

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DEBORAH ALEXANDER, et al.,	: Case No. 1:24-cv-2224-DG-JRC
	:
Plaintiffs,	:
	:
v.	:
	:
TAJH SUTTON, et al.,	:
	:
Defendants.	:
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DECLARATION OF MAUD MARON

I, Maud Maron, declare and state as follows:

1. On April 17, 2024, at 10:48 pm, I received an email from the Department of Education notifying me that I have been found guilty under Regulation D-210.

2. Attached as Exhibit I is a true and correct copy of the “determination.”

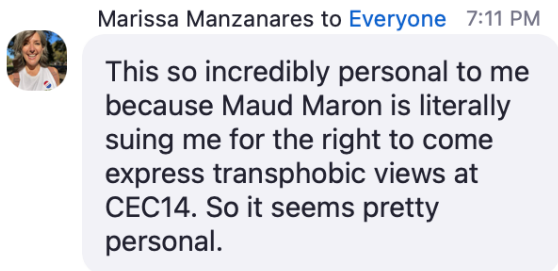
3. I have been found guilty of making “derogatory and offensive comments” about an unspecified student, and “conduct that serves to harass, intimidate, or threaten, including but not limited to frequent verbal abuse and unnecessary aggressive speech that serves to intimidate and cause others to have concern for their personal safety.”

4. The determination threatens to suspend or remove me from office.

5. I have no idea what conduct I’ve been found guilty of, as I have never been provided with copies of the charges and do not know which charge this relates to.

6. However, I have only been accused of exercising my First Amendment rights to criticize transgender theory, and criticize an anonymous editorialist for not putting his or her name to an editorial that I found offensive and absurd.

7. Last night, I also attended the Community Education Council 2 meeting. Marissa Manzanares attended virtually, and complained that I was “suing [her] for the right to come express transphobic views at CEC 14.” This is a true and correct copy of her message



8. Obviously Manzanares is aware of this lawsuit, and insists that she can prohibit me from expressing “transphobic views” in public, in violation of my First Amendment rights.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2024.

A handwritten signature in black ink that reads "Maud Maron".

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Maud Maron