

## Exhibit 2

### Declaration of P.B.-P.

**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  
P. B.-P.**

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

1. My name is P. B.-P. and I am a 16 year-old boy. I have personal knowledge of the facts as stated herein.
2. I am a junior at Waterloo West High School in Black Hawk County, Iowa. I am a transgender young man who uses he/him and they/them pronouns.
3. I live with my mother, and my father lives a few minutes away. One of my two siblings is also queer. We all moved to Waterloo before my freshman year of high school from Waverly, a much smaller town where everyone knew me before my transition. Moving allowed me to get a fresh start and be gendered correctly by everyone around me. My life now is filled with joy, friends, family, and activities I enjoy. I play the cello in multiple orchestras, I perform in my school's plays, and I play roller derby. I spend my time doing things I love, which has helped me

conquer my depression and become truly happy. I am in an incredibly rare position where I have transitioned with a loving support system to lean on, and enough money to fund my medical transition. All of this has helped me to grow into myself and made me feel secure in who I am, which is incredibly rare, especially at such a young age. But SF 496 restricts my rights and freedoms to be who I am without worry, and leaves me concerned for my friends who do not have as many supportive people around them.

4. I discovered my identity when I was in the 7th grade. I was visiting my local public library when I picked up a book called *Gracefully Grayson* by Ami Polonsky. On the back of the book, it said, “What if who you are on the outside doesn’t match who you are on the inside?” When I read that, my heart stopped. I had thought those exact words in elementary school, staring at a mirror wondering why I couldn’t relate my face to myself. I flew through that book, and it made me realize that I was not a girl. Without that story, I don’t know how long I would have gone feeling out of place in my own skin. Queer literature was the start of my journey into knowing myself, and it remains a big part of my life. *Hell Followed With Us* by Andrew Joseph White made me feel powerful in a way nothing else has. *Orlando* by Virginia Woolf made me realize that queerness does not need to be labeled the way it is today. *Heartstopper* by Alice Oseman, *Good Omens* by Terry Pratchett and Neil Gaiman, and *Red, White, and Royal Blue* by Casey McQuiston are all beautiful stories that give me hope that one day, my life could be filled with as much laughter and queer joy as those characters had. Storytelling has existed for as long as people have, because we share our joy and ideas as a form of connection. Limiting that expression limits our humanity.

5. I have been told by my librarians that Waterloo West High School is waiting for more direction from the state before they remove any books from the shelves. The librarians are very accepting and kind, and they understand the importance of keeping all literature available to

students. There are many LGBTQ+ books in our library that would be targeted under SF 496. Many I have checked out and I adore. Being able to access these books at school makes me feel safe and welcomed in that library, and I'm sure it does for many others. As I mentioned, I discovered my transgender identity through a book. Keeping that book and others like it on the shelves gives that same opportunity to other young kids seeking to understand themselves. I have recommended *Gracefully Grayson* to many of my friends, and lent my personal copy out. I believe it helped another young kid understand their identity. Without representation in books, kids will struggle for longer to find out who they are. These books also bring joy to me and others, which is very valuable in a world that has so many challenges for us specifically.

6. SF 496 has heightened my own fear of violence and harassment in school, and I know my fears are shared by other LGBTQ+ students. Such fears are reasonable given our past experiences of bullying and harassment in Waterloo schools. For example, in 9th grade, I participated in a school play. When I was on stage, delivering a monologue, a middle school kid shouted that he was going to shoot me, identifying me by name. Although I didn't hear the words myself, I was told about it afterward, and I learned that the student had been goaded on by others. The school reported the threat to the police, but no action was taken by the police to my knowledge, nor did my school ever check in with me to ask how I was doing or how they could help. My understanding is that the student threatened me in this way because I staged a protest for the rights of transgender Iowans. I assume they knew my name from the press coverage of the event. This experience changed the way I navigate the world. I don't know what the student looks like, so I could be going to school with the person that threatened my life. I have tried my best to not let it affect me, but I know it has scarred me and left me anxious whenever I express my identity. Even when I am not wearing pride flags or talking about being transgender, I am often still harassed. On

multiple occasions, classmates have yelled at me in the halls demanding to know whether I am a boy or a girl, at lunch people have yelled “faggot” at me and my friends, and kids have yelled and laughed at us with no provocation. Things are worse this year. After SF 496, I feel as though I have a target on my back. This law gives confidence to those who believe something is wrong with me, because the law reflects that belief.

7. Despite the bullying and harassment I experienced, I used to feel more comfortable wearing clothing or buttons with the pride rainbow flag or other indicators that I am a member of the LGBTQ+ community. However, now, after passage of SF 496, my worries about being a target have reached a new high. I do my best to remain confident in myself, but my pride has dwindled to a small pin on my bag and a sticker on my water bottle. Anything else, and I feel unbearably anxious, looking over my shoulder and stressing over who is looking at me and judging me. It is ultimately more trouble than it is worth, but I also love to wear pride apparel. Having a stranger compliment a little rainbow gives an immediate sense of security and community with that person. It’s devastating that I have to give it up just to feel safe.

