

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 JASON MARSDEN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, Jason Marsden hereby declares as follows:

1. I am the Executive Director of Plaintiff Matthew Shepard Foundation, 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. Plaintiff Matthew Shepard Foundation is a non-profit organization incorporated in Wyoming. Its business address is 301 Thelma Drive, #512, Casper, Wyoming, 82609.
4. Matthew Shepard Foundation was founded by Dennis and Judy Shepard in memory of their 21-year-old son, Matthew, who was murdered in an anti-gay hate crime in Wyoming in October 1998. The Foundation's mission is to encourage respect for human dignity and difference by raising awareness, opening dialogues, and promoting positive change. It

works to support diversity programs in education and to help youth organizations establish environments where young people can feel safe and be themselves.

5. Matthew Shepard Foundation does not have a formal membership structure. It maintains a database, however, that includes all donors, registered website users, and recipients of the Foundation's newsletters and e-mails. The database includes 42,417 individuals, 524 of whom have Missouri addresses.

6. Matthew Shepard Foundation maintains an internet website located at www.matthewshepard.org. The website includes a link to www.MatthewsPlace.com, which is an online community and resource center for LGBT and allied youth. It provides resources about LGBT youth-friendly shelters, outreach centers and empowerment programs across the country. It includes moderated chats, discussion boards, and informational columns from notable individuals in the LGBT and allied community.

7. The work of the Matthew Shepard Foundation focuses particularly on ensuring that LGBT and questioning youth have access to resources that can help them lead healthy, productive, hate-free lives. These resources include community organizations, care providers, topical motivational interviews with LGBT professionals, blogs, and other educational and interactive features provided chiefly through MatthewsPlace.com.

8. MatthewsPlace.com is entirely devoted to a youth audience, ranging in age from 13 to the early 20s. It provides articles and links on coming out, talking to friends and family, emergency hotlines, local and national services and centers, faith and spirituality, tips on healthy living, youth blogs, interviews, and topical online chats. It also provides information on productions of "The Laramie Project," a play that examines life in the town of Laramie during the year after Matthew Shepard's murder and has been produced over 5,000 times by schools,

community theaters, faith-based organizations, and mainstream theater groups around the world. Additionally, MatthewShepard.org, the Foundation's main organizational website, offers links to the Foundation's collaborators at the Stop the Hate campus program and a contact form for "Laramie Project" support.

9. Matthew Shepard Foundation's websites are important tools in its communication efforts. Useful resources for LGBT and questioning youth are fairly scarce, especially in more rural areas, while the population in need of them is widely dispersed geographically. In the Foundation's judgment, providing these resources online is the only cost-effective and geographically widespread approach that guarantees equal access opportunities.

10. During the past year, www.MatthewsPlace.com received 41,054 visits, including 475 from Missouri. It had 34,644 unique visitors and 95,109 page views. The Foundation's main website, www.matthewshepard.org, received 127,899 visits, including 1,539 from Missouri and three from Camdenton. It had 100,569 unique visitors and 289,479 page views.

11. Neither www.matthewshepard.org nor www.MatthewsPlace.com contains pornography or sexually explicit content.

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

Executed on August 12, 2011


Jason Marsden