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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

POWELL'S BOOKS, INC., et al.,

Plaintiffs,

v.

HARDY MYERS, in his official capacity as
ATTORNEY GENERAL OF THE STATE
OF OREGON, et al.,

Defendants.

Civil No. CV 08-0501-MO

DECLARATION OF CAMELIA HISON IN
SUPPORT OF PLAINTIFFS' REQUEST
FOR DECLARATION OF
UNCONSTITUTIONALITY AND
PERMANENT INJUNCTION

I, Camelia Hison, declare under penalty of perjury:

1. I am an individual currently residing in the State of Oregon, and I am over the age of 18. I have personal knowledge of the facts and statements contained in this declaration.

2. I am the Youth Programs Manager for Planned Parenthood Columbia

Willamette (PPCW). As such, I supervise and coordinate staff and interns to assist with youth and young adults sexual health education programs. My job responsibilities include training and coaching my staff and interns on answering questions from education programs recipients of PPCW services, and keeping current on literature and research concerning sexual behaviors and risk factors, and pregnancy or sexually transmitted infection ("STI") rates.

3. I have been involved with efforts to improve public sexual health and decrease the spread of sexually transmitted infections (STIs) such as HIV/AIDS for more than ten years. I have experience developing, monitoring and conducting science-based reproductive health education programs, such as sexually transmitted infections and teen pregnancy prevention, developing educational materials, and conducting community-based sexual health educational programs for young adults, adolescents, and preteens.

4. My professional experience and training allows me render a qualified opinion about sexual health education for and sexual behaviors of preteens and teenagers.

5. According to a June 6, 2008 study by the Centers for Disease Control and Prevention's Youth Risk Behavior Surveillance System, almost half (48%) of high school teens say they have had sex; that is an increase of 2% between 2005 and 2007. During the same time period, the proportion of high school teens who say they used a condom the last time they had sex decreased 2%.

6. According to that study, 7% of high school students report that they had sex before age 13; 15% say they have had four or more sexual partners, and 35% say they have had sex in the past three months. These three measures of sexual behavior all increased between 2005 and 2007. In fact, during this decade (2000s), almost every measure of teen

sexual activity has increased and the increase in the proportion of teens who say they used a condom the last time they had sex has slowed down considerably.

7. In December 2007, the federal government announced that the teen birth rate had increased for the first time in 15 years.

8. Through educational programs our staff regularly receives questions from adolescents and from preteens about basic sexual health information. Both teenagers and preteens are asking questions that indicate they are having sex or are in a relationship where they may do so at any time.

9. Many of the questions our staff receives from teenagers and preteens demonstrate a lack of basic factual information about sex and sexuality. For instance, they receive questions about anatomy and physiology, STIs transmission and symptoms, and how to use and get condoms. Through education sessions, our staff has learned that teens and preteens believe a number of dangerous myths. For instance, preteens and teenagers believe that a girl who is a virgin at the time of intercourse cannot become pregnant, that a person cannot contract an STI from oral sex, and that if a male drinks Mountain Dew soda before sex he will not be able to impregnate his female partner.

10. My goal, as an educator of teens and preteens, is to help young people delay having sex until they are mature enough to behave in a responsible manner with regard to their emotional needs and their health needs. Knowing that preteens and teens will ultimately become sexually active, I want to ensure that when they do engage in sexual activities, they do so having made fully informed decisions with as complete an understanding of the risks as possible.

11. From the existing research we found that the most effective way to ensure that teens and preteens delay their first sexual experiences as well as use protection against STIs and unintended pregnancy is to provide them with accurate sexual health information before they engage in sexual behaviors for the first time. That information may necessarily include pictures and text descriptions of body parts, growth and gender differences, or other

sexual behaviors. A teen or preteen who understands the importance and consequences of sexual behaviors is more likely to refrain from unsafe sexual activities.

12. In order to effectively reach teens and preteens before they engage in their first sexual experiences, it is often necessary to educate them before they reach puberty. That age is often younger than age 13. The educational programs are age-appropriate and follow the Department of Education standards and guidelines.

13. It is not uncommon for teens and preteens to seek out information and material describing or depicting sexual information before coming to speak with their parents or our staff. In fact, teens and preteens often use this material to educate themselves and give themselves courage to request more accurate and specific help.

Executed this 30th day of July, 2008, at Portland, Oregon.



CAMELIA HISON