

## Exhibit 11

### Declaration of Lara Newsom

**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  
LARA NEWSOM**

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.*

---

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

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

2. I am the legal parent and next friend of my minor child, B.F., 16 years old, who is a plaintiff in this action and who has also submitted a declaration. B.F. is my youngest child, and we are very close. I am proud to say that even on the weekends, they often choose to hang out with mom and dad. They are a funny, caring, creative child who cares deeply for their friends and family. They struggle with anxiety and are currently receiving treatment for their anxiety disorder. They identify as non-binary and came out to us when they were in 7th grade. I have always been supportive of them and their LGBTQ friends, many of whom do not have support at home. I have held my crying child as they described their close childhood friends participating in hateful anti-

trans demonstrations in their own school in middle school that echo much of the same rhetoric we are seeing in the Iowa State House. I have sat up late at night with my child as we frantically tried to contact the parents of friends who are threatening self harm. In high school, they have found their home in the theater department where they have found tremendous support and strength in discovering who they are and who they want to become. I have seen them flourish in high school as they have been able to discover and try out new identities. They changed their name their freshman year and they were able to “try it out” at school before they told us, because they didn’t want us to have to go through the process of telling everyone if they decided it wasn’t the right fit. I was so thankful that they had that opportunity to discover themselves without needing me to hover over their every step.

3. I am a resident of Iowa. I have lived in Iowa for the last 16 years. I was born and raised in Iowa. After graduating from Iowa State and the University of Iowa, I attended graduate school in California. I lived in Los Angeles for six years before deciding to move my family back to Iowa in 2007 so that they could receive the same excellent public education that I received as a child.

4. When I first learned about this law I was worried for my child and their friends. These kids, B.F. and their friends, struggle enough with their own identities and dealing with bullying from other students that this feels like another heaping on of anxiety and “othering” for these kids. My child lost a friend to suicide a year ago and has had to report threats of self-harm to their friends’ parents since they were in 6th grade. We know how hard it is for LGTBQ+ kids to feel like they fit into school, and this law which was clearly designed to strip the libraries of any reference to LGBTQ children or adults was just another attack on these children by people who should know better.

5. This fall the Urbandale Superintendent published a list of around 400 books to be banned. The list of books actually removed from the shelves of the high school is closer to 50, but those books include classics like “The Color Purple” and “Ulysses.” The initial list made it perfectly clear that the books targeted for removal leaned heavily towards deleting LGBTQ characters from the shelves. One of the books actually removed from the shelves was “Gender Queer” which we bought for our child when they came out to us.

6. Many of the other books including “the Color Purple,” “Perks of Being a Wallflower,” and “The Sun and Her Flowers” deal with the topic of sexual abuse of children. There is an unknown number of children in the state of Iowa who have suffered sexual abuse at the hands of their caregivers. These children already carry shame about what happened to them, and banning books that discuss sexual abuse of children sends the message that the very existence of these children is a topic too inappropriate for school. It worries me that we will see fewer children reporting sexual abuse at home, and we will see higher suicide rates amongst LGBTQ students and students who have been sexually abused.

7. My child and their friends have talked about it with me. My child and their friends are angry. My child and their friends feel targeted. My child and their friends feel like the state is telling them that they are “too sexual” to belong in a public high school even though most of them are not currently sexually active and they are being targeted solely because of their LGBTQ identities.

8. Since passage of the law, my child and their friends are being more openly bullied by kids who are not themselves the target of this law. It feels like these other kids are emboldened to attack my child and their friends. B.F. and their friends get called “faggot” and have been told on more than one occasion to go kill themselves. My child has been called a “slut” because they

wear black clothing and eye make up. It is difficult for my child and their friends to report these incidents because they often do not even know the names of the students who are harassing them.

9. My child has one teacher who has been very supportive of them. I wanted to email the teacher to thank them for recognizing my child's humanity but I was worried that I would get them in trouble or cost them their job if I was too explicit in how I worded my email. I am aware that the school is able to monitor emails on their gmail account, and I am worried that they will use this monitoring to fish out teachers that are openly supportive of students. While this may or may not actually happen, this is the environment that has been created in our schools. It is very difficult to build trust between teachers, parents, and students, because all of us are afraid that saying the wrong thing—even a thank you for being supportive to an LGBTQ student who is struggling—will get someone fired. My child has expressed anxiety that the teacher that supports them will be fired because they respect my child's chosen name and pronouns. I did email the teacher and chose my words very carefully to thank them for helping my child feel safe in their classroom, and the teacher wrote back to express that they felt very frustrated by the new laws because it makes it more difficult to build trust between themselves and the students. I wanted to write a follow up email but I stopped because I was worried that I was treading on dangerous grounds and I didn't want to get a teacher that has done nothing but make my child feel like they belong fired.

