

Exhibit 6

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 B.M.
(TEENS TAKE CHARGE)**

B.M., pursuant to 28 U.S.C. § 1746, declares the following:

1. I am a student member of Teens Take Charge. I am a leader of the growth team, which is responsible for expanding Teens Take Charge's membership base and its efforts to collaborate with other groups.
2. I am a Latinx student at New Heights Academy Charter School in Hamilton Heights, where I am currently a junior.
3. Teens Take Charge was co-founded in 2017 by New York City public school students Nelson Luna and Whitney Stephenson to address segregation and inequity in New York City schools. Taylor McGraw serves as the adult facilitator for Teens Take Charge.
4. Teens Take Charge is a student-led group that advocates for educational equity. It provides a platform for New York City students to host public events, organize other students, execute advocacy campaigns, and meet directly with education policymakers to address the most critical issues facing our public schools.
5. I joined Teens Take Charge in about January of 2018. My older sister was already a part of Teens Take Charge. I learned about the organization from her and became curious

about its work. Teens Take Charge gives me and other students a platform to share our thoughts and proposals for what should happen in our schools, and an opportunity to learn from each other.

6. Teens Take Charge is open to all New York City high school students. At present, we have approximately fifty active members. Our members come from more than 30 different high schools across all five New York City boroughs. Our membership includes students of many different racial and ethnic identities, including Black, Latinx, White, Middle Eastern, South Asian, East Asian, West African, and Caribbean, who have an interest in school integration and equity. Many of our members have applied for admission to specialized high schools, but few received offers. In some cases, students who were valedictorians or salutatorians of their 8th grade classes did not score high enough on the admissions test to receive an offer.
7. Student members make decisions about the issues Teens Take Charge will focus on, how we present ourselves, and the types of events we want to host. We hold weekly meetings and have five subgroups that focus on specific aspects of Teens Take Charge's work.
8. Teens Take Charge has identified two core goals: expanding student voice and representation in NYC Department of Education decision making, and advocating for fair admission policies for all New York City high schools that lead to integration and equity.
9. Teens Take Charge advocates for integration of specialized high schools because we believe that all students benefit from racially diverse classrooms, because the current environment at specialized high schools is isolating and unwelcoming to the Black and Latinx students who are admitted, and because the system breeds a culture of divisions and elitism that harms all New York City students.
10. In January 2018, Teens Take Charge began calling for admissions changes to New York City's specialized high schools, at which Black and Latinx students are severely underrepresented.
11. In March 2018, Teens Take Charge announced our Enrollment Equity Plan to meaningfully integrate New York City high schools. Along with other proposals, the plan calls for replacing the single-measure multiple-choice entrance exam for specialized high schools with a more holistic method that would draw top students from every middle school in the city.

12. Teens Take Charge has a strong interest in increased integration and equity across New York City schools and specifically at the specialized high schools. The organization has taken numerous efforts to promote these interests.
13. On December 3, 2018, Teens Take Charge held an event titled “The Ones Left Behind” at the Brooklyn Central Library. During the event, seventeen student members of Teens Take Charge, including me, told our stories about inequities in the New York City public schools including in access to specialized high schools. We shared our Enrollment Equity Plan and discussed our goals on stage with leading experts on school segregation.
14. At the event, I spoke about my hopes of attending a Specialized High School, and the disappointment of finding that dream out of reach. I spoke about what disappointed me the most: “Not being told that because of my economic status, I can’t have any sort of hope for a quality education. Not being told that many students who look like me — Latinx and black — barely get accepted to a specialized high school. That at Stuyvesant, my dream school, only 3 percent of students during that school year were Latinx, and only 1 percent were Black.” A copy of my written testimony is attached as Exhibit A.
15. On May 17, 2018, the 64th anniversary of the Supreme Court’s decision in *Brown v. Board of Education*, Teens Take Charge organized an event called “A Day in Our Shoes,” during which policymakers from the Chancellor’s office, the city council, the state legislature, the Panel for Educational Policy and the Mayor’s School Diversity Advisory Group visited schools and met students across the city to discuss issues of race and equity, including the lack of equity in admissions to specialized high schools. The event also included a luncheon to commemorate *Brown*, discuss ongoing issues of equity in New York City schools, and commit to future action.
16. On March 29, 2018, Teens Take Charge held an event entitled “We Regret to Inform You” at the Brooklyn Central Library that addressed inequities in New York City’s high school admissions process, a key driver of high school segregation. Teens Take Charge student members shared personal testimony about their experience of going through the process and its unequal outcomes. We also shared our Enrollment Equity Plan to promote integration and increase academic diversity across the school system.
17. On December 7, 2017, six Teens Take Charge student members, including my sister and our co-founders, Nelson Luna and Whitney Stephenson, presented testimony at a City Council hearing on school integration to encourage city leaders to do more to promote integration across the school system, including addressing school screening as a barrier to integration.

