

Exhibit 4

**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 TIFFANY M. BOND

Tiffany Marie Bond, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Tiffany Marie Bond, I am over 18 years of age, and I am fully competent to make this declaration.
2. I was born in Brooklyn, New York, and lived there until 2014. I then moved to Harlem, New York, where I currently reside in a housing complex operated by the New York City Housing Authority. I moved to Harlem because my apartment in Brooklyn was ruined in the aftermath of Hurricane Sandy.
3. My daughter, K.B, is a Black seventh-grade student at St. HOPE Leadership Academy (St. HOPE). K.B. is eligible for free lunch at St. HOPE.

4. K.B. is an honor roll student and is actively engaged in her learning experience. K.B. voluntarily participates in an “extended days” program at St. HOPE to do extra credit, and she is involved in student government.
5. K.B. is very interested in STEM subjects. She is above grade level in science, and she does especially well in math.
6. K.B. is involved in Harlem Children’s Zone afterschool program. In this program she works with a tutor if she needs assistance with homework, and she also participates in a fashion and sequin program that the Harlem Children’s Zone offers.
7. In January 2019, K.B. received a letter from St. HOPE, indicating that she was selected to participate in the school’s SHSAT preparation program. The letter said that K.B.’s teachers believed that she was a good candidate for the prep program, and that she could pass the SHSAT.
8. K.B. started the prep program during the third quarter of this year. The program takes place during the last period of each school day, and replaces one of her enrichment classes, like an art class. K.B. believes that forgoing art class is worth the sacrifice, because the preparation for the SHSAT will increase her chances of being admitted to a Specialized High School.
9. During her third, fourth and fifth grade school years, K.B. attended an elementary school in which a great deal of bullying and fighting occurred. This atmosphere had a negative impact on her. She became a withdrawn, quiet girl, even though she wanted to make friends and she fell behind in her academics. However, after leaving this environment, and entering St. HOPE, she was able to thrive.

10. At St. HOPE, K.B. is an exceptional student. She now has friends and enjoys extracurricular activities.

11. K.B. would like to attend a Specialized High School because they offer courses and programs that most other public high schools do not. The Specialized High Schools offer language courses and enrichment classes such as music and art. They offer an array of sports teams and Olympic-sized swimming pools, as well as chess and even drama clubs. Essentially, at a Specialized High School, K.B. would have the opportunity to join any team, club, or activity she can fathom. I am very optimistic about the possibility of her becoming engaged and exposed to the bevy of opportunities such as these, should she attend a Specialized High School.

12. Also, at a Specialized High School, K.B. would get to meet students who grew up in other parts of the city. I want this exposure for her. K.B. needs to see that the entire world is not just Harlem, and she needs exposure to students who have had experiences different from her own. Similarly, K.B. attends school with almost entirely all Black students. At a Specialized High School, she would meet students from other racial and ethnic backgrounds. This would be great for her. The real world is not all Black, and I want her to meet and befriend individuals who are different from her.

13. On the other hand, I also worry that the Specialized High Schools are not diverse enough. Attending a school with few Black and Latino students could make her feel isolated and unsupported. Black girls need each other for support in predominately white spaces.


14. For this reason, it is important to me and to K.B that the City take steps, including expanding the Discovery program that will make the schools more diverse.

15. Expanding the Discovery program also increases opportunity for disadvantaged students like K.B to attend these competitive schools.

16. Many students do not have access to the resources that best prepare students for success on the SHSAT. While K.B has the opportunity to attend a prep program, she still does not have all of the academic advantages of many of the applicants. The Discovery Program gives disadvantaged students a foot in the door. Regardless of where you come from, all children should have a fair shot for admission to the Specialized High Schools. Everyone should have equal access to these schools because, at the end of the day, they are also public schools.

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

Executed this 28th day of MARCH, 2019.

By: 

Tiffany M. Bond