## 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 JODY M. HUCKABY IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, Jody M. Huckaby hereby declares as follows:

1. I am the Executive Director of the national organization for Plaintiff Parents,

Families and Friends of Lesbians and Gays, Inc. ("PFLAG"), 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. PFLAG is a non-profit organization incorporated in the State of California. Its

business address is 1828 L Street, N.W., Suite 660, Washington, D.C., 20036.

4. PFLAG's mission is to promote the health and well-being of lesbian,

gay, bisexual and transgender ("LGBT") persons, their families and friends through: support, to cope with an adverse society; education, to inform the public; and advocacy, to end discrimination and to secure equal civil rights. PFLAG provides opportunity for dialogue about

sexual orientation and gender identity and acts to create a society that is healthy and respectful of human diversity.

5. PFLAG is the nation's foremost family-based organization committed to the civil rights of LGBT people. Founded in 1973 by mothers and fathers, PFLAG has 200,000 members and supporters in more than 350 chapters throughout the United States, including seven chapters and approximately 1,669 members in Missouri. PFLAG's Missouri chapters include PFLAG Columbia/Mid-Missouri, PFLAG Kansas City, PFLAG Kirksville/NE Missouri, PFLAG Mineral Area, PFLAG Springfield, PFLAG St. Charles, and PFLAG St. Louis.

6. PFLAG maintains a website at www.pflag.org that provides information about PFLAG chapters and resources, provides links for LGBT persons and for families and friends of LGBT persons, and offers advice aimed at keeping families together. PFLAG's website does not contain pornography or sexually explicit content.

7. A number of PFLAG's local chapters and affiliates maintain websites, including pflag-austin.org, pflag-eastbay.org, pflag-nb.org, pflag-palatine.org, pflag-phoenix.org, pflag.ca, pflag.communitypoint.org, pflag.org, pflag.org.au, pflag.us, pflagaa.org, pflagaustralia.org.au, pflagboulder.org, pflagcanada.ca, pflagcd.tripod.com, pflagcolumbiasc.org, pflagdayton.org, pflagde.org, pflagdenton.org, pflagdetroit.org, pflagdownriver.org, pflagftc.org, pflaghilo.org, pflaghouston.org, pflagjtown.org, pflagkc.org, pflagla.org, pflaglubbock.org, pflagoahu.blogspot.com, pflagpensacola.org, pflagphila.org, pflagphoenix.org, pflagsanjose.org, pflagshreveport.org, pflagsouthoc.org, pflagtucson.org, and pflagtulsa.org.

8. PFLAG envisions a society that embraces everyone, including those of diverse sexual orientations and gender identities. Only with respect, dignity and equality for all will we reach our full potential as human beings, individually and collectively. Unfortunately, far too

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many families struggle with accepting their LGBT children, compounding the isolation, stigma and discrimination these young LGBT people endure.

9. To more fully support these youth, PFLAG communicates through a variety of resources, many of which are made available online. For young people struggling to find support, our website offers "Coming Out Help for Families and Friends"

(http://community.pflag.org/page.aspx?pid=539), which helps young people locate supportive resources and guidance on how to talk to a family member about their sexual orientation and/or gender identity. These resources include:

- <u>Finding a PFLAG chapter.</u> PFLAG chapters exist in every state.
- <u>The PFLAG Family Story Center</u>. Stories from real PFLAG families providing a better understanding about the coming out process and how PFLAG can help.
- <u>Frequently Asked Questions (FAQ) About LGBT People</u>. General answers to many common questions about LGBT communities.
- <u>Terminology</u>. General dictionary of terms and facts.
- Our Daughters and Sons: Questions and Answers for Parents of Gay, <u>Lesbian and Bisexual People.</u> One of our most popular publications, this is a "must read" for parents and children working to form new and honest relationships after a child comes out. This booklet answers several commonly-asked questions about having a gay child and includes a list of related resources.
- <u>Welcoming Our Trans Family and Friends</u>. Another popular publication that provides transgender children and their parents resources to help forge stronger familial relationships after a transgender child comes out.
- <u>PFLAG's Diversity Network</u>. Resource identifying the unique challenges experienced by families of color when a loved one comes out. It provides community-appropriate resources as well as PFLAG information in other languages.

- <u>Dos and Don'ts for Families and Friends</u>. Guidance for family members and allies after a loved one or friend comes out to them.
- <u>Straight for Equality</u>. Resource for allies of LGBT individuals who do not have a friend or family member who is LGBT.
- <u>Tips for the holidays</u>. Guidance on how to respond to LGBT issues that may arise during family visits at home.
- <u>Gender Spectrum</u>. Creating a gender sensitive and inclusive environment for all children and teens through education, training and support.
- 10. Because of the high costs of printing and mailing, all of PFLAG's top

publications are made available online for no cost.

11. In addition to these resources, PFLAG's website also provides information to LGBT students on how they can claim their federal civil rights if they have experienced bullying, harassment and/or discrimination by filing a claim with the U.S. Department of Education's Office for Civil Rights. This resource is available at www.pflag.org/claimyourrights. PFLAG also offers ways that school community members can take action to build safer schools. Resources related to safe schools advocacy are found at

http://community.pflag.org/page.aspx?pid=1011.

12. PFLAG National is charged with cultivating, resourcing and serving over 350 chapters. One of the primary ways the organization equips these chapters to more fully support, educate and advocate on behalf of LGBT communities, including LGBT students, is by sharing helpful resources and guidance on our website. If, for example, a young student does not have access to a Gay-Straight Alliance or an LGBT youth center or program, one common place they search for supportive resources is by visiting our website. The coming-out guidance and safer schools resources we provide have offered enormous support to LGBT young people nationwide.

13. On a national level, PFLAG's website had 423,546 visits and 1,561,610 page views over the past year. In Missouri, it had approximately 4,584 visits with about 19,236 page views for an average of 382 visitors viewing 1,623 pages per month.

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

Executed on August \_15\_, 2011

Huckeby Jody M. Huckaby