

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
Email: paul@paulsouthwick.com
Phone: 503-806-9517

Timothy R. Volpert (OSB 814074)
Tim Volpert PC
2111 NE Hancock St. Ste. 2B
Portland, OR 97212
Email: tim@timvolpertlaw.com
Phone: 503-703-9054

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
)
) Plaintiffs,)
)
) v.)
)
) U.S. DEPARTMENT OF EDUCATION and)
) Suzanne GOLDBERG, in her official capacity as)
) Acting Assistant Secretary for Civil Rights,)
) U.S. Department of Education,)
)
) Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF JONI
MCLEOD**

I, Joni McLeod, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am a resident of New York, New York.
3. I live with my wife and our dog.
4. I was born in Durham, North Carolina.
5. I grew up in Buffalo, New York.

6. I identify as queer or lesbian and use she/her pronouns.
7. I currently work as a Mental Health Counselor and do research on the intersection of trauma and affectional (LGBTQ+) identities.
8. I started at Oral Roberts University (ORU) in Tulsa, Oklahoma when I was only 18.
9. When I started ORU, I was vulnerable. I didn't know any better and it was the only option I had. I also felt like something was wrong with me and I hoped I could get healing.
10. I received a Bachelor of Arts in Leadership Studies and a Bachelor of Arts in International Community Development with a minor in Spanish from ORU in 2016.
11. I received a Master of Arts in Mental Health Counseling from Northwestern University in 2020.
12. I was a student at ORU from 2012–2016 then worked as Assistant to the Vice President of Enrollment from May 2017–July 2018. I accepted the job at ORU because I needed the money and felt like I didn't have any other option.
13. I fell in love with my now wife while we were both working at ORU.
14. I would describe my time at ORU as being truly terrifying.
15. I experienced the worst anxiety I've ever had when I was there, but I wasn't able to get the help that I needed because if anyone ever found out, I would lose my entire livelihood.
16. I was in constant fear. I was stuck in fight or flight mode.
17. Students and staff are required to sign an Honor Code with the following statement: "I PLEDGE at all times to keep my total being under subjection from all immoral and illegal actions and communications, whether on or off campus. I will not take any illegal drugs or misuse any drugs; I will not engage in or attempt to engage in any illicit, unscriptural sexual acts, which include any homosexual activity and sexual intercourse with one who is not my spouse through traditional marriage of one man and one woman. I will not drink alcoholic beverages of any kind; I will not use tobacco; I will not engage in other behavior that is contrary to the rules and regulations listed in the Employee Handbook."
18. We were told we were going to hell if we didn't agree with the Honor Code.
19. I remember sitting on the balcony weeping during a mandatory chapel service because I was dating my now wife, while in the closet, and the crowd was cheering during a sermon about how sex and love is so much better inside heterosexual marriage between a man and a woman.

20. After falling in love my wife, we quit soon after.
21. We 100% quit because we would be fired when we came out.
22. When I was on staff, I worked with scholarship application committee at ORU. I reviewed applications for the university's "Whole Person Scholarship," a form of institutional financial aid. My role was to make applications anonymous before being reviewed.
23. On one occasion, I was asked to remove an admitted gay student's application for consideration for the full scholarship once the university's administration found out that he was gay. I don't know if he was considered for a lesser scholarship.
24. Religious trauma syndrome would define my time as a student and employee at ORU.
25. The university presents itself as safe and welcoming, but the policies are the exact opposite.
26. My time there was by definition a gaslighting experience.
27. I hope for a future where queer students at ORU know that they are valued, accepted, and loved—not in spite of their affectional and/or gender identities, but because of those identities.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 30th day of July, 2021.

By: *s/ Joni McLeod*

Joni McLeod