

**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 F.S.

I, F.S., hereby 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 live in Anchorage, Alaska. In 2007, my husband passed away after battling cancer. And in 2009, I lost my home.

3. I didn't know about the Hope Center and I don't think they had a women's shelter then. So I stayed in other local shelters for a long time. But I was always scared. People at those shelters used drugs and alcohol and there was a lot of fighting. I even saw women trafficked.

4. Both men and women stayed overnight at other shelters. And even when there were separate dormitories for men and women, men would come into the women's sleeping areas at night. That scared me.

5. I have been abused—raped and beaten—including by men I met at shelters. One time, the police had to be called to a shelter because my boyfriend was abusing me. Because of these experiences, it is very hard for me to be in a vulnerable position, like sleeping, around any biological male. I do not feel safe. It brings up my past and is bad for me.

6. That is why the Hope Center's women's shelter has been so important for me. I started staying at the Hope Center's women's shelter in 2016. I finally felt safe. I didn't have to worry that I would see a biological male where I was sleeping and be scared or anxious because of things that happened to me in the past. I felt like I had some privacy again and I felt respected.

7. At the Hope Center, I had a positive influence in my life. I began to work on my self-esteem and my life skills. I went through and graduated from the Hope Center's baking school and its culinary school. In 2017, I got a job at Value Village, where I currently work. I am applying to jobs in the food industry because after the baking and culinary school, I'd like to work in food service. I have applied for housing and I was just notified that I will have my own place in a few months. In the meantime, I am staying at the Hope Center at night.

8. The Hope Center is my home—it has been my only home for two years. And it has helped me so much.

9. I wish everyone could understand what the Hope Center provides to women like me in the Anchorage community. There are no other long term shelters that provide a secure place for women to sleep. And allowing any biological male into the Hope Center would take that security away. It would change the shelter and hurt the women the shelter serves.

10. The fact that the shelter houses only biological women also protects my privacy and the privacy of other women in the shelter. Some women change clothes in the evening and in the morning where they sleep and when they do they are at least partially exposed to the other women in the room. If a biological man were in the room, they would be undressing in front of him. While that would be uncomfortable for anyone, it is impossible for a woman who has been abused by men.

11. Women sleep three to five feet from each other in the Hope Center women's shelter. Especially in these quarters, with my past, I would not feel safe with a biological man in the room while I sleep. I didn't when I was in other shelters.

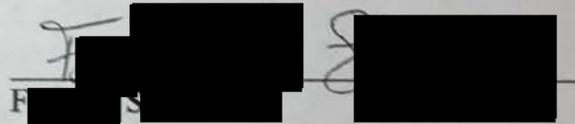
12. I can be around men during the day. I am fully dressed, awake, and I can leave the situation if someone makes me uncomfortable. But I feel too vulnerable at night and in bed. I am not fully dressed. I am not awake. I don't feel like I can take care of myself or leave a bad situation. Because of this, sleeping near a biological male would cause me a lot of distress, like it did in prior shelters I stayed in.

13. I know the individual who filed the complaint against the Hope Center. While I was not there when he tried to come to the women's shelter to sleep, I heard about it from other women. I immediately started praying that the Hope Center would not let him stay.

14. I have made so much progress in life skills, dealing with my emotions, respecting myself and my boundaries. I am so grateful to the Hope Center. I want to continue to feel safe and I want other women to be able to gain what I have gained through the Hope Center's women's shelter.

I hereby 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 31 day of October, 2018, at Anchorage, Alaska

A signature and name are present but heavily redacted with black boxes. The signature appears to be in cursive. The name is partially visible as "F... S...".