

## Exhibit 4

### Declaration of P.C.

**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, MAKKA 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  
STEVE RICHMAN, in their official capacities as board

Case No. 4:23-cv-474

**DECLARATION OF P.C.**

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

1. My name is P.C. and I am 17 years old. I have personal knowledge of the facts as stated herein.

2. I am in the 12th grade at City High School in Iowa City, Johnson County, Iowa. Even as a small child, I didn't particularly care for gender norms. I enjoyed wearing dresses, but I was the father whenever my friends played "family," and I was always happy to get my hands on a hammer. I always enjoyed mixing and matching gender roles, but as I continued to grow, I noticed that I did it more intensely than other girls my age. It gave me a sense of affirmation to be able to be the chivalrous one—to hold doors open, carry bags, and give others my jacket. Of course, those traits aren't inherently masculine, but they do carry masculine connotations in the society we live in. I wanted desperately to be like the princes in the books I read, to be handsome, and able to save the day. Simultaneously, I wanted to wear elegant masquerade dresses, trading secrets in

ballrooms and gardens. As far as I was aware, those were my two options. Around 11, I started reading more books involving queer people. While I certainly knew about queer people before, having the literature allowed me to relate to the characters in the same way I had related to the royalty of my childhood. It opened up a world for me—there were words that I could use to understand myself, ways to clarify the identity I had been wrestling with. I flitted between a lot of different labels and pronouns, trying to find what fit best for me. In the end, much like my childhood preferences, it ended up being anything. These days, I just call myself queer. I have a strong relationship with womanhood, though I am not necessarily a cut-and-dry woman—I use he/him; she/her; and they/them interchangeably, though I don't mind being called just one.

3. Since the passage of SF 496, books written by and about the LGBTQ+ community have been removed from Iowa City schools. Last year, my teacher lent me the book *Last Night at the Telegraph Club*, by Melinda Lo. This year, it no longer sits on her shelf. It is well-researched historical fiction on being queer as a Chinese-American teenager in 1954; and it is a wonderful, wonderful book. There were several times that I cried reading this book--it was a beautiful portrayal of sapphic relationships, gender diversity in lesbians, and teenage relationships. It was thoughtful and nuanced, and extremely relatable, despite the different culture, place, and time. It made me feel both seen and freer to have read it. It also happened to have a short sex scene. This didn't seem out-of-place at all--sex and sexuality, like it or not, absolutely play a role in teenager life. Exploration is fundamental in teen relationships, so why shouldn't the literature we read reflect that? However, it is the reason that it is marked as “inappropriate” by SF 496. You can walk into any high school and hear things that are vastly more explicit and significantly less nuanced, but this valuable piece of literature is still removed. Without it being available in my school, and my teacher recommending it to me, I likely wouldn't have read *Last Night at the Telegraph Club*. Now

that it is banned, none of my peers will be able to access it through school, meaning that I cannot discuss the book with them, or recommend they read it. How many more life-changing books will I, and other students miss out on because of this law? School is one of the main places that children read, and being able to access literature in which you can see yourself can be instrumental to a student's discovery of themselves--it certainly was to me. Removing these books not only makes queer people less visible, but it also stops students from discovering and being true to themselves.

4. Literature has always been an important part of my identity and journey. When I was in seventh grade, I read *Melissa*, by Alex Gino. It was the first time I had read about a trans kid. While that might not seem like a lot, being able to find and identify yourself with things is an important part of being a child. While *Melissa* described a gender journey that was very different from mine, it still cemented it as something that *could* happen in my mind. *Melissa* is also not an adult book. Thematically and language-wise, it's very similar to what 10-12-year-old children talk about.

5. Knowing *Melissa* has been removed from schools angers me—it feels ridiculous to imply that children at that age are entirely devoid of ideas of gender and sexuality. Plenty of people have kindergarten boyfriends, or girlfriends, but they are not banned from school playgrounds—the issue here just seems to be the identity. Being trans is not a disease that children will catch if they read about it, just as reading a book about a doctor will not give you a medical degree. Instead, removing these books suppresses trans children. It shows them that they are “inappropriate” to exist with other children, as if their existence itself is somehow sexual or perverse. Furthermore, it prevents non-trans children around them from learning about the topic in a child-appropriate way, meaning they are more likely to react to their trans peers with confusion, or bullying. I hope

children, cis and trans alike, can read books about trans people, in the same way that they can read books about *anyone*—because books are meant for knowledge.

6. In a more personal sense, I also hope my sister can read *Melissa*. I hope it can remind her, even just through sitting on a shelf, that she belongs in her school just as much as any other kid does. I hope it can remind her she has nothing to be ashamed of.

7. Since the passage of SF 496 I have felt less comfortable expressing who I am in school and informing teachers of my identity and the pronouns I use. Prior to this year, I would simply email teachers at the beginning of the course to address my gender identity and establish how I should be addressed, but now I do not feel safe doing that. It feels like I need to meet the teachers first and verify that they are accepting before I disclose my identity. Since I don't have the support of the law to fall back on, it means I have to be more cautious about what I want to reveal, since I have no actual power if a teacher does decide to invalidate me.

8. My little sister is a lot younger than me—seven to eight years, depending on what time of the year it is. It was New Year's when she was born, and I remember holding her, and thinking that she was so small that she didn't look real. Her presence contextualized all of my difficulties, my disappointments, my mistakes—I was there to pave the way, so she didn't stumble on the same cracks that I did. I don't know how well I did, in that regard, but I certainly tried as hard as I could. She's my little sister, after all. Isn't the natural instinct just to swoop them up and protect them from everything that could hurt?

9. In the end, that's what hits me the hardest about this bill. Literature paved the way for me, and I was meant to be paving the way for her—but how can I do that without the books? How can I look my little sister in the eye and tell her not to worry, when the school systems she's in want to eliminate her existence from every library, every curriculum? How can I promise that

I'll keep her safe against something I can't stop? Because it's not just about what the children are learning. It's about safety. When my sister sees a rainbow in a classroom, it shows her that she is safe there. It says that that room contains people who will not harass or harm her for something she cannot change.

10. SF 496 hasn't been easy for my little sister. I see how she's more and more worried about going to school, how she conceals herself instead of taking pride in who she is. No longer can she tell if someone is safe, because they aren't allowed to advertise that—and it means she has to treat everyone as unsafe, by default. It is heartbreaking to watch her be made to feel alone, silenced, and less than at school, and to know that the state we have lived in for our entire lives supports that. I don't think I want anything unreasonable for her. I want her to learn about the world and play with her friends. I want her to read books and talk to her teachers. I want her to be safe. I want school to be a place that she can be excited to go, like it should be for every child. In the end, like anyone else with an important kid in their life, I just want her to be a happy kid for as long as she can be.

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 24th day of November, 2023, at Iowa City, Iowa.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to be the initials "PC".

P.C.