

# Exhibit 1

## Declaration of B.F.

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF IOWA**

GLBT YOUTH IN IOWA SCHOOLS TASK FORCE  
d/b/a/ IOWA SAFE SCHOOLS; P.B.-P., by his parent and  
next friend, BELINDA SCARROTT; P.C. and A.C., by  
their parents and next friends, RICHARD and ULRIKE  
CARLSON; T.S., by her parent and next friend, ERIC  
SAYLOR; B.F.S., by their parents and next friends,  
BRIGIT and JOSEPH STEVENS; ROBERT SMITH, by  
his parents and next friends JANE and JOHN SMITH;  
B.F., by their parent and next friend, LARA NEWSOM;  
JAMES DOE, by his parent and next friend, JOHN DOE,

*Plaintiffs,*

v.

KIM REYNOLDS, in her official capacity as Governor of  
the State of Iowa; MCKENZIE SNOW, in her official  
capacity as Director of the Department of Education;  
IOWA DEPARTMENT OF EDUCATION; IOWA STATE  
BOARD OF EDUCATION; IOWA CITY COMMUNITY  
SCHOOL DISTRICT; MATT DEGNER, in his official  
capacity as Iowa City Community School District  
Superintendent; MOLLY ABRAHAM, J.P. CLAUSSEN,  
CHARLIE EASTHAM, JAYNE FINCH, RUTHINA  
MALONE, MAKI PILCHER HAYEK, and LISA  
WILLIAMS, in their official capacities as board members  
of the Iowa City Community School District; SIOUX  
CITY COMMUNITY SCHOOL DISTRICT; ROD  
EARLEYWINE, in his official capacity as Sioux City  
Community School District Superintendent; DAN  
GREENWELL, JAN GEORGE, TAYLOR GOODVIN,  
BOB MICHAELSON, MONIQUE E. SCARLETT,  
PHILIP HAMMAN, and BERNIE SCOLARO, in their  
official capacities as board members of the Sioux City  
Community School District; URBANDALE  
COMMUNITY SCHOOL DISTRICT; ROSALIE DACA,  
in her official capacity as Urbandale Community School  
District Superintendent; KATHERINE HOWSARE,  
BRIANNA SAYRE GEISER, ASHLEY ANDERSON,  
DANIEL GUTMANN, RACHEL KENT, JENNY  
MEADE, JASON MENKE, JULIE MITCHELL, and

Case No. 4:23-cv-474

**DECLARATION OF B.F.**

STEVE RICHMAN, in their official capacities as board members of the Urbandale Community School District; WATERLOO COMMUNITY SCHOOL DISTRICT; JARED SMITH, in his official capacity as Waterloo Community School District Superintendent; SUE FLYNN, JESSE KNIGHT, ASTOR WILLIAMS, LYLE SCHMITT, STACIE MILLS, JANELLE EWING, PAM ARNDORFER, and JEFF SOMMERFELDT, in their official capacities as board members of the Waterloo Community School District; WEST DES MOINES COMMUNITY SCHOOLS; MATT ADAMS, in his official capacity as West Des Moines Community Schools Superintendent; JEFF HICKS, LILA P. MONTOYA STARR, LIZ COX, LONNIE DAFNEY, FANNETTE ELLIOTT, JILL CATON JOHNSON, and ANADELIA MORGAN, in their official capacities as board members of the West Des Moines Community Schools District,

*Defendants.*

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COMES NOW, B.F. and pursuant to 28 U.S.C §1746, declares under penalty of perjury that the following is true and correct:

1. My name is B.F. I am 16 years old. I have personal knowledge of the facts as stated herein.
2. I am pansexual, non-binary and use they/them pronouns.
3. I am in the 11th grade at Urbandale High School in Urbandale, Iowa. I was born in Los Angeles but moved home to Iowa when I was five weeks old. The house I live in with my mom, dad, and sister is the only home I remember. I love making art and enjoy drawing and making ceramic sculptures of the characters I create. In school I enjoy working on the tech crew of the theater department. My family fosters kittens and we have helped over 100 cats and kittens find their forever homes, we currently have four kittens that we are working to socialize.
4. I first discovered I was trans around the end of 6th grade. One of my friends at the time had come out and it helped me figure out who I was. It was really important at the time that

I had good representation of people like me at my school. One of the things I looked for was LGBTQ+ representation in books. We went to the library every other week I think and I would always look in the graphic novels section and read the books that had some sort of LGBTQ+ representation. Books like *Heartstopper*, by Alice Oseman, *Lumberjanes*, by Shannon Watters, Grace Ellis, Gus Allen, and ND Stevenson, *Drama*, by Raina Telgemeier, and *Laura Dean Keeps Breaking Up With Me*, by Mariko Tamaki, were and are ones that I enjoy.

