

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 MARIANNE DUDDY-BURKE
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, Marianne Duddy-Burke hereby declares as follows:

1. I am the Executive Director of Plaintiff Dignity, Inc., d/b/a DignityUSA (“DignityUSA”), 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. DignityUSA is a non-profit organization incorporated in the District of Columbia. Its business address is P.O. Box 376, Medford, Massachusetts, 02155.

4. DignityUSA is the oldest and largest national lay movement of lesbian, gay, bisexual and transgender Catholics. DignityUSA envisions and works for a time when Gay, Lesbian, Bisexual and Transgender Catholics are affirmed and experience dignity through the integration of their spirituality with their sexuality, and, as beloved persons of God, participate fully in all aspects of life within the Church and society.

5. DignityUSA has approximately 6,000 members nationwide and 155 members in Missouri. It has chapters located throughout the United States.

6. On a national level, DignityUSA advocates for change in the Catholic Church's teachings on homosexuality; provides educational materials, speakers, and other resources to Catholic parishes, gay ministries, and other interested groups; and maintains an ongoing dialogue with Catholic bishops and other Church leaders. In local chapters, members worship openly with other LGBT and supportive Catholics, socialize, share personal and spiritual concerns, and work together on educational and social justice issues.

7. DignityUSA seeks to communicate with students because young people are often discovering their sexual orientation and/or gender identity and need resources that address questions they may have. Many feel shame and isolation due to messages they have received from religious authorities or their religious traditions. The ability to present gay-positive religious messages is important in helping create space and freedom for students and other young people to begin to accept affirming messages.

8. Dignity USA maintains an internet website located at <http://www.dignityusa.org>. The website provides information regarding the organization and its ministries, answers frequently asked questions regarding Catholicism and homosexuality, and provides resources for those visiting the site, including a Young Adult Caucus for gay and lesbian youth on its blog.

9. Several of DignityUSA's local chapters and affiliates maintain websites, including dignityboston.org, dignityhouston.freeyellow.com, dignitypacific.org, and dignitysd.org.

10. None of DignityUSA's websites contains pornography or sexually explicit content.

11. DignityUSA's websites are important tools in its communication efforts. Many students and young people, particularly in rural areas, do not have the ability to join groups for LGBT and allied individuals. They may not feel comfortable checking materials out of libraries where they are known to staff. They may not feel safe speaking about issues of sexuality and gender identity by telephone. Being able to access websites where they can read information, send messages privately, and post questions or comments on blogs is particularly important to this group.

12. DignityUSA's website includes a Young Adult Caucus on its blog that students may particularly wish to access.

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

Executed on August 11, 2011



Marianne Duddy-Burke