

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

THE DOWNTOWN SOUP KITCHEN d/b/a
DOWNTOWN HOPE CENTER,

Plaintiff,

v.

MUNICIPALITY OF ANCHORAGE,
ANCHORAGE EQUAL RIGHTS
COMMISSION, and PAMELA BASLER,
Individually and in her Official Capacity as the
Executive Director of the Anchorage Equal
Rights Commission,

Defendants.

Case No. 3:18-cv-00190-SLG

DECLARATION OF S.D.

I, S.D., declare as follows:

1. I am a citizen of the United States and a resident of the State of Alaska. I am competent to make this declaration and the facts stated herein are within my personal knowledge.
2. I became homeless in Anchorage, Alaska in 2012.
3. I tried to stay at another shelter but there were so many men there that I had to leave. The presence of men triggered me. I was really scared. I was not comfortable being around biological men when I was sleeping because I was abused by men in the past.
4. Then someone told me about the Hope Center. When I walked in, I saw how different the Hope Center's women's shelter was from the other shelters where I had stayed. I knew I was safe.

5. I have been coming to the Hope Center since May 2018 and the place feels like a family. The women watch out for each other and we know that we are safe. The structure has helped me. I am working on my GED. And most importantly, I feel valued and respected. I can truly say that the Hope Center changed my life.

6. The Hope Center's policies have created that change in my life. Those policies protect me. No one can stay at the shelter if they are drunk or high. That assures me that I won't run into anyone unsafe because of drugs or alcohol.

7. The Hope Center provides Bible studies, church service, and daily devotions. People can choose to take part in those or not, but I try to go to devotions every morning. It starts my day off right. I also go to the church services on Sunday. Those services really help me.

8. Most importantly, only biological women can stay in the Hope Center's women's shelter. That has been critical for me because of the past abuse I suffered. Seeing drunk men in a place where I feel vulnerable can trigger me and cause me many problems.

9. I spent time on the streets and I know how hard it can be out there. But if the Hope Center were forced to let any biological man into the women's shelter, I would leave even if it meant sleeping in the woods. I would rather sleep in the woods than sleep in the same area as a biological man.

10. That includes the individual who filed the complaint against the Hope Center. If he, or any biological male, stayed in the Hope Center's women's shelter I would not feel safe and I would have to leave.

11. I have been raped. And rape can happen in shelters, when men come into shelters where women are sleeping. Because of that and my past experience of rape, if I was to see a biological man in a shelter I would be afraid that I was going to be raped again. It would trigger a PTSD reaction for me. It makes it very hard for me to breathe. It's like I cannot get my breath. I know that I am not alone in that reaction. I have talked to other women in the Hope Center's women's shelter that experience a similar thing.

12. Because of that, it is important for me, and other women like me, that the Hope Center can continue to maintain a shelter where only biological women can sleep.

13. It is also important to me that the Hope Center maintain its ability to announce its decision to admit only biological women to its shelter. That policy lets women like me know that there is a safe place for them—a place where they will not encounter any biological men while they are sleeping. That is necessary for women who have been abused in the past.

14. I am grateful for what the Hope Center has done for me. I need their services to stay available for me and for other women.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 29th day of October, 2018, at Anchorage, Alaska

A handwritten signature in blue ink is written over a black redaction box. Below the signature, the letters 'S' and 'D' are visible, also partially obscured by redaction.