8. In the past, I sometimes referred to my identity as transgender in class or related school work. My transgender identity is a big part of my life, and is woven into my experience of the world, so whenever I talk about myself, I am inherently talking about being transgender. Especially in my English classes, where there are plenty of essays on self-reflection or our subjective opinions, my identity comes up in almost all of them. I have written assignments on overcoming personal challenges, what I would say to my younger self, what it means to be American, and many others that all have mentions of me being queer. But after the passage of this law, I find myself hesitant to bare that part of me to my teachers and classmates. Instead of writing my whole story, I omit parts in order to feel safe letting others read it. Many of my teachers are

wonderful people who I adore, and who I trust with my identity, but I also worry about getting them in trouble. If my conversation with a teacher on how this law is affecting me, or just friendly jokes that have something to do with my identity are overheard and reported, could my teacher get in trouble? That is the last thing I would wish on any of them. They shouldn't have to worry about talking with a student freely, which should be a protected right. After SF 496, I now never mention being transgender in class discussions, even when I want to share, and know my point of view would be a valuable and unique one, for fear that my teacher could get in trouble if they allow that conversation.

9. Before SF 496, I knew that a teacher could help create an environment of understanding and inclusion of all students, but now, they cannot, at least when it comes to me and other transgender and queer students. So I fear judgment from other students, as well. We should have the right to speak freely in a classroom, because classrooms exist for us to learn about alternate points of view of the world to enrich the mind. Without free discussion, we cannot do this.

10. I am the president of the Gay Straight Alliance ("GSA") at my school. We meet every Tuesday after school, and continue to do so this year. This GSA means a lot to me and the other members. It is a place where we can all feel comfortable sharing ourselves and where we can find community. We have a wonderful faculty advisor who oversees our meetings and who is not going to back down in the face of this law. Even prior to SF 496, we have, in the past, been denied publicity that other clubs have access to without question, such as mentions in the yearbook. We were told it was a privacy issue to have a picture of our members in case a parent was not accepting. However, it is an easy fix to simply take a picture only of those who wish to be in it. When I brought this up to an administrator, we eventually gained permission to have a picture in the

yearbook, but I should not have had to fight for that. After SF 496, it feels like we will have to fight harder, that efforts to censor or hide our GSA from public view will only get worse because the school is worried they will get in trouble with the state.

11. Our numbers have also dwindled this year, presumably because kids are scared to show up and possibly be outed as a result of SF 496, or get bullied and harassed. GSA is a lovely, happy space that should be accessible to all queer children, but SF 496 interferes with our ability to create a supportive community for each other.

12. As a member of our school's GSA during my freshman year, I led a protest against anti-LGBTQ+ measures that were proposed and passed by the Iowa legislature that year. Many students banded together, walked out of the school, and gathered outside. We shared our stories through a megaphone, chanted, and generally shared the power that comes with community. But it was not all positive. Some administrators and school security glared at us through the windows. Students on the second floor shouted at us through windows, and they were not stopped. After the passage of SF 496, I would be terrified of staging another protest. I feel as though anti-LGBT sentiment has risen in my school. I have witnessed homophobic and transphobic comments consistently this school year, more than I have previously. I think many queer students would be scared to join a protest on school grounds again, if not for fear of the students, then for fear of punishment from the school. This law places transgender youth below other cisgender students, forcing them to take more steps to earn the same rights and respect that others have. This limitation of freedom to be ourselves encourages schools to limit us even more.

13. Transgender people, especially transgender youth, have to deal with a surplus of challenges that cisgender people do not. Not only do we struggle to feel comfortable in our bodies, which is a sort of pain I can never describe in full accuracy, but we must also worry about whether



the people around us are accepting. Coming out to friends and family is an ordeal that all transgender people carefully consider and plan. Yet, beyond all of this, SF 496 places another undue mental burden on young people in Iowa. This law forces students to come out to their parents if they have any hope of being called the correct name and pronouns at school, which is a right any other cisgender student never has to consider. For any kid who does not have accepting parents, being gendered correctly remains a dream that is far from reality. As for me, my school records correctly list my preferred name, as I have changed it legally, but they still list me incorrectly as female, since I have not yet changed my gender legally. I worry that, should a teacher or faculty member ever misgender me, I could get myself or them in trouble if I correct them, or be singled out by my peers. I should not have to worry about the consequences of attempting to gain basic respect from those around me, and neither should any other queer student. We deserve to be treated with the same respect as our cisgender peers without having to jump through unnecessary hoops to abide by this law.

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 25 day of November, 2023, in Waterloo, Iowa.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be "P. B.-P.", written over a light yellow rectangular highlight.

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P. B.-P.