

## Exhibit 15

# Supplemental Declaration of Ulrike Carlson

**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. 4:23-cv-474

**SUPPLEMENTAL  
DECLARATION OF  
ULRIKE CARLSON**

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

1. My name is Ulrike Carlson. I am over 18 years old. I have personal knowledge of the facts as stated herein.
2. My husband, Richard Carlson, and I are the legal parents and next friends of our minor child, A.C., who is a plaintiff in this action.<sup>1</sup>
3. I previously submitted a declaration in this matter as Exhibit 12 in support of a Motion for Preliminary Injunction. (Doc. 2-13). I am now submitting this declaration to reaffirm and update what I said previously.
4. I am a resident of Iowa City in Johnson County, Iowa, along with my husband and our children. I have lived in Iowa for over 20 years.
5. A.C. is a girl in the 5<sup>th</sup> grade at Twain Elementary School in Iowa City.
6. A.C. is transgender. At the age of 1.5 years, A.C. learned to say several color words and started demanding that all her clothes be “purple.” We honored her wishes at that point and

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<sup>1</sup> We are also the legal parents and next friends of P.C., who has previously submitted a declaration at Exhibit 4 to Plaintiffs’ Motion for Preliminary Injunction, (Doc. 2-5).

bought traditional boys' clothes in that color. A.C. also showed an interest in toys that are generally considered to be more typical for girls, such as dolls and sparkly crowns. At age three, A.C. started complaining and crying every morning before daycare when we were putting on clothes, at times fighting every part of her outfit. During those occasions, A.C. said (she spoke predominantly German in the home as a toddler): *Ich will aber ein Kind sein.* (But I want to be a child.) When we reassured A.C. that she indeed was a child, more tears and tantrums would follow. We later realized that she had mixed up the German words *Kind* (child) and *Mädchen* (girl). After several months of A.C. being very unhappy every morning, we permitted A.C. to choose her own Halloween costume at Costco. She picked a frilly, pink Minnie Mouse costume with white polka dots. At home she put it on and her whole demeanor changed, the previous sadness was gone. I asked her if that was what she meant with being a *Kind* and she repeatedly replied in the affirmative.

7. We began letting her wear dresses and skirts at home and for family outings occasionally, but not for school, as we weren't sure whether her daycare would be fully supportive. A change of daycare allowed us to let A.C. present fully as a girl. When she entered kindergarten, she did so fully presenting as a girl. Initially, she opted to use either they/them or she/her pronouns, but quickly amended that to using only she/her which she continues to use now.

8. A.C. has never wavered in her conviction: she is a girl. She is fully accepted as such by her friends and enjoys playing with dolls, reading and playing video games. She has many friends, is well-liked by her peers and does very well in school.

9. After passage of SF 496, A.C.'s school removed all safe space stickers and LGBTQ+ pride flags from classrooms and other spaces due to the prohibition on "promotion" of gender identity or sexual orientation. After these symbols of inclusion and safety were taken away, A.C. became often reluctant to go to school. She expressed on numerous occasions that she felt

unsafe or as if somebody was “watching her” because she was different. A.C. feels as if she is being singled out for being transgender.

10. We have talked before with A.C. about her worries of being disliked for who she is, but also affirmed her identity as a transgender girl. Previously, teachers were able to educate others about A.C.’s identity when necessary and books about gender identity were available in classrooms and the library. Rare instances of questions from peers about A.C.’s gender were met with child-appropriate explanations regarding A.C.’s trans identity. In fact, back then, A.C. felt comfortable sharing the fact that she is trans with close friends in her classroom. Since the law was passed, except for the time the preliminary injunction was in effect, A.C. has been unsure of what is safe and legal to say and so have been her educators, creating a climate of distrust, worry, and fear that is not conducive to A.C.’s education or wellbeing.

11. After SF 496 was passed but prior to the preliminary injunction, A.C. reported to me an instance of bullying where another student from her class told her that being trans was “stupid” and that that particular student did not like trans people. A.C.’s classroom teacher interfered, telling the offending students that such language was not permitted: according to A.C. she said, “Oh no, we don’t say that!” to the student. However, the teacher did not follow this reprimand up with any teaching on tolerance and gender identity, as would have happened in the past. The teacher obviously felt prohibited from doing so, as it would have been “instruction” or “promotion” of gender identity for which the teacher would have been subject to discipline. In the spring, while the preliminary injunction was in effect, there was another incident; but this time, this teacher was able to talk with the student specifically about respecting A.C.’s gender identity. More recently, in the beginning of A.C.’s school year and after the lifting of the injunction, there was yet another incident. A student at A.C.’s school taunted A.C. for being trans. The teacher

stepped in to resolve the conflict, but, just like it was when the law was first passed, did so without explicitly mentioning A.C.'s transgender identity. This did not effectively address the root cause of the bullying. The other student's lack of understanding and empathy on the subject of transgender identity was not challenged. The law ties teachers' hands, and A.C. and other transgender or non-binary children are the ones who suffer.

