

Exhibit 2

Supplemental Declaration of P.B.-P.

**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-00474

**SUPPLEMENTAL
DECLARATION
OF
P. B.-P.**

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 now a 17 year-old boy. I have personal knowledge of the facts as stated herein.

2. I am a senior 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. The librarians at my school are very accepting and kind, and they understand the importance of keeping all literature available to students. They have told me that there are many LGBTQ+ books in our library that are targeted for removal under SF 496. Specifically, they recently told me that they were directed by the school district attorney’s to remove, among other books, *All Boys Aren’t Blue* by George M. Johnson, *Gender Queer* by Maia Kobabe, *Let’s Talk*

About It by Erika Moen and Matthew Nolan, *Lawn Boy* by Jonathan Evison, and *Lucky* by Alice Sebold, although I don't think our library even had *Lucky* in the first place.

6. Many of the books the librarians will be removing I have checked out and I adore. For example, I recently read *All Boys Aren't Blue* by George M. Johnson, and found it profoundly moving. No adult ever told me about their life in such a clear picture the way that George did in this book. George articulates in this book how exhausting it can be to be a queer person. One line of the book particularly resonated with me: "My second identity—queer—is a journey that I will be on until the day I die, and I honestly believe that."

7. I managed to check out *Lawn Boy* before the librarians were told to remove it from shelves, and I still have it in my possession. I am worried that if I don't finish it by the time I have to give it back—I am very busy with my other schoolwork and can only do so much non-homework reading—I won't be able to finish it at all. I have other friends who are interested in reading it, too, but if I give it back to the library, it will be removed and they won't get to check it out. I am worried also that I will get in trouble for keeping the book longer than I am supposed to, or for loaning it to a friend who didn't check it out.

8. 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.

9. 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 since SF 496 was announced. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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. It is clear that the number of participants in the GSA continues to shrink, and even with us doing publicity to get out the word about the GSA, the

numbers are definitely lower this year and last year than they were before SF 496. Only three Freshman joined last year and there seems to be less commitment among attendees who are afraid of being outed, bullying or harassment.

15. I believe that SF 496 has had a chilling effect on attendance. Fewer people are participating because they are afraid of attending. One reason for the decline in participation is that many students believe incorrectly that there is a registration list and they are afraid to join because they will be identified. I am worried about this drop in membership because it has been difficult to find students who are willing to take on leadership roles or to help organize activities.

16. 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.

17. 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 17 day of October 2024, in Waterloo, Iowa.

Respectfully Submitted,

Handwritten signature in cursive script, appearing to read "P. B.-P."

P. B.-P.