

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF ALBEMARLE

C [REDACTED] and T [REDACTED] I [REDACTED];

R.I. and V.I., minors, by and through their parents, C [REDACTED] and T [REDACTED] I [REDACTED], as the minors' next friend;

M [REDACTED] and M [REDACTED]
M [REDACTED];

P.M., a minor, by and through the minor's parents, M [REDACTED] and M [REDACTED] M [REDACTED], as the minor's next friend;

K [REDACTED] and M [REDACTED] G [REDACTED];

T.G. and N.G., minors, by and through their parents, K [REDACTED] and M [REDACTED] G [REDACTED], as the minors' next friend;

E [REDACTED] and T [REDACTED] D. T [REDACTED];

D.T. and H.T., minors, by and through their parents, E [REDACTED] and D [REDACTED] T [REDACTED], as the minors' next friend;

M [REDACTED] R [REDACTED]; and

L.R., a minor, by and through the minor's parent, M [REDACTED] R [REDACTED], as the minor's next friend;

Plaintiffs,

v.

ALBEMARLE COUNTY SCHOOL BOARD;

MATTHEW S. HAAS, Superintendent, in his official capacity; and

Case No. CL21001737-00

DECLARATION OF PLAINTIFF
MARGARET GOKTURK IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION

BERNARD HAIRSTON, Assistant
Superintendent for School Community
Empowerment, in his official capacity;

Defendants.

I, Margaret Gokturk, declare as follows:

1. I am a citizen of the United States and a resident of Ivy, Virginia. I am over the age of eighteen and competent to testify. I make this declaration based on personal knowledge.
2. My husband Kemal is also a U.S. citizen and resident of Ivy, Virginia. Kemal and I are the parents and natural guardians of T.G. and N.G., both minors, U.S. citizens, and residents of Ivy, Virginia. At all times relevant to this matter, T.G. and N.G. have been students in Albemarle County Public Schools.
3. I grew up in the state of Georgia. My father was the first in his family to graduate from college and my mother taught middle school English. My parents always taught me to value education and hard work.
4. My parents also instilled in me a strong belief that everyone should be treated equally, with love and respect regardless of their race or ethnicity. This has been particularly important to my family because we have had close family members who are white, black, biracial, and immigrants from Vietnam and Turkey.
5. My husband, Kemal, is the first generation in his family to grow up in the United States. His father immigrated here from Turkey. He raised Kemal and his sisters to value hard work and to believe that success was possible regardless of your race or ethnic background. Kemal watched his dad live these values out and build a successful medical practice in the United States. As a result, Kemal has emphasized work ethic and education for our kids without limitation based on race and ethnicity.
6. Kemal and I both desire to provide the best education for our children. Years ago, we were dissatisfied with the schools in Georgia and were on a path

toward costly private schooling. So, I switched employers and took a job as a traveling analyst and researched school systems in different areas of the country. My research revealed that Albemarle County had a reputation for excellent public schools.

7. After much discernment, Kemal and I decided that it was best for our family to move to Charlottesville so that our children could benefit from the public schools in Albemarle County. Kemal quit his job in Georgia, I took a job in Charlottesville, and we relocated to Albemarle County. Kemal was unemployed for two years as a result.
8. When our family moved to Charlottesville, we specifically bought a house in the area zoned to Murray Elementary and Henley Middle School, both part of the Albemarle County School District, because those schools are so highly rated, even within Albemarle County. We now have two children, T.G. and N.G., currently attending Murray Elementary School. T.G. is in 4th grade and N.G. is in 2nd grade.
9. Even though we moved to Albemarle County for the public schools, Kemal and I are seriously considering withdrawing our children from the School District because of the racial discrimination we see in the school under the District's "Anti-racism" Policy ("Policy"). This discrimination violates our sincerely held beliefs.
10. I believe that all people are valuable, created equal, and that everyone deserves to be treated with respect and dignity. I believe that discrimination based on race is morally wrong and that no person should be treated worse than anyone else because of their race or ethnicity. I do not want my children to judge or define others by race, or to be judged or defined by race. Based upon conversations we have had, I believe that Kemal agrees with these beliefs and values.

