

Exhibit 6

Declaration of T.S.

**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
STEVE RICHMAN, in their official capacities as board

Case No. 4:23-cv-474

DECLARATION OF T. S.

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

1. My name is T.S. and I am 15 years old. I am also a lesbian. I have personal knowledge of the facts as stated herein.

2. I live in Urbandale, Polk County, Iowa. I live with my parents and my cat. I have lived in Urbandale my whole life, and the people I have met, the community I have made, is very close to me, and means a lot. I am in band and choir, as well as show choir and mock trial, both as a coach and on my own team. I was welcomed into the high school last year as a freshman with open arms, and now I have many friends in varying grade levels.

3. I am in the 10th grade at Urbandale High School in Urbandale, Iowa. I began to discover my identity in 7th grade. I began to figure out what different identities were, and that there were different identities available to me. I had always felt different from the other girls because of my personality and the things I liked. When I discovered the LGBTQ+ community, I finally felt

like there were people who understood how I felt. I began identifying as lesbian in early 2021, and I began exploring my gender expression in early 2022. I realized gender wasn't something that was very important to how I feel as a person. I am myself, and gender is something that is so unique and complex to each person that there isn't a point for me to put labels where they feel unnecessary.

4. Something that was always a thought in my mind while I was discovering my identity was the prospect of being out at school. At school, I never directly mentioned that I was a lesbian in class, only to my friends. I'm hesitant to mention my identity in many classes because of the possibility of teachers reacting poorly, or—especially now, after passage of SF 496—cracking down on students based on the law.

5. In 8th grade, I was out as lesbian in school. I never directly mentioned it in a class situation, but people could tell. As a result, I was bullied quite harshly. I would be called names, slurs, and mocked in general. I also got shoved into locker, pushed to the ground, and at one point I even got into a fight. I reported this to my middle school's administration, and they did little to nothing about any of these issues. I filled out at least 50 incident report sheets over the course of the year, and very few of them got recognized or had anything done about them. For instance, in my 8th hour science class I got bullied particularly badly, and I would often cut class and go to my favorite counselor's room to work instead because of how unsafe I felt in that environment. Despite numerous reports about this, it took months for the issue to be addressed, and when one of the bullies finally got taken out of my class, another was moved to sit next to me. I had meetings with our principal, dean of students, and equity and inclusion director for the district. The only person that ever tried to help in any perceptible way was the E and I director. By the time I was through the middle school, I had made a large impact with the work I tried to do with bullying prevention,

and according to current middle schoolers it has gotten better. I am concerned that bullying could become even worse an issue for queer kids in the future because of the way this law singles us out and the message it sends about us. I am worried the work I did will be undone because the school cannot talk about LGBTQ+ issues.

6. In 8th grade, I read the book *Rick* by Alex Gino. I really related to this book at the time because I was a young queer child grappling with my identity in an environment that wasn't always supportive. The book depicted a young boy learning his identity while trying to go through his normal life and act like nothing is happening. The book shows him attending a GSA meeting, and expressing himself for the first time, and it meant a lot to me to see someone like me in a book. It makes me sad and angry that other kids in Iowa just coming to understand their identities will not have *Rick*, or books like it, to help them.

7. Before the passage of SF 496, I hoped to read the book *Gender Queer: A Memoir* by Maia Kobabe. I've wanted to read it for a while but I simply haven't gotten around to it yet. I understand that this book has been pulled from classrooms and the library in my school due to the law. It's frustrating that I won't be able to read from the school library anymore because, as a queer person, I feel like who I am is being erased from the public view. If *Gender Queer* were available at school, I would check it out.

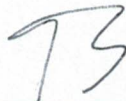
8. The school library has a display of books that feature the voices of people who are members of historically marginalized and silenced groups. Last year, this display included books featuring the voices of LGBTQ+ people among others. I appreciated this because it helped me find books I might like and it made a point that people like me should be included. This year, after the passage of SF 496, the books with LGBTQ+ narratives have all been pulled. I know now I won't

be able to have the opportunity to read these books, and this is the same for every person who goes to my 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 20 day of November, 2023, at Urbandale, Iowa.

Respectfully Submitted,

A handwritten signature consisting of the letters 'T' and 'S' in a cursive, stylized font.

T.S.