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**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 LAUREN
SWAIN**

I, Lauren Swain, 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 work for the Religious Exemption Accountability Project (REAP) as a paralegal and administrative assistant.
3. I have filed Title IX complaints with the Office for Civil Rights (OCR) of the U.S. Department of Education on behalf of 35 of the plaintiffs in this case, *Hunter, et al.*
4. I submitted the Title IX complaint form for our first complainant, Mortimer Halligan, to the OCR on June 23, 2021. Camille Lee, an attorney at OCR-Chicago, has subsequently interviewed Mortimer twice.

5. During these interviews, Ms. Lee informed Mortimer that their case against Indiana Wesleyan University may be dismissed if the OCR finds that IWU is qualified for a religious exemption.
6. As I understand Ms. Lee's statements, if the OCR determines that IWU is exempt from Title IX civil rights protections regarding sexual orientation and gender identity then it will close Mortimer's case without investigating Mortimer's individual or class-based allegations.
7. On August 2, 2021, I received an email from Ms. Lee notifying me that the OCR is likely to make its decision on the case "soon."
8. I submitted all of the remaining complaints on July 27, 2021 or later. Regional offices of the OCR have acknowledged more than half of the complaints as of this writing.
9. Exhibit A includes Title IX complaints I prepared and submitted to the OCR, signed by the following plaintiffs: Victoria Bacon, Avery Bonestroo, Nathan Brittsan, Hayden Brown, Brooke C., Gary Campbell, Tristan Campbell, Natalie Carter, Saren Craig, and Alex Duron.
10. Exhibit B includes Title IX complaints I prepared and submitted to the OCR, on behalf of the following plaintiffs: Mortimer Halligan, Rachel Held, Lauren Hoekstra, Chandler Horning, Elizabeth Hunter, Louis James, Jonathan Jones, Jamie Lord, Ashtin Markowski, and Cameron Martinez.
11. Exhibit C includes Title IX complaints I prepared and submitted to the OCR, on behalf of the following plaintiffs: Joanna Maxon, Mackenzie McCann, Darren McDonald (x2), Scott McSwain, Faith Millender, Rachel Moulton, Journey Mueller, Veronica Bonifacio Penales, and Jake Picker.
12. Exhibit D includes Title IX complaints I prepared and submitted to the OCR, on behalf of the following plaintiffs: Megan Steffen, Daniel Christopher Tidwell-Davis, Justin Michael Tidwell-Davis, Spencer Vigil, Lucas Wilson, and Audrey Wojnarowisch.
13. Exhibit E includes Declarations of Religious Belief by Avery Bonestroo, Hayden Brown, Brooke C., Tristan Campbell, Saren Craig, Alex Duron, Mortimer Halligan, Rachel Held, Lauren Hoekstra, and Jamie Lord.
14. Exhibit F includes Declarations of Religious Belief by Cameron Martinez, Joanna Maxon, Darren McDonald, Faith Millender, Jake Picker, Megan Steffen, Daniel Christopher Tidwell-Davis, Justin Tidwell-Davis, Lucas Wilson, and Audrey Wojnarowisch.

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 4th day of August, 2021.

By: s/ Lauren Swain
Lauren Swain