5. The GSA (Gay Straight Alliance) Club we had at Urbandale Middle School (6-8 grades) was really helpful. It gave me the chance to talk with other students and teachers about my experiences. These things really helped me work through who I was and how to deal with my newfound identity.

6. When I first heard about this law, SF 496, I was frankly insulted. It made me feel unwanted and shameful. It'll make other kids/teens like me feel unwelcome in their schools. I am thankful that I have a good support system at home and in my friend group so that I can handle any discrimination that goes on at my school. However, since this new law has passed, I've been more fearful of being openly out at school. I worry that something I say could get a supportive teacher fired or that another student will think it's okay to bully me. The only thing the law does is spread a message of hate, and it feels like the school isn't able to do anything to support us.

7. I usually dress in dark, alternative fashion. My hair is split dyed, one half red and the other brown which is my natural hair color. Over the past few years I've dealt with harassment. People would call me emo, faggot, telling me to kill myself or calling me a slut. This school year I've had multiple people think it's okay to harass me. It's a lot of the same stuff, getting insulted for expressing myself. But it's worse. It makes being at school uncomfortable and not as safe as

before. Considering that it's only the first few months of the school year and I've already had multiple instances of people harassing me, the new law definitely makes school feel less safe.

8. I used to feel comfortable discussing my identity and pronouns in class. Expressing myself hasn't been a huge issue for me. After the law passed, though, I have been more careful on certain things I say in fear of getting my teachers in trouble. If one of my teachers shows support for me when I'm discussing things pertaining to my identity and a student reports that or if the wrong teacher or administrator hears that they could get in trouble. I would feel guilty if something I said got a supportive teacher I liked fired. It would be different if I got in trouble for talking about my opinions and identity. If someone tried to get me in trouble, I know my parents would back me up and I would defend myself as well. Some of my teachers may need their job though and it's important to them.

9. I'm worried about talking to teachers about these issues both in and out of class. I understand there is a system that monitors school emails and flags certain words. I know that it flags things like swears and words of violence, but I'm worried the school is using it to flag certain words pertaining to LGBTQ+ themes. Not knowing if it is being used for that makes me reluctant to send emails talking about those themes in the possibility that a teacher could get fired.

10. I know Urbandale released a list of the books that were being banned because of the new law. Seeing the books that were being banned was insulting and frankly idiotic. They claim that the books that are being banned are because they're "pornographic." I don't know if they know what a pornographic piece of literature/media is or what the word even means. I know a lot of the books that are being banned mention sexual assault. It's insulting to our intelligence that they think we're too immature to be reading these books. I feel sad for kids that are dealing

with those issues in real life. Reading books that speak honestly about tough issues helps kids feel less alone.

11. In the first list Urbandale released, LGBTQ+ themes or characters was the only reason given for removing a lot of books, including books that were important to me growing up. I know they've said they are changing it, but a lot of the books that are still being banned are books with LGBTQ+ themes and characters. LGBTQ+ people are not inappropriate. It's degrading that people, including our government, think that me and my friends are too inappropriate to even be in the school. It makes me feel like I should be ashamed of who I am. And, like I said before, one of the things I looked for when I was discovering my identity was representation in books. I'm worried about those kids that won't have that opportunity anymore, because they don't have supporting parents, or don't have money for books, and now they can't get them at school, either. Just seeing books with LGBTQ+ representation on the shelves is important to me and I know it is to other kids growing up, too.

12. There are things on the list of banned books I'd like to read like *Call Me By Your Name*, by Andre Aciman, or *The Color Purple*, by Alice Walker. If they weren't banned, I'd check them out from school. I think some of the books on the list are even recommended reading before college. The list will definitely alter our curriculum, and I'm worried that I am going to miss out on books other kids from other schools are reading and talking about in class. Now I have to find and buy these books myself, and I don't get to work through them with other students.

13. I have a few friends that are not out to their parents. There is a possibility that they could be outed to their parents that are not supportive and could be kicked out or worse. I don't know what would happen if they got outed and that's what's so scary about it. With my teachers it doesn't let us have a proper relationship that I've had with other teachers before the law. I would

love to be able to connect with them in a way I'm passionate about but I am unable to with the risk of them getting fired.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 24 day of November, 2023, at Urbandale, Iowa.

Respectfully Submitted,

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B.F.