

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

PARENTS DEFENDING EDUCATION,
Plaintiff,

v.

CROTON-HARMON UNION FREE
SCHOOL DISTRICT, *et al.,*
Defendants.

Case No. 7:24-cv-4485

SUPPLEMENTAL DECLARATION OF NICOLE NEILY

1. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.

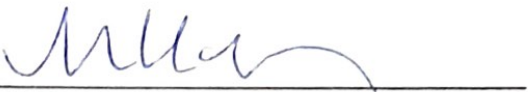
2. I am the President of Parents Defending Education.

3. I am personally familiar with, and have spoken to, PDE members whose children are enrolled in the Croton-Harmon Union Free School District, including those discussed in the complaint and whose declarations have been provided in this case.

4. PDE and its members in the District, including Parents A-C, are aware that after the filing of this suit and the preliminary-injunction motion, the District issued a statement addressing the suit, the challenged policies, and PDE. Attached as Exhibit Q is a true and accurate copy of the statement issued by the District on June 13, 2024, at 4:00 p.m., to every parent with children attending a school in the District. The statement was not available at the time of the filing of this case or the preliminary-injunction motion.

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

Executed on June 17, 2024.



Nicole Neily
President, Parents Defending Education

Exhibit Q

June 13 Community Update

Posted by Croton-Harmon Union Free School District on Thursday, Jun 13 at 4:00 PM in Croton-Harmon Union Free School District



CROTON-HARMON UNION FREE SCHOOL DISTRICT

10 Gerstein Street
Croton-on-Hudson, NY 10598

Mr. Stephen Walker
Superintendent of Schools

June 13, 2024

Dear Croton-Harmon Community,

We are incredibly proud of our schools. All of us, collectively, work to ensure that they are places where our community's young people feel safe, supported, and embraced for the unique individuals that they are. We believe our schools are, and always have been, part of the foundation of what makes our community special.

Yesterday, we became aware that our school district will be served with a federal lawsuit brought by a group called *Parents Defending Education*. Among what the lawsuit alleges is that our policies and practices violate the First Amendment by not allowing for students to make offensive statements toward other students based on their race, immigration status, sexual orientation, and gender identity.

Contrary to what the *Parents Defending Education* group may assert, we are proud that there is no place in our schools for hurtful and hateful rhetoric. When we envision "What School Can Be," we see schools as places where students feel comfortable in, and celebrated for, their own identity and are positioned to make positive contributions to our society. Speech that is harmful to students, which *Parents Defending Education* suggests should be permitted in its lawsuit, is not welcome in our schools, and does not align with our beliefs as a school district community. We know that this isn't the first time that our incredible schools have been made targets of political agendas, and we will not allow a lawsuit, or other extraneous political factors, to distract us from the work of making that vision into a reality for all of our students, staff members, and community.

Thank you for your incredible and ongoing support of our schools. If you have any questions

about this communication, please feel free to contact us directly.

With Great Tiger Pride,

The Croton-Harmon Administrative Team

[View in ParentSquare](#)