18. In addition to live interactive events, we share our poems and written testimony through the press, on our website, and on social media in order to increase awareness of inequity in the school system and to build support for change.
19. Teens Take Charge member Wyatt Perez wrote about the inequality he saw between his own education and the education others received at Bronx Science. Of the SHSAT he wrote, “the exam is not an accurate measure of a student’s ability to perform well at a specialized high school. It is more so empirical evidence of the achievement gap.” A Copy of Wyatt’s testimony is attached as Exhibit B.
20. Teens Take Charge member Yacine Fall wrote about her experience of attending an elite, majority white high school and recognizing the disparity between the school and those in the Harlem neighborhood where she lived. “To whom it should concern,” she wrote, “there’s a plague of poverty in my neighborhood that eats at our schools. To whom it should concern there are two different worlds only five miles apart. Please tell me what happened.” A Copy of Yacine’s testimony is attached as Exhibit C.
21. In December 2018, Teens Take Charge press team leader Ayana Smith wrote an op-ed in The Daily News titled, “Stop relying on just one test.” She wrote, “I was the valedictorian of my eighth-grade class and earned a special honor for never missing a day of school, but that wasn’t enough to help me, or others like me, gain admission into schools like American Studies. Instead a single specialty test was used to gauge my intelligence, work ethic and worthiness.” Ayana is from a school district in the Bronx that sends few students to specialized high schools. In addition to testifying about this issue at Teens Take Charge events, she spoke publicly about the need to diversify specialized high schools at a recent parent meeting in Manhattan’s District 2. A Copy of Ayana’s op-ed is attached as Exhibit D.
22. In January 2019, Teens Take Charge policy team leader Coco Rhum wrote an op-ed describing her experience in the New York City school system in the New York Post. Coco attended an elementary school that was over 75 percent white and economically advantaged, and a coveted middle school that screens for test scores and grades before applying to high schools. She describes her experience with the notoriously complex process as “smooth sailing.” “My family purchased a prep book for the SHSAT, the exam to get into the eight elite high schools, and took me to practice tests,” she writes. “I aced the test with a score of 561 — enough to get accepted to Brooklyn Technical HS, my first choice among the elites.” Coco chose to attend another selective high school, the Beacon School. Coco recognized that her experience was not the norm, and that New York City school district’s de facto segregation and inequality harmed students of color. For this

reason, Coco supports doing away with the SHSAT admissions test for specialized high schools. A Copy of Coco's op-ed is attached as Exhibit E.

23. Members of Teens Take Charge participate on a volunteer basis, and it is supported largely by pro bono and volunteer work from adults. As a result, Teens Take Charge has limited resources and must make decisions about how to use our time and limited funds to advance our goals of increasing integration and equity in New York City schools. Together, we have spent hundreds of hours advocating for the New York City Department of Education and other policy makers to do more to integrate New York City schools and to make admissions to specialized high schools more equitable.
24. Teens Take Charge is advocating for changes to the Specialized High School admissions process that would do more to increase equitable access to these schools than is achieved through the current Department of Education's admissions process. If it were successful, Plaintiff's challenge to New York City's present efforts to expand access to the specialized high schools would directly undermine Teens Take Charge's central mission. It would also frustrate Teens Take Charge's ongoing efforts to expand access to specialized high schools and to increase integration across the New York City school system.

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

Executed March 21, 2019

By: B.M

B. M.

Exhibit A

Testimony of B. M., a junior at New Heights Academy Charter School in Manhattan

‘Are you sure? You know there are many students who have been studying for this test since last year and the summer.’ These were the words from my guidance counselor that rang in my head because like many students, I had some sort of hope that I could have a seat in a specialized high school....

That’s what disappointed me the most: not being told the whole truth ... Not being told that because of my economic status, I can’t have any sort of hope for a quality education. Not being told that many students who look like me — Latinx and black — barely get accepted to a specialized high school. That at Stuyvesant, my dream school, only 3 percent of students during that school year were Latinx, and only 1 percent were black.

