

## Exhibit 7

# Supplemental Declaration of Brigit Stevens

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

IOWA SAFE SCHOOLS f/k/a GLBT YOUTH IN IOWA  
SCHOOLS TASK FORCE, et al.,

*Plaintiffs,*

v.

KIM REYNOLDS, in her official capacity as Governor of  
the State of Iowa, et al.,

*Defendants.*

Case No. 4:2023-cv-474

**SUPPLEMENTAL  
DECLARATION  
OF BRIGIT STEVENS**

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

1. My name is Brigit Stevens. I am over 18 years old. I have personal knowledge of the facts as stated herein.

2. My husband, Joe Stevens, and I are the legal parents, guardians, and next friends of our minor child, B.F.S., age 14, who is a plaintiff in this action.

3. Joe and I are residents of West Des Moines, Iowa, Polk County, along with our two teenaged children. We have been married for 17 years.

4. I am an ordained minister of the United Church of Christ in the Iowa Conference UCC and my husband works in project management in information technology.

5. Our younger child, B.F.S., is in the 9th grade at Valley Southwoods Freshman High School in West Des Moines, Iowa. B.F.S. is a bright, thoughtful, athletic, joyful, and caring teenager. They enjoy singing in the choir, playing in the band, and are in advanced classes for their grade. They enjoy their friends more than their classwork but manage excellent grades and are enjoyed by their teachers. B.F.S. is gender-fluid and uses they/he/she pronouns.

6. I am increasingly concerned about how our district, West Des Moines Community Schools (“WDMCS”), is handling the needs of LGBTQ+ students because of SF 496. I used to think that they were fearful and timid because of uncertainty around the law. Last year, at an October 9, 2023 WDMCS school board meeting, a staff member shared with the board that teachers were in constant anxiety over how to handle issues that have come up because of the law and because of a lack of guidance from the district. One particular area of concern was if, when, and how to tell parents of a change to a student’s name and/or pronouns used at school. At that time, I knew of one friend of B.F.S.’s whose parent refused to use the child’s chosen name, and even commented on it when we all ran into each other at the school open house prior to the first day of school last fall. This friend of B.F.S.’s rolled their eyes and seemed embarrassed by the parent’s comment. SF 496 negatively affects students like this friend who are learning and exploring their own identity. They can no longer rely on teachers to respect their right to choose how and when to share their changed names or pronouns with their parents, adding stress and vulnerability to rejection and worse at home. SF 496 puts teachers in an impossible position when caring for students in such a vulnerable time and experience in their lives is now potentially against the rules.

7. Though I used to think that WDMCS was paralyzed by the vagueness and uncertainty around the law, I now think they are not only fearful of the consequences of the law, but that they are actively and intentionally making decisions to avoid the topic of LGBTQ+ students and to signal that they do *not* care about these kids.

8. I have continued to attend and speak out at WDMCS board meetings whenever I am available, against SF 496 and other laws that also target LGBTQ kids in schools. I always

encourage the Board to have courage and to create and enforce policies that will protect our children, instead of isolate them and put targets on their backs.

9. During a board meeting on August 26 I spoke to the board. This particular meeting was difficult for me, because an Iowa student had very recently taken his life. I will not speak to the particulars of this young person's experience, except to say that I believe the ongoing failures of Iowa schools and school boards to address the real needs for protection of the mental and physical health of LGBTQ + students—and any student made to feel like an “other” who does not belong—may have contributed to this tragic ending. I spoke at this meeting, but I was very emotional because their death affected me deeply. I sent a follow up email to the board which contained a written version of the remarks I had planned to deliver, which were on the topic of SF 482, the anti-trans school bathroom bill. The board responded by telling me that they must refrain from discussing the issues I brought up, because of pending litigation.

10. One positive consequence of my public involvement in this case is that some kids now know that my family is a safe place for them, even just to chat. While last year, I knew of one child whose parents refused to acknowledge their true gender identity, I now know several. Last spring I chaperoned the Indian Hills Junior High School GSA on a trip to the state capitol as part of an Iowa Safe Schools event. Every kid there used pronouns that indicated either gender fluidity or a gender other than that assigned them at birth. But I came to understand that not all of these kids would use these preferred names and pronouns in any other context. They felt safe doing so with me, but they did not all feel safe doing so at school or at home.

11. In Fall 2023, B.F.S. was bullied with anti-LGBTQ+ speech and the response from the district has been reserved and reactive rather than proactive as requested by us. The school principal tried to reassure my spouse and me after the incident by telling us that the school would

continue to respond whenever anything happened. “We’ll keep responding,” he said. His words communicated that he fully expected the anti-LGBTQ+ bullying to continue. In that statement and in our follow-up phone call he acknowledged that the current environment in our state is difficult for LGBTQ+ students. SF496 is intimidating our district leaders.

