Darin M. Sands, OSB No. 106624 sandsd@lanepowell.com Lane Powell PC 601 SW Second Avenue, Suite 2100 Portland, Oregon 97204-3158 Telephone: 503.778.2100 Facsimile: 503.778.2200

Mathew W. dos Santos, OSB No. 155766 mdossantos@aclu-or.org
Direct Dial: (503) 552-2105
Kelly Simon, OSB No. 154213
ksimon@aclu-org.org
Direct Dial: (503) 444-7015
ACLU Foundation of Oregon
PO Box 40585
Portland, OR 97240

Gabriel Arkles, Pro Hac Vice Application Pending garkles@aclu.org
Shayna Medley-Warsoff, Pro Hac Vice Application Pending smedley@aclu.org
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Telephone: 212.549.2500
Facsimile: 212.549.2650

Attorneys for Proposed Intervenors

UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

PARENTS FOR PRIVACY; KRIS GOLLY and JON GOLLY, individually [and as guardians ad litem for A.G.]; LINDSAY GOLLY; NICOLE LILLIE; MELISSA GREGORY, individually and as guardian ad litem for T.F.; and PARENTS RIGHTS IN EDUCATION, an Oregon nonprofit corporation,

Case No. 3:17-cv-01813-HZ

DECLARATION OF CHRISTINE STAUB IN SUPPORT OF BASIC RIGHTS OREGON'S MOTION TO INTERVENE

PAGE 1 - DECLARATION OF CHRISTINE STAUB IN SUPPORT OF BASIC RIGHTS OREGON'S MOTION TO INTERVENE

Plaintiffs,

ν.

DALLAS SCHOOL DISTRICT NO. 2; OREGON DEPARTMENT OF EDUCATION; GOVERNOR KATE BROWN, in her official capacity as the Superintendent of Public Instruction; and UNITED STATES DEPARTMENT OF EDUCATION; BETSY DEVOS, in her official capacity as United States Secretary of Education as successor to JOHN B. KING, JR.; UNITED STATES DEPARTMENT OF JUSTICE; JEFF SESSIONS, in his official capacity as United States Attorney General, as successor to LORETTA F. LYNCH,

Defendants.

I, Christine Staub, declare as follows:

- 1. I am a resident of Portland, Oregon.
- 2. I submit this declaration in support of Basic Rights Oregon ("BRO") Motion to Intervene, in order to explain BRO's interest this litigation.
- 3. I became a supporter of and volunteer for Basic Rights Oregon ("BRO") in 2015, shortly after my daughter, Adi, came out to our family as transgender. My husband, Lon Staub, and I have been regular donors to BRO since 2015. We are members of BRO's Equality Circle major giving program, which recognizes donors giving \$1,200 or more annually. We are also members of BRO's Fierce Family Group, which seeks to engage family members in creating safe and affirming communities for transgender individuals in every corner of Oregon.
- 4. In 2017, we partnered with BRO to create and promote The Adi Staub Transgender Leadership Fund. This fund is dedicated to supporting transgender rights throughout Oregon. Gifts to the Adi Staub Transgender Leadership Fund support Basic Rights Education Fund's transgender justice programming including policy efforts to remove barriers to transgender inclusion in health care and education; providing scholarships for transgender youth to attend our annual statewide

PAGE 2 - DECLARATION OF CHRISTINE STAUB IN SUPPORT OF BASIC RIGHTS OREGON'S MOTION TO INTERVENE

leadership summit; our leadership development program Catalyst for transgender and gender nonconforming Oregonians; providing workplace and community Transgender Justice 101 trainings throughout the state; and continuing BRO's statewide outreach so that all transgender Oregonians are celebrated and supported in every community in the state. The Adi Staub Transgender Leadership Fund raised over \$63,000 in 2017.

- 5. My daughter, Adi, was 16 when she came out. She was attending high school in the Portland Public Schools District at Grant High School. Adi entered school a straight-A student and had a strong group of friends. After a health class video profiled a transgender teen, Adi finally understood the conflict she experienced since birth. Though a doctor assigned her to the male sex at birth, Adi knew that her honest and authentic self was female. Her longtime dreams of being a woman finally made sense to her.
- 6. With the help and support of BRO, our family was able to connect with other families who were raising transgender students. And through BRO, Adi was able to connect with peers who shared her experiences and to find purpose in advocating for those peers.
- 7. Adi did not anticipate that coming out to friends and family would have any adverse effects. For Adi, coming out gave her newfound hope, excitement and optimism for being able to live as her true self. Her courage in coming out inspired our family. She stood up in her classes and asked that others begin to accept her as "Aditi" or "Adi," a transgender woman, whose name meant "free and limitless" in Sanskrit.
- 8. Unfortunately, not everyone around Adi responded to her with the acceptance and support that she needed and expected. Over the next two years, Adi faced significant hardships at school. She lost a number of friends. Many teachers, students, and staff repeatedly misgendered her, despite her requests to be acknowledged with her true gender identity. Even in our family sessions with high-school faculty, she was repeatedly misgendered despite our consistent modeling and coaching. In addition, students repeatedly refused to call her Adi, instead using her name assigned at birth. She became the target of violent words and bullying, including being subjected

PAGE 3 - DECLARATION OF CHRISTINE STAUB IN SUPPORT OF BASIC RIGHTS OREGON'S MOTION TO INTERVENE

Case 3:17-cv-01813-HZ Document 27 Filed 02/20/18 Page 4 of 4

to anti-transgender graffiti. She stopped feeling safe at school. Her attendance and grades began

to drop.

On July 24, 2017, the pain that came from others' negative reactions to her as an 9.

out transgender student became too great, and Adi decided to end her life. Our family will never

be the same because of what my daughter experienced in her school as a transgender girl.

I have learned that Adi is not alone in her experiences, and that both harassment of 10.

transgender students and suicide among transgender people is sadly common.

Policies that protect transgender students and make them feel welcome at school 11.

are truly life-saving. When schools do not take affirmative steps to protect young people like Adi,

kids are seriously hurt and sometimes lives are lost. I want all kids to feel safe at school. And I

want transgender students to be celebrated, not merely tolerated. That is why I dedicate my time

and resources to supporting BRO, an organization I know to be invested in making safety a reality

for all students.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct.

DATED: February 20, 2018

DECLARATION OF CHRISTINE STAUB IN SUPPORT OF BASIC RIGHTS OREGON'S MOTION TO INTERVENE