It is always us — Latinx and black students — who are left behind because either many of us aren’t encouraged or are limited because we are underestimated in the work we can do. So you’re telling me that countless nights of doing homework at 1 a.m. because I didn’t have a proper desk to work at during my middle school years isn’t hard work?

A few times a week for a couple of weeks, I would approach my eighth-grade algebra teacher to ask for help with the math section of the SHSAT because of the fear of being left behind or not being good enough to score high for this exam. Unfortunately, little did I know that I was already behind. This was math that I should have understood except I didn’t, because although I was one of the top students at my middle school, I didn’t have enough knowledge. I was never encouraged by an adult to strive to go somewhere such as Stuyvesant or Brooklyn Tech. Instead, we were told to just transfer to a regular public high school.

I didn’t know what were the ‘good schools.’

Exhibit B

TEENS TAKE CHARGE (/)

[HOME \(/\)](#) [VOICES](#) [EVENTS \(/EVENTS\)](#) [POLICY](#) [JOIN US](#)

[SUPPORT US \(/DONATE\)](#) [STATISTICS \(/WHY\)](#) [PRESS \(/PRESS\)](#)

[ABOUT \(/ABOUT\)](#)

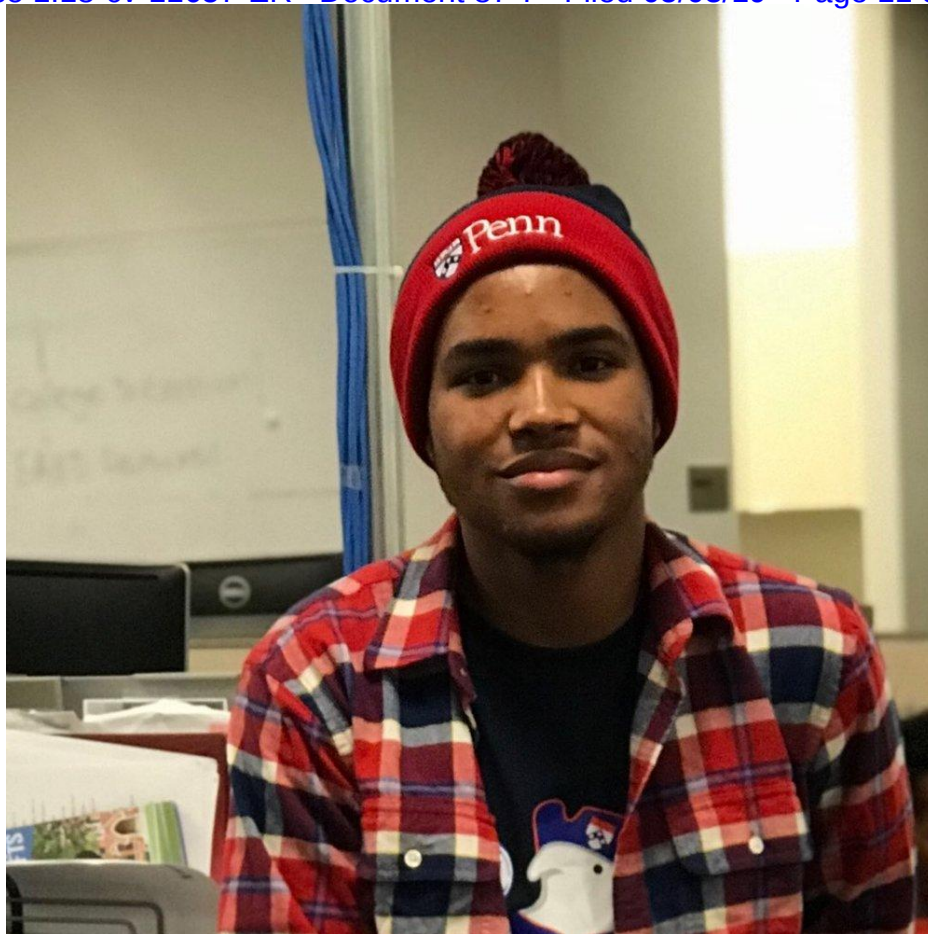
[APRIL 6, 2018 \(/TESTIMONY-1/2017/11/16/WYATT-PEREZ\)](#)

WYATT PEREZ (/TESTIMONY- 1/2017/11/16/WYATT. PEREZ)

[TESTIMONY \(/TESTIMONY-1?CATEGORY=TESTIMONY\)](#)

“

New York City, known for its diversity and embrace of immigrants, has one of the most segregated school systems in the country.



