

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STUDENTS AND PARENTS FOR PRIVACY, a voluntary unincorporated association; **C.A.**, a minor, by and through her parent and guardian, **N.A.**; **A.M.**, a minor, by and through her parents and guardians, **S.M.** and **R.M.**; **N.G.**, a minor, by and through her parent and guardian, **R.G.**; **A.V.**, a minor, by and through her parents and guardians, **T.V.** and **A.T.V.**; and **B.W.**, a minor, by and through his parents and guardians, **D.W.** and **V.W.**,

Plaintiffs,

vs.

SCHOOL DIRECTORS OF TOWNSHIP HIGH SCHOOL DISTRICT 211, COUNTY OF COOK AND STATE OF ILLINOIS,

Defendants,

and

STUDENTS A, B, and C, by and through their parents and legal guardians **Parents A, B, and C**, and the **ILLINOIS SAFE SCHOOLS ALLIANCE**,

Intervenor-Defendants.

Case No. 1:16-cv-04945

The Honorable Jorge L. Alonso

Declaration of V.W. in Support of Plaintiffs' Motion to Supplement the Record

**DECLARATION OF V.W.
IN SUPPORT OF PLAINTIFFS' MOTION TO SUPPLEMENT THE RECORD**

I, V.W., declare as follows:

1. I am the president of Students and Parents for Privacy, a plaintiff in this matter.
2. I am over the age of eighteen.

3. I filed a Freedom of Information Act request with the Illinois Department of Human Rights to determine if any complaints had been filed against the Defendant High School District No. 211, with regard to gaining access to privacy facilities at any of the District 211 schools on the basis of gender identity rather than sex.

4. Attached hereto is a true and correct copy of Minor Public Accommodation Charge No. 2017CP0498, dated September 8, 2016 which I received from the Illinois Department of Human Rights on August 14, 2017 in response to my public records request. The grade level and initials of the minor charging party, and the initials of the charging party's parent have been redacted to help ensure privacy of the charging party.

5. The Charge indicates that the charging party's "gender-related identity, female, fails to match her sex assigned at birth," and that the charging party attends Palatine High School in District 211.

6. At least three female student members of Students and Parents for Privacy are currently attending Palatine High School in District 211.

7. An attorney with the Illinois Department of Human Rights advised me that the Charge is an open case that has not yet been resolved.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 23, 2017 at Palatine, Illinois.

V.W.
V.W.