

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTA MCAULIFFE
INTERMEDIATE SCHOOL PTO, INC., et al.,

Plaintiffs,

v.

BILL DE BLASIO, in his official capacity
as mayor of New York, et al.,

Defendants,

and

TEENS TAKE CHARGE, et al.,

*Defendant-
Intervenors.*

Case No. 1:18-cv-11657

DECLARATION OF O.R.

O.R., pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is O.R., I am under 18 years of age, and I am fully competent to make this declaration.

2. I was born in Queens, New York, and have lived there my entire life.

3. My mother, Elizabeth Pierret, is representing me in this litigation

4. I am an Afro-Latinx junior at Brooklyn Technical High School (“Brooklyn Tech”).

5. I grew up in a majority Latinx neighborhood, so my zoned elementary school was predominantly Latinx as well. My middle school was in a white neighborhood and, though there were some Southeast Asian students and me, it was a predominantly white

school. All my teachers were white there, and the school had more funding than my zoned middle school. My elementary school wasn't bad; it just had lower resources.

6. In middle school, I found out about the Specialized High Schools because the kids in my school were informed about them and on the SHSAT.

7. I also have a cousin who went to one of the Specialized High Schools – Stuyvesant. His mom, my aunt, planted the seed of the idea – of me going to a Specialized High School by talking to me about my cousin. My siblings encouraged me to take the SHSAT as well.

8. One of the main reasons I personally wanted to go is the name: Brooklyn Tech. Just saying I go there has opened doors for me. I also thought I could go to a school where I could be considered one of the best students in New York City. It represented a good opportunity to make a positive impact, so that I could transition from one of the best middle schools to one of the best high schools and, hopefully, an ivy league college.

9. To prepare for the test, I used the books that we were given to me by my middle school. I looked at those books, and took practice tests. That was it. My middle school did not offer a test prep program at the school, and I didn't take an outside test prep program, because I couldn't afford that. But a lot of my friends – and what seemed like most of the kids at the school – paid for test prep.

10. When I actually took the SHSAT, the test was a total shock. I didn't even finish the test. I didn't get a time warning, and from one moment to the next the test was over. I had 10 questions left. What we were given in the prep books was basic and easy; totally different than what was on the actual test. The SHSAT was a totally different

animal. Maybe other kids with Kaplan books were ready, but just with the book I was given, I was not ready.

11. When I found out that I didn't score high enough on the SHSAT, it was a bad day for me. My other friends got into Brooklyn Tech and I didn't. I did get into a good high school, Baccalaureate, so I was going to go there, but I was devastated.

12. But two months later, I got called into the guidance counselor's office, and my math teacher and counselor told me that I had an opportunity to attend Brooklyn Tech through the Discovery Program. My math teacher said it was like a Golden Ticket and I had to take that opportunity. So I did, and I don't regret it.

13. The Discovery Program itself was easy for me – I felt prepared for it. The biggest takeaways for me were that it helped me become familiar with the space—with the school itself—because the program was held at Brooklyn Tech, and that it made me feel that much more motivated at succeeding.

14. There were 120 kids in the Discovery Program at Brooklyn Tech when I was there. My section had 30 kids and there were maybe two Black kids. My section was fairly diverse though, where no group was predominant; there was a little bit of everybody in there.

15. When I finally got to Brooklyn Tech, I knew how to operate and manage the school a little since the Discovery Program had been there. But I was nervous, because I had to prove that going through that program wasn't just a game – I needed to put my best foot forward.

16. Brooklyn Tech is one of the most diverse of the Specialized Schools, but it still is not representative of the City.

17. Even though there's a lack of Black and Latino students at Brooklyn Tech, I have made the best of the situation. For example, since freshman year, most of the friends that I have now are like me, are of Latino background. There are not too many people like me, but we have banded together and we help each other out. And I'm a leader within that group. Aspira, IntegrateNYC, and the Track Team are highlights.

18. I'm involved in Aspira, an organization that is for people of Latinx background – both at school and in the Citywide group. Aspira meets once a week at school, and we meet every other Saturday. We have a City conference every year.

19. I'm on the Aspira Board for the school, but also on the overall, Citywide Board of Aspira-New York. There are maybe 50-60 kids in Aspira from Brooklyn Tech in Brooklyn Tech, and thousands of kids in Aspira New York. It has opened doors for me.

20. In Aspira, we try to bring in everybody so we can help each other progress. It used to be only the Puerto Rican and Latinx kids, but now, we welcome anyone who wants to be involved and supports our mission. There are white kids and kids of every background in Aspira, even though it is mostly Latinx.

21. We always talk at Aspira about what the experience is like of being “that colored kid.” We talk about problems we have and how we are going to tackle them.

22. Through Aspira, I got to know and got involved with the organization IntegrateNYC. I go to IntegrateNYC two to three hours every week on Friday.

23. I live the traditional high school athlete lifestyle, but if I'm not at track or doing homework, I'm at Aspira or Integrate. Track practice is on Monday, Tuesday, and Thursday, and practice ends at 5:30-5:45 pm. I then take the train and get home at 7 or 8 PM, then I have to eat, shower, and then I have so much homework at that point. I can and have been juggling a lot of things.

24. Through Aspira and IntegrateNYC, I've been speaking at rallies, branching out, and working on my leadership skills. For example, I spoke at a rally recently that was about trying to stop arrests and summons of kids in public schools, because almost all of the kids that get arrested or summons in public schools are Black and Latinx.

25. But there are also some negative impacts of the lack of diversity at Brooklyn Tech. There are some instances when I regret going, but in general I don't.

26. There are times where I have been "the only one." For example, I'm the darkest kid on track, and I was the only Black kid in my history class Freshman year.

27. In that history class I was looked to to talk about "the Black perspective." If we talked about slavery, everyone would look at me because I have the darkest skin. When it comes to talking about Black History, I'm the guy that everyone says, "You should know about that, right?"

28. Also, this year in one of my classes we were reading *Fences* by August Wilson, which takes place in the 1950s around a Black family, and it uses the "N word." The teacher, an older white person said that kids, anybody, could just say it. In my section with that teacher they didn't use it – they chose not to – but in other class periods

they did. A student complained with an administrator, but there were no real repercussions.

29. In terms of my future, at Brooklyn Tech, we choose majors, and I chose Law and Society because I hope to be a lawyer some day. But I have succeeded at Brooklyn Tech. I have a 4.0 GPA, I am doing so many extra-curriculars, and I am being a leader. I don't know if I would be where I am and have done so well if I had not gone to Brooklyn Tech.

30. The Discovery Program is important because it works as a pipeline for the kids that couldn't afford test prep, and that's a more diverse group of people. Being that I came through Discovery Program, I felt like I had to work that much harder and to prove my worth. It positively reinforces kids, because now they have this second chance.

31. I think our schools should be representative of New York City. There are really few Black kids, really few Latinx kids – I feel like it would be better if there were more of us in the Specialized High Schools.

32. Before I went to a Specialized High School and connected with IntegrateNYC, I saw that there were few Black kids, but I didn't think about this in the context of the larger problem. But I know now that it's a New York City problem, and I have been working with them, because it's a message that I stand for: Integrate NYC.

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

22 day of March, 2019.

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O.R.