Wyatt is a senior at the Eagle Academy for Young Men in the Bronx. He is headed to the University of Pennsylvania.

Every time I see large groups of Caucasian teenagers on the train, there are usually two reasons why: the Yankees are playing or the kids from Bronx Science have been dismissed.

On the hourlong trip from my public high school on the outskirts of the South Bronx to a college prep program in lower Manhattan, I see the Bronx Science students get off the train at 86th or 59th Street. Like everyone who has ever been on a train before, I sometimes peek at what the passenger next is reading, watching, etc. As my head aches at the thought of thick practice SAT packets awaiting me, Bronx Science kids quickly pack up their complex work into their Herschel bags and go home to rest up.

Later, after two hours of supplemental instruction in math and english, my friends and I will take the train back north and get off at 167th Street or Burnside Avenue. We might make it home by nine. All of this work is done with hopes of attending the same prestigious colleges as the Bronx Science kids – that is, if we receive enough financial aid.

The average household income for 86th Street's zip code is about \$340,000. Burnside's zip code? \$31,000. The differences in school funding are also two distant numbers. Contributions from parents, alumni, and other private funders give schools like Bronx Science more resources than others. My school, which is located in between a mental health center and a halfway house, seems to exist in a funding desert.

New York City, known for its diversity and embrace of immigrants, has one of the most segregated school systems in the country. Although the high school admissions process theoretically gives all students lots of choices, low-income black and Latino students end up clustered in the same schools year after year. Meanwhile, students at selective or specialized high schools are mostly white or Asian and affluent. Out of the 5,078 students that got accepted into specialized high schools this year, only 524 are black or Latino – in a school system where 7 in 10 students are black or Latino. At Stuyvesant High, considered the city's best, only 13 of the 1,000 available seats were given to black students.

My school is 96% black or Latino and 82% of the students meet the requirements for free or reduced price lunch. The school promotes helping students of color from low-income backgrounds graduate and redefine statistics. But the inferior academic instruction at my school, layered on top of years of inferior instruction in elementary and middle schools, cripples students' chances. My peers perform poorly on Regents Exams and SATs, evidence that they are missing out on material essential for college success.

My school is one of at least 45 high schools in New York City with above average graduation rates that mask college readiness rates below 20%. At my school, 51% of the class of 2016 graduated and went on to college; however, only 9% were "college ready" based on CUNY's standards. The same graduating class at Bronx Science had a 100% graduation rate and a 100% college readiness rate. My school's average SAT score was an 816. Bronx Science? 1389.

Evidently, there are sharp contrasts between the education provided to affluent and low-income students. The idea of educational equality is flawed in the sense that a child's early years, which are the most essential to one's education, depend largely on a family's income. Even if schools were "equal," they could not compensate for years of being at a disadvantage. The problem is, schools widen those existing inequalities.

The admissions test for specialized high schools is flawed. I'll admit that I took the test a few years ago and did not do well enough to get accepted, but the exam is not an accurate measure of a student's ability to perform well at a specialized high school. It is

more so empirical evidence of the achievement gap. Specialized high schools should take more factors, such as academic portfolios and personal statements, into consideration when managing admissions.

I'll continue to make the most of the opportunities that have come my way. As I start my senior year of high school, I think of my competition, the Bronx Science kids of the world. I think of the kids who have grown up in the 86th Streets of other states and countries. For now, I may only see them on the train, but next fall, I'll see them at freshman orientation.

♥ 4 LIKES ↪ SHARE

< Coco Rhum (/testimony-1/2018/4/6/coco-rhum)

Sabrina DuQuesnay >

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Exhibit C

TEENS TAKE CHARGE (/)

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MAY 19, 2017 (/TESTIMONY-1/2017/5/19/YACINE-FALL)

YACINE FALL
(/TESTIMONY-
1/2017
/5/19/YACINE-FALL)

TESTIMONY (/TESTIMONY-1?CATEGORY=TESTIMONY)

“

What happened in 5 miles that determined who got to graduate, who went to college, who got to explore their talents, who learned to question?



Yacine is a senior at Beacon High School in Manhattan. She's headed to Smith College in the fall.

To Whom it Should Concern:

I live in the center of Harlem where I attended middle school, but now I go to an elite public high school in midtown. Two different worlds. Only 5 miles apart.

