

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 ROSALYN
SIMON**

I, Rosalyn Simon, 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 Huntsville, Alabama.
5. I identify as queer or lesbian and use they/them/she/her pronouns.
6. I was a student at Oral Roberts University from 2010–2017.

7. I didn't have a choice with where to go to college. My parents said my only option was to go to ORU.
8. I received my Bachelor of Arts in Elementary Education from ORU in 2014.
9. I received my Master of Arts in Higher Education Administration from ORU in 2017.
10. I am currently working on my Master of Arts in Management from Western Governors University.
11. As a student at ORU, I was very depressed. I didn't feel like I fit in.
12. I heard students and staff say awful things about gay students. They would say things like: "they never shouldn't have ever been here in the first place."
13. I worked at ORU from 2014–2018 as an Enrollment Counselor, Senior Enrollment Counselor, and Assistant Director of Enrollment.
14. I fell in love with my wife when I was still the Assistant Director of Enrollment.
15. My wife and I quit ORU because we knew we would be fired for coming out.
16. When I worked in the Office of Admissions, I was part of several conversations with gay prospective students.
17. As staff in the Office of Admissions, we were often coached on how to present ORU as a university that is accepting of gay students just to increase enrollment numbers.
18. We would say things like "ORU is a safe place but just so you know we have an Honor Code." and "ORU is voted one of the friendliest universities, so it's easy to find community. But just so you know we do have an honor code you can find online."
19. We would try to avoid questions about being gay at ORU at all costs.
20. Faculty and administration were often involved in communications with gay students, and Deans would come together to come up with a strategy on how to handle gay students.
21. I would describe ORU as completely unethical. The communication with gay students was entirely deceptive.

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/ Rosalyn Simon*

Rosalyn Simon