

## Exhibit 10

### Declaration of Brigit Stevens

**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  
BRIGIT STEVENS**

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, 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 13, 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 16 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 8th grade at Indian Hills Junior High School in Clive, Iowa. B.F.S. is a bright, thoughtful, athletic, joyful, and caring teenager. They enjoy singing

in the choir, participating in drama, and the show choir at school. 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 that our district, West Des Moines Community Schools (“WDMCS”), is fearful and timid in how they are responding to the needs of our LGBTQ+ students because of SF 496. At the 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 is if, when, and how to tell parents of a change to a student’s name and/or pronouns used at school. I know of a friend of B.F.S.’s whose parent refuses to use the child’s chosen name, even commented on it when we all ran into each other at the school open house prior to the first day of school this 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, potentially 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.

7. This fall, 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.

8. 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.

9. 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. But this 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.

10. 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

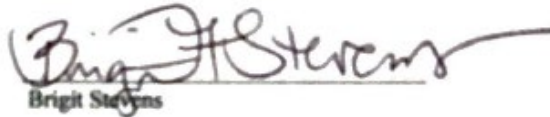
removing these books means less access for B.F.S. and kids like them to see themselves in media. Pulling these books, denying these kids representation in media, sends a message that there is something wrong with them, that even characters in books like them are so dangerous and/or disturbing kids need 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. And parents always have the ability to limit which books their 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.

11. It has been a rocky start to this year. The district has disappointed me, but it is mostly by 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.

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 18th day of November, 2023, at West Des Moines, Iowa.

Respectfully Submitted,



Brigit Stevens