At my high school 93% of students graduate college ready. At my zoned school in Harlem? 7%. I was one of few students in my middle school to go through the entire high catalogue to find a high school outside of my neighborhood with more resources. I didn't realize that an A in Harlem was not the same as an A in a majority white high school on the upper west side. I had to go through this process on my own as a low income child of immigrants who did not understand the American education system. At age 13, I had to create my own definition of a good high school, not knowing that the high school I attended would largely impact my future college and career.

In my school, I have the privilege of walking through unlocked doors.

Vast hallways, white walls, high ceilings, bright lights.

My own textbooks that I can bring home if I need to.

Multiple recording studios.

Professional 600 dollar cameras that I can rent for a day.

A psychiatrist is offered.

Vegans are accommodated.

Teachers do not have to teach to a test and have flexibility in creating their own lessons, where group discussions about current events are far more common than multiple choice exams.

I go to a school where the majority of students are white, and I wonder how I made it there despite living in a neighborhood where opportunity is slight. Where teachers only stay in schools for 2 years before deciding they've had enough. Where poverty is high and expectations are low, and I cannot help but think, what made it this way? What happened in 5 miles that determined who got to graduate, who went to college, who got to explore their talents, who learned to question?

To whom it should concern, there's a plague of poverty in my neighborhood that eats at our schools. To whom it should concern there are two different worlds only five miles apart. Please tell me what happened.

P.S. I've always been told that I had to work two times as hard. I put in extra work and hours into academics and studying so I would not end up at my local high school where I would be cast away as a statistic. I worked through the system to find ways to open up doors for myself; going through ancient books to find the rules to a foreign game.

I was a black girl who was the daughter of immigrants with education the only hope of redefining her life. But it seemed like the bar was always set out of reach for people like me and most of our time was spent elevating ourselves to reach the bar instead of figuring out how to surpass it. It was remarkable that I "beat the odds" and thought I'd find greener grass, but instead I was introduced to an elite education system that had no space for me.

I walked into a school where my black and brown peers struggled to stay afloat and were barely passing their classes. I came into a school where we were made to leave our identities and struggles out of the classroom. My elite school thought diversity ended when you put black and white students together and did not create a space for us to learn from those identities. No one told me about the rooms and spaces I would need to create for myself in order to survive. I remember a teacher saying he wouldn't learn to say the correct pronunciation of my name and another one going as far to calling me an "illegal refugee" within school walls.

The system tells us that getting into elite institutions is the goal to have a better education, but they do not know how to incorporate black and brown identities into their classrooms. I wonder why the more elite opportunities I can attain the more I feel I have to leave parts of me behind.

I am useful beyond numbers, so I ask: when will you be able to find talented black and brown students, and love us, too?

♥ 22 LIKES < SHARE

< [Tonie Chase \(/testimony-1/2017/5/19/tonie-chase\)](#)

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Exhibit D

EXCLUSIVE Former Hooters waitress says breastrănt favored her white co



Ex slugger Jose Canseco accuses Alex Rodriguez of cheating on fiancée Jennifer



Woman arrested after drinking six pack of beer in Target dressing room



Fieldston school race controversy explodes in protest

OPINION

Stop relying on just one test: Mayor de Blasio is right to try to want to turn away from the SHSAT high school admissions exam

By AYANA SMITH
DEC 05, 2018 | 5:00 AM



A dream that wasn't at the High School of American Studies. (Michael Schwartz for New York Daily News)

When I was younger, I dreamed of going to the High School of American Studies, one of the city's eight specialized high schools, where admission is based solely on a student's performance on a single test. I imagined strolling through wide hallways lined with cases of trophies for superb academics and athletics. I'd be an active member in a like-minded, tight-knit school community.

be worth the commute. And I knew exactly how to get there: I had to do well on the Specialized High School Admissions Test.

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When the big day came in the fall of eighth grade, I stood outside of my testing site, Bronx High School of Science, reflecting on the events that led up to it.

After spending my elementary years struggling to articulate my responses in class, covering in shame as I took home failing grades, I was finally able to meet my academic potential when I moved from Harlem to the Bronx. At my new school, teachers were attentive and offered tutoring outside of class, an opportunity of which I took full advantage. I started receiving top scores on state tests and performing at the top of my class.

PAID POST

What Is This?



The Tragic Story of "Green Boots," The Frozen Body On Mt. Everest That Hikers Use As A Checkpoint [↗](#)

As a reporter from the BBC once stated, "When [Mount] Everest takes a life, it also keeps it." One of Everest's most famous residents, Green Boots, resides at a...

