

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

E.L., a minor, by LA'SHIEKA WHITE the)
mother, legal guardian, and next friend of E.L.,)

Plaintiff,)

v.)

VOLUNTARY INTERDISTRICT CHOICE)
CORPORATION,)

Defendant.)

JURY TRIAL DEMANDED

Case No.:

4:16-cv-00629-RLW

**DECLARATION OF
LA'SHIEKA WHITE IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, La'Shieka White, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge and, if called as a witness, I could and would competently testify thereto under oath. As to those matters which reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.

2. I am the mother and legal guardian of E.L.

3. Our family lived in the City of St. Louis until March 2016. We lived in a neighborhood where my car was vandalized many times, and I regularly heard gunshots. We decided to move the family into a bigger house in a safer community in Maryland Heights, Missouri. I have yet to experience any crime or hear any gunshots since we moved.

4. I want E.L. to remain at Gateway Science Academy and attend that school through at least the Fifth Grade.

5. I learned of the race-based St. Louis Student Transfer Program when I was given the enrollment guidelines for students seeking to enroll at Gateway Science Academy. A true and correct copy of the guidelines I was given is attached to this declaration as Exhibit A.

6. I was shocked when I learned that E.L. would not be able to continue his enrollment at Gateway Science Academy because of his race.

7. E.L. has attended Gateway Science Academy since kindergarten. At Gateway, E.L. has made friends, stayed out of trouble, and excelled academically.

8. E.L. currently has a 3.79 GPA at Gateway Science Academy.

9. E.L. is a good student, non-disruptive, and is well-liked at Gateway Science Academy. The school supports his continued enrollment.

10. If not for the transfer program, E.L. would have already enrolled in Gateway Science Academy for the 2016-2017 school year, which begins at Gateway on August 10, 2016.

11. If the transfer program is not enjoined I will be forced to enroll Edmund in a public school located in the Pattonville School District.

12. I feel stigmatized by the transfer program. The program sends the invidious message that black students are categorically incapable of improving City schools.

13. I have raised E.L. to treat everyone equally on the basis of race. However, as a result of the Transfer Program, I explained to E.L. that he is prohibited from attending Gateway because of his skin color.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 6, 2016 at Maryland Heights, Missouri.

LA'SHIEKA WHITE