

## Exhibit 4

# Supplemental Declaration of T.S.

**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 T.S.**

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 16 years old. I am also a lesbian. I have personal knowledge of the facts as stated herein.
2. I previously submitted a declaration in this matter as Exhibit 6 in support of a Motion for Preliminary Injunction. (Doc.2-7). I am now submitting this second declaration to provide additional context and an update from the time I submitted the first declaration. The declaration I submit today incorporates and supersedes my previous declaration.
3. As stated in my previous declaration, 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.
4. I am in the 11<sup>th</sup> grade at Urbandale High School in Urbandale, Iowa. I began to discover my identity in 7<sup>th</sup> 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.

5. My school now has a GSA; however, I am not involved with the organization.
6. In 8<sup>th</sup> 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 8<sup>th</sup> 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 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.

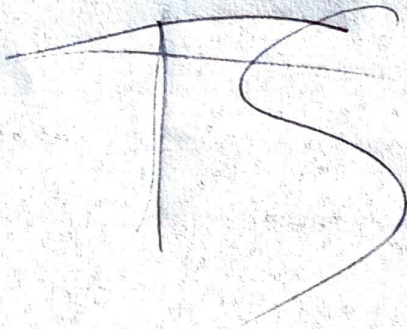
7. In 8<sup>th</sup> grade, I read the book *Rick* by Alex Gino. I really related to this book at the time because I was a young queer child grappling with my identity in an environment that wasn't always supportive. The book depicted a young boy learning his identity while trying to go through his normal 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.
8. 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.
9. 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. 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 14 day of October 2024 , at Urbandale, Iowa.

Respectfully Submitted,

T.S.

A handwritten signature in black ink, consisting of a vertical line on the left, a horizontal line at the top, and a large, sweeping curve on the right that loops back towards the vertical line.