IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

TAMER MAHMOUD, et al.,

Plaintiffs,

v.

MONIFA B. MCKNIGHT, in her official capacity as Superintendent of the Montgomery Board of Education, et al.,

Defendants.

Case No. 8:23-CV-01380-TJS

DECLARATION OF HISHAM GARTI

- I, Hisham M. Garti, declare as follows:
- 1. My name is Hisham M Garti. I am over 21 years old and capable of making this declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this declaration.
- 2. I am the current Outreach Director for the Montgomery County Muslim Council, a grassroots community advocacy organization made up of American Muslims based in Montgomery County, Maryland.
- 3. Alongside other Muslim organizations, Montgomery Muslim Council has been privately and publicly calling on Montgomery County Public Schools to restore the opt-out option for books and classroom discussions that we believe would force students to unnecessarily compromise their sincerely held religious beliefs.
- 4. On May 1st, 2023, I attended a meeting between Muslim community leaders (Myself and Dr. Zainab Chaudry of CAIR) and MCPS officials, including Dr. Pugh, Ms. Niki Hazel & Ms. Elba Garcia, to discuss the issue. I personally took written notes on the statements that were made during the meeting and the most important points.

5. According to notes I took at the meeting, Dr. Pugh told me that the "decision to rescind the Opt-Out was made after a few parents of the LGBTQ community complained they (children) were offended and had their feelings hurt when students started leaving classrooms during instructions of these texts."

6. The aforementioned statement was the only explanation MCPS provided for why it rescinded the opt-out when I specifically asked for clarification purposes.. At no point did Dr. Pugh or any other MCPS official present claim that the number of students requesting opt-outs had become too burdensome or disrupted the functioning of the schools.

7. Dr. Chaudry, who was also present at the hearing,, has confirmed to me on multiple occasions that my handwritten notes and personal recollections align exactly with her memory of what MCPS officials said during the meeting.

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

Executed on this 26th day of June, 2023.

Hisham M. Garti