12. Incidents such as these will keep happening. With the law back in effect, I am worried it will only get worse. The hampering of teachers' ability to educate and socialize their students creates a hostile environment for my child, who is already especially vulnerable as part of a minority. I am worried that similar incidents of bullying will increase now that teachers are again unable to address the topic of gender identity. A.C.'s teachers are put in the impossible position to choose being supportive educators over compliance with the laws.

13. SF 496 has put considerable stress on the entire family as we constantly worry that A.C. may experience further harmful incidents in school without teachers being able to address the root cause. As a result, A.C. does not share her status as a trans girl with any other peers and has taken care to ensure that she avoids wearing clothing that might reveal her biological sex.

14. Prior to the preliminary injunction, A.C.'s school had started removing books that acknowledge the existence of LGBTQ+ people as well as books that educate preteens and young teenagers about topics related to sexuality. With the law back in effect, this has continued and the district appears to be nearly finished, with many books now removed. This is seriously harmful to A.C. and students in her age group.

15. In the last two years, A.C., like other kids her age, has had many questions about changes in her body and about sexual topics overheard in other kids' conversations and in the media. A.C. previously had access to a book in the school library she found helpful because it

answered questions preteens and teenagers might have about sex, consent, and sexual abuse. This book and others like it were removed because they talk about sex. These books that have been removed were not trying to glamorize or encourage sex, they were answering honest questions in an age-appropriate way and educating preteens and teenagers about their rights. With books like this being removed from the school library, A.C. loses an important avenue to even learn about books that might help her with her questions, as the school library was usually the place where she would learn about new books to read.

16. The exact rules the district is following to determine which books to remove are very unclear. District teachers have reported that K-6 schools were instructed to remove all books containing what is deemed sexual content or LGBTQ+ content. This lack of clarity leads to over-censorship. Recently, a series of planned readings by an Iowan author of a novel addressing LGBTQ+ themes written for preteens and young teens (Erin Becker's *Crushing It*) was canceled. Even if some books with LGBTQ+ characters remain in A.C.'s school, they aren't being treated the same as books about straight and cisgender characters.

17. When the school does things like removing books pertaining to A.C.'s experiences as a transgender child, not allowing them to be read or highlighted in class or in extracurricular events, or decreasing their visibility on the shelves, it deprives A.C. and other children from seeing themselves and their own specific experiences as normal and accepted. A.C. often acknowledges that seeing and reading books and other materials that include references to LGBTQ+ characters means a lot to her. Since they have been erased from her school, she has experienced alienation and felt like an outcast.

18. Taking books with diverse characters and identities away from students singles our children out for who they are. Access to these books is an extremely important factor in fostering

the tolerance and acceptance that is needed to ensure that members of the LGBTQ+ minority can obtain a public school education free of harm and without danger to their physical and mental wellbeing.

19. This is all occurring while the school is taking other actions signaling LGBTQ+ students are less-than. As A.C. is getting older and entering her preteen stage, she has become more socially conscious and peer-group oriented. But the student LGBTQ+ group she used to attend hasn't been allowed to meet. This deprives her of the opportunity to find solidarity. That companionship is so important right now, at a time when these very same students feel attacked and unsupported by their schools.

20. Without the GSA, A.C. has complained that it feels like there is no place where she can be safely acknowledged in her own identity as a trans girl. She wants to join with other LGBTQ+ students and allies in a dedicated group, but it is not possible because the law.

21. A.C. understands that school has changed as a result of SF 496 and other recently-enacted laws targeting transgender youth, and I can tell that she is hurt, stressed, and upset. When the injunction was entered, A.C. was happy and felt reassured that there was a place for her after all. Now that the law is in place again, A.C. has increasingly resigned herself to the fact that she, as a trans girl and student, will never fully be able to receive her education in a place where she is accepted for who she is and treated the same as all the other students. School used to be a place A.C. loved and could not wait to go to every morning. Now, school makes her feel sad. She is withdrawn, has expressed fear, frustration and resignation, as well as worry about never fitting in.

22. I do not want A.C. to internalize these feelings. A.C. needs reassurance that there is nothing wrong with her, that she is entitled to speak about her identity, that symbols, books, and

groups that acknowledge she is not alone are welcomed in her school. I am worried about the toll this is taking on A.C.'s ability to have a happy childhood.



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 17th day of October, 2024, at Iowa City, Iowa.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Ulrike Carlson", written in black ink.

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Ulrike Carlson