11. We are instilling these values in our children and believe it is particularly important given the diversity in their own families. I would never want my children to look at their biracial cousins differently because of their race, and I would never want my nieces to look differently at my children because of their race. I believe that the Albemarle County School District's "Anti-racism" Policy and the curriculum coming out of that policy encourages just that result.
12. I have reviewed the Policy and many of the District's Policy-related documents and training materials. These documents instruct students and District staff to view everyone (and everything) through the lens of race. They contain instruction based on critical theory; they group people together exclusively by their race and then label one group (white) as privileged and dominant while all other races are subordinate.
13. The ideology laid out in the Policy and related documents is not presented as an idea or even a theory. It's presented as irrefutable truth about the world. And it is clear in reviewing these documents that school staff and students are expected to agree with it. They are told that every person must choose between being an "anti-racist" activist or a racist.
14. I object to the Policy, its curriculum, and the ideology that it is pushing. I object to my children being treated differently based on race, particularly at school where they should receive equal treatment and educational opportunities. I also object to the school teaching my children to focus on their race and how their race differs from that of their peers and family. I also object to my children being taught that racial differences must be acknowledged as primary predictors of attitudes, behaviors, and outcomes. In sum, I object to my children being pressured to agree with the school's so-called "anti-racist" ideology.
15. I believe that people should be colorblind, treating everyone with the same value, dignity, respect, and kindness without regard for their race or ethnicity.

I am raising my children to be colorblind, and it is important to me that they view and treat other people in this way.

16. My beliefs on race come from my family background but also from my faith. I am a member of the Protestant Christian faith, and the way I raise my children stems from that faith.
17. My Christian faith governs the way I think about all of human life, including human nature, morality, and identity, and because of it, I have sincerely-held religious beliefs in these areas.
18. My convictions concerning human nature, the purpose and meaning of life, and ethical standards that govern human conduct are drawn from the Bible.
19. My faith teaches me that each person is made in the image of God, that every person possesses inherent dignity and value, and that all people must be treated as such. Consistent with my faith, I endeavor to treat every person—no matter the person's race, color, or creed—with dignity, love, and care. I want my children to do the same.
20. My faith teaches me that God creates all people equal, and that a person's race has no relation to that person's inherent dignity as a child of God. I believe that all people should receive equal and loving treatment and that a person's race should not determine how he or she is treated.
21. I oppose racism in every form because it contradicts my religious and philosophical beliefs and the foundational principles of our country. Kemal and I object to the school training our children in religious and philosophical beliefs about race that violate our sincerely-held beliefs.
22. My faith also teaches me that parents are the primary educators of their children in all matters and have the duty to educate their children.
23. Kemal and I share the philosophical belief that parents have the fundamental right and responsibility to control their children's education and upbringing.

24. Defendants' racial discrimination—under the guise of trying to eliminate discrimination—conflicts with our sincerely-held beliefs.
25. Kemal and I are already seeing the negative impact on our children from the “anti-racist” education, sometimes called “social, emotional learning” (SEL) in Albemarle schools. More and more of the school day is being spent on SEL rather than reading, math, history, and science. We are seeing our children, particularly our youngest, N.G., fall behind in some of these core subjects. We are seeing a notable difference in the way the school day is spent and the amount that N.G. has learned compared to what T.G. was doing and learning in the same grade. This deeply concerns us.
26. Watching my children, it is clear to me that they (and other children) have been through so much over the last two years. Everyone did the best they could with virtual learning, but school closures left gaps in the children's academic progress. I object to the District's focus on training kids in an ideology that tells them to focus on the race of their peers and to treat their peers differently based on race—particularly following a time of learning disruption when there are so many academic concerns to be addressed in the core subjects. Based on conversations we have had, I believe Kemal shares my concerns here.
27. We understand from the school that there will be no way to opt our children out of Policy-based instruction because the “anti-racist” curriculum will be woven into every subject and the teaching method applied throughout the school environment.
28. Without intervention from the Court, I believe the District will continue to instruct kids to adopt this racist ideology in violation of our beliefs and parental rights, and at the expense of even more learning time that should be focused on the core subjects. That is why we are involved in this case.

I declare under penalty of perjury that the foregoing facts are true and correct to the best of my knowledge.

Dated this 22nd day of February, 2022, in Charlottesville, Virginia.

By: 
Margaret Gokturk