

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

PARENTS, FAMILIES, AND FRIENDS )  
OF LESBIANS AND GAYS, INC., et al., )  
 )  
Plaintiffs, )

v. )

Case No. 2:11-cv-04212

CAMDENTON R-III SCHOOL )  
DISTRICT, et al., )  
 )  
Defendants. )

AFFIDAVIT OF RANDAL COWEN

Before me, the undersigned authority, on this date personally appeared Randal Cowen, who being by me duly sworn on oath did depose and state as follows:

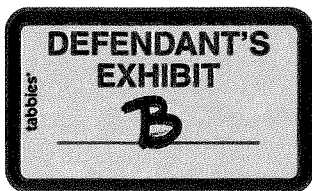
1. My name is Randal Cowen. I am over the age of eighteen and competent to make this Affidavit. I am not suffering from any mental disabilities and/or suffering from any conditions that would prevent me from providing true and accurate facts as set forth in this Affidavit.

2. The content of this Affidavit is based on first-hand information and my own personal knowledge and belief.

3. I have been an employee in the Camdenton R-III School District's technology department since 1999.

4. At all relevant times herein, I was the Network Administrator of the Camdenton R-III School District.

5. As Network Administrator for the District, I work with and design the District's Internet and technology systems.



6. In order to comply with Children's Internet Protection Act, the District blocks certain categories of web material through the use of customized Internet filtering software.

7. One of the categories of web material which the District blocks is material that falls under the category of "sexuality".

8. This "sexuality" filter is intended to capture inappropriate material not captured by the District's filters which block "pornography" and "adult material."

9. The District does not block the categories of "LGBT", "Gay or Lesbian or Bisexual Interest," "Alternative Lifestyles", or "Social Issues".

10. Some of the websites blocked by the District's "sexuality" filter include the-  
penis.com, imasturbate.org, and givingwomenorgasms.com, among many others.

11. Websites which support and provide information regarding LGBT rights such as <http://gayrights.change.org>, <http://www.aclu.org/lgbt-rights>, <http://lgbtweekly.com>, <http://lgbt.wisc.edu>, [www.itgetsbetter.org](http://www.itgetsbetter.org), among many others are not blocked by the District.

12. The attached list of Examples of Open District Websites is a true and accurate list which reflects websites which are currently accessible to District students and employees through the District's Internet system. *See* Examples of Open District Websites attached hereto as **Exhibit 1**.

13. I personally ran a test on the District's system and temporarily disabled the "sexuality" filter. The following sampling of websites became available on the District's system within minutes: <http://barebacksexinsf.com>, <http://iphis.com>, and <http://about-swinging.co.uk>.

14. The District has had a procedure in place since 2004 which allows students to make an anonymous electronic request that a website which has been blocked by the filter be unblocked for access by District students.

15. The District's process for requesting access to blocked websites has been used on numerous occasions and websites have been unblocked for access by District students and employees as a result of these requests.

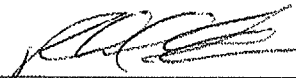
16. On November 12, 2008, it was requested that the following website be unblocked: www.rainbowdomesticviolence.itgo.com. I personally unblocked this website and it has remained unblocked ever since.

17. I personally unblocked the websites for GSA Network, GLSEN, Day of Silence, and the Trevor Project in the first week of June 2011.

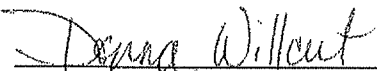
18. Campus Pride's website at www.campuspride.org, has not been blocked by the District.

I swear that the preceding paragraphs are true and accurate to the best of my knowledge, information and belief.

Further Affiant sayeth not.

  
\_\_\_\_\_  
Randal Cowen

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2011.

