

SUPREME COURT OF NEW YORK
COUNTY OF KINGS

X

In the Matter of

JOANNE ADAMS, individually, and on behalf of her child,
Y.A., who attends P.S. 25; SHAKEMA ARMSTEAD,
individually, and on behalf of her child, D.M., who attends
P.S. 25; and CRYSTAL WILLIAMS, individually, and on
behalf of her two children, H.T. and K.T., both of whom
attend P.S. 25,

Index No.: 506124/2018

AFFIDAVIT OF

**IN SUPPORT OF
PRELIMINARY
INJUNCTION**

Petitioners,

-against-

BOARD OF EDUCATION OF THE CITY OF
NEW YORK,

Respondent,

For an Order, Pursuant to Article 78 of the CPLR and
Section 2590-e(11) of the Education Law, Annulling the
Decision to Close P.S. 25 in the County of Kings.

X

STATE OF NEW YORK)
 RIETH) ss.:
COUNTY OF KINGS)

CRYSTAL WILLIAMS, being duly sworn, deposes and says:

1. I am Crystal Williams, and I make this affidavit in further support of the application for a preliminary injunction to keep P.S. 25 from closing.
2. I am the parent of Halahy Thomas, who attends P.S. 25.
3. My child is now in the 3rd grade.
4. I am the parent of Keita Thomas who attends P.S. 25
5. Keita is in the 2nd grade.
6. I am also the Vice President of the P.S. 25 PTA.

7. I am not confused about the transfer process, nor do I believe that I am at a disadvantage by waiting for the hearing process to determine what will happen to our school. I have no problem waiting for the Court to resolve this case. I would prefer of course that it do so quickly, but I am willing to wait until the Court decides what should happen.
8. I am available to testify if necessary, and I believe other parents are prepared to testify as well as to why we want to keep the school open.
9. More than two thirds of all P. S. 25 parents have written letters and signed petitions to keep the school open. Sixty eight letters were delivered to the DOE before the PEP voted on February 28, 2018 to close the school.
10. I don't want the school to close. I also don't believe the transfer options we were given by the DOE are good ones as none of these schools are of the same high quality as P.S. 25.
11. As the city admits in its legal response to our lawsuit, "according to the DOE's school performance dashboard, P.S. 25 is the second best public elementary school in Brooklyn, and the fourth best in the City."
12. In addition, many of the school choices the DOE gave us to apply to are far from my home, and/or overcrowded.
13. If we transferred, all of the schools we were given to apply to have class sizes much larger than those at P.S. 25. Right now, we have class sizes of between 10 and 18 students in a class.
14. Learning in a small class is a huge benefit to my children. It is has allowed my children to achieve academically and succeed at a high level. P.S. 25 allows the

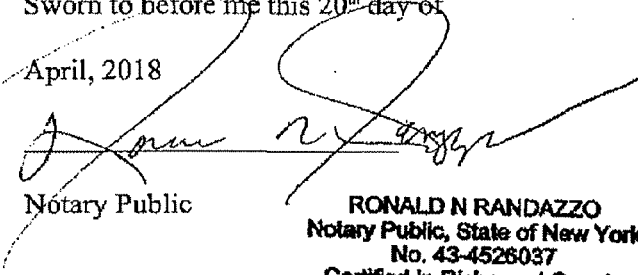
teachers to concentrate on my children and to provide her with personal, individual attention.

- 15. The school's degree of parent involvement is wonderful. We are a close-knit community and like a family.
- 16. The school also partners with other organizations to provide our children with opportunities for enhanced education, like Activity Works, Learning Leaders, Gift of Sight, Hip Hop Public Health, Safety City, Shape-Up New York, PENCIL, LeAp, Pricewaterhousecoopers, NSA Supermarket, Urban Dove, Family Center, Verizon, DOVE, and the Men's Lions Club. Students also participate in the Morgan Library Museum program, the Morgan Book Project: Arts at the Core of Collaboration and the Cross Curricular Skills program. The school's collaborative partnerships support our school's community in a variety of ways, including their social, emotional, and academic growth and development.
- 17. I strongly urge this Court not to allow the DOE to close our school and to issue an injunction to keep the school open.

Crystal Williams

Dated: April 20, 2018
Brooklyn, New York

Sworn to before me this 20th day of
April, 2018


Notary Public

RONALD N RANDAZZO
Notary Public, State of New York
No. 43-4526037
Certified in Richmond County
Commission Expires 1/31/2019