10. In addition to the emotional toll this law is taking on my child and their friends, I worry what it will mean for their ability to compete academically nationwide, since many of the books that are being removed from libraries and classrooms are books that are listed on college preparatory lists. Personally, I studied *Odyssey* when I was an 8th grade student at Johnston Middle School in Iowa back in 1989. I was able to understand the poem so much more deeply because I

had the opportunity to read and discuss it with my teacher and fellow students. My teacher turned a boring book into something that was interesting. We studied this poem for several weeks. As a result I was able to understand references to this poem in other books, conversation, and popular culture, and I was already familiar with the book when it was referenced in my college classes. By banning the teaching of and removing these books entirely from public school libraries, the State of Iowa is stripping away the opportunity to read and discuss classic books and novels from all of the children of Iowa. As an upper middle class parent, I am able to afford to buy these books for my children, however I will never be able to replicate the experience of a classroom discussion or the guidance of an experienced teacher. This law was passed under the guise of “Parental Rights” however, previous to this law, any parent in the state of Iowa could already request that their student be exempt from reading any book that the parent deemed inappropriate for their own child. Under this new law, a small handful of parents are demanding that any material that they deem offensive be removed from classrooms and libraries for all students regardless of how any other parent in the district feels. I do not think that queer or transgender characters are inappropriate for children. I believe that children are capable of understanding and interpreting a wide variety of characters and situations safely while reading books. Depriving children of these reading opportunities is intentionally narrowing their world view in an attempt to make them less tolerant of people who do not look, believe, or act exactly like them. I do not appreciate that I am being forced to co-parent with people that believe my child should be forced back into the closet and made to conform to their religious beliefs. By enrolling my child in a public school in Iowa, I am being forced as a parent to participate in a hateful crusade against LGBTQ children and adults. It makes me even more angry because I chose to move my children back to the State of Iowa because of the excellent public schools, only to find that the public schools in Iowa are being forced to

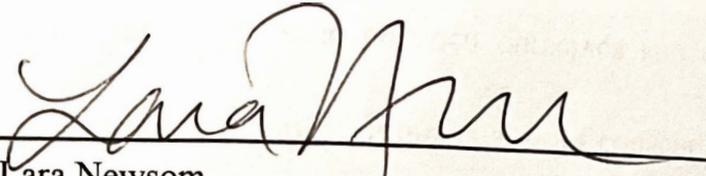
mirror the religious beliefs of a small number of parents at the expense of the education of Iowa's public school students.

11. One of the reasons I chose to enroll my children in public schools is because public schools serve the public. Public schools are designed to provide a safe and inclusive learning environment for all children in the State of Iowa regardless of their religion, race, gender, sexuality, or other personal background. Public schools allow children to interact with other students who are not like them and to learn to work with and listen to people with different perspectives and backgrounds. We learn tolerance in public schools along with math, history, and reading. This law, SF 496, is pushing the personal, often religious, beliefs of the lawmakers who wrote this law in our public school system. These beliefs work from the base assumption that people who are not cis-gendered or heterosexual are somehow deviant, sinful, or wrong, and that even reading books with characters who talk about their gender identity or sexuality are inappropriate for anyone in Iowa's public schools. The lawmakers who publicly defend this bill refer to any mention of gender or sexuality as "pornography" and refer to transgender people as "groomers". The State of Iowa is intentionally singling out and vilifying LGBTQ people and creating a secondary class of Iowa public school students who are not allowed to discuss their gender or their sexuality in their own classrooms with their own peers. From my perspective as a parent of a transgender child, this bill is meant to keep them quiet about being a member of the LGBTQ community by encouraging other students to see them as deviant and by limiting their ability to have open and honest classroom discussions about who they are as a person.

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 24 day of November, 2023, at Urbandale, Iowa.

Respectfully Submitted,

  
Lara Newsom