  
\_\_\_\_\_  
Notary Public

My commission expires:

9/26/2013



DONNA WILLCUT  
My Commission Expires  
September 26, 2013  
Camden, MO



DONNA WILLCUT  
My Commission Expires  
September 26, 2013  
Camden County  
Commission #09773027

## **Examples of Open District Websites**

<http://www.houstonglbtcommunitycenter.org/>

<http://www.thedccenter.org/>

<http://www.glbtcOLORADO.org/>

<http://liglbtcenter.org/>

<http://blogs.denverpost.com/thespot/2011/08/30/hancock-picks-2011-glbtc-commissioners/37636/>

[http://en.wikipedia.org/wiki/LGBT\\_rights\\_by\\_country\\_or\\_territory](http://en.wikipedia.org/wiki/LGBT_rights_by_country_or_territory)

[http://en.wikipedia.org/wiki/LGBT\\_social\\_movements](http://en.wikipedia.org/wiki/LGBT_social_movements)

<http://www.aclu.org/lgbt-rights>

<http://www.amnestyusa.org/our-work/issues/lgbt-rights>

<http://gayrights.change.org/>

<http://www.hrw.org/en/category/topic/lgbt-rights>

<http://www.civilrights.org/lgbt/>

[http://change.gov/agenda/civil\\_rights\\_agenda/](http://change.gov/agenda/civil_rights_agenda/)

[http://en.wikipedia.org/wiki/Lesbian\\_American\\_history](http://en.wikipedia.org/wiki/Lesbian_American_history)

<http://www.datehookup.com/content-the-history-of-lesbianism.htm>

<http://sitemaker.umich.edu/lesbian.history/home>

[http://edweb.sdsu.edu/people/cmathison/gay\\_les/](http://edweb.sdsu.edu/people/cmathison/gay_les/)

<http://www.tulane.edu/~wc/months/gllm.html>

<http://www.mincava.umn.edu/documents/lgbtqviolence/lgbtqviolence.html>

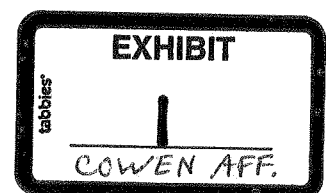
<http://community.middlebury.edu/~harris/Translations/Sappho.html>

[http://sitemaker.umich.edu/lesbian.history/lesbian\\_feminism](http://sitemaker.umich.edu/lesbian.history/lesbian_feminism)

<http://www.utoronto.ca/wjudaism/journal/vol1n1/v1n1zeid.htm>

<http://www.lgbtbar.org/>

<http://www.washlaw.edu/subject/gay.html>



<http://www.bevrijdingintercultureel.nl/eng/homoseksuelen.html>

<http://www.chgs.umn.edu/educational/homosexuals.html>

<http://womenst.library.wisc.edu/fc/fcwebgrn.htm>

<http://www.umsl.edu/~safezone/Manual/6-Famous%20LGB.pdf>

[http://en.wikipedia.org/wiki/Violence\\_against\\_LGBT\\_people](http://en.wikipedia.org/wiki/Violence_against_LGBT_people)

<http://www.avp.org/>

<http://www.guardian.co.uk/world/2010/oct/17/increase-homophobia-violence-new-york>

[http://fathersforlife.org/gay\\_issues/gay\\_hate\\_crimes.htm](http://fathersforlife.org/gay_issues/gay_hate_crimes.htm)

[http://www.washingtonpost.com/blogs/going-out-gurus/post/anti-gay-violence-in-play-stop-kiss-hits-close-to-home/2011/08/16/gIQAzvgjJJ\\_blog.html](http://www.washingtonpost.com/blogs/going-out-gurus/post/anti-gay-violence-in-play-stop-kiss-hits-close-to-home/2011/08/16/gIQAzvgjJJ_blog.html)

<http://equalitymi.org/equality-michigan-condemns-recent-anti-gay-violence-calls-for-comprehensive-hate-crime-law/>

<http://www.rainbowdomesticviolence.itgo.com/>

<http://www.musc.edu/vawprevention/lesbianrx/factsheet.shtml>

[http://www.vawnet.org/Assoc\\_Files\\_VAWnet/LGTBManual-Participant.pdf](http://www.vawnet.org/Assoc_Files_VAWnet/LGTBManual-Participant.pdf)

<http://www.aardvarc.org/dv/gay.shtml>

<http://www.nyc.gov/html/ocdv/html/issues/lesbian.shtml>

<http://www.avp.org/publications/reports/2000ncavpdvrpt.pdf>

<http://www.gaydomesticviolence.com/>