

Exhibit 8

Declaration of Robert Smith

**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
STEVE RICHMAN, in their official capacities as board

Case No. 4:23-cv-474

**DECLARATION OF
ROBERT SMITH**

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.

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

1. I provide this testimony under a pseudonym, Robert Smith.¹ I am 12 years old and identify as a transgender male. I have personal knowledge of the facts as stated herein.

2. I am in the 8th grade at Stilwell Junior High School in West Des Moines, Iowa. When I was 10 years old, I came out to my friends, teachers, and parents as a transgender boy. I began using he/him pronouns and going by my preferred name, which made me feel validated for who I am. My teacher was a supportive person in my journey because she showed me I was accepted by affirming my pronouns and preferred name when I came out to her. She also updated all my school materials and my locker, which helped me transition socially at school. This brought

¹ I have sought leave to proceed under a pseudonym in this matter to protect my right to privacy, and to protect myself from discrimination, harassment, and violence, as well as retaliation for seeking to protect my rights.

me a lot of peace, and helped me feel I belonged for who I am. I have now legally changed my name and it is correct on my school records.

3. I was at first angry when I learned of the new law, because it affects me and my friends.

4. I feel comfortable being out at school, but I know many of my peers at school do not feel comfortable because they feel restricted by the laws. Not all my friends have supportive homes, and school is a place they used to feel safe to be themselves. Now, they don't have the chance to be safe at school. For example, I had been a member of our Gay-Straight Alliance ("GSA") organization. I recently learned our GSA will go inactive this year because we could not find a willing teacher or administrator to take on the sponsorship of our group. There was no adult willing to take the risk under the new law. Now there isn't a safe place for kids like me and our ally friends to come together and support each other to feel accepted. Even before that, some of my peers were afraid to join this year because they feared the teacher/administrator leader would report them to non-supportive family members. Some teachers who used to talk about LGBTQ issues, no longer do. All teachers took down their safe-space stickers.

5. I am who I am, and no law can change that. I have already socially and legally transitioned. I have support from my family. But not everyone at school does. Being able to be out and express myself is very important to me so that I can show other students that I'm a safe person to come to. Teachers can no longer be that safe place.

6. I have experienced multiple incidents of bullying and harassment because I am trans. In middle school I was bullied and pushed up against a brick wall.

7. Being trans isn't all I am. I am also involved art club and card club at my school. I have previously participated in volleyball and theater. I also enjoy taking arts classes at the Des

Moines Arts Center, cooking with my family, and baking. I love to read, especially graphic novels that represent diverse kinds of people. I am scared that these books won't be available for me and other kids to check out, which isn't ok. Kids need to see themselves represented. It helps us feel like we belong.

8. I think it's important for everyone to be accepted for who they are. At the end of the day, pronouns are just pronouns, but they represent something bigger. They represent someone being accepted for their identity, which is who they are. Having support of family is really important to my journey, that no matter who I am, my parents will always have my back. The support of friends helps me feel accepted, and that I can be myself. Having the support of teachers and administrators means school is also a safe place. Without these safe people, and safe spaces, I don't know where I would be today. The emotional and mental health toll is heavy. No one should have to navigate this alone. The law takes away safety. It takes away safe people and safe spaces, for fear of violating the law. I fear that it will cause emotional and mental health issues for people, and they may not make it through.

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 19th day of November, 2023, at West Des Moines, Iowa.

Respectfully Submitted,

A handwritten signature in black ink that reads "Robert Smith". The signature is written in a cursive style and is positioned above a solid horizontal line.

Robert Smith