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Because I was outperforming my fellow low-income students of color, I qualified for DREAM, a free SHSAT preparatory program run by the city's Department of Education.

The summer after seventh grade, I woke up at 8:30 a.m. every weekday to spend five hours learning the concepts on the exam, concepts I had not been taught in school. The program continued in the fall of eighth grade after school hours.

Although I made it to every session and worked my hardest to capitalize on the opportunity, preparing for the SHSAT outside of DREAM was tedious. My middle school made little effort to help students get ready. My teachers did not know how to explain the practice test questions because they did not understand the questions themselves.

Meanwhile, my responsibilities outside the classroom continued to mount. Varsity volleyball practice and spoken-word club meetings demanded much of my time. Both of my parents were always busy with work. This left an immense responsibility in my hands: my younger sister.

I carried all of those burdens with me into my testing room at Bronx Science and gave it my best. The results came months later. I wasn't admitted into American Studies or any other specialized high school.

It crushed me. I was the valedictorian of my eighth-grade class and earned a special honor for never missing a day of school, but that wasn't enough to help me, or others like me, gain admission into schools like American Studies. Instead, a single specialty test was used to gauge my intelligence, work ethic and worthiness.

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Replay

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The mayor's proposal to admit students based on a more equitable policy has been met with vehement opposition from people with false presumptions about students like me. Many assume that low-income students of color like me are just "too lazy" to prepare for the exam, and that kids who do better on the SHSAT prove they "deserve" to get in.

Replacing the SHSAT with a more balanced approach is about taking a holistic approach that factors in academic excellence, motivation and grit throughout a student's entire middle school career. To me, that's better than relying on a single test, any day of the week.

Smith is a senior at University Heights High School in the Bronx and a member of Teens Take Charge, a student-led coalition that advocates for equity in New York City schools.

Topics: [High Schools](#)

Exhibit E

TEENS TAKE CHARGE (/)

JOIN US

STATISTICS (/WHY)

PRESS (/PRESS)

ABOUT (/ABOUT)

DONATE (/DONATE)

APRIL 6, 2018 (/TESTIMONY-1/2018/4/6/COCO-RHUM)

COCO RHUM
(/TESTIMONY-
1/2018/4/6/COCO-
RHUM)

TESTIMONY (/TESTIMONY-1?CATEGORY=TESTIMONY)

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I had good odds because I am a privileged student in an unequal school system.

When I applied to high school I navigated through the process nervously but with a clear plan. I knew the steps to take, the “good” schools to go to — these were the schools to put first and second on my list, I knew how to speak thoughtfully about myself for my Beacon interview, how to unscramble a paragraph for the SHSAT, and I knew how to pirouette for my LaGuardia audition. In a nutshell, I was prepared.

I felt the stress of the process, but the stress I experienced was, well, relatively small. I was energized and excited. I envisioned myself in schools with small classes, art supplies and engaged teachers, and this was all because I was given the tools that allowed me to see myself excelling in rigorous environments.

I also remember being conscious of how many other students in my middle school were applying to the school I go to now, Beacon High School, a well resourced school that’s more competitive than Harvard. I did not think of the miniscule acceptance rate; instead, I thought that I had pretty good odds, and I did. I had good odds because I am a privileged student in an unequal school system. I come from a neighborhood that is also mainly white and wealthy, and through this, I have benefitted from public schools that have



Coco is a student at Beacon High School in Manhattan.

more resources, better teachers and helped me to grow as a person. These are the facts of the system, the New York City public school system, the largest and most segregated in the country.

My experience is the norm for students who come from similar racial and socioeconomic backgrounds, and this is not because I am smarter or more deserving. We regret to inform you, the system is broken and unequal and it CANNOT go on like this anymore. Students, ALL students, not just those of privilege, have a right to an education of equal quality. We have a right to learn beside and from students of differing backgrounds.

This is no radical statement, simply an extension of how a public school system is supposed to function. Yet, in 2018, 64 years after the *Brown v. Board of Education* decision, we have to continue to fight for our rights. So, today we will make history. We are the students and we are angry and we are tired and WE are going to fight for ourselves and each other and for all the students before and after us and no one can stop us.

♥ 9 LIKES ↪ SHARE

< Dulce Marquez (/testimony-1/2018/4/6/dulce-marquez)

Wyatt Perez >

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