

DECLARATION OF CHARMAINE ALEXANDER

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

1. My name Charmaine Alexander, I am a resident of Urbandale, Iowa, and I am over 18 years old. I have personal knowledge of the facts as stated herein.
2. I am the mother of two children, C.B. who is eleven years old and C.A. who is three years old.
3. C.B. is enrolled in the sixth grade at Summit Middle School in the Johnston Community School District.
4. Because my children are under the age of twelve, they are not eligible to receive any of the currently authorized COVID-19 vaccines.
5. C.B. has asthma, which the CDC has identified as putting him at risk of severe illness from COVID-19.
6. C.B. has a 504 plan to address his asthma as well as his attention deficit hyperactivity disorder (ADHD). (See Attached Exhibit A).
7. C.B.'s treating doctor has informed me that my child is at risk for severe complications if he contracts a COVID-19 infection.
8. Last year C.B. was enrolled in the remote option. While that had some difficulties, at least I knew my child was safe. If the school offered a remote option, I would enroll him through that for this year again.
9. However, the Johnston Community School District is not offering online or remote options this year, so I have no choice but to send C.B. back to school in person.

10. I feel like I cannot keep my own child safe. I am very anxious about sending C.B. to school for in person instruction given the risks if he contracts COVID-19, especially with his medical history.
11. After his first week in person, I am even more concerned, because C.B. has reported that a vast majority of teachers and other students are not wearing masks in the classrooms.
12. C.B. has been anxious about getting COVID-19 because others in his school are not masking, and he is afraid he would get others in our home sick.
13. There have already been at least six positive cases at the middle school, that I am aware of. However, they only notify parents if their child's specific classroom has a positive case, so we do not even have sufficient information to keep our children safe.
14. We also have a medically fragile family. I have asthma, which puts me at risk for severe illness from COVID-19.
15. I believe that if everyone was wearing a mask and the school was following the guidance and recommendations from the CDC, my child would be safe in school.
16. My child is having to take greater risks – and unnecessary risks – to get his education than other students. I think this unfair.
17. I am seeking to have HF847 blocked so that my school will be able to require universal masking as necessary to meet its obligations to my child.

I swear under the 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 2 day of September 2021, at Urbandale, Iowa.


Charmaine Alexander