first grade student at Hempstead Middle School. My 16-year-old stepdaughter, D.M., was a student in East Ramapo public schools from 2006 to 2009, and from 2013 to 2015.

8. The quality of education provided by East Ramapo public schools changed since I was a student there. When I was a student, the ratio of students to teachers and staff provided students with individualized attention. Teachers and guidance counselors knew me and had the time to pay attention to me and address my needs, which was especially important to me when I entered Spring Valley High School midway through my freshman year. But recently, I have been concerned that East Ramapo public schools lack the faculty, administration, and staff necessary to provide students with the resources and attention they need to be successful.

9. My son's first grade class in the District had over 30 children. His teacher expressed her concern to me that with so many students, she would have only a few minutes to meet with each student's parents on parent-teacher conference nights.

10. By the time my son was eligible for kindergarten in 2016, the District made available only 156 spots in a full-day kindergarten program and announced that a lottery would

be held for those spots. My son was one of approximately 600 students not selected for the full-day kindergarten classes. Instead, he started the year in half-day kindergarten, which amounted to approximately two and half hours of school time. Eventually, my son received full-day kindergarten, but approximately a month into the school year.

11. When my stepdaughter was a 9th grade student at Ramapo High School, her Global History teacher stopped showing up to school about one month into the school year. For the remainder of the year, the students received no instruction during that period and instead were placed in a classroom with a security guard and given study packets and worksheets to complete on their own.

12. The extracurricular programming offered by the East Ramapo public schools has also decreased since I was a student. For example, when I was a student at Spring Valley High School, art education and extra-curricular activities such as music, dance, theater, and art were offered. When my stepdaughter was a student at Ramapo High School, she wanted to enroll in an art class, but her school did not offer art as an elective or extra-curricular activity. After-school programs also have suffered from the District's cuts to the public school budget. When our son was a student in East Ramapo, my husband and I paid out of pocket for basketball classes because his elementary school did not provide any after-school activities.

13. We moved out of the District because I was not satisfied with my son's public school education in East Ramapo. I was concerned that he was not receiving an elementary education that would prepare him for success in middle school, high school, and eventually college and work.

Lack of Responsiveness of the Board

14. When my son attended public school in East Ramapo, I regularly attended and spoke at Board meetings to express my concerns about the quality of public education. I expressed my concerns about class sizes; how teachers, school administration and staff were overwhelmed and lacked the time to devote sufficient attention to individual students; and the lack of adequate academic and extracurricular programming. To the best of my knowledge, the Board did not address my concerns during the meetings in which I spoke or at subsequent meetings I attended.

Experience as a Candidate

15. In 2017, I ran for a seat on the Board. I ran because I wanted to ensure that the Board considered the needs of all children in East Ramapo in its decision-making and that there would be greater transparency surrounding the Board's decision-making processes. I also wanted to strengthen the relationship between the District and all of the communities it serves and to promote greater parent involvement in education. In particular, as the mother of a bi-racial, public school student, I wanted to be a voice for the public school and minority community in the East Ramapo, many of whom told me that they feel disenfranchised from the Board and the District.

16. On February 16, 2017, I announced my candidacy at a forum held by Power of Ten, a local web-based publication focused on public school advocacy. 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.

17. I ran for a seat on the Board on a slate with Eric Goodwin and Chevon Dos Reis. The public school advocacy organizations Power of Ten and Strong East Ramapo endorsed our slate.

18. The other members of my slate and I started to campaign shortly after we announced our candidacies in February 2017. We created a campaign web site, Facebook page, flyers, posters, and yards signs. We generated a robo-call to remind East Ramapo voters to get out and vote. We were featured in a television commercial on the local news channel. We knocked on doors in a number of neighborhoods, including Chestnut Ridge, Hillcrest, Nanuet, New City, Pomona, and Spring Valley. I also attended multiple candidate forums, meet-and-greets, and Q&A sessions hosted by various local groups, such as the NAACP of Spring Valley, CUPON Rockland, and Strong East Ramapo. I did not see any of the opposing candidates at these events. People in our community, including many black and Latino people, volunteered for and supported 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.

19. 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. I do not recall any other members of the white, private school community who engaged with our campaign. I did campaign in a racially diverse part of Monsey, but Mr. Goodwin and Ms. Dos Reis did not join me. 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.

20. I was not aware of my opponent, Mark Berkowitz, until 28 days before the election—one day after the deadline by which all candidates are required to submit their petitions for election.

21. I did not know which organizations or community leaders endorsed the slate on which my opponent ran. I was not offered an opportunity to compete for a position on that slate or for the endorsement of the community leaders who endorsed my opponent. I did not know what criteria those organizations or leaders used to slate or endorse their preferred candidates.

22. I never saw my opponent or other members of his slate campaigning, and he did not attend any candidate forums, meet-and-greets, and Q&A sessions that I attended. If he did attend candidate events, then it was for events for which I do not recall receiving an invitation. The week before the election, I noticed a few campaign posters and flyers for my opponent and the other members of his slate in majority-white neighborhoods. I did not see or hear about my

opponent or other members of his slate canvassing in any of the minority neighborhoods in which I campaigned.

23. I never met my opponent or the other members of his slate in the months leading up to the election. The only member of my opponent's slate with whom I was familiar is Harry Grossman because he had already served a term on the Board and was running for re-election.

24. In the May 2017 election, I was defeated by my opponent, Mark Berkowitz. Mr. Berkowitz received 4,153 more votes than I did. I saw Mr. Berkowitz for the first time during the Board meeting when he was being sworn in to take a seat on the Board.

25. In my race, black and Latino voters supported me. Members of the black and Latino communities donated to my campaign and volunteered to support me and the other candidates on my slate. When I campaigned in black and Latino neighborhoods, I was told by many black and Latino voters that they were going to vote for me. Leaders in the black and Latino communities strongly supported me.

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

Dated: Pomona, New York

December^{14th}, 2017


Alexandra Manigo