

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

_____)	
Parents, Families and Friends of Lesbians and Gays, Inc.,)	
et al.)	
)	
Plaintiffs)	
)	Case No. 2:11-cv-04212
v.)	
)	
Camdenton R-III School District, et al.)	
)	
Defendants)	
_____)	

**DECLARATION OF SHANE WINDMEYER
IN SUPPORT OF PLAINTIFFS’ MOTION
FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, Shane Windmeyer hereby declares as follows:

1. I am a founder and the Executive Director of Plaintiff Campus Pride, Inc. (“Campus Pride”), am competent to testify and have personal knowledge of the matters in this Declaration.

2. I make this Declaration in support of Plaintiffs’ Motion for Preliminary Injunction.

3. Campus Pride is a non-profit organization incorporated in the State of North Carolina. Its business address is P.O. Box 240473, Charlotte, North Carolina, 28224.

4. Campus Pride was founded in the fall of 2001 and represents the only national nonprofit 501(c)(3) organization for student leaders and campus groups working to create a safer college environment for LGBT students. It is a volunteer-driven network “for” and “by” student

leaders. The primary objective of Campus Pride is to develop necessary resources, programs and services to support LGBT and allied students on college campuses across the United States.

5. Campus Pride's mission is to serve LGBT and allied student leaders and campus organizations in the areas of leadership development, support programs, and services to create safer, more inclusive, LGBT-friendly colleges and universities. It exists to develop, support and give "voice and action" in building future LGBT and allied student leaders. Campus Pride envisions campuses and a society free of LGBT prejudice, bigotry and hate. It works to develop student leaders, campus networks, and future actions to create such positive change.

6. Campus Pride estimates that nearly 300,000 people are served annually through its programs and services. Its website receives over 4 million "hits" a year.

7. Campus Pride works with youth/students to build future leaders and create safer learning environments for all students, particularly LGBT and allied students. It provides resources on its websites, which include:

- Campus Pride's main website, www.campuspride.org, which can also be accessed at www.campuspride.net. It provides resources for LGBT and allied youth to feel supported, safe and welcome on campus and provides information about educational training opportunities. It includes information about Campus Pride events and conferences, newsletters, a blog, and a discussion board.
- www.campusclimateindex.org, which provides youth with information on how to find colleges that are welcoming and safe for LGBT youth, scholarships offered by Campus Pride, and LGBT-friendly college fairs. The Campus Climate Index is a tool for assisting campuses in learning ways to improve their LGBT campus life and ultimately shape the educational experience to be more inclusive, welcoming and respectful of LGBT people and their allies.
- www.stophate.org, which provides valuable resources and training opportunities on bias and hate crime prevention for college campus communities. Stop The Hate supports colleges and universities in preventing and combating hate on campus as well as fostering the development of community.
- www.lambda10.org, an educational initiative that provides outreach, resources, programs and services to fraternities and sororities regarding LGBT issues and

works to heighten the visibility of LGBT members of college fraternities and sororities.

8. Campus Pride's websites are important tools in its efforts to communicate with young people. They provide resources to help students find LGBT-friendly colleges; share valuable research on LGBT college campus issues; list activities and events to teach leadership skills and awareness for LGBT and allied youth; provide information on scholarships, particularly for LGBT youth; and list LGBT-friendly college fairs. Campus Pride's primary audience is students in general and LGBT students in particular.

9. None of Campus Pride's websites contains pornography or sexually explicit content.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Shane Windmeyer", with a large, stylized flourish at the end.

Executed on August 11, 2011

Shane Windmeyer