12. After B.F.S. was bullied, it was heartbreaking to hear about conversations among their friends. While there was dismay and anger that the bullying had happened, friends/classmates shared with B.F.S. that anti-LGBTQ+ bullying is to be expected when they wear rainbows or other clothing advertising that they are LGBTQ+. B.F.S. was disappointed and hurt to hear that some of their peers seemed to think that this is normal, or that LGBTQ+ students are in part responsible for their own harassment.

13. B.F.S. was bullied again in the spring of 2024 during an award ceremony where B.F.S. won two awards for academic achievement. Several kids booed B.F.S. when they were called up to accept their award. The GSA advisor and another teacher who was present told those kids to knock it off, but there was no follow up from the school with B.F.S. One of the responding teachers called me prior to B.F.S. arriving home that day and mentioned that B.F.S. had been emotional and crying at the award ceremony, but didn’t offer information about what had happened. I learned later from another parent who was present at the ceremony what happened. As I feared, the teachers are holding back how and what they speak about and the school is still not taking this issue seriously and is not being proactive about protecting kids like B.F.S. from bullying. Additionally, I was saddened to not hear from B.F.S. first about the incident. One of my greatest fears as a parent is that B.F.S. will come to not just expect, but accept bad behavior from others because of their LGBTQ+ identity and stop reporting it.

14. When B.F.S. changed their name 3 years ago, in 6th grade, the district accommodated that very easily and updated it in their system. Teachers needed reminding but they were receptive. Last year there was a software update and every child with a name in the system that was different from their birth certificate was mislabeled for two-weeks in several software programs the students used for daily learning. While the problem wasn't the fault of the district, the district's response to it was detrimentally affected by SF 496. The data/software problem would have been an appropriate moment for teachers and staff to teach students that everyone has a name and pronouns, and we use the ones they ask us to use as a matter of respect for them. Instead, for our child, there was a moment when a teacher used B.F.S.'s dead-name (prior name) before the entire class while demonstrating the software on the second day of school. As the teacher asked, "Who is this?" while calling our child's dead-name to the class, B.F.S. had to raise their hand and say, "That's me." The teacher didn't correct themselves, didn't teach the class to correct themselves, and didn't acknowledge the error that was made. SF 496 is paralyzing our teachers.

15. I just read the long list of books that are being pulled from the libraries of our secondary schools in the district because of SF496. I am angry and frustrated as a parent because removing these books means less access for B.F.S. and kids like them to see themselves in media. Pulling these books, denying these kids representation in media, sends a message that there is something wrong with them, that even characters in books like them are so dangerous and/or disturbing kids need to be protected from them. Additionally, our district has a robust challenge process for books in our libraries. If anyone has a concern about a book, there are processes for our professional librarians, administrators, school board members, and parents to all participate in together to decide whether to continue to keep the book on the shelves. For instance, in 2022, before SF 496 was signed into law, a parent in our district had challenged *Gender Queer*, a graphic

novel by Maia Kobabe. The book was then reviewed and considered by the WDMCS Board of Education who decided to keep it in the library collection. But even with the book still in the collection, parents always had the ability to limit which books their specific children check out from the library. SF496 removes my option as a parent to allow my child to read those books with the support of their teachers and librarians near them for questions, learning, and processing as needed.

16. The district has disappointed me, but it is mostly because of their missed opportunities to do better. SF 496 looms in the background of all decision making. Our child deserves a safe and welcoming place in their school for learning and growing. SF 496 is having a direct harmful effect on our children and their school.

17. B.F.S. continues to get excellent grades, and has a decent relationship with a counselor at their new school, but they feel that many other students do not like them, in some part because they are visibly LGBTQ+. B.F.S. also knows now that the teachers at the school will not stand up for them, or help protect them from being bullied. B.F.S. is involved in the GSA at their new school, but it is a very small group, and meets infrequently. I suspect that the hostile attitude of the school towards LGBTQ+ students has dissuaded some from joining the GSA or being visibly out in any way.

18. It has been difficult on our family to live in a place so hostile to our children. As a result, we made the decision as a family to move not just out of Iowa, but out of the country. We had talked about this option in the past, but the tipping point for us was the passage of SF 496, in particular. After seeing how the leadership of this state—and of our schools—regards our family, we knew we could not keep our kids safe here anymore. We do not have a set date to move yet, because there is a lot of red tape to first wade through, such as getting our visas approved, and


finding adequate housing for all of us. But the choice has been made, and as soon as we are able to, we plan to move. Both of our children are very excited about the move, and are only disappointed that it is taking so long to happen.



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 17<sup>th</sup> day of October, 2024, at West Des Moines, Iowa.

Respectfully Submitted,

 10/17/